

AINSLIE WOOD PRIMARY SCHOOL

Low-Level Concerns Policy

2026-2027

A culture of openness, trust and transparency helps us identify and respond to concerns about adults early, appropriately and consistently.

School	Ainslie Wood Primary School
Headteacher	Julie Crouch
Chair of Governors	
Designated Safeguarding Lead	Philippa Ioannou
Policy version	September 2026
Approval	To be confirmed by the Governing Body
Review date	September 2027, or sooner if required

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1. Purpose and context

This policy should be read alongside Ainslie Wood Primary School's Child Protection and Safeguarding Policy, Staff Code of Conduct, Managing Allegations Against Staff procedures and Whistleblowing Policy.

It is written in line with Keeping Children Safe in Education (KCSIE) 2026 and the relevant London safeguarding procedures for managing allegations and concerns about adults who work with children.

Low-level concerns should be considered carefully and, where appropriate or where there is doubt about the threshold, evaluated in consultation with the Local Authority Designated Officer (LADO). Consultation allows concerns to be evaluated objectively and helps establish whether similar concerns may have been raised previously.

2. What is a low-level concern?

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern - no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work; and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Concerns may arise through, for example:

- suspicion
- complaint
- a safeguarding concern or allegation from another member of staff
- a disclosure made by a child, parent or other adult within or outside the school
- pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

3. Examples of low-level concerns

Examples of low-level concerns could include, but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on a personal mobile phone contrary to school policy
- engaging with a child one-to-one in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating or offensive language
- humiliating children

Such behaviour can exist on a wide spectrum, from inadvertent or thoughtless behaviour, or behaviour that may appear inappropriate, through to behaviour which is ultimately intended to enable abuse. Determining where a concern sits on that spectrum is important and must be handled through the school's safeguarding procedures.

4. Sharing concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- empowering staff to share any low-level concerns promptly
- empowering staff to self-refer where they recognise that they may have acted in a way that could be misinterpreted or may fall below expected professional standards
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- providing a responsive, sensitive and proportionate handling of concerns when they are raised
- helping to identify any weakness in the school's safeguarding system

Staff should not dismiss a concern because it appears small, attempt to determine the threshold themselves, or investigate the matter before reporting it.

5. Responding to low-level concerns

Any member of staff who becomes aware of a low-level concern should inform the Headteacher, Julie Crouch, immediately. This includes concerns relating to agency and supply staff, contractors and volunteers.

Where the concern is about the Headteacher, it must be reported to the Chair of Governors. If, for any reason, the concern cannot appropriately be raised through these internal routes, the member of staff may seek advice directly from the Waltham Forest LADO/Safeguarding in Education service.

The Headteacher or Chair of Governors, as appropriate, will consider the information and determine the appropriate next steps. Where there is any doubt about whether the harm threshold is met, or where local procedures require consultation, advice will be sought from the LADO promptly. No member of staff should undertake their own safeguarding investigation before appropriate advice has been received.

If the concern may meet the harm threshold, it will be managed under the school's Managing Allegations Against Staff procedures and in accordance with KCSIE and local LADO arrangements.

If the concern is confirmed as a low-level concern, the school will respond sensitively and proportionately. This may include clarification of expectations, advice, training, supervision, management guidance, review of working arrangements or, where appropriate, formal action under relevant employment procedures.

6. Waltham Forest advice and contact

Staff who do not feel confident raising a concern within the school, or who need safeguarding advice about a concern regarding an adult working with children, may contact Waltham Forest Safeguarding in Education/LADO services.

Telephone	020 8496 3646
Safeguarding in Education email	Safeguardingineducation@walthamforest.gov.uk
School safeguarding email	SafeguardingTeam@awp.waltham.sch.uk

The school will use the current Waltham Forest LADO referral and consultation arrangements where a referral or formal LADO consultation is required.

7. Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken, decisions made and the rationale for those decisions.

Records will be:

- kept confidential, held securely and managed in accordance with the Data Protection Act 2018 and UK GDPR
- reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified
- retained at least until the individual leaves employment at the school, and longer where required by the school's records retention arrangements or where the concern has become an allegation or another formal employment/safeguarding matter

Where a pattern of behaviour is identified, the school will decide on an appropriate course of action. This may include action under disciplinary or capability procedures, further safeguarding measures, or consultation/referral to the LADO where the pattern may meet the harm threshold.

Low-level concern records will be held separately from the individual's personnel file unless the concern, or subsequent action arising from it, needs to be placed on the personnel file in accordance with KCSIE, employment procedures or records-management requirements.

Where a low-level concern relates to a supply teacher, contractor or other person employed by an external organisation, the school will notify the individual's employer so that any potential pattern of inappropriate behaviour can be identified, while ensuring that the school also follows its own safeguarding responsibilities.

8. References

Low-level concerns will not normally be included in references unless:

- the concern, or group of concerns, has met the harm threshold and has been found to be substantiated; and/or
- the concern, or group of concerns, relates to issues that would ordinarily be included in a reference, such as misconduct or poor performance.

References will be handled in accordance with KCSIE, safer recruitment requirements and the school's employment procedures.

9. Confidentiality and information sharing

Information about low-level concerns will be shared only with those who need to know in order to safeguard children, manage the concern fairly, identify patterns or fulfil legal and employment responsibilities. The school will not promise absolute confidentiality where information needs to be shared for safeguarding purposes.

Where a child has made a disclosure or is otherwise affected by the concern, the child's welfare remains paramount and the school's usual safeguarding recording, information-sharing and support procedures will apply.

10. Links with the Staff Code of Conduct and safeguarding culture

The purpose of a low-level concerns system is not to create a punitive culture. It is to make professional boundaries visible, enable early intervention, reduce the risk of harm and ensure that adults feel able to speak up when something does not feel right.

All adults working in or on behalf of Ainslie Wood Primary School are expected to understand and follow the Staff Code of Conduct and the school's safeguarding procedures. Leaders will use themes from low-level

concerns, without inappropriate disclosure of personal information, to identify training needs or weaknesses in systems and practice.

11. Monitoring and review

The Headteacher and Governing Body will keep the effectiveness of the school's low-level concerns arrangements under review. The Headteacher will ensure that relevant staff understand the reporting route and that records are reviewed for patterns.

This policy will be reviewed annually and sooner if KCSIE, London or Waltham Forest procedures change, or if learning from a concern or allegation indicates that amendments are needed.

Quick reporting route

Concern	Report to
Concern about any adult working in or on behalf of the school	Headteacher - Julie Crouch
Concern about the Headteacher	Chair of Governors
Unable to raise internally / safeguarding advice needed	Waltham Forest LADO / Safeguarding in Education
Concern appears to meet the harm threshold	Treat as an allegation and follow Managing Allegations Against Staff procedures immediately

Approval and review record

Approved by	Governing Body - date to be confirmed
Policy owner	Headteacher
Safeguarding lead	Designated Safeguarding Lead
Next planned review	September 2027, or sooner if required