



# Low-Level Concerns Policy

## St Stephen's CofE First School

OUR VISION:


WE ARE COMMITTED TO THE CHRISTIAN ETHOS - EVERY CHILD IS SPECIAL IN THE EYES OF GOD AND WE TEACH THAT ALL PEOPLE SHOULD LOVE, CARE FOR AND RESPECT ONE ANOTHER AND OUR PLANET.

*It is our ambition that all our pupils use our 6 Christian values **Love, Compassion, Forgiveness, Integrity, Community and Respect** to achieve our vision and mission.*

**'A New Commandment I give you, 'Love one another as I have loved you.'** John 13:34

It is from this Commandment and the teachings of Jesus that we teach our children the six Christian values.



Recommended by:	SC
Recommendation Date:	21 <sup>st</sup> September 2025
Ratified by:	Chair's Action/ LAGB
Signed:	
Position on the Board:	Chair of LAGB
Ratification Date	21 <sup>st</sup> September 2025
Next Review:	September 2026
Policy Tier (Central/Hub/School):	School

## Low-Level Concerns Policy St Stephen's CofE First School

### Introduction

At St Stephen's C of E First School, we take safeguarding very seriously. This includes ensuring that adults who work with children do so in a way that is in accordance with the ethos and policies set out by the school, including the Staff Code of Conduct. This policy sets out the detail and processes for staff regarding low-level concerns they may have.

### Summary

It may be possible that a member of staff acts in a way that does not cause risk to children, but is however inappropriate. A member of staff who has a concern about another member of staff should inform the Principal about their concern using a Low-Level Record of Concern Form. If the Headteacher cannot be contacted, the information should be reported to the designated safeguarding lead or deputy (the most senior person in this role). The term 'low-level' concern does not mean that



it is insignificant. It means that the behaviour towards a child does not meet the threshold for an allegation.

Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The Headteacher will:

- Speak to the person reporting the concern to gather all the relevant information;
- Speak to the individual about the concern raised to ascertain their response.

Where necessary further investigation will be carried out to gather all relevant information. This may involve speaking to witnesses. The outcome to the investigation will determine the action taken in accordance with the CRST Code of Conduct and Allegations policies.

## Keeping Children Safe in Education September 2024

The following is taken from Keeping Children Safe in Education September 2024

425. 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 or college 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. Examples of such behaviour could include, but are not limited to:
  - being over friendly with children
  - having favourites
  - taking photographs of children on their mobile phone, contrary to school policy
  - engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
  - humiliating pupils.

426. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

427. Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

428. It is crucial that all low-level concerns are shared responsibly with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings.

## Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

**Allegation:**



Behaviour which indicates that an adult who works with children has:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved in a way that indicates that they may pose a risk of harm to children.

**Low-Level Concern:**

Any concern – no matter how small, even if no more than a nagging doubt, that an adult may have acted in a manner which:

- Is not consistent with the Trust's Code of Conduct ;
- Relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

**Appropriate conduct:**

Behaviour that is entirely consistent with the Trust Code of Conduct and the law.

## Storing and use of Low-Level Concerns and follow-up information

Low Level Concern forms and follow-up information will be stored securely within the Principal's secure online staff records. The only people with access to this will be the school's Principal and the CEO if necessary. This will be stored in accordance with the school's GDPR and data protection policies.

The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Principal or those aware in the senior leadership team. Low-Level Concerns will not be referred to in references unless they relate to issues that would normally be included in a reference (e.g. misconduct or poor performance) have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

Whenever staff leave the schools, any record of low-level concerns which are stored about them will be reviewed as to whether or not that information needs to be kept. Consideration will be given to:

(a) whether some or all of the information contained within any record may have any reasonably likely value in terms of any potential historic employment or abuse claim so as to justify keeping it, in line with normal safeguarding records practice; or

(b) if, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted accordingly.

This policy links to the follow documents:

- Keeping Children Safe in Education 2024
- Safer Working Practice
- School based Safeguarding Policies
- CRST Code of Conduct
- CRST Dealing with Allegations of Abuse Against Teachers and other Staff



Process to follow when a Low-Level Concern is raised.



**Low Level Concern Report regarding a current member of staff.**



- Please use this form to share a Low-Level Concern. Where possible please speak with the Principal as soon as possible. If the concern is regarding the Principal, please pass your concerns to Mr Guy Shears CEO CRST [gshears@crst.org.uk](mailto:gshears@crst.org.uk)

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**Appropriate conduct:**

Behaviour that is entirely consistent with the Trust Code of Conduct and the law.



Name of adult writing this concern:	
Name of adult who the concern is about:	
Date:	
Signed:	
Concern:	

