At Knights Enham Schools we provide…

Inclusive and ambitious learning experiences where our school community feels safe and motivated to achieve their best.

'Together We Achieve'

Low level concern policy

(based on a model policy from Hampshire County Council)

Approved: September 2026

Date of next review: September 2027

1.0 Policy Statement

1.1 Knights Enham Schools recognises its statutory and moral duty to safeguard and promote the welfare of pupils and understands that staff play a vital role in meeting these responsibilities.

1.2 Knights Enham schools work to ensure that we promote **a culture of openness, trust and transparency** in which all concerns about adults working in or on behalf of the school are **shared, recorded and addressed promptly, appropriately and proportionately. Staff are encouraged to report any concerns, however small, and understand that safeguarding is everyone's responsibility.**

1.3 Creating a strong safeguarding culture enables concerns to be identified and addressed at the earliest opportunity and helps prevent harm to children.

1.4 This policy should be read alongside the Child Protection and Safeguarding Policy, Staff Code of Conduct, Whistleblowing Policy,

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2.0 Scope

2.1 All employees employed at this school including:

- ▪ Teachers
- . **Trainee teachers**
- ▪ Support staff
- ▪ Supply teachers
- ▪ Volunteers
- ▪ Local Authority visiting staff
- ▪ Contractors

2.2 The term ‘staff’ throughout this policy refers to all of the above.

3.0 Policy Aims

3.1 To help create a culture in which all concerns about adults are **reported without delay**, shared responsibly and with the right person, **recorded accurately** and dealt with appropriately.

3.2 To enable schools to identify concerning, problematic or inappropriate behaviour early.

3.3 To minimise the risk of abuse occurring.

3.4 To ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries and in accordance with the ethos and values of the school.

3.5 To help create an environment where staff are comfortable to **self-report concerns about their own conduct**, where they have found themselves in a situation which could be misinterpreted, might appear compromising to others and/or on reflection believe they may have behaved in a way that falls below expected professional standards.

4.0 Definition

4.1 The term 'low-level concern' does not mean that it is insignificant. It means that the behaviour towards a child does not meet the harm threshold for an allegation.

4.2 Keeping Children Safe in Education defines a low-level concern as:

"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/or**

▪ does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the Local Authority Designated Officer (LADO)."

4.3 Examples of low-level concerns

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

▪ Being over-friendly with children

▪ Having favourites

▪ Taking photographs of children on personal devices

▪ Communicating with children through personal social media or messaging platforms

▪ Using inappropriate language, jokes or comments

▪ Failing to maintain professional boundaries

▪ Behaviour that may undermine the school's safeguarding culture

These examples are illustrative and not exhaustive.

5.0 Avoiding Low-Level Concerning Behaviour

5.1 Behaviour defined as a low-level concern can exist on a spectrum, from the inadvertent or thoughtless, or behaviour that may appear inappropriate but is not in specific circumstances, through to behaviour intended to enable abuse.

5.2 Staff education and reinforcement on avoiding circumstances which may place them in difficult situations is key to avoiding low-level concerns.

5.3 Our school ensures that staff are clear about appropriate behaviour through induction and regular reinforcement of documents such as:

- Staff Code of Conduct
- Avoiding Allegations Guidance
- Safeguarding and Child Protection Policies and regular training
- Teachers' Standards

5.4 Staff are expected to maintain professional curiosity, exercise professional judgement and challenge any behaviour that may place a child or adult at risk of harm or undermine the school's safeguarding culture.

6.0 Reporting a Low-Level Concern

6.1 Low-level concerns about a member of staff should be reported (form attached) **without delay to the Headteacher, Daniel Whitehouse. The DSL, Emma Stott, may receive concerns and will ensure they are shared promptly with the Headteacher.**

If the concern is about the Headteacher, this should be reported to the Chair of Governors, Louise Martos.

6.2 Low-level concerns about supply staff, contractors and local authority visiting staff will also be reported to their employer or agency.

6.3 Staff who are uncertain whether a concern meets the low-level concern threshold or harm threshold should always seek advice and report the concern.

6.4 The school recognises that concerns may also be raised through the Whistleblowing Policy where appropriate.

6.5 Self-Reporting

Staff are encouraged to self-report (form attached) where they believe they may have:

- acted in a way that could be misinterpreted;
- found themselves in a situation which may appear compromising;
- behaved in a manner that may not meet the expectations set out in the Staff Code of Conduct; or
- acted in a way which, on reflection, falls below expected professional standards.

Self-reporting demonstrates professional responsibility and supports a culture of openness, honesty and accountability. Concerns raised through self-reporting will be managed fairly, proportionately and in accordance with this policy.

7.0 Dealing with a Low-Level Concern

7.1 Where a concern is raised about the practice or behaviour of a member of staff, this information must be recorded and passed to the Headteacher.

7.2 The Headteacher must assess the concern and determine whether:

▪ **The behaviour is consistent with the Staff Code of Conduct and requires no further action**

▪ **The matter constitutes a low-level concern**

▪ **The concern meets the harm threshold and requires referral to the LADO and/or other agencies**

The rationale for all decisions will be clearly recorded.

Where appropriate:

▪ Allegations that meet the harm threshold will be referred to the LADO.

▪ Low-level concerns requiring additional safeguarding advice may be discussed with the LADO.

▪ Low-level concerns dealt with internally will be addressed through the school's **safeguarding, conduct, capability or disciplinary procedures as appropriate.**

7.3 The school will engage with its HR provider where it is necessary to undertake further investigation and/or deal with concerns under relevant procedures.

8.0 Recording a Low-Level Concern

8.1 All low-level concerns should be formally recorded (forms attached) when they are reported. This record should be passed to the Headteacher (or Chair of Governors if the concern involves the Headteacher).

8.2 The record should include:

▪ Details of the concern

▪ The context in which the concern arose

▪ The outcome of any investigation and action taken

▪ The name of the person reporting the concern (unless anonymity is requested and can be respected)

Records should be:

- **Factual**
- **Objective**
- **Accurate**
- **Dated**
- **Signed where appropriate**
- **Records should indicate whether the concern was raised by another individual or through self-reporting by the member of staff concerned**.

8.3 Relevant records will be retained confidentially on personnel files and in central low-level concerns record to enable patterns of behaviour to be identified.

8.4 Low-level concerns should be recorded (forms attached) and reviewed even where they appear isolated, resolved or unsubstantiated, as a pattern of concerns may indicate a wider safeguarding risk.

8.5 All records must be maintained in accordance with data protection legislation and the school's retention schedule.

9.0 Reviewing Low-Level Concerns

9.1 The Headteacher will regularly review records of low-level concerns, including self-reported concerns, to identify patterns, trends and repeated behaviours that may indicate a safeguarding risk.

9.2 Where patterns are identified, the Headteacher will determine appropriate action, which may include:

▪ Disciplinary investigation and/or proceedings

▪ Management advice and support

▪ Training or supervision

▪ Referral to the LADO where concerns meet the harm threshold

9.3 The school will seek advice from HR where appropriate.

9.4 The school will review relevant policies, procedures, training and wider safeguarding culture to minimise the likelihood of similar concerns arising.

Consideration will also be given to whether concerns identify weaknesses in safeguarding practice, supervision arrangements, staff training, organisational culture or the need for additional support and guidance for staff.

9.5 Records will be retained confidentially in accordance with the school's retention schedule and data protection requirements.

9.6 Low-level concerns will not normally be included in references unless they relate to substantiated safeguarding concerns, misconduct, disciplinary action or other matters that are relevant and lawful to disclose.

9.7 9.7 A low-level concern, or a pattern of low-level concerns, that is determined to meet the threshold for referral to the Local Authority Designated Officer (LADO) and is subsequently managed under allegations procedures, may be included in an employment reference where the information is relevant, accurate, factual, substantiated and proportionate, in accordance with KCSIE, safer recruitment guidance and the school's legal obligations.

10.0 Related Guidance

This policy should be read alongside:

▪ Keeping Children Safe in Education 2026

▪ Working Together to Safeguard Children

▪ Teachers' Standards

▪ Staff Code of Conduct

- Avoiding Allegations Guidance
- Safeguarding Policy
- Child Protection Policy
- Whistleblowing Policy

Governor Approval Note

The most significant changes are:

- **Updated KCSIE 2026 references**
- **Direct reporting route to the Headteacher**
- **Addition of low-level concern examples**
- **Strengthened safeguarding culture expectations**
- **Whistleblowing reference added**
- **Improved recording and review requirements**
- **Updated references section to reflect safer recruitment expectation.**
- **Strengthened arrangements for self-reporting by staff and the identification of patterns of concerning behaviour.**

KNIGHTS ENHAM SCHOOL

LOW-LEVEL CONCERN RECORDING FORM

This form should be completed as soon as possible following identification of a low-level concern and submitted to the Headteacher.

1. Person Completing the Form

Name: _____

Role: _____

Date and Time of Report: _____

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2. Person Subject of Concern

Name: _____

Role/Position: _____

☐ Employee
☐ Supply Staff
☐ Volunteer
☐ Contractor
☐ Local Authority Staff
☐ Other: _____

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3. Nature of Concern

Date of Incident: _____

Time (if known): _____

Location**:** _____

Was the concern directly observed?
☐ Yes ☐ No

If no, how did you become aware of the concern?

4. Details of the Concern

Provide a clear, factual and objective account of what was seen, heard or reported. Avoid opinions or assumptions.

5. Context

Include any relevant information, such as what was happening, who was present, and whether there were any safeguarding concerns regarding a child.

6. Witnesses

Were there any witnesses?

☐ Yes ☐ No

If yes:

Name

Role

7. Immediate Action Taken

STAFF SELF-REPORTING FORM

Professional Conduct / Low-Level Concern

Name: _____

Role: _____

Date: _____

What are you reporting?

Date/Time of Incident: _____

Location: _____

Brief factual description of what happened:

_____

_____

_____

_____

Reason for Self-Reporting

☐ Could be misinterpreted by others

☐ Professional boundary concern

☐ Possible Code of Conduct issue

☐ Communication with pupil/family

☐ One-to-one situation

☐ Physical contact with pupil

☐ Other: _____

I am submitting this information in line with the school's Low-Level Concerns Policy.

Signature: _____ **Date:** _____

Headteacher / Chair of Governors Use Only

Date received:

Received by:

Concern categorised as:

☐ No further action required

☐ Low-Level Concern

☐ Allegation meeting harm threshold

☐ Referred to LADO

☐ HR advice sought

☐ Other

Details of decision and rationale:

Actions agreed:

Review date:

Date closed:

Signature:

Headteacher / Chair of Governors

Date