

Kingsland CE Primary School

Low Level Concerns Policy and Guidance



Let your light shine

“Let your light shine before others that they may see your good deeds and glorify your Father in heaven.” Matthew 5:16

Let your light shine on our vision:

As God's children, overflowing with His light, we will shine before others to inspire, nurture and bring joy so all may embrace life in its fullness to the glory of God.

September 2026

Kingsland CE Primary School

Low Level Concerns Policy and Guidance

Date for full implementation: September 2026
Review date: September 2027



This policy is to be read alongside the following documents:

- [Keeping Children Safe in Education](#) (DfE September 2026) - KCSIE 2026
- KCSIE Part 1 and Annex for Further Information
- [Working Together to Safeguard Children \(DfE 2026\)](#)
- [Information Sharing \(HM Govt July 2018\)](#)
- The procedures of Herefordshire Safeguarding Children Partnership
<https://herefordshiresafeguardingboards.org.uk/>
- Staff Code of Conduct Policy
- Attachment Aware Behaviour Regulation Policy
- Child-on-Child Abuse (Anti-bullying) Policy

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1. Introduction

At Kingsland CE Primary School, we aim to create an open and transparent culture where all concerns about all adults involved with our school are dealt with promptly and appropriately. We take safeguarding very seriously. We aim to identify any concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of our school are clear about professional boundaries and act within these boundaries, and in accordance with our school ethos. This policy should be read alongside our Safeguarding and Child Protection, and Staff Code of Conduct, Policies.

Kingsland CE Primary School promotes a whole school approach to safeguarding, ensuring an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

At Kingsland CE Primary School all concerns about adults (including allegations that do not meet the harms threshold (see KCSIE 2026 Part Four - Section one) are shared responsibly and with the right person, they are recorded and dealt with appropriately. This will encourage an open and transparent culture; enable school to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and 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.

2. Summary

It may be possible that a member of staff / volunteer / contractor 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, volunteer, contractor or who, on reflection, recognises that their actions could have been viewed as a risk, should inform the Head Teacher about their concern using a Low-Level Record of Concern Form. If the Head Teacher cannot be contacted, the Chair of Governors should be contacted instead. If the concern is about the headteacher, the Chair of Governors should be contacted.

3. Keeping Children Safe in Education September 2026

The following is taken from [Keeping Children Safe in Education September 2026](#) and identifies what may be considered behaviour relating to low level concern:

What is a low-level concern (LLC)?

506. 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 set out at paragraph 338 (and on page four of this policy in the red box). 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 allegations threshold or is otherwise not considered 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 children

507. 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.

509. 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.

Reports of any low-level concern from pupils or staff should be made in the first instance to the Headteacher, or in their absence, the Deputy Head. If the issue relates to the Headteacher, the information is to be given to the Chair of Governors via email or by phone with the telephone number held in the school office.

Staff code of conduct and safeguarding policies

This low-level concerns policy sits alongside the Staff Code of Conduct 2026-2027 and the Safeguarding and Child Protection Policy 2026. It is important to share low-level concerns for the purpose of creating and embedding a culture of openness, trust and transparency in which the school's values and expected behaviour are constantly lived, monitored and reinforced by all staff.

The governing body ensures the staff code of conduct, behaviour policies and safeguarding policies and procedures are implemented effectively, and ensure appropriate action is taken in a timely manner to safeguard children and facilitate a whole school approach to dealing with any concerns.

Kingsland CE Primary School can achieve the purpose of the low-level concerns policy 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 safeguarding concerns as per paragraph 513 KCSIE 2026;
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage;
- providing a responsive, sensitive and proportionate handling of such concerns when they are raised; and,
- helping identify any weakness in the school's safeguarding system

Sharing low-level concerns

Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported as per paragraph 513 KCSIE 2026. Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified. Our school will ensure there is an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Recording low-level concerns

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their

concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

The Headteacher will keep these written records. The record will be confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) (see paragraph 109 for more information). Concerns about the headteacher will be kept by the Chair of Governors.

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO. Consideration will be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.

The school will retain the information in accordance with the school's GDPR and data protection policies.

Responding to low-level concerns

On receiving information regarding a low level concern, the person raising the concern will be asked to complete the form in Appendix 1 'Low Level Concerns Reporting Form.' The Headteacher will discuss the concerns raised with the person completing the report and the actions around the concern. The information collected will help the Headteacher to categorise the type of behaviour and determine what further action may need to be taken. All of this will be recorded along with the rationale for the decisions and action taken.

If the concern has been raised via a third party, the Headteacher will collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. All of this needs to be recorded along with the rationale for their decisions and action taken.

This low level concerns policy will be a reflection and extension of the school's wider staff behaviour policy/code of conduct.

If the concern is about the headteacher, the Chair of Governors will instigate the above actions using a Low Level Concerns Reporting Form.

Low level concerns outside of school

If a low level concern has taken place outside of the workplace, it is the responsibility of the employee to have an open and transparent conversation with the headteacher (or the Chair of Governors if it involves the headteacher) to discuss the incident. This will be recorded in the usual manner.

If a low level concern occurs in relation to a contractor, this will be reported to their employer.

4. Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

Allegation:

Any adult linked to our school who has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Low Level Concern:

Any adult linked to our school who has behaved in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Appropriate:

- Behaviour which is entirely consistent with our school's Code of Conduct, and the Law.

5. Storing and use of Low-Level Concerns and follow-up information

LLC forms and follow-up information will be stored securely by the headteacher, with access only by the leadership team. 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 Head Teacher or those aware in the senior leadership team.

Low-Level Concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures. Whenever staff leave Kingsland CE Primary School, 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.

Kingsland CE Primary School

Low Level Concerns Reporting Form

Your details

Name	
Role	
Date and time of completing this LLC form	

Details of individual (including yourself for self-reporting) whom the concern is about	
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Name	
Role	

Details of the concern	
1	1. The first concern is that the company's financial statements are not transparent and do not provide a clear picture of the company's financial health.
2	2. The second concern is that the company's management team is not experienced and lacks the necessary skills to manage the company effectively.
3	3. The third concern is that the company's products are of poor quality and do not meet the needs of the market.
4	4. The fourth concern is that the company's marketing strategy is ineffective and does not reach the target audience.
5	5. The fifth concern is that the company's customer service is poor and does not address the needs of the customers.
6	6. The sixth concern is that the company's operations are inefficient and do not utilize resources effectively.
7	7. The seventh concern is that the company's compliance with regulations is poor and may result in legal issues.
8	8. The eighth concern is that the company's reputation is poor and may affect its ability to attract investors and customers.
9	9. The ninth concern is that the company's financial statements are not audited and may be inaccurate.
10	10. The tenth concern is that the company's management team is not diverse and may lack the necessary perspectives to manage the company effectively.

Please include as much detail as possible. Think about the following: What behaviour and/or incident are you reporting? What exactly happened? Why does the behaviour and/or incident worry you? Why do you believe the behaviour and/or incident is not consistent with our Staff Code of Conduct?

[illegible]

Name(s)	
Class	

Next Steps	
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Any further information that you feel is relevant to this concern?	Now pass this form to the headteacher (or Chair of Governors) ...
Signature	

For use by HT / DSL upon receipt of the concern	
Date and time of receipt of this concern form	
Signature	
Role	
Actions to be taken	