



# Low Level Concern Policy

Reviewed by the Governing Board September 2026 - Due to be reviewed June 2029

## **Contents**

|                                                                           |   |
|---------------------------------------------------------------------------|---|
| 1. Introduction                                                           | 3 |
| 2. Summary                                                                | 3 |
| 3. Keeping Children Safe In Education September 2021                      | 3 |
| 4. Clarity around Allegations Vs Low-Level Concern Vs Appropriate Conduct | 5 |
| 5. Storing and use of Low-Level Concerns and follow-up information        | 5 |
| 6. Process to follow when a Low-Level Concern is raised                   | 6 |
| 7. Key Reference Document                                                 | 7 |
| 8. Low Level Concern Form                                                 | 7 |

### **1. Introduction**

At Valley View Primary 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. This policy sets out the detail and processes for staff regarding low-level concerns they may have.

### **2. 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 Head Teacher about their concern using a 'Staff Concern Form'. If the Head Teacher cannot be contacted, the Chair of Governors should be contacted instead.

### **3. Keeping Children Safe in Education September 2026**

As part of their whole-school approach to safeguarding, schools and colleges must ensure they promote an open and transparent culture in which all concerns about adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

Creating a culture in which all concerns about adults—including those that do not meet the harm threshold—are shared responsibly, recorded and addressed appropriately is essential. This enables early identification of concerning, problematic or inappropriate behaviour; minimises the risk of abuse; and ensures adults understand professional boundaries and act within them.

A 'low-level concern' is any concern—no matter how small—that an adult may have acted in a way that is inconsistent with the school's Code of Conduct, including behaviour outside work, and does not meet the threshold for referral to the LADO.

Examples include:

- being overly familiar with children;
- having favourites;
- taking photographs of children on personal devices;
- spending time alone with a child in a secluded area;
- using sexualised, intimidating or offensive language.

All concerns, including those that meet the harm threshold, must be shared with the appropriate person and recorded and addressed in line with Part Four of KCSIE 2026.

#### 4. 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 towards a child or children in a way that indicates 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 organisation's Code of Conduct, and / or
- 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 which is entirely consistent with the organisation's Code of Conduct, and the law.

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

Staff concern forms and follow-up information will be stored securely within the school's safeguarding systems, with access only by the leadership team. This data will be stored in accordance with the school's GDPR and data protection policies.

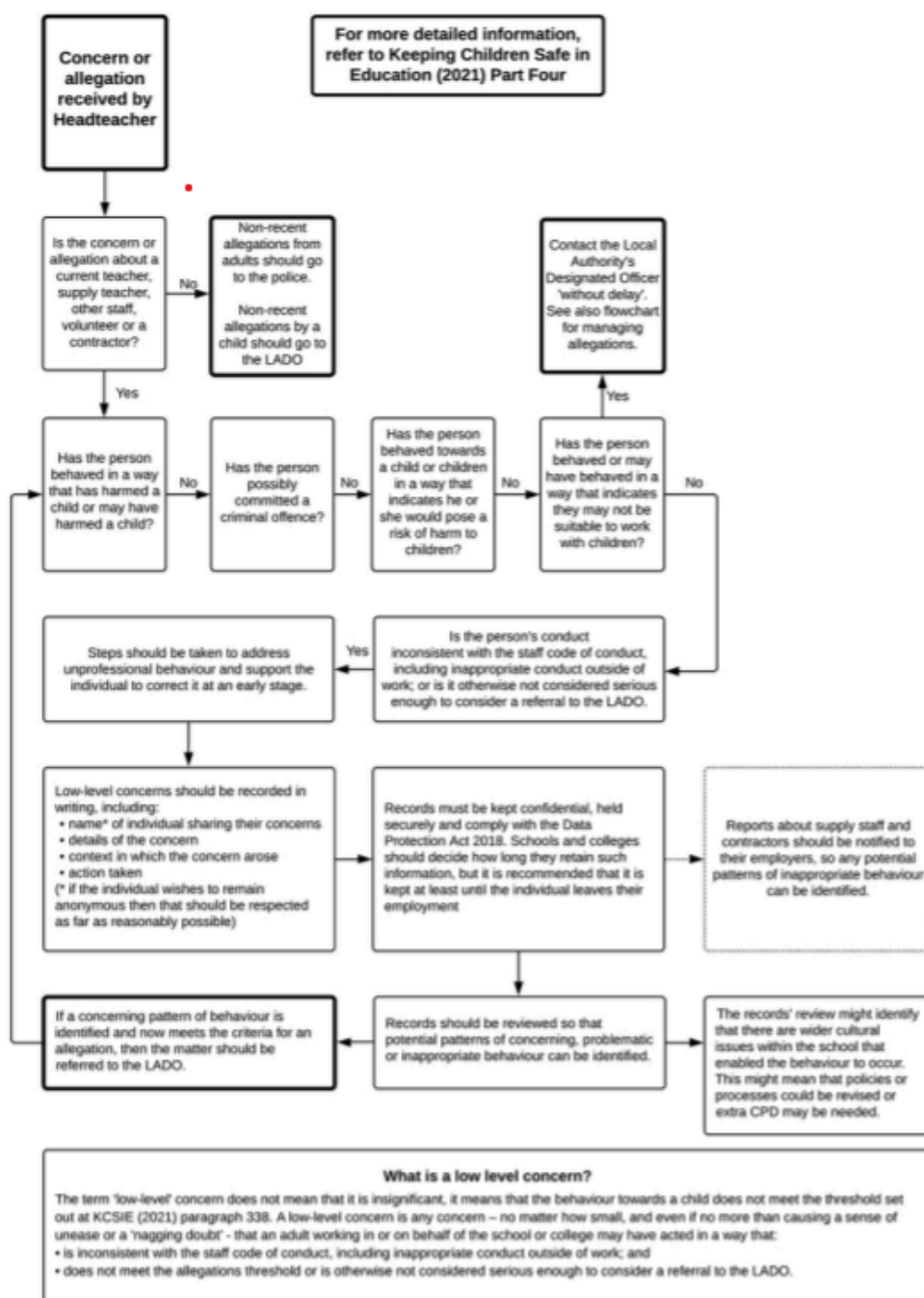
The staff member(s) reporting the concern must keep the information confidential and must not share the concern with others apart from the Head Teacher or those aware in the Senior Leadership Team.

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. The head Teacher must ensure low-level concerns are recorded, reviewed and retained in accordance with Part Four of KCSIE 2026, and in line with data protection legislation.

Whenever staff leave Valley View, 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.

## **6. Process to follow when a Low Level Concern is raised.**



## 7. Key Reference Document

Read this document for further information about Low-Level Concerns, which is referenced in KCSIE 2026:

<https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/low-level-concerns-guidance-2020.pdf>

## **8. Low Level Concern Form**

This form will be available to staff via:

- The Office
- DSLs
- Senior Leadership Team
- Staff Room
- Mosaic 2021 2022 Shared Drive (Policies File)

**Low-Level Record of Concern Regarding a Staff Member**

Please use this form to share any concerns – no matter how small, and even if no more than a ‘nagging doubt’ – than an adult may have behaved in a manner which:

- Is not consistent with Valley View’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 the adult’s suitability to work with children.

Where possible, please speak with the Head Teacher as soon as possible. It is also helpful to document your concerns, which can be done using this form and then passed to the Head Teacher. When completed, please pass this form to the Head Teacher. If the concern is about the executive Head Teacher, please pass it onto the Chair of Governors or email him at [info@valleyview.s-tyneside.sch.uk](mailto:info@valleyview.s-tyneside.sch.uk). [If the concern is regarding the Head of school contact the executive Head Teacher](#)

You should provide a concise record – including brief context in which the Low-Level Concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s), Continue on a separate sheet if necessary). The record should be signed, timed and dated.

Staff concern form [HERE](#) as a separate document or in appendix A

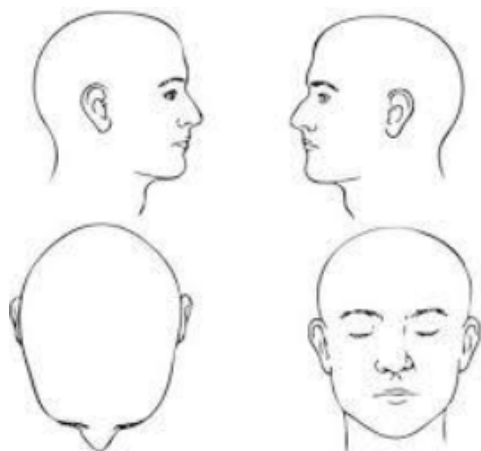
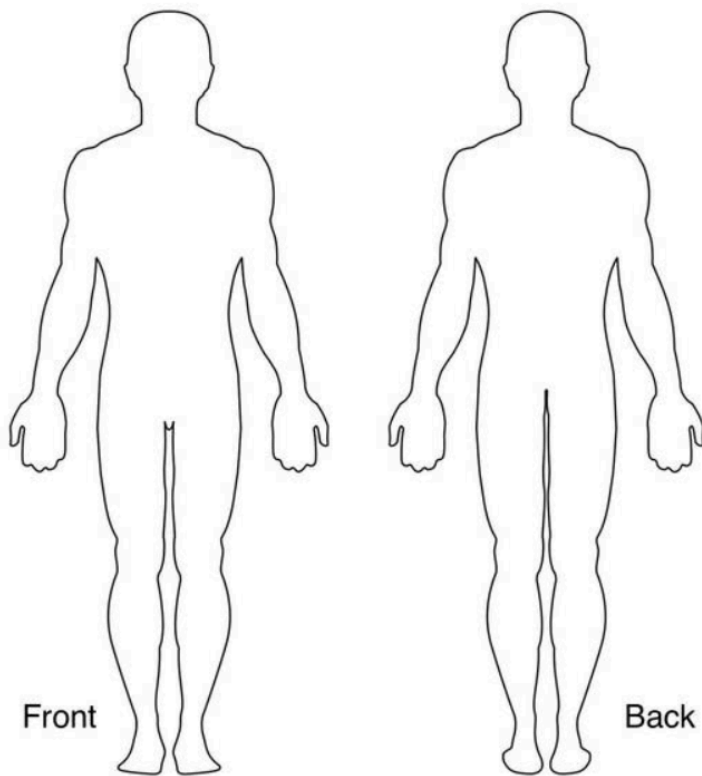
|                                                                                                                                                                                                                   |                         |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|--------------------------|
| <b>Full Name of Staff member</b>                                                                                                                                                                                  |                         | <b>DOB:</b>              |
|                                                                                                                                                                                                                   |                         |                          |
| <b>Time of concern:</b>                                                                                                                                                                                           | <b>Date of concern:</b> | <b>Place of concern:</b> |
|                                                                                                                                                                                                                   |                         |                          |
| <b>Concern/Incident:</b>                                                                                                                                                                                          |                         |                          |
| <b>Detailed Account:</b><br><br>(Please bullet point. Do not interpret what is seen or heard; simply record the facts. After completing the form, pass it immediately to the designated safeguarding lead/deputy) |                         |                          |
| <b>Staff Actions:</b> (Bullet point any actions already taken and any future actions to be completed)                                                                                                             |                         |                          |
| <b>Member of Staff completing form</b>                                                                                                                                                                            |                         | <b>Role/Title</b>        |
|                                                                                                                                                                                                                   |                         |                          |

Please provide a copy to the designated safeguarding lead

## BODY MAP- IF AN INJURY HAS OCCURRED TO A CHILD

|                          |            |             |
|--------------------------|------------|-------------|
| <b>Child's Full Name</b> | <b>DOB</b> | <b>Date</b> |
|                          |            |             |

|  |  |  |
|--|--|--|
|  |  |  |
|--|--|--|



**Description of injury/additional notes:**

| Professional's Name | Professional's Designation | Contact Number |
|---------------------|----------------------------|----------------|
|                     |                            |                |



## DESIGNATED SAFEGUARDING LEADS CHECKLIST

| Possible Action                                                      | By Whom | Outcome |
|----------------------------------------------------------------------|---------|---------|
| Discuss with staff member if not an obvious police reportable matter |         |         |
| Discuss with child                                                   |         |         |
| Contact parents                                                      |         |         |
| Check records in school                                              |         |         |
| Discuss with relevant professionals                                  |         |         |
| Seek advice from LA/ LADO                                            |         |         |
| Monitor and review                                                   |         |         |
| Consult with Social Care where needed                                |         |         |

|                                                               |              |                  |
|---------------------------------------------------------------|--------------|------------------|
|                                                               |              |                  |
| Contact police<br>101: Non-emergency<br>999: Immediate Danger |              |                  |
| Other (please specify)                                        |              |                  |
| <b>Assessment of Risk</b>                                     |              |                  |
| Safeguarding                                                  | Risk of Harm | Immediate Danger |