



The Welbeck Federation

Low-Level Concerns Policy

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Date Adopted:	Sept 2026
Review Date:	Sept 2027

1. Introduction

The Welbeck Federation of Schools is committed to safeguarding and promoting the welfare of children. We seek to maintain a culture of openness, transparency, trust and accountability in which all adults understand and fulfil their safeguarding responsibilities.

The Federation's Code of Conduct establishes the standards of behaviour expected from all adults working with children. This policy provides a framework for recognising, reporting, recording and responding to low-level concerns about adults working in our schools.

This policy applies to:

- All employees
- Supply staff
- Agency workers
- Volunteers
- Governors
- Contractors
- Students on placement

2. Purpose

The purpose of this policy is to:

- Create and embed a culture of openness and transparency.
- Encourage all staff to report concerns, no matter how small.
- Clarify the difference between appropriate conduct, low-level concerns and allegations that meet the harm threshold.
- Ensure concerns are appropriately recorded and reviewed.
- Help identify concerning patterns of behaviour at an early stage.
- Protect children and young people from harm.
- Protect staff from misunderstandings or false allegations through prompt recording and management of concerns.

Safeguarding is everyone's responsibility.

3. Legislative and Guidance Framework

This policy should be read alongside:

- Keeping Children Safe in Education (KCSIE) 2026
- Working Together to Safeguard Children
- The Federation Safeguarding and Child Protection Policy
- Staff Code of Conduct
- Disciplinary Policy
- Whistleblowing Policy
- Grievance Policy
- Data Protection and Records Management Policies

KCSIE states that schools should promote an open and transparent culture in which all concerns about adults working in or on behalf of the school are dealt with promptly and appropriately.

4. Definition of a Low-Level Concern

A low-level concern is any concern, no matter how small, including 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; and/or
- Demonstrates behaviour outside work that may raise questions about their suitability to work with children;
- Does not meet the threshold for referral to the Local Authority Designated Officer (LADO).

Examples may include:

- Being overly familiar with pupils.
- Having favourites.
- Using personal devices contrary to school policy.
- Spending unnecessary time alone with a pupil behind a closed door.
- Humiliating or belittling pupils.
- Inappropriate communication with pupils.
- Poor professional boundaries.

This list is not exhaustive.

5. Distinguishing Between Appropriate Conduct, Low-Level Concerns and Allegations

Allegation

Behaviour indicating that an adult may have:

- Harmed a child or may have harmed a child.
- Committed a criminal offence against or related to a child.
- Behaved in a way that suggests they may pose a risk to children.

Such concerns must be managed under safeguarding and allegation procedures and may require immediate referral to the LADO.

Low-Level Concern

Behaviour that:

- Is inconsistent with the Staff Code of Conduct.
- Gives rise to concern regarding professional boundaries.
- Does not meet the threshold for a LADO referral.

Appropriate Conduct

Behaviour fully consistent with:

- The Staff Code of Conduct.
- Professional standards.
- School policies and procedures.
- Relevant legislation.

6. Reporting a Low-Level Concern

Staff do not need to determine whether a concern is a low-level concern or an allegation.

Any concern should be reported to:

- The Headteacher; or
- In the Headteacher's absence, a Designated Safeguarding Lead (DSL) or Deputy Headteacher.

Concerns should be reported:

- As soon as reasonably practicable.
- Ideally within 24 hours of the concern arising.

Concerns may be reported:

- In writing using the Federation's Low-Level Concern Form.
- Verbally to the Headteacher or DSL.

If reported verbally, a written record will be completed as soon as possible and agreed with the reporting person.

7. Self-Reporting

Staff are encouraged to self-report any incident that:

- Could be misinterpreted.
- May appear compromising.
- Might give rise to concern.

Self-reporting supports professional transparency and helps protect staff from misunderstandings.

8. Responding to a Low-Level Concern

All low-level concerns will be considered sensitively, proportionately and confidentially.

The Headteacher will:

1. Review the information received.
2. Speak with the reporting individual where appropriate.
3. Determine whether:
 - The behaviour is consistent with the Code of Conduct.
 - The matter constitutes a low-level concern.
 - The concern meets the threshold for referral to the LADO.
 - A series of low-level concerns indicates a wider safeguarding issue.
4. Seek advice from HR and/or the LADO where necessary.
5. Meet with the individual concerned, unless advised otherwise by external agencies.
6. Decide on any appropriate action.

Possible outcomes may include:

- No further action.
- Professional guidance.

- Additional supervision or monitoring.
- Training or support.
- A management action plan.
- Referral to HR procedures.
- Escalation to a formal allegation process.

9. Confidentiality

Information relating to low-level concerns will be shared only with those who need to know in order to safeguard children and manage the concern appropriately.

Staff who raise concerns should maintain confidentiality and not discuss concerns with colleagues.

Anonymous reports will be considered, although anonymity cannot always be guaranteed if a formal investigation becomes necessary.

10. Recording and Storage

The Federation will maintain secure records of all low-level concerns.

Records will include:

- The details of the concern.
- Actions taken.
- Decisions reached.
- Rationale for decisions.
- Any follow-up actions.

Records will be stored securely in line with:

- UK GDPR.
- Data Protection legislation.
- Federation records retention procedures.

Access will be restricted to authorised safeguarding and senior leaders.

11. Use of Records

Low-level concern records:

- Will be reviewed regularly to identify patterns or repeated behaviour.
- May be considered alongside other safeguarding information.
- Will not normally be included in employment references unless concerns have progressed into formal disciplinary findings or misconduct matters.

Where multiple concerns exist regarding the same individual, these may collectively indicate a greater safeguarding risk and require escalation.

12. Concerns About the Headteacher

Any low-level concern regarding the Headteacher should be reported directly to:

The Chair of Governors

The Chair of Governors will determine the appropriate next steps and seek advice from HR and the LADO where necessary.

13. Monitoring and Review

The Governing Body will review this policy annually or earlier where required by:

- Legislative change.
- Statutory guidance updates.
- Learning from safeguarding reviews.
- Changes within the Federation.

Appendix A – Low-Level Concern Record Form

Name of person reporting concern	
Name of adult concerned	
Date and Time of Incident	
Date Reported	
Were there any witnesses?	
Details of Concern Please provide a factual and chronological account of the concern below, including: • What was observed. • Date, time and location. • Any words spoken. • Any contextual information. • Any action already taken.	

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