Shefford Lower School Low-Level Concerns Policy

Written by	Reviewed and Ratified by Governors	Shared with Staff	Last Updated	Review Cycle	Next Review due
Polly Ross	October 2026	September 2026 – INSET Day	September 2026	Annual	September 2027

1.0 Statement of Intent

1.1 The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues relating to staff conduct

1.2 Shefford Lower School understands the importance of acknowledging, recording and reporting **all** safeguarding concerns, regardless of their perceived severity. We understand that, while a concern may be low-level, that concern can escalate over time to become much more serious.

1.3 Our school prides itself on creating a safe and prosperous environment for pupils, and our staff are expected to adhere to high standards of behaviour when it comes to professional conduct regarding pupils. The school has clear professional boundaries which all staff are made aware of and will adhere to. We are committed to ensuring that any safeguarding concerns are dealt with as soon as they arise and before they have had a chance to become more severe, to minimise the risk of harm posed to our pupils and other children. This policy is written in line with the school's Ethical Leadership Framework to create and embed a culture of; OPENESS, TRUST, HONESTY and INTEGRITY.

2.0 Legal framework

2.1 This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- DfE (2026) 'Keeping children safe in education 2026'
- Data (Use and Access) Act 2025
- DfE (2024) 'Working Together to Safeguard Children'

2.2 This policy operates in conjunction with the following school policies:

- Child Protection and Safeguarding Policy
- Staff Code of Conduct
- Physical Intervention Policy
- Allegations of Abuse Against Staff Policy
- Whistleblowing Policy

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- Data Protection Policy

2.3 This policy read in conjunction with:

- Whistleblowing Policy
- Safeguarding and Child Protection Policy
- Staff Code of Conduct
- Disciplinary Procedures

2.4 Where this policy applies to staff working in Early Years Foundation Stage (EYFS) settings within our school, we ensure that staff and volunteers are not permitted to begin work in regulated activity until we have received their enhanced DBS certificate with barred list information, in line with KCSIE 2026 requirements.

3.0 Concerns

3.1 This section is based on concerns that do not meet the harm threshold in part 4 of KeepingChildren Safe in Education 2026. This applies to all concerns (including allegations) about members of staff, including supply teachers, trainee teachers, volunteers, contractors and external providers, which do not meet the harm threshold set outined in section 1 above.

3.2 Concerns may arise through, for example:

Suspicion
Complaint
Disclosure made by a child, parent or other adult within or outside the school
Pre employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timelymanner to safeguard the welfare of children.

4.0 Definition of Low-Level Concerns

4.1 The term 'Low-Level' concern is any concern – no matter how small – that an adultworking in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside ofwork, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enoughto consider a referral to the designated officer at the local authority

4.2 Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate methods of discipline such as shouting, intimidating or offensive language

5.0 Sharing Low-Level concerns

We recognise the importance of creating a culture of openness, trust and transparency toencourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

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- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic orinappropriate behaviour, in themselves and others
- Have clear policies and procedures
- Empowering staff to share any low-level concerns as per section 7.0 of this policy

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- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at anearly stage
- Providing a responsive, sensitive and proportionate handling of such concerns whenthey are raised
- Helping to identify any weakness in the school's safeguarding system

6.0 The Difference between an Allegation and Concern

6.1 It is important to be clear whether an incident constitutes an 'allegation'. An allegation is where the alleged incident is sufficiently serious as to suggest that one or more children has or may have been harmed, or that the alleged behaviour indicates the individual may pose a risk of harm to children (or otherwise meets the criteria above).

6.2 Keeping Children Safe in Education 2026 (part 4, section 2) provides this definition of a low-level concern.

6.3 If it is difficult to determine the level of risk associated with an incident the following should be considered:

- Was the incident a disproportionate or inappropriate response in the context of a challenging situation?
- Where the incident involved an inappropriate response to challenging behaviour, had the member of staff had training in managing this?
- Does the member of staff understand that their behaviour was inappropriate and express a wish to behave differently in the future? For example, are they willing to undergo training?
- Does the child or family want to report the incident to the police, or would they prefer the matter to be dealt with by the employer?
- Have similar allegations been made against the employee – is there a pattern developing?

7.0 Reporting a low-level concern

- Low level concerns about a member of staff should be reported to the Headteacheras per the school's Child Protection procedures.
- If the concern is about the Headteacher this should be reported to the Chair ofGovernors.
- Low level concerns about supply staff, trainee teachers, contractors and local authority visiting staffwill also be reported to their employers.
- In the first instance this should be reported verbally via a 1:1 conversation with the headteacher or deputising deputy headteacher.

8.0 Responding to low-level concerns

8.1 If the concern is raised via a third party, the headteacher will collect evidence wherenecessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

8.2 The headteacher will use the information collected to categorise the type of behaviour anddetermine any further action, in line with the school's staff Code of Conduct.

- Allegations that meet the harm threshold will be referred to the LADO for advice.
- Low level concerns that the school feel may need further guidance on will bereferred to the LADO for advice.
- Low level concerns that the school feel they can deal with internally will be dealtwith via the school's usual child protection investigation process.
- The school will engage with its HR provider where it is necessary to undertakefurther investigation and/or deal with the concern under relevant processes.

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- Governors will be informed on a termly basis of all low level concerns and their outcomes by the headteacher.

9.0 Record keeping

9.1 All low-level concerns will be recorded in writing. In addition to details of theconcern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

9.2 Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at thelocal authority
- Retained at least until the individual leaves employment at the school in line with school retention Policy

10.0. Reviewing a low level concern

10.1 Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

10.2 Where a pattern of such behaviour is identified, the Headteacher will decide on a course ofaction, which may include:

- Disciplinary investigation and/or proceedings
- Management Advice, including recommendations for training
- Referral to the LADO (where a pattern of behaviour moves from a concern to meetingthe harm threshold).

If the concern relates to volunteers, or any other concerns arise, school can contact theLADO for further advice.

11.0 References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designatedofficer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be includedin a reference, such as misconduct or poor performance

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Appendix 1

Low-Level Concern Form

Please use this form to share any concern – no matter how small, and even if no more thancausing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that:

- is inconsistent with Shefford Lower School staff code of conduct, including in

inappropriate conduct outside of work, **and**

- does not meet the allegation threshold, or is otherwise not serious enough toconsider a referral to the LADO.

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) (and please use a separate sheet ifnecessary).

The record should be signed, timed and dated and returned to the Headteacher

Details of Concern

Name of staff member Team & Role

Date Signed Name

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