Mid Essex Anglican Academy Trust

To unlock every child's potential as a unique child of God

Respect – Forgiveness – Trust – Responsibility – Thankfulness – Justice – Humility

Low-Level Concerns Policy

Ratified: Autumn 2026

Review due: Autumn 2027

This policy is based on concerns that do not meet the harm threshold in part 4 of Keeping Children Safe in Education.

This applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers, and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- suspicion,
- complaint,
- disclosure made by a child, parent, or other adult within or outside the school, and/or
- pre-employment vetting checks.

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

Definition of Low-Level Concerns

The term 'Low-Level' concern is any concern – no matter how small – 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, 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 designated officer at the local authority.

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 without this being part of an agreed plan (eg therapeutic intervention, One Plan strategy), and
- using inappropriate sexualised, intimidating, or offensive language.

Sharing Low-Level concerns

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

We will create this culture 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'
- have clear policies and procedures,
- empowering staff to share any low-level concerns as per section 7.7 of this policy,
- empowering staff to self-refer,
- 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 to identify any weakness in the school's safeguarding system.

Reporting a low-level concern

- Low level concerns about a member of staff should be reported to the Headteacher/Head of School as per the school's Child Protection procedures.
- If the concern is about the Headteacher/Head of School, this should be reported to the Chair of Governors.
- Low level concerns about supply staff, contractors and local authority visiting staff will also be reported to their employers.

Staff should use the school's Low-Level Concerns Reporting Form (below).

Responding to low-level concerns

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

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

The headteacher will use the information collected to categorise the type of behaviour and determine 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 be referred to the LADO for advice.
- Low level concerns that the school feel they can deal with internally will be dealt with via the school's usual child protection investigation process.
- The school will engage with its HR provider where it is necessary to undertake further investigation and/or deal with the concern under relevant processes.

Record keeping

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

Records will be:

- Kept confidential, held securely, and comply with the DPA 2018 and UK GDPR (in schools with CPOMS Staff Safe, this form will be uploaded and then the paper copy destroyed safely)
- 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 the local authority
- Retained at least until the individual leaves their employment at the school.

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

Reviewing a low-level concern

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 Headteacher/Head of School will decide on a course of action, 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 meeting the harm threshold).

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

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 designated officer 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 included in a reference, such as misconduct or poor performance.

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Low-Level Concern Form

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

- is inconsistent with Mid Essex Anglican Academy Trust Staff Codes of Conduct, including inappropriate conduct outside of work, and

- does not meet the allegation threshold or is otherwise not serious enough to consider 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 if necessary).

The record should be signed, timed, and dated and returned to the Head Teacher/Head of School.

Name of Staff Member:

Details of Concern:

Name: Signed: Date: