Low-Level Concerns Policy

At Lochinver House School we take safeguarding very seriously. We aim to create an open and transparent culture in which all concerns about any adults in or acting on behalf of our School (including supply staff, volunteers and contractors) are shared responsibly with the right person, recorded and dealt with promptly and appropriately. We aim to identify any concerning, problematic or inappropriate behaviour early, thus minimising the risk of abuse. We ensure that all adults working in or on behalf of the School are clear about professional boundaries and act within these boundaries, and in accordance with our ethos and our Staff Code of Conduct documented in the School's Child Protection and Safeguarding Policy. This creates a culture in which all concerns about adults (including those that do not meet the harms threshold of an allegation) are shared responsibly and with the right person, are recorded and dealt with appropriately. We believe such an approach enables the School to identify concerning behaviour early. This policy sets out the detail and processes for staff regarding any low-level concerns that they may have.

The School has implemented carefully designed training that is engaging to encourage buy-in from staff and volunteers and help to achieve the policy's objectives. We aim to ensure that we achieve the purpose of this policy by:

- ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from inappropriate, problematic or concerning behaviour, in themselves and others
- empowering staff to share any low-level safeguarding concerns
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- handling and responding to such concerns sensitively and proportionately when they are raised, and
- helping identify any weakness in the school's safeguarding systems.

Low-level Concerns – Definition and Further Information

In Keeping Children Safe in Education (KCSIE) 2026, a low-level concern is defined as:

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 harm threshold or is otherwise not 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 pupils.*

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.

Low-level concerns may arise in several ways and from a number of sources. For example:

- *suspicion*
- *complaint*
- *or disclosure made by a child, parent or other adult within or outside of the organisation*
- *or as a result of vetting checks undertaken.*

Any concerns which arise will be recorded and appropriate action will be taken to safeguard the children in our care.

As part of our whole school approach to safeguarding, we deal with any concerns (including allegations) that do not meet the harm threshold as detailed in Part Four, Section 2, of KCSIE (2026). These concerns (including allegations) are termed as 'low-level' concerns.

It may be possible that a member of staff acts in a way that does not cause risk to children but is, however, inappropriate. We are committed to cultivating a culture of staff being able to, in a safe and professional manner, challenge behaviours that may breach professional standards, professional boundaries or safeguarding expectations. Any member of staff who has a concern about the action/s of another member of staff, volunteer or contractor, or who on reflection, recognises that their own actions could have been viewed as concerning should normally inform the Head. In the Head's absence, concerns should be reported to the Deputy Head Pastoral or the DSL. Where a member of staff does not feel able to report the concern to the Head, concerns may also be reported to the DSL, Deputy Head Pastoral, the Chair of Governors, or through the School's Whistleblowing Policy. Concerns about the Head's conduct should be reported to the Chair of Governors.

We recognise that a low-level concern about a member of staff may be raised by an external agency, the wider school community or indeed by someone outside of the school community, or family member. In this instance it will be the Head's responsibility to have an open and honest discussion with the member of staff.

Low-level concerns which are shared about supply staff and contractors will be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

Clarity around Allegation vs Low-Level Concerns

It is important to clarify the relationship between low-level concerns and allegations. For example, the Head who receives the low-level concern (or if the concern is about the Head then it must be shared with the Chair of Governors) will always consider whether it meets the threshold for reporting to the designated officer (LADO) of the local authority as an allegation. If the Head is in any doubt, they will contact the LADO for advice. Equally, a series of low-level concerns may cumulatively meet the threshold and need to be treated as such. All concerns are logged so that patterns can be identified. The Spectrum of Behaviour pictured below, gives a clear illustration of the differences between Allegation and Concerns.

Spectrum Of Behaviour

Concern or allegation that may meet harm threshold

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; 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 they 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

Does not mean that it is insignificant. 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 with children may have acted in a way that:

- is inconsistent with an organisation's staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the harm threshold, or is otherwise not serious enough to merit a referral to the LADO.

Appropriate conduct

Behaviour which is entirely consistent with the organisation's staff code of conduct, and the law.

Table taken from Appendix C, Diagram 1, Developing and implementing a low-level concerns policy: A guide for organisations which work with children, Farrer and Co, developing-and-implementing-a-low-level-concerns-policy.pdf (farrer.co.uk)

Process to Follow when a Low-Level Concern is Raised

As detailed above, all low-level concerns should be shared initially with the Head. The Head is responsible for determining how low-level concerns are managed, taking safeguarding advice where appropriate., although it is recognised that depending on the nature of some low-level concerns, the Head may wish to consult with the DSL or the Deputy Head Pastoral, or one of the other Deputy Designated Safeguarding Leads ("DDSLs") and take a more collaborative decision-making approach.

If the Head is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, the Head will consult with the LADO.

Where a low-level concern has been raised by a third party, the Head will collect as much evidence as possible, speaking to the person who raised the concern (if possible), to any individuals involved and any witnesses. The information collected will help to categorise the type of behaviour and determine what further action may need to be taken. This information will be recorded in writing along with the rationale for decisions and action taken.

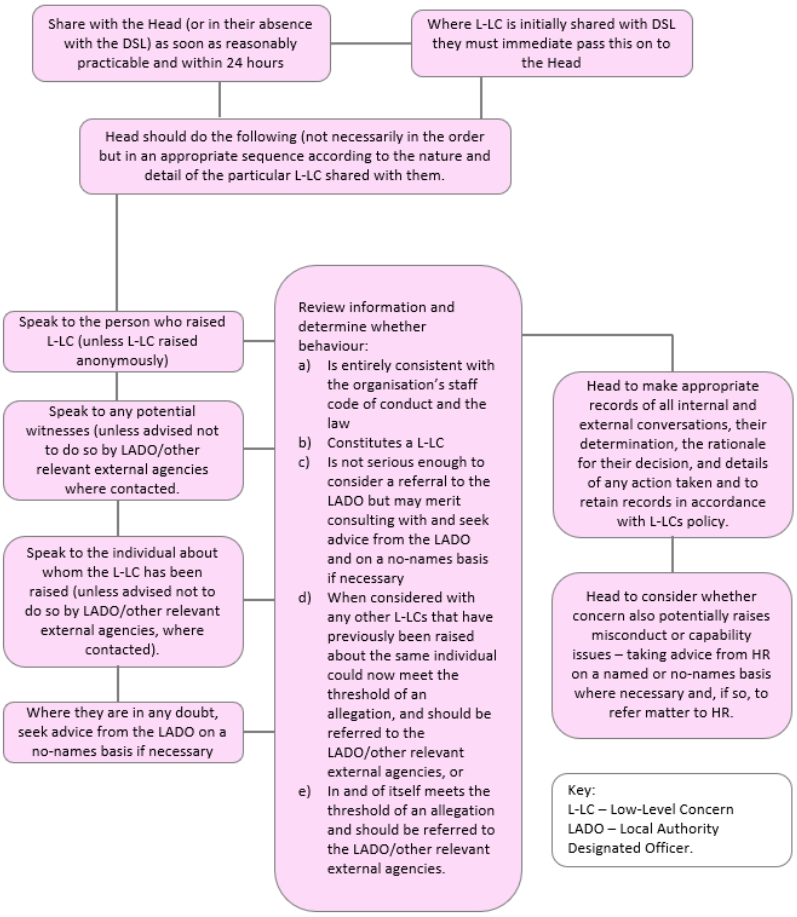
The Head will discuss reported concerns with the member of staff. It may not be necessary to name the complainant unless the concern is escalated to formal proceedings (see linked to policies). The Head will discuss:

- what changes need to be made
- agree a support plan if required
- any further action
- consequences of repeated behaviour/actions
- time scale (normally immediate)

The member of staff will be directed not to discuss with colleagues and attempt to investigate where the reported concern came from.

The Head will be mindful of disguised compliance Disguised compliance refers to situations where a member of staff appears to acknowledge feedback but does not make meaningful changes to their behaviour.

To summarise, where a concern does not meet the harm threshold, action will be taken as summarised in the table below:



Handling Concerns

Handling concerns appropriately and proportionately will strengthen confidence of staff and volunteers. In contrast, handling concerns disproportionately or inappropriately will decrease rather than increase reporting. The way in which concerns are handled, and the identity of the person handling them, will necessarily depend on the context and nature of the concern being raised.

If a low-level concern is raised about the Head then it must be shared with the Chair of Governors, who can be contacted via chairofgovernors@lochinverhouse.com.

In addition, ensuring low-level concerns are dealt with effectively should also protect those working in or on behalf of the School from becoming the subject of potential false low-level concerns or misunderstandings.

Recording, Storing and Use of Low-Level Concerns and Follow Up Information

All low-level concerns will be recorded in writing by either the adult who raises the concern or the Head if reported by the adult verbally in the first instance. Written records will be recorded on the low-level concerns form found in Appendix A of this policy. The record will include details of the concern and the context in which the concern arose.

The Head will also record next steps and any action taken. The name of the individual sharing their concerns should always be noted, although if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. However, there may be circumstances where the staff member will need to be named (for example where it is necessary to carry out a fair disciplinary process) and, for this reason, Lochinver House School does not promise anonymity to members of staff who share a low-level concern. Where possible, we try to encourage staff to consent to be named, as we believe this helps to foster a culture of transparency and openness.

Self Reporting

Occasionally, a member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, a member of staff may, for whatever reason, have behaved in a manner which, on

reflection, they consider falls below the standard set out in our Staff Behaviour and Code of Conduct. In these circumstances, we encourage individuals to 'self-report' using the mechanism for reporting low-level concerns set out in this policy. Such self-reporting can be positive for a number of reasons; it enables any potentially difficult situations to be addressed at the earliest opportunity; it demonstrates an individual's self-awareness and understanding of the behavioural standards expected; and crucially it is an important means of maintaining our school culture, in which everyone aspires to the highest standards of conduct and behaviour.

Records are kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). Retention and disposal of low-level concern records will be undertaken in accordance with the School's Records Retention Schedule, Data Protection Policy and current safeguarding guidance

Any such records are regularly reviewed by the Head so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of behaviour is identified, the school will decide on an appropriate course of action, which could include:

- internal disciplinary procedures;
- referral to the LADO (if the Harms Threshold is met).

In these circumstances, the School will consider whether there were any wider cultural issues in school that enabled the behaviour to occur. If this is found to be the case, relevant policies will be reviewed, and extra training put in place to minimise the risk of recurrence. The School will regularly check and review the low-level concerns log and records, documenting this process carefully.

The treatment of personal data for the purpose of personnel files and references is important. KCSIE requires schools to retain a copy of all substantiated, unsubstantiated or false allegations on a staff member's personnel file but to refer only to substantiated allegations in references. Low-level concerns which do not individually or collectively meet the threshold for referral to the LADO will be retained in a separate confidential, school low-level concerns file. The recording of information will be done following the exercise of sound professional judgement as to what information is necessary for safeguarding purposes. That information, once recorded, will be treated most carefully, recorded in the file, which only the Head has access to and any other individual who they deem required to know, have access to it, oversee and review its contents. All individuals have the right to access these records about them under data protection law.

Low-level concerns will not be recorded in individual's personnel files, unless they also involve issues of misconduct or poor performance, or where they have triggered our disciplinary, grievance or whistleblowing procedures. Where these issues would ordinarily require records to be made and retained on the staff member's personnel file, this will be done in the normal way, in addition to the record of the low-level concern(s) being retained in the central low-level concerns file. Furthermore, low-level concerns about an individual will not be referred to in references, unless they relate to issues which would normally be included in a reference, for example relating to misconduct or poor performance. However, where a low-level concern (or group of concerns) meets the Harm Threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

Should a staff member leave Lochinver House 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.

Oversight and Review

The regular review of low-level concerns by the Head, in conjunction with the DSL and Deputy Head Pastoral (DDSL) is required to ensure that the concerns are being handled appropriately and proportionately, that no concerns meet the threshold of an allegation, and that any subtle patterns of behaviour are spotted. Getting these points right will create a solid foundation for a transparent culture in which all concerns are shared openly and acted on appropriately. By contrast it can be hard to retrieve a situation if these areas are not considered carefully at the outset.

Here at Lochinver House School, our governing body understands its role in terms of having oversight of and monitoring the effectiveness in which low-Level Concerns are handled and dealt with by the school. The Governing Body will seek assurance that appropriate reporting systems, training, safeguarding culture and record keeping arrangements relating to low-level concerns are operating effectively. To this end, the Head and/or DSL will regularly inform the Governing Body about the implementation of this policy and any evidence to its effectiveness. This will be done by including reference to it in the termly safeguarding report submitted by the DSL to the Safeguarding Governor, which is also included in the report to the Board of Governors drafted by the Head each term. Furthermore, the Safeguarding Governor will also review an anonymised sample of low-level concerns at regular intervals, in order to ensure that these concerns have been responded to appropriately and promptly. For further information, please see Section Two: concerns or allegations that do not meet the harm threshold, paragraphs, KCSIE, 2026.

Reviewed By	Head
Approval Body/ Committee	Full Governing Body
Last Review	Autumn 2026
Next Review	Autumn 2027
Policy Linked To	Contract of Employment, Staff Behaviour and Code of Conduct (held within the Child Protection and Safeguarding Policy and Procedure), Keeping Children Safe in Education (September 2026), Staff Handbook, Whistleblowing Policy.

Any data held in relation to the content of this policy will be managed in accordance with our Data Protection Policy and Privacy Notice.

Appendix A

Low-Level Concern Form

Please use this form to share any concern – no matter how small, 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 Lochinver House School's staff code of conduct, including inappropriate conduct outside of work and
- does not meet the harmthreshold, or is otherwise not serious enough to merit a referral to the LADO.

You should provide a consise record (online/electronically or hardcopy) 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) – please use a separate sheet if necessary. The record should be signed, timed and dated.

Details of the Concern:

Name of staff member:
Department and role of staff member?
Concern:
Signed:
Time and Date:
Received by (ensure date and time noted):
Action taken (specify):