

Harewood Junior School

Low Level Concerns Policy



Approved by:	Date: 26.09.2026
Last reviewed on:	New Policy – previously embedded into Communication Policy
Next review due by:	September 2027 – in line with KCSIE updates or earlier if needed
Person responsible:	Headteacher

1. Purpose

Harewood Junior School is committed to maintaining the highest standards of safeguarding and promoting the welfare of children.

The purpose of this policy is to provide a clear framework for identifying, reporting, recording, assessing and responding to **low-level concerns about the behaviour of adults working in or on behalf of the school**.

The school recognises that safeguarding is strengthened by creating a **culture** in which all concerns about adult behaviour can be raised confidently and appropriately.

A low-level concern should not be regarded as insignificant. An isolated incident may be relatively minor, but a series or **pattern of concerns** may indicate behaviour that requires further action or may meet the threshold for an allegation of abuse.

This policy should be read alongside the school's Safeguarding and Child Protection Policy, Staff Code of Conduct, Whistleblowing Policy, Allegations Against Staff Procedure and relevant HR/disciplinary procedures.

2. Legislative and statutory framework

This policy has been developed with regard to current statutory guidance and relevant legislation, including:

- [Keeping Children Safe in Education \(KCSIE\)](#) – Department for Education
- [Working Together to Safeguard Children](#) – Department for Education
- [Education Act 2002](#)
- **Children Act 1989 and 2004**
- **Data Protection Act 2018**
- **UK General Data Protection Regulation (UK GDPR)**
- Relevant local safeguarding partnership procedures
- Relevant Local Authority (Gloucestershire County Council) Designated Officer ([LADO](#)) procedures

The school will ensure that this policy is reviewed against the latest statutory guidance and local safeguarding arrangements.

3. Scope

This policy applies to **all adults** working in or on behalf of the school, including:

- teachers
- teaching assistants and support staff
- senior leaders
- administrative and office staff
- temporary and supply staff
- agency workers
- volunteers
- trainee teachers and other trainees
- contractors
- governors/trustees where relevant
- other professionals working on school premises or providing services to pupils

The policy applies to behaviour occurring:

- on school premises

- during school activities or trips
- during residential visits
- online or through digital communication
- outside school where the behaviour may affect the safeguarding or welfare of pupils
- in any other context where an adult is acting in a professional capacity on behalf of the school.

. What is a low-level concern?

A **low-level concern** is a concern about an adult working in or on behalf of the school where the behaviour is **inconsistent with the school's expectations**, staff code of conduct or professional boundaries, but does not meet the harm threshold for an allegation of abuse.

Examples may include, depending on the circumstances:

- being over-friendly with children
- having inappropriate conversations or jokes
- using inappropriate language in front of pupils
- failing to maintain appropriate professional boundaries
- showing favouritism towards a particular pupil
- engaging in inappropriate physical contact
- communicating with pupils in an inappropriate way
- using personal social media or messaging channels inappropriately
- using authority inappropriately
- behaving in a way that could reasonably be interpreted as undermining professional boundaries
- failing to follow school policies or procedures in a way that creates a safeguarding concern
- other behaviour that causes a member of staff to feel uncomfortable or concerned about an adult's conduct around children.

The list is illustrative and not exhaustive.

A low-level concern may arise from a **single incident or behaviour**, or from a **pattern of behaviour**.

5. Low-level concerns are not allegations

The school will distinguish between:

Low-level concerns

Behaviour that is concerning, inappropriate or inconsistent with professional expectations but does not meet the harm threshold.

Allegations

Information suggesting that an adult working 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; or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

Where the information may meet the harm threshold, it **must not simply be dealt with as a low-level concern**.

The matter must be escalated immediately in accordance with the Harewood Junior School's allegations procedure and appropriate safeguarding advice should be sought.

6. Creating an open safeguarding culture

The school encourages all staff to raise concerns without fear of criticism or reprisal.

Staff should understand that:

It is better to report a concern that ultimately proves unfounded than to fail to report behaviour that could indicate a safeguarding risk.

Staff are not expected to determine whether a concern meets a particular safeguarding threshold before reporting it.

The responsibility of the person raising the concern is to provide the information they have observed, heard or received.

The responsibility for assessing the concern rests with the appropriate safeguarding lead.

The school will:

- ensure staff know how and to whom concerns should be reported;
- provide appropriate safeguarding training and induction;
- promote professional boundaries through its Staff Code of Conduct;
- respond to concerns consistently and proportionately;
- maintain appropriate records;
- identify patterns of behaviour;
- provide appropriate support and guidance to staff;
- take action where professional standards are not being met.

7. Who should report a low-level concern?

Any person working in or on behalf of the school may raise a low-level concern.

Concerns may be raised by:

- teaching staff
- support staff
- senior leaders
- volunteers
- governors
- contractors
- visitors
- pupils
- parents/carers
- other professionals.

A person raising a concern must not investigate the matter themselves.

They should report what they have **seen, heard or been told**, using **factual** and **objective** language wherever possible.

8. How to report a concern

Concerns should be reported promptly to Harewood Junior School's headteacher and/or DSL or the next appropriate staff member.

9. Immediate safeguarding concerns

A low-level concerns form must **not** delay action where a child may be at immediate risk.

If there is an immediate safeguarding concern, staff must follow the school's Child Protection and Safeguarding Policy.

Where necessary:

- contact the DSL/deputy DSL immediately;
- contact emergency services where appropriate;
- follow local safeguarding procedures;
- seek advice from the appropriate safeguarding authority.

If there is uncertainty about whether behaviour meets the harm threshold, staff should **report the concern rather than attempting to resolve the threshold question themselves**.

11. Information that should be recorded

When reporting a concern, staff should provide as much factual information as possible, including:

- name and role of the adult concerned;
- date and time of the incident;
- location;
- names or identifiers of children involved;
- names of witnesses;
- what was seen, heard or reported;
- exact words used where relevant;
- context surrounding the incident;
- any immediate safeguarding action taken;
- whether the behaviour has occurred previously;
- any relevant evidence.

Staff should avoid:

- speculation;
- assumptions about motives;
- diagnosing behaviour;
- exaggerated language;
- conclusions about whether abuse has occurred.

The purpose of the initial record is to capture the information accurately so that an appropriate assessment can be made.

12. Assessment of a concern

The DSL, Headteacher or another appropriately designated person will assess the concern.

The assessment will consider:

- the nature of the behaviour;
- the circumstances;
- the age and vulnerability of any children involved;
- the adult's role and responsibilities;
- whether the behaviour breached the Staff Code of Conduct;
- whether there have been previous concerns;
- whether there is a pattern of behaviour;
- whether the concern may meet the harm threshold;
- whether advice from another safeguarding professional is required.
- The person assessing the concern should record the decision and the rationale for it.

13. Possible outcomes

Following assessment, the school may determine that:

A. No further action is required

The information does not indicate inappropriate behaviour requiring further action.

The concern will nevertheless be recorded appropriately where required.

B. Professional expectations need to be reinforced

The matter may be addressed through:

- a professional discussion;
- clarification of expectations;
- reference to the Staff Code of Conduct;
- safeguarding reminders;
- additional training.

C. Further management action is required

This may include:

- increased supervision;
- mentoring;
- monitoring;
- professional development;
- management action;
- HR advice.

D. The concern should be escalated

If the information suggests that the harm threshold may have been met, the matter will be managed under the school's allegations procedure.

Advice may be sought from the **Local Authority Designated Officer (LADO)** or other appropriate safeguarding professionals.

E. Child safeguarding procedures are required

Where information indicates that a child may be at risk of harm, the school's safeguarding procedures will be followed.

14. Recording and record management

The school will maintain appropriate records of low-level concerns.

Records should include:

- the concern raised;
- date and time;
- person reporting;
- person the concern relates to;
- factual details;
- any children involved;
- action taken;
- decisions made;
- rationale for decisions;
- advice sought;
- outcome;
- follow-up/review arrangements.

Records must be:

- factual;

- objective;
- proportionate;
- securely stored;
- accessible only to those with a legitimate safeguarding or management need to access them.

The school will comply with applicable data protection legislation and its records management procedures.

15. Confidentiality

Information relating to low-level concerns will be treated confidentially and shared only where there is a legitimate reason to do so.

Confidentiality does not prevent appropriate information sharing for safeguarding purposes.

Staff must not:

- discuss concerns casually with colleagues;
- discuss cases with pupils or parents unless authorised;
- share confidential records through personal email or messaging accounts;
- conduct their own informal investigation;
- make allegations publicly or on social media.

The school will balance confidentiality with the need to safeguard children and manage concerns appropriately.

6. Anonymous reporting

The school will accept anonymous concerns where possible.

However, anonymity may make it more difficult to:

- clarify information;
- obtain additional evidence;
- assess the concern;
- provide feedback;
- investigate patterns.

Staff are therefore encouraged to identify themselves where they feel able to do so.

The school will not treat a concern less seriously simply because the person reporting it wishes to remain anonymous.

17. Concerns raised by pupils

Pupils may report concerns about adults directly or through another trusted adult.

All staff should take such reports seriously and follow safeguarding procedures.

A pupil should not be asked to investigate, prove or repeatedly recount the concern unnecessarily.

Information should be recorded accurately and passed to the appropriate safeguarding lead.

18. Concerns raised by parents or carers

Parents and carers may raise concerns about the behaviour of an adult working in or on behalf of the school.

Such concerns should be passed to the DSL, Headteacher or other appropriate person.

The school will:

- listen carefully;
- record the concern;
- avoid making premature conclusions;
- assess the information;
- take appropriate safeguarding or management action;
- communicate appropriately with the parent/carer, subject to confidentiality requirements.

19. Self-reporting by staff

The school encourages staff to self-report situations where they recognise that their behaviour may have crossed, or could be perceived as crossing, a professional boundary.

Examples might include:

- an unintended inappropriate interaction;
- accidental physical contact;
- a communication sent to the wrong recipient;
- a situation in which professional boundaries were unclear;
- an incident where the member of staff believes their behaviour could reasonably be misunderstood.

Self-reporting will be considered as part of the overall assessment of the circumstances.

A self-report does not automatically mean that disciplinary action is required.

20. Pattern recognition

A central purpose of maintaining low-level concern records is to identify possible patterns.

The school will periodically review records to determine whether:

- multiple concerns relate to the same individual;
- similar behaviours are recurring;
- concerns involve the same pupil or group of pupils;
- concerns indicate weaknesses in school procedures;
- professional boundaries require clarification;
- further training is needed;
- a series of concerns may collectively indicate a more serious safeguarding issue.

Where a pattern emerges, the school will reassess the position and determine whether escalation or further action is necessary.

21. Review of concerns

The DSL/Headteacher or designated person will determine an appropriate review period based on the circumstances.

Reviews may consider:

- whether the behaviour has stopped;
- whether professional expectations have been understood;
- whether further concerns have arisen;
- whether monitoring has been effective;
- whether additional support or action is required.

The outcome of significant reviews should be recorded.

22. Allegations that may meet the harm threshold

Where a concern may meet the harm threshold, it must be escalated immediately and managed under the school's **Allegations Against Staff** procedure.

The school will not attempt to resolve potentially serious allegations solely through its low-level concerns process.

Appropriate advice will be sought from the LADO and/or other relevant safeguarding professionals in accordance with local procedures.

The school will follow all relevant requirements concerning:

- safeguarding;
- referral;
- investigation;
- suspension or alternative arrangements where appropriate;
- disciplinary processes;
- information sharing;
- record keeping;
- support for children and staff.

24. Support for staff

Raising or being subject to a concern can be stressful.

The school will seek to provide appropriate support to:

- the person raising the concern;
- the member of staff about whom the concern has been raised;
- children affected by the concern;
- other staff or individuals affected by the situation.

Support will be provided consistently with safeguarding, confidentiality, employment and legal requirements.

25. Training and awareness

All staff will receive information about:

- professional boundaries;
- the Staff Code of Conduct;
- what constitutes a low-level concern;
- how to report concerns;
- who to report concerns to;
- the difference between low-level concerns and allegations;
- whistleblowing arrangements;
- confidentiality and information sharing.

The school will ensure that new staff receive this information as part of induction.

The school will periodically remind staff of the reporting procedure.

26. Responsibilities

All staff

All staff are responsible for:

- maintaining professional boundaries;
- following the Staff Code of Conduct;
- recognising inappropriate or concerning behaviour;
- reporting concerns promptly;

- recording information accurately;
- maintaining confidentiality;
- following safeguarding procedures.

Designated Safeguarding Lead

The DSL is responsible for:

- ensuring appropriate reporting arrangements are in place;
- receiving and assessing concerns;
- ensuring appropriate records are maintained;
- seeking advice where required;
- identifying patterns;
- ensuring concerns are escalated appropriately;
- ensuring staff understand the procedure.

Headteacher

The Headteacher is responsible for:

- ensuring the policy is implemented;
- supporting the DSL (if different from this role);
- ensuring appropriate management action is taken;
- ensuring concerns involving senior staff are managed appropriately;
- ensuring appropriate HR and safeguarding advice is obtained.

Governing Body

The governing body is responsible for:

- ensuring appropriate safeguarding arrangements are in place;
- ensuring the school has an effective policy;
- providing appropriate oversight;
- ensuring concerns about senior leaders are handled through the correct arrangements;
- monitoring safeguarding culture and compliance.

27. Monitoring and quality assurance

The school will monitor the effectiveness of this policy through:

- periodic review of low-level concern records;
- safeguarding audits;
- staff training;
- review of patterns and themes;
- safeguarding governor/trustee oversight;
- review following significant incidents;
- updates to statutory guidance and local procedures.

Monitoring will focus on whether the school has an effective culture of openness and whether concerns are being identified, reported and managed appropriately.

28. Equality and inclusion

The school will ensure that concerns are assessed **fairly** and **without discrimination**.

The school will consider relevant individual circumstances when determining appropriate support and action.

29. Review of this policy

This policy will be reviewed at least annually and sooner where:

- statutory guidance changes;
- local safeguarding procedures change;
- there is a significant safeguarding incident;
- monitoring identifies a weakness;
- relevant legislation changes;
- the school identifies a need for procedural improvement.

Designated Safeguarding Lead (DSL):

Name: Headteacher

Contact: head@harewoodjunior.co.uk

Deputy DSL:

Name: Inclusion Leader

Contact: sendco@harewoodjunior.co.uk

Headteacher:

Name: L Lennox

Contact: head@harewoodjunior.co.uk

The school's preferred reporting method is:

- Staff should use the **Low-Level Concern Reporting Form (see attached)** where appropriate.
- Where the concern relates to the DSL, it should be reported to the Headteacher/Chair of Governors if the DSL is the Headteacher.
- Where the concern relates to the Headteacher, the concern should be reported to the Chair of Governors.

LOW-LEVEL CONCERN REPORTING FORM

Confidential – Safeguarding Record

School: _____

Academic Year: _____

Reference Number: _____

Date concern reported: _____

Purpose of this form:

This form should be used to report a concern about the behaviour of an adult working in or on behalf of the school where the concern does not currently meet the harm threshold but may be inconsistent with the school's staff code of conduct, professional expectations or safeguarding culture.

If you believe the concern may meet the harm threshold, or a child may be at immediate risk of harm, do not use this form as a substitute for the school's safeguarding/allegations procedure. Report the matter immediately to the DSL/headteacher in accordance with the school's safeguarding policy.

1. Person the concern relates to

Name: _____

Role/job title: _____

Employment status:

- ☐ Permanent member of staff
- ☐ Temporary/supply staff
- ☐ Trainee/student teacher
- ☐ Volunteer
- ☐ Contractor
- ☐ Agency worker
- ☐ Other: _____

Department/team: _____

2. Person reporting the concern

Name: _____

Role/job title: _____

Contact details (if required): _____

Relationship to the school: _____

Date and time concern was reported: _____

Method of reporting:

- ☐ Written report

- ☐ Face-to-face
- ☐ Telephone
- ☐ Email
- ☐ Other: _____

Do you wish to remain anonymous?

- ☐ No
- ☐ Yes

Where a person wishes to remain anonymous, the school will respect this as far as reasonably possible while recognising that anonymity may affect the school's ability to investigate or respond to the concern.

3. Date, time and location of incident

Date of incident: _____

Approximate time: _____

Location: _____

Was the incident:

- ☐ On school premises
- ☐ Off-site/school trip
- ☐ Online/digital
- ☐ During an educational or school-related activity
- ☐ Other: _____

4. Child/children involved or present

Name(s), initials or pupil reference(s), where appropriate:

Year/group: _____

Were any other children present or potentially affected?

- ☐ No
- ☐ Yes – details: _____

Was a child directly involved in the incident?

- ☐ No
- ☐ Yes
- ☐ Unsure

5. Description of the concern

Please describe exactly what you saw, heard or were told.

Record **facts and observations**, rather than assumptions, opinions or conclusions.

Include, where relevant:

- what was said or done
- who was present
- the context in which it occurred
- the exact or approximate words used
- the behaviour observed
- how the interaction began and ended
- any relevant previous context
- whether this has happened before
- whether anyone else witnessed the incident

Report:

6. Why are you reporting this?

Please identify the reason(s) for raising the concern.

- ☐ Behaviour appears inconsistent with the staff code of conduct
- ☐ Professional boundary concern
- ☐ Inappropriate language or communication
- ☐ Inappropriate physical contact
- ☐ Inappropriate relationship/boundary with a pupil
- ☐ Favouritism or preferential treatment
- ☐ Excessive or inappropriate use of personal communication/social media
- ☐ Inappropriate online/digital behaviour
- ☐ Inappropriate use of authority

- ☐ Inappropriate conduct outside normal professional expectations
- ☐ Concern about confidentiality/information sharing
- ☐ Concern about supervision
- ☐ Concern arising from an interaction with a pupil
- ☐ Concern about behaviour towards a colleague that may affect safeguarding
- ☐ Self-referral by staff member
- ☐ Other: _____

Please explain why you believe the behaviour is concerning:

7. Immediate safeguarding action

Did you take any immediate action to safeguard a child?

- ☐ No
- ☐ Yes

If yes, describe the action taken:

Was the DSL/deputy DSL contacted immediately?

- ☐ Yes
- ☐ No
- ☐ Not applicable

If no, explain:

8. Evidence or witnesses

Were there any witnesses?

- ☐ No
- ☐ Yes

Names/roles of witnesses, where appropriate:

Is there supporting evidence?

- ☐ No
- ☐ Yes – CCTV
- ☐ Yes – email/message
- ☐ Yes – photograph/document
- ☐ Yes – online/digital record
- ☐ Yes – other: _____

Where is the evidence stored or how can it be accessed?

Do not attach or copy sensitive material unnecessarily. Follow the school's information-sharing, data protection and evidence-retention procedures.

FOR DSL / HEADTEACHER / DESIGNATED DECISION-MAKER**9. Initial assessment**

Date concern received: _____

Reviewed by: _____

Role: _____

Initial assessment

Does the information appear to constitute a low-level concern?

- ☐ Yes
- ☐ No – may meet the harm threshold
- ☐ No – safeguarding referral/procedure required
- ☐ Unclear – further advice required

Reason for decision:

Has advice been sought?

- ☐ No
- ☐ DSL
- ☐ Headteacher
- ☐ Local Authority Designated Officer (LADO)
- ☐ HR
- ☐ Safeguarding adviser

- ☐ Other: _____

Date advice was sought: _____

Advice received/action recommended:

10. Action taken

Select all that apply.

- ☐ No further action required
- ☐ Concern discussed with staff member
- ☐ Professional expectations/code of conduct reinforced
- ☐ Informal management action
- ☐ Additional supervision/support
- ☐ Training or professional development
- ☐ Monitoring arrangement introduced
- ☐ Parents/carers considered/contacted in accordance with safeguarding advice
- ☐ DSL review required
- ☐ Headteacher review required
- ☐ HR advice/action
- ☐ LADO consultation
- ☐ Allegations/harm-threshold procedure initiated
- ☐ Child safeguarding procedure initiated
- ☐ Other: _____

Details of action taken:

11. Decision and rationale

Final classification at this stage:

- ☐ Low-level concern – closed
- ☐ Low-level concern – ongoing monitoring
- ☐ Low-level concern – further action required
- ☐ Escalated to harm-threshold/allegations procedure

- ☐ Referred through child safeguarding procedures
- ☐ Other: _____

Rationale for decision:

Decision made by: _____

Role: _____

Date: _____

12. Follow-up and outcome

Is further monitoring required?

- ☐ No
- ☐ Yes

If yes, what will be monitored and by whom?

Review date: _____

Outcome of review:

Has the concern contributed to a pattern of behaviour?

- ☐ No
- ☐ Yes
- ☐ Too early to determine

If yes, what action has been taken?

13. Pattern and record review

Date record reviewed for potential patterns: _____

Reviewer: _____

Were other concerns identified relating to the same individual?

- ☐ No
- ☐ Yes
- ☐ Unknown

If yes, summarise the relevant pattern and action taken:

Does the pattern indicate that the concern should be escalated?

- ☐ No
- ☐ Yes
- ☐ Further advice required

Action:

14. Confidentiality and storage

Record stored in: _____

Access restricted to: _____

Date record created: _____

Retention/disposal date or review requirement: _____

Data protection/retention considerations addressed:

- ☐ Yes
- ☐ No – action required

SIGN-OFF

DSL / Designated Decision-Maker

Name: _____

Signature: _____

Date: _____

Headteacher

Name: _____

Signature: _____

Date: _____

Record closed/review date: _____

Important reminder for staff

A concern being described as **“low-level” does not mean it should be ignored or dealt with informally without a record.**

Staff should report concerns promptly through the school's established safeguarding procedure. The school should record the concern, actions taken, decisions, rationale and outcomes, and should review records to identify possible patterns of inappropriate or concerning behaviour.

DfE alignment

The form reflects the current KCSIE 2026 requirements that staff act promptly on safeguarding concerns, know the school's reporting routes, and that concerns about staff are managed through the school's established procedures. KCSIE also requires records to capture the concern, actions, decisions, rationale and outcomes. GOV.UK

DfE – Keeping Children Safe in Education 2026