

Low Level Safeguarding Concerns Policy

Date Plan Agreed by the Full Governing Body

Monday 5th October 2026

Date of Next Review

October 2027

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Statement of intent

Throston Primary 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.

Our school prides itself on creating a safe 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.

The purpose of this policy is to create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour, as set out in the Staff Code of Conduct, are lived, monitored and reinforced consistently by all staff. All concerns about adults working in or on behalf of the school will be shared responsibly, recorded and dealt with promptly and appropriately.

This policy should be read alongside the Staff Code of Conduct, Child Protection and Safeguarding Policy, Allegations of Abuse Against Staff Policy, Whistleblowing Policy, Behaviour Policy, Data Protection Policy and relevant SEND policies and procedures.

1. Legal framework

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.
- Data (Use and Access) Act 2025 and applicable data protection laws.
- DfE ‘Keeping children safe in education 2026’ (KCSIE 2026), in force from 1 September 2026.
- DfE ‘Working Together to Safeguard Children 2026’.
- DfE statutory guidance ‘Information sharing to safeguard children and young people’ (2026).
- DfE ‘SEND Code of Practice: 0 to 25 years’ (current statutory guidance).
- DfE ‘Special educational needs (SEN) and disabilities: guidance for school governing boards’ (current guidance).

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
- Data Protection Policy
- Behaviour Policy
- SEND Policy / SEN Information Report

2. Definitions

For the purposes of this policy, a low-level concern is any concern – no matter how small, and even if it is no more than 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, including inappropriate conduct outside of work;
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

A low-level concern does not mean that the concern is insignificant. Examples include, but are not limited to:

- Being overly friendly with children – including inappropriate personal communications or conversations.
- Having favourites – including inappropriate terms of endearment or buying pupils gifts.
- Taking photographs of children on a 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.
- Humiliating children.

Low-level concerns may arise from suspicion, a complaint, a disclosure made by a child, parent or other adult inside or outside the school, or as a result of vetting checks.

The harm threshold is the point at which a concern is no longer a low-level concern and may constitute an allegation. The threshold includes circumstances where an adult 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;
- behaved towards a child in a way that indicates they may pose a risk of harm to children; or
- behaved in a way, or may have behaved in a way, that indicates they may not be suitable to work with children.

Where there is doubt about whether the harm threshold is met, the school will consult the LADO.

Behaviour which appears in this policy as an example of a low-level concern may meet the harm threshold depending on the circumstances, including the age, developmental stage, vulnerability or SEND of the child and the content or context of the behaviour. Conversely, behaviour may not be a concern where there is a legitimate, proportionate and appropriately risk-assessed explanation.

3. Roles and responsibilities

The governing body will be responsible for:

- Ensuring that the school complies with its safeguarding duties and has effective procedures for concerns and allegations about adults.
- Providing strategic leadership, challenge and assurance that safeguarding policies, procedures and training are effective and compliant with the law.
- Ensuring there is an effective Staff Code of Conduct which includes low-level concerns, allegations against staff, whistleblowing, acceptable use of technology, staff/pupil relationships and communications, including social media.
- Ensuring that a suitably trained DSL has been appointed, alongside deputy DSLs where appropriate.
- Ensuring robust reporting arrangements and effective multi-agency working.
- Ensuring the school promotes an inclusive, anti-discriminatory culture in which safeguarding systems operate in the best interests of the child.
- Ensuring that safeguarding arrangements recognise additional barriers faced by children with SEND or certain health conditions and that appropriate liaison with the SENCO is built into safeguarding practice.

The headteacher will be responsible for:

- Being a point of contact for staff when they have safeguarding concerns, whether serious or low-level.
- Being the ultimate decision maker in respect of low-level concerns, while consulting the DSL and other appropriate colleagues as necessary.
- Assessing whether concerns meet the harm threshold and, where appropriate, ensuring referral under Part Four, Section One of KCSIE 2026.
- Implementing this policy and related policies throughout the school.
- Safeguarding pupils' wellbeing and maintaining public trust in the teaching profession.
- Ensuring all staff have appropriate safeguarding training and ongoing awareness of low-level concerns and reporting procedures.
- Ensuring accurate, secure records are maintained, including the rationale for decisions and actions.

The DSL will be responsible for:

- Being a point of contact for staff when they have safeguarding concerns.
- Advising on whether concerns meet the harm threshold and supporting referral to the LADO or other agencies where required.
- Following the procedures in this policy for low-level concerns.
- Liaising with the headteacher, SENCO, staff, governing body and relevant agencies where necessary.
- Ensuring that safeguarding responses involving children with SEND include close liaison with the SENCO and that appropriate communication and pastoral support are considered.

Staff will be responsible for:

- Adhering to all relevant policies and procedures, including acting within the Staff Code of Conduct at all times.
- Interacting with pupils in a respectful and professionally appropriate way, having due regard to the power imbalance between pupils and staff.

- Understanding and reporting low-level safeguarding concerns and concerns which may meet the harm threshold.
- Reporting concerns without undue delay through the school's confidential reporting procedure.
- Recognising that children with SEND may experience additional barriers to recognising, communicating or reporting abuse and using appropriate communication and support.

4. Prevention amongst staff

Appropriate and inappropriate behaviour

The school will ensure that all staff members are aware of the standards of appropriate behaviour expected towards pupils.

Staff will ensure that they pay due regard to the fact that:

- They are in a unique position of trust, care, responsibility, authority and influence in relation to pupils.
- There is a significant power imbalance in the pupil-staff dynamic.
- There are more stringent expectations on their behaviour due to their position as public professionals.
- All pupils under the age of 18 are children in law and staff must not assume maturity or engage with pupils as they would with peers.

The Staff Code of Conduct will set clear expectations regarding staff/pupil relationships and communications, social media, personal devices and acceptable use of technology, as required by the school's wider safeguarding arrangements.

Examples of inappropriate behaviour that would constitute a low-level concern include, but are not limited to:

- Being overly friendly with children, including inappropriate personal social media contact or conversations about a staff member's private life or sexual matters.
- Having favourites, including inappropriate pet names or terms of endearment or buying pupils gifts.
- Taking photographs of children on personal mobile phones contrary to school policy.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door without an appropriate professional reason and safeguards.
- Humiliating children.

Staff must recognise that a child's age, developmental stage, disability, SEND, communication needs, health condition or dependency on adults may affect how behaviour is experienced or reported. Staff must not assume that a behaviour or change in presentation is explained by a child's SEND or health condition without further exploration.

Where there is any doubt about whether another adult's behaviour is appropriate, it should be reported immediately. Behaviour need not be intentional to require reporting.

School culture

- The school will foster an environment where staff can challenge inappropriate behaviour and report concerns without professional loyalties preventing safeguarding action.
- The school will promote an open, transparent, inclusive and anti-discriminatory culture in which concerns are taken seriously.
- All staff will receive safeguarding training at induction and regular updates at least annually, with additional training where required.

- Training will include how to recognise, report and respond to concerns about adults and how additional barriers affecting children with SEND may affect recognition, communication and reporting of abuse.

Evaluating school culture following concerns

The school will consider whether its culture, systems, supervision, staffing arrangements, policies, training or physical environment contributed to inappropriate behaviour. Where weaknesses are identified, the school will take proportionate action, including revising policies, improving supervision or providing additional training.

5. Reporting concerns

The school will promote a culture in which safeguarding pupils is the uppermost priority, beyond perceived professional loyalties to colleagues. Staff are actively encouraged to report concerns regardless of their relationship with the adult concerned.

The school's procedure for sharing low-level concerns will be clear, confidential, easy to understand and easy to implement. Concerns may be reported to the headteacher, DSL or nominated deputy, in accordance with the school's reporting arrangements.

Staff should report concerns without undue delay. Where the report concerns a specific incident, staff should normally report it as soon as possible and, where practicable, no later than 24 hours after the incident. Concerns remain reportable even if they appear minor.

Where the DSL receives a low-level concern, the DSL will inform the headteacher in a timely manner according to the nature of the concern. The headteacher is the ultimate decision maker.

Concerns may be made verbally in the first instance, but the school will ensure the concern is recorded in writing. Staff may request anonymity. The school will respect anonymity as far as reasonably possible but cannot guarantee it where disclosure is necessary for a fair process or safeguarding action.

Where a concern relates to the headteacher, it should be reported to the chair of governors.

Where a concern relates to a person employed by a supply agency or contractor, it should be reported to the headteacher/DSL and the person's employer should be notified so that potential patterns can be identified.

Where a concern is raised about an adult working for an organisation using the school premises, the school will follow its safeguarding procedures and manage the matter in accordance with the relevant arrangements and responsibilities.

6. Self-reporting

The school will maintain an environment that encourages staff to self-refer where they have found themselves in a situation that could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have fallen below expected professional standards.

The headteacher and DSL will maintain a culture of approachability and respond sensitively to self-reports. Self-reporting does not remove the need to assess the concern or follow safeguarding, disciplinary or other procedures where appropriate.

7. Evaluating concerns

When the headteacher is notified of a concern, they will use professional judgement to determine whether it is a low-level concern or whether it meets the harm threshold and must be escalated. If there is doubt, the LADO will be consulted.

To evaluate a concern, the headteacher/DSL will:

- Speak to the person who raised the concern, unless it was raised anonymously, to establish the facts and obtain relevant information.
- Review the information and consider whether the behaviour is consistent with the Staff Code of Conduct, professional standards and the law.
- Consider any previous low-level concerns about the same individual and whether, taken together, the information indicates a pattern that should be dealt with under disciplinary procedures or has moved to the harm threshold.
- Consult the LADO or other external agencies where there is uncertainty about the appropriate course of action.
- Speak to the individual about whom the concern has been raised and provide an opportunity to respond, unless doing so would prejudice a safeguarding, police or other statutory process.
- Consider the child's age, developmental stage, SEND, disability, communication needs, health needs, dependency on adults and other contextual factors where relevant.
- Keep a written record of the information gathered, discussions, decisions, rationale and actions taken.

8. Acting on concerns

Where the concern is unfounded

If, following evaluation, the behaviour is not considered to breach the Staff Code of Conduct or the law, the headteacher will consider how to explain the outcome to the individuals concerned and will ensure that the person who raised the concern is not deterred from reporting future concerns.

The headteacher and DSL will consider whether the concern identifies ambiguity or weaknesses in policies, procedures, training, supervision or culture and will address these where necessary.

Where the concern is low-level

Where the headteacher determines that a concern is low-level, the school will respond in a sensitive and proportionate manner. The response may include:

- A meeting with the individual concerned to explain how the behaviour was perceived, why it is inappropriate or problematic, and what needs to change.
- Giving the individual an opportunity to respond.
- Revisiting the Staff Code of Conduct.
- Guidance, supervision, mentoring or further training.
- A proportionate action plan and monitoring where appropriate.
- Pastoral support for any pupil or other person affected by the behaviour, where appropriate.
- Disciplinary action where the circumstances warrant it.

Where a concern has been raised by a third party, the headteacher or nominated deputy will collect as much evidence as possible by speaking directly to the person who raised the concern (unless anonymous), the individual involved and any witnesses.

Where a concern is found to be part of a pattern, the school will consider disciplinary procedures. If the pattern moves from low-level concern to meeting the harm threshold, it will be referred to the LADO and managed under Part Four, Section One of KCSIE 2026.

Any investigation will be discreet and information will be shared only on a need-to-know basis, subject to safeguarding, employment and legal requirements.

Where the concern is serious

Where the headteacher determines that the concern meets the harm threshold, or that it may do so, the concern will be escalated immediately and managed as an allegation in accordance with Part Four, Section One of KCSIE 2026 and the local authority's procedures. The LADO will be consulted as required.

The school will not treat a concern as a low-level concern merely because it was initially reported as minor or because there is no immediate evidence of harm.

9. Record keeping

All low-level concerns will be recorded in writing. Records will include:

- A clear and comprehensive summary of the concern.
- The context in which the concern arose.
- Details of how the concern was followed up.
- The action taken, decisions reached and outcome.
- The name of the person sharing the concern, where known. Anonymity will be respected as far as reasonably possible.
- The rationale for decisions and actions.

Records may be kept in the school's designated low-level concerns record or another appropriate secure system. They must be kept confidential, held securely and comply with data protection laws.

Records will be reviewed periodically so that potential patterns of inappropriate, problematic or concerning behaviour can be identified. Where a pattern is identified, the school will consider disciplinary action or referral to the LADO if the harm threshold is met.

The school will decide how long low-level concern records are retained, taking account of applicable data protection and employment requirements. In line with KCSIE 2026, retention of such information is recommended at least until the individual leaves their employment.

Low-level concern records will not routinely be placed on the individual's personnel file. The school will determine the appropriate secure location for such records and will only transfer or cross-reference information to personnel records where this is justified by employment, disciplinary or safeguarding requirements.

References: the school will only provide substantiated safeguarding concerns or allegations that meet the harm threshold. A low-level concern should not normally be included in a reference unless it relates to an issue that would normally be included in a reference, such as misconduct or poor performance. A low-level concern relating exclusively to safeguarding should not be referred to in a reference.

Cases or repeated concerns found to be false, unfounded, unsubstantiated or malicious will not be included in references, in accordance with KCSIE 2026.

10. Monitoring and review

This policy will be reviewed annually by the headteacher and DSL and in response to new safeguarding requirements, changes to local safeguarding arrangements, concerns about wider culture, or lessons learned from incidents.

The governing body will receive appropriate assurance that the policy is implemented effectively, including review of themes and patterns arising from low-level concerns and the school's response to concerns involving children with SEND.

The next scheduled review for this policy is November 2027.

Appendix A – Low-level Concern Reporting Form

This form should be completed as soon as practicable and passed to the headteacher, DSL or nominated deputy in accordance with the school's confidential reporting arrangements.

Low-level Concern Reporting Form

Details of individual sharing concerns	
Name (optional)	
Role	
Date	
Details of individual whom the concern is about	
Name	
Role	
Details of individual who dealt with the concern/s	
Name	
Role	
Details of concern	
Details of any children or young people involved	
Name(s)	
Actions to be taken (e.g. no action, investigation, reclassification as allegation meeting the harms threshold.)	

Change highlighting and source note

Yellow highlighting identifies substantive new or amended wording introduced for this September 2026 update. Unhighlighted wording is retained from the previous policy where it remains appropriate.

This update has been checked against KCSIE 2026 (in force from 1 September 2026), Working Together to Safeguard Children 2026, the 2026 information-sharing statutory guidance, the current SEND Code of Practice and current DfE SEND governance guidance. KCSIE 2026 specifically requires safeguarding policies to address low-level concerns and highlights additional safeguarding barriers for children with SEND, including communication barriers, dependency on adults and the risk of misattributing indicators to a child's condition; reports of abuse involving children with SEND require close liaison between the DSL and SENCO.