Fair Ways Schools

Low Level Concerns Policy

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Fair Ways Vision, Mission and Values

Our vision
To build a community that changes lives, makes a difference to society and leaves a legacy greater than us and our contributions.

Our mission
To grow a compassionate, resilient, and trauma-informed community, that embraces learning, so that we improve the lives and outcomes of individuals.

Our values
Our values form the heart of the work we do, defined by Fair Ways people, for Fair Ways people. These are the values by which we operate, by which we are governed, and to which we are held accountable.

We therefore expect every individual within Fair Ways to *play their part*:

PROFESSIONAL	**A**CCEPTING	**R**EFLECTIVE	**T**RANSPARENT
· We do what we say we will. · We approach challenges with optimism and enthusiasm. · We don't judge, we notice. · We put the needs of the service before our own personal gains.	· We don't give up on people. · We value all individuals and are willing to challenge them. · We embrace each other's differences as much as our similarities. · We accept responsibility for our actions.	· We give feedback, we invite feedback, we listen to feedback. · We look inward before we look outward. · We learn as much from our mistakes as from our successes. · We listen to each other, learn from each other and grow together.	· We are always willing to explain why. · We have the courage to be open and honest. · We earn trust through our transparency. · We live by our values even when no-one is watching.

1 Introduction

1.1 Our school recognises its statutory and moral duty to safeguard and promote the welfare of children. This policy must be read alongside Keeping Children Safe in Education 2026 (KCSIE), Working Together to Safeguard Children and the school's child protection policy, staff code of conduct and procedures for managing allegations against adults who work with children.

1.2 Our school works to ensure that we promote an open and transparent culture in which all concerns about adults working in or on behalf of the school are dealt with promptly and appropriately.

2 Scope

2.1 This policy applies to all adults working in or on behalf of the school, whether paid or unpaid, including employees, agency and supply staff, trainee teachers, volunteers, governors or trustees, contractors, local authority staff and visitors undertaking work with children.

2.2 The term 'staff' in this policy includes all adults within paragraph 2.1. Concerns about adults from another organisation will also be shared with that organisation in accordance with KCSIE and local safeguarding procedures.

3 Policy aims

3.1 To help create a culture in which all concerns about adults are shared responsibly and with the right person and are recorded and dealt with appropriately.

3.2 To enable schools to identify concerning, problematic or inappropriate behaviour early.

3.3 To minimise the risk of abuse occurring.

3.4 To ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries and in accordance with the ethos and values of the school.

3.5 To help create an environment where staff are comfortable to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

4 Definition

4.1 The term 'low level' concern does not mean that it is insignificant. It means that the behaviour towards a young person does not meet the harm threshold for an allegation.

4.2 'Keeping Children Safe in Education' defines a low level concern 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 allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO"*

5 Avoiding low level concerning behaviour

5.1 Behaviour defined as a 'low level concern' can exist on a spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate but is not in specific circumstances, through to that which is ultimately intended to enable abuse.

5.2 Staff education and reinforcement on avoiding circumstances which may put them in a difficult situation is key to avoiding the need for dealing with these types of concerns.

5.3 The school ensures that staff understand appropriate behaviour through induction, regular safeguarding training and reinforcement of documents such as:

- Staff Code of Conduct
- Safeguarding and Child Protection policies and regular training
- Teachers' Standards (for teaching staff)

6 Reporting a low level concern

6.1 Any low-level concern must be shared without delay with the Head of School or Headteacher, in accordance with the school's reporting arrangements. The designated safeguarding lead should be informed where the concern has safeguarding implications. A concern about the Head of School or Headteacher must be reported to the Executive Head.

6.2 Concerns may be shared verbally but must be recorded in writing. Staff are encouraged to self-refer where they believe their own conduct could be misinterpreted or may have fallen below the standards in the staff code of conduct. The school will accept anonymous reports and will preserve anonymity as far as reasonably possible, although this may limit the school's ability to investigate.

7 Dealing with a low-level concern

7.1 The Head of School or Headteacher, or the person appointed to manage a concern about them, will collect as much evidence as possible by speaking to the person who raised the concern, the individual involved and any witnesses, unless doing so would conflict with advice from the LADO, police or children's social care. The school will respond sensitively, proportionately and in a timely manner.

7.2 The case manager will decide whether the information: (a) meets the harm threshold; (b) is a low-level concern; or (c) is appropriate conduct that requires no further safeguarding action. The harm threshold is met where a person may have harmed a child, may have committed a criminal offence against or related to a child, may pose a risk of harm to children, or may not be suitable to work with children. If the threshold may be met, or there is uncertainty, the case manager will contact the LADO without delay and before carrying out an internal investigation.

- Allegations that meet, or may meet, the harm threshold will be managed under the school's allegations procedure and in consultation with the LADO.
- Low-level concerns will be managed internally, with advice from the LADO, HR or other agencies where appropriate.
- Where the conduct is consistent with the staff code of conduct and no safeguarding action is required, the decision and rationale will still be recorded.

7.3 The school will engage with HR where it is necessary to undertake further investigation and/or deal with the concern under relevant processes.

8 Recording a low level concern

8.1 All low-level concerns must be recorded in writing and held securely and confidentially. The record will be passed to the Head of School or Headteacher, who will share these with the Executive head.

8.2 The record should include:

- a clear summary of the concern and the context in which it arose;
- the name and role of the person sharing the concern, unless it was raised anonymously;
- the evidence considered and enquiries made;
- the decision reached, the reasons for that decision, actions taken and any outcome; and
- any subsequent review, pattern identified, referral, support, training or management action.

8.3 Records will be kept confidential, with access restricted to those who need it for safeguarding or employment purposes. Information will be processed in accordance with UK data protection law, but data protection will not prevent necessary and proportionate information-sharing to safeguard a child. Records will be retained at least until the individual leaves employment and longer where this is necessary, lawful and consistent with the school's retention schedule.

9 Reviewing a low level concern

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

9.2 Where a pattern of such behaviour is identified, the 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).

9.3 The school will take advice, where appropriate, from their HR Business Partner in respect of low level concerns.

9.4 The school will also review appropriate policies and training, or other wider cultural issues in the school, to see whether anything needs to be done to minimise the risk of similar behaviour happening again.

9.5 Relevant records will be retained confidentially on the personnel file. A separate record will also be kept of low level concerns to more easily identify patterns that may involve more than one member of staff. All records must be kept in line with data protection principles. Head of school/Head teacher will maintain a low level concerns tracker.

9.6 Low-level concerns will not be included in references unless they relate to issues that would normally be included, such as substantiated misconduct or poor performance. Any reference will be factual, accurate and fair and will comply with KCSIE and the school's reference procedure.

9.7 Where a concern, or a pattern of concerns, subsequently meets the harm threshold, it will be managed under the allegations procedure, and the LADO will be consulted. Information about substantiated safeguarding allegations will be included in a reference where required by KCSIE.

10 Related guidance

10.1 The policy links to the following guidance documents:

- Keeping Children Safe in Education 2026, particularly Part Four
- Working Together to Safeguard Children 2026
- Fair Ways Staff Code of Conduct
- Safeguarding and Child Protection Policy
- Managing allegations against staff and volunteers procedure
- Whistleblowing Policy
- Disciplinary, capability, record-retention and data-protection procedures

11 Associated Documentation & Legislation

- Children Act 1989
- Children Act 2004
- Education Act 2002, section 175, and the equivalent safeguarding duties applying to academies and independent schools
- Children's Wellbeing and Schools Act 2026
- Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025
- Department for Education data protection guidance for schools
- Rehabilitation of Offenders Act 1974 and the Exceptions Order 1975, as amended