

Uplands Primary School Low-level Concerns (LLCs) policy

Date ratified: **September 2026**

Date for review: **September 2027**



Rationale

1. At Uplands, we put the welfare and safeguarding of all our pupils at the forefront of all we do. We believe that all those who work with children must always behave appropriately and that early identification and prompt and effective management of concerns regarding adults is crucial to effective safeguarding. The purpose of our low-level concerns policy is to ensure that we create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour set out in our code of conduct are lived and monitored. This policy, alongside the culture of our school, will support staff to be able to raise any concerns no matter how small.

2. This policy sits alongside our child protection policy, safeguarding policy and our code of conduct. We have referred to *Keeping Children Safe in Education 2026* when *Developing and implementing a low-level concerns policy: A guide for organisations which work with children* (Farrer and co).

Scope of the policy

3. **This policy applies to ALL adults who may come into contact with pupils at Uplands including:**

- a. All members of staff, including leadership, teaching and support staff; volunteers, including governors.
- b. Casual workers.
- c. Temporary and supply staff, either from agencies or engaged directly.
- d. Student placements, including those undertaking initial teacher training, and apprentices.

Policy Aims

- a. 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.
- b. To enable schools to identify concerning, problematic or inappropriate behaviour early.
- c. To minimise the risk of abuse occurring.
- d. 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.
- e. 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

What is a low-level concern?

4. The term 'low-level' concern does not mean that it is insignificant, it means that the adult's behaviour towards a child does not meet the threshold for a referral as set out in Keeping Children Safe in Education 2026. 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 may have acted in a way that:

- a. Is inconsistent with an organisation's staff code of conduct, including inappropriate conduct outside of work.
- b. Does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary.

Avoiding low level concerning behaviour

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.

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.

Our school ensures that staff are clear about what appropriate behaviour is through their induction and regularly reinforcement of documents such as:

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

5. Staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is not serious enough to consider a referral to the LADO, or whether it meets the threshold of an allegation. Once staff share what they believe to be a low-level concern, that determination should be made by the Headteacher.

6. **If there is any doubt about the level at which behaviour needs to be addressed, LADO advice will be taken by the Headteacher.**

Sharing and dealing with concerns

7. If a member of staff has a concern, then they will need to be passed onto the Headteacher (DSL) within 24 hours. In her absence, she can be contacted via telephone. Should this not be possible then concerns must be passed to one of the Assistant Headteachers. They will then inform the Headteacher as soon as possible.

8. If the concern is regarding the behaviour of the Headteacher, then staff will need to contact the Chair of Governors. Her number can be located on the staffroom wall.

9. If a concern relates to a contractor or supply teacher, the school will pass on the concern to their employer.

10. The Headteacher must then make an assessment to determine if the matter is a 'low level concern' or an 'allegation' and follow one of the following routes. ▪

- 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

Self-referring

11. 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 the staff code of conduct. Self-reporting in these circumstances can be positive for a number of reasons: it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity; it demonstrates awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived; and, crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour. Staff can speak to the Headteacher if they feel they need to self-refer.

Reporting and recording concerns

12. Staff can speak verbally to the Headteacher but must then follow up in writing a summary of their concerns which should be signed and dated. The Headteacher must also write up a record of any conversation and sign/date it.

13. What should be included in a record?

- a. Name and role of the person recording the concern.
- b. Date, time and signature.
- c. Context in which the concern arose.
- d. Accurate and concise details which should if appropriate be chronological.

14. All records will be stored in a locked cabinet in the Headteacher's office and retained for at least as long as the individual remains in our school.

Dealing with concerns

15. Once the concern has been received, the Headteacher (or Chair of Governors if the concern relates to the Headteacher) will:

- a. Speak to the person who raised the concern (unless it has been raised anonymously), regardless of whether a written summary has yet been provided.
- b. Speak to any potential witnesses (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted).
- c. Speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted).
- d. Review the information and determine whether the behaviour:
 - i. is entirely consistent with their staff code of conduct.
 - ii. constitutes a low-level concern.
 - iii. is not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO, and on a no names basis if necessary.
 - iv. when considered with any other low-level concerns that have previously been raised about the same individual, could now meet the threshold of an allegation and should be referred to the LADO/ other relevant external agencies.
 - v. in and of itself meets the threshold of an allegation and should be referred to the LADO/other relevant external agencies.

- e. Where they are in any doubt whatsoever, seek advice from the LADO - on a no-names basis if necessary;
- f. Make appropriate records of:

- i. All internal conversations – including with the person who initially shared the low-level concern (where this has been possible), the adult about whom the concern has been shared (subject to the above), and any relevant witnesses (subject to the above).

- ii. All external conversations – for example, with the LADO/other external agencies (where they have been contacted, and either on a no-names or names basis).

- iii. Their determination.

- iv. The rationale for their decision.

- v. Any action taken.

16. Any investigation of low-level concerns will be conducted discreetly and on a need-to-know basis.

17. If it is determined that the reported behaviour is consistent with expected behaviour in the school Code of Conduct then the Headteacher will inform the individuals concerned as soon as possible. No further action will be taken.

Further action

18. If it is determined that the behaviour constitutes as low-level concern most will be resolved through a conversation with the individual. Any such conversation will include being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that, and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan which is agreed with the individual, and regularly reviewed with them, may also be appropriate.

19. Some low-level concerns may also raise issues of misconduct or poor performance. The Headteacher should also consider whether this is the case – by referring to disciplinary and/or capability procedures and taking advice from the LADO. If the Headteacher considers that the organisations disciplinary or capability procedure may be triggered, they will refer the matter to EPS. Any such referral should be made by the Headteacher having received the low-level concern and not by individual staff members.

20. However, if it is determined that the behaviour:
- a. Whilst not sufficiently serious to consider a referral to the LADO nonetheless merits consulting with and seeking advice from the LADO, and on a no-names basis if necessary, then action (if/as necessary) should be taken in accordance with the LADO's advice.
 - b. When considered with any other low-level concerns that have previously been shared about the same individual, could now meet the threshold of an allegation, or in and of itself meets the threshold of an allegation, then it should be referred to the LADO.
21. Following an investigation, it may be necessary to review policies, perceptions and training to ensure that individuals in school have the support and guidance needed to prevent low-level concerns in the future.

When staff move on

22. When asked to provide references for staff, we will adhere to the expectations in KCSIE.