

## Testwood School Low Level Concerns Policy

Key Responsibility	PW
Last Review:	November 2025
Next Review:	November 2027

### Revision History

Version	Date	Amendments	Initials
V1.0	23.11.22		JB
V2.0	06.07.23		JB
V2.1	24.11.23	Revision dates revised	JB
V3	22.11.23	Key Responsibility to PW Section 4 updated Appendix removed as this is no longer in use	PW
V3.1	12.11.25	KCSIE changed to 2025 & dates revised	PW

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## 1. Introduction

A low-level concern is any concern that an adult has acted in a way that: is inconsistent with the staff code of conduct, including inappropriate conduct outside of work doesn't meet the threshold of harm or is not considered serious enough for the school or college to refer to the local authority.

At Testwood School, we take safeguarding very seriously. This includes ensuring that adults who work with children do so in a way that is in accordance with the ethos and policies set out by the school, including the Staff Code of Conduct. This policy sets out the detail and processes for staff regarding low-level concerns they may have.

## 2. Summary

It may be possible that a member of staff acts in a way that does not cause risk to children, but it is, however, inappropriate. A member of staff who has a concern about another member of staff should inform the Headteacher about their concern in writing or in person. If the Headteacher cannot be contacted, the Chair of Trustees should be contacted instead.

## 3. Keeping Children Safe in Education September 2025

What is a low-level concern?

The term '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 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.

It is crucial that all low-level concerns are shared responsibly with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings.

#### **4. Reporting, storing and use of Low-Level Concerns and follow-up Information**

All low level concerns should be reported the Headteacher in writing or in person (or Chair of Governors if the concern is about the Headteacher).

The record should include:

- Details of the concern
- The context in which the concern arose

A record will be kept of low level concerns to more easily identify patterns that may involve more than one member of staff. This will be kept confidential by the Headteacher.

Reviewing a low level concern records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the Headteacher 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)

Low level concerns will not be included in a reference unless they relate to issues which would normally be included in a reference (e.g. misconduct or poor performance). Low level concerns which relate solely to safeguarding will not be included in a reference. A low level concern (or group or pattern of concerns) which has met the harm threshold and has therefore been referred to the LADO may be included in a reference depending on the circumstances.

This Policy will be reviewed by the Senior Leadership Team every two years via the Deputy Headteacher with oversight for Safeguarding and cross referenced against any updates from Hampshire Safeguarding Children Partnership.