

NP1.3 Low-Level Concerns Policy and Procedures

This policy applies to the whole School including EYFS at Newton Prep

Executive Summary

The safety and welfare of all our pupils at Newton Prep (or the “School”) is our highest priority. Our culture is one of safety, equality and protection. We are fully committed to always acting in the best interests of the child. Our business is to know everyone as an individual and to provide a secure and caring environment so that every pupil can learn in safety. **Safeguarding is everyone’s responsibility and no member of staff should assume that somebody else will take action and share information that might be critical in keeping children safe.** A culture of safety is supported by providing staff with an effective system to report low-level concerns. This policy seeks to clarify what a low-level concern is and how to report them.

Associated Policies

This policy is available on the School website. This policy is one of a series in the school’s integrated safeguarding portfolio, which includes the following policies:

- Anti-Bullying Policy
- Behaviour Policy
- Complaints Procedure
- CCTV policy
- Data Protection Policy
- Educational Trips Policy
- Employment Manual (includes Staff Code of Conduct)
- E-Safety Policy
- PSHE Policy
- Recruitment Policy
- Relationships, Sex and Education Policy
- Safeguarding and Child Protection Policy and Procedures
- SEND Policy
- Supervision and Lost (Missing) Child Policy (including children missing education)
- Visits and Visiting Speakers Policy
- Whistleblowing Policy

Our core safeguarding principles are that:

- safeguarding and promoting the welfare of children is everyone's responsibility;
- the School's responsibility to safeguard and promote the welfare of children is of paramount importance;
- the School has a 'whole school' approach to safeguarding, ensuring safeguarding and child protection underpin all School processes and policies to ensure the best interests of the child is at their heart;
- at Newton Prep we adopt a child-centred approach - always considering the best interests of the child, taking action to enable all children to have the best outcomes; and
- policies will be reviewed at least annually unless an incident or new legislation or guidance suggests the need for an interim review.

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What is the purpose of this policy?

Newton Prep promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the school are dealt with promptly and appropriately.

The purpose of this policy is to help create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour set out in our Safeguarding and Child Protection Policy and Procedures are lived, monitored, and reinforced. Safeguarding and promoting the welfare of children is everyone's responsibility.

This policy seeks to clarify what low-level concerns are and how to report them. It sets out guidance as to when staff are expected to share / report 'low-level' concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working at Newton Prep.

This policy should be read alongside Keeping Children Safe in Education 2026, Part Four, Section Two, and the School's Safeguarding and Child Protection Policy and Staff Code of Conduct.

This policy applies to all staff whether working in or on behalf of the school, including anyone who is part of the School Council.

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.

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.

What types of behaviour require sharing as a low-level concern?

Examples of behaviour that require sharing as a low-level concern could include, but are not limited to:

- being over friendly with children
- having favourites

- 'friending ' past pupils on social media
- sexist language or behaviour
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- humiliating pupils.
- being overly harsh or losing one's temper
- taking photographs on a personal device, or otherwise taking, storing or sharing images contrary to School policy

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.

Low-level concerns can also relate to conduct outside of work which, even if not linked in a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

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 aims to protect those working in or on behalf of the school from becoming the subject of potential false low-level concerns or misunderstandings.

How are low-level concerns shared?

Any member of staff who has a concern about another member of staff should fill in the [Low-Level Concern Form](#) which will notify the Head by email of your submission.

The written record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, but if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

If the concern is about the Head, the concern should be raised with the Chairman by email or in writing (without first notifying the Head) in accordance with the procedures in School's Safeguarding and Child Protection Policy and Procedures. In a situation where there is a conflict of interest in reporting the matter to the Head, this should be reported directly to the local authority designated officer(s) (LADOs). Referrals to the LADO must be made via the MASH (020 8871 6622).

How are low-level concerns responded to?

When the Head receives a low-level concern, the Head will:

- Speak to the person who raised the low-level concern (unless it has been raised anonymously)
- Speak to any potential witnesses
- Speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/relevant external agency).
- Review the information and determine whether the behaviour is consistent with the Staff Code of Conduct and the law, constitutes a low-level concern, or may meet the harm threshold. If there is any doubt about the threshold or the appropriate response, the Head will seek advice from the LADO before taking further investigative steps.

The Head may nominate a Deputy Head or Designated Safeguarding Lead to assist with any of the above stages.

Where the behaviour is determined to be consistent with the School's Code of Conduct and the law, the Head will update the individual in question and inform them of any actions taken. The Head will also speak with the person who shared the low-level concern and provide feedback.

Where the behaviour is determined to be a low-level concern, the Head will determine and record a proportionate response. This may include discreet fact-finding, management guidance, training, support, monitoring or, where misconduct may be involved, action under the School's disciplinary procedure. Information will be shared only on a need-to-know basis.

In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised. Others may be most appropriately dealt with by means of management guidance and/or training.

Any such conversations will include being clear to the member of staff who is the subject of the concern as to why their behaviour is inappropriate, problematic or concerning. Required changes in their behaviour will also be discussed alongside what, if any, support they might need in order to achieve these changes. Ongoing and transparent monitoring of the individual's behaviour and feedback may be appropriate.

If low-level concerns raise issues of misconduct, the Head will follow the School's disciplinary procedures, taking advice from HR.

Records will be reviewed regularly so that potential patterns of inappropriate, problematic or concerning behaviour can be identified. Where a pattern is identified, the School will consider whether the matter should be addressed through management guidance, training or disciplinary procedures, or whether the pattern may meet the harm threshold and requires consultation with or referral to the LADO, in accordance with KCSIE 2026, Part Four.

It may be the case that a person finds themselves in a situation which could be misinterpreted, or might appear compromising to others; or they may have behaved in a manner which on reflection they consider falls below the standard set out in the Staff Code of Conduct. In these circumstances they should self-report. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary. To self-report, staff should also fill in the [Low-Level Concern Form](#).

Low-level concerns which are shared about supply staff and contractors are shared with their employers, so that any potential patterns of inappropriate behaviour can be identified.

How will low-level concerns be held?

Low-Level Concern submissions and follow-up information will be kept confidential and stored securely within the School's systems, with access only by the Head. This will be stored in accordance with the School's Data Protection Policy. The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Head.

Following a Low-Level concern, the Head and, if appropriate, the Designated Safeguarding Leads will consider if there are any wider cultural issues within the School that enabled the behaviour to occur. If deemed appropriate, policies will be revised or extra training will be delivered to minimise the risk of it happening again.

Low-level concerns will not be included in references unless the concern, or a pattern of concerns, has met the threshold for inclusion under KCSIE 2026.

Unsubstantiated, unfounded, false or malicious allegations will not be included. At the point where a member of staff leaves, the Head will review the record and document the decision to retain or delete it in accordance with KCSIE 2026, data-protection principles and the School's Records Retention Schedule.

What types of behaviour may meet the harm threshold?

Behaviour that may meet the harm threshold is dealt with under KCSIE 2026, Part Four, Section One. The threshold is met where it is alleged that a person who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child and/or
- possibly committed a criminal offence against or related to a child, and/or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

When an allegation may meet any one or more of the criteria above, it must be reported to the Head immediately. The Head, acting as case manager, will discuss the allegation with the LADO as soon as possible and before carrying out an investigation. Emergency action needed to safeguard a child or preserve evidence must not be delayed.

If there is any doubt as to whether an allegation meets the threshold of harm, the Head will seek advice from the LADO.

For further information please refer to NP1.1 Safeguarding and Child Protection Policy and Procedures

Review and Update Process

Last update	September 2026
Next update	September 2027