

# NP1.3 Low-Level Concerns Policy and Procedures

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

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## 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 Child Protection and Safeguarding policy 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.

The policy should be read in conjunction with the current statutory guidance – 'Keeping Children Safe in Education KCSIE 2025 Part 4 Section 2 (sections of which have been referenced below.)

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, even if no more than causing a sense of unease or a 'nagging doubt', that a person working in or on behalf of the school may have acted in a way that:

- is inconsistent with our Staff Code of Conduct (including inappropriate conduct outside of work), and
- does not meet the **harm threshold** or is otherwise not considered serious enough to make a referral to the Local Authority Designated Officer (LADO).

Low-level concerns may arise in several ways and from several different sources (such as suspicion, complaint or disclosure).

## 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 of children 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 a Low-Level Concern Form (See [appendix 1](#)) and hand it to the Head. Hard copies of the Low-Level Concern form can be found on the safeguarding board in the staff room.

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.

## 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 (unless advised not to do so by the LADO/relevant external agencies)
- 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 appropriate, constitutes a low-level concern, or if it meets the harm threshold, in which case they will consult with the LADO.

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, a full investigation will be done discreetly and 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 are reviewed so that potential patterns of inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the School will decide on a course of action, either through the disciplinary procedures or, where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, by referring it to the LADO (as per KCSIE 2025 Part 4, Section 1). For further details, please refer to the final section of this policy 'What types of behaviour do meet the harm threshold?' (page 7)

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 a Low-Level Concern Form (See [appendix 1](#)) and hand it to the Head.

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 Forms and follow-up information will be kept confidential and stored securely within the School's safeguarding 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 referred to in references unless they have become more significant concerns resulting in disciplinary or misconduct procedures. Whenever staff leave Newton Prep, any record of low-level concerns (including any Low Level Concern Forms) which are stored about them will be reviewed as to whether or not that information needs to be kept.

## What types of behaviour may meet the harm threshold?

Behaviour that meets the harm threshold refers to any allegations that might indicate a person would pose a risk of harm (see KCSIE 2025 Part 4 section 1) if they continue to work in their present position, or in any capacity with children in a school or college. Examples of this behaviour could include, but are not limited to, where an adult 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 the allegation meets any one or more of the criteria above, you must inform the Head immediately. The Head will inform the LADO immediately of such an allegation. The School will not investigate before referral to the LADO.

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

<b>Last update</b>	September 2025
<b>Next update</b>	September 2026

# Appendices

## Appendix 1 - Low-Level Concern Form

Please complete this form to share a low-level concern and then submit it to the Head. This may relate to your own behaviour or actions where you feel they could be misconstrued or misinterpreted or to report any behaviour by an adult towards a pupil or another child that may have concerned you. If you are unsure as to whether or not to complete this form, you should seek advice from the Head.

If a child is at immediate risk, and you are not able to contact a DSL, the Head or the Chairman, you should contact Wandsworth MASH immediately on 020 8150 1362 or email [mash@wandsworth.gov.uk](mailto:mash@wandsworth.gov.uk)

Name of the adult who this concern is about:	
Please outline your concern, providing all the details you think are relevant.	
(Be sure to add as much detail as you can - include relevant dates and the names of any colleagues or pupils involved or who may also have witnessed what happened.)	
Any additional information which may be relevant	
Thank you for completing the form. The Head will review your submission and get in touch as needed.	
Your name	Date

To be completed by the Head:

Was the staff member spoken to?	
Yes - Staff member's response to concern	
No - Give a brief but valid reason if not	
Action Taken by:	
Was advice or guidance sought from the LADO, a DSL or HR?	
Signed	Date
Head:	