Low-Level Concerns Policy

Introduction

At Manor Farm, we aim to create an open and transparent culture where all concerns about any individuals involved with our provision are dealt with promptly and appropriately. We aim to identify any concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working within Manor Farm are clear about professional boundaries and act within these boundaries, and in accordance with our ethos.

This policy applies to all staff and volunteers and should be read alongside our Safeguarding & Child Protection Policy and Staff Behaviour & Disciplinary Policy.

Purpose

The purpose of this policy is to create and embed a culture of openness, trust and transparency in which our setting's values and expected behaviour set out in the staff code of conduct are lived, monitored and reinforced constantly by all staff.

Summary

It may be possible that a member of staff acts in a way that does not cause risk to children but is however inappropriate. A member of staff who has a concern about another adult or who, on reflection, recognises that their own actions could have been viewed as a risk should inform the Designated Safeguarding Lead (DSL) about their concern in person, via the telephone or in writing. If the DSL cannot be contacted, the Deputy DSL or setting lead should be contacted.

Keeping Children Safe in Education (KCSiE) September 2026

All staff should familiarise themselves with the latest KCSiE guidance:

https://assets.publishing.service.gov.uk/media/6ac3c09c11ed58342ad8e4ac/Keeping_children_safe_in_education_2026.pdf

The following is taken directly from Keeping Children Safe in Education 2026 and identifies what may be considered behaviour relating to low level concern:

What a low-level concern is

509. 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 overfriendly 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 children.

510. 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.

511. 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.

512. 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.

Recording, Storing and use of Low-Level Concerns and follow-up information

All low-level concerns should be communicated to the DSL in person, via the telephone or in writing. The DSL will upload a written copy of the concern to CPOMS. The record will include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns will also be noted, however, if the individual wishes to remain anonymous then that will be respected as far as reasonably possible.

Records will be reviewed by the DSL so that potential patterns of inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the setting will decide on a course of action, either through our disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, it will be referred to the LADO. Consideration will also be given to whether there are wider cultural issues

within the setting that enabled the behaviour to occur and where appropriate policies will be revised, or extra training delivered to minimise the risk of it happening again.

Low-level concern CPOMS records, and follow-up information will be stored securely within the provision's safeguarding systems, with access only by the Senior Leadership team. This will be stored in accordance with our GDPR and Data Protection Policy.

The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from those aware in the Senior Leadership team.

Although it is important that staff feel comfortable with, and are clear about, the concept of low-level concerns, and know what to do if they have such a concern, they do not need to be able to determine in each case whether the behaviour in question constitutes a low-level concern, or if it may meet the harm threshold. Once staff share what they believe to be a low-level concern, that determination will be made by the DSL and in consultation with the setting lead.

Low-level concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

When staff leave Manor Farm, any record of low-level concerns which are stored about them will be reviewed as to whether or not that information needs to be kept.

Consideration will be given to:

a) whether some or all of the information contained within any record may have any reasonably likely value in terms of any potential historic employment or abuse claim so as to justify keeping it, in line with normal safeguarding records practice; or
b) if, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted accordingly.

Allegation VS Low-level concern

Allegation:

Any adult linked to our setting who 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.

Low Level Concern:

Any adult linked to our setting who has behaved 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.

Appropriate:

- Behaviour which is entirely consistent with our setting's Code of Conduct, and the Law.

If the DSL or setting lead are in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they should consult with their LADO.

Process to follow when a Low-Level Concern is raised

*NB – if the concern is about the DSL, then the Deputy DSL or setting lead should be informed.

Once the DSL or setting lead has received what is believed (by the person raising it) to be a low-level concern, they will (not necessarily in the below order but in an appropriate sequence according to the nature and detail of the particular concern shared with them):

- speak to the person who raised the concern (unless it has been raised anonymously), regardless of whether an initial verbal or written log has been provided;
- speak to any potential witnesses (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted);
- 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);
- review the information and determine whether:
    a) the behaviour is in fact appropriate – i.e. entirely consistent with their staff code of conduct and the law,
    b) the behaviour constitutes a low-level concern,
    c) there is any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact may meet the harm threshold, in which case the DSL will consult with the LADO,
    d) when considered with any other low-level concerns that have previously been shared about the same individual, the behaviour may meet the harm threshold, and should be referred to the LADO/other relevant external agencies,
- make appropriate CPOMS records of:

- 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);
- 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);
- their determination

Monitoring and Review

This policy will be reviewed annually or sooner if required by the Senior Leadership Team and DSL, and in response to any new safeguarding requirements or concerns.

Policy Last Reviewed: 20th October 2026

Next Review Due: 20th October 2027