Beverley School
Safeguarding Policy –
Managing Low Level Concerns Policy

DSL

DDSL

DDSL

Suzanne Mulligan **Toni Pawson** **Karen Seivwright**

DDSL : Paige Richards

Safeguarding: Chris Mulligan Gary Errington Kim Swales

Regional Director :Richard George

Introduction

This policy is written in line with Keeping Children Safe in Education (KCSiE) 2025 and Working Together to Safeguard Children 2023.

Wider Policies support this Child Protection Policy. All are numbered and sit alongside to create the school safeguarding policy.

1. Child Protection Policy
2. The Role of the DSL Policy
3. Child on Child Abuse Policy
4. Filtering and Monitoring Policy

5. Managing Low Level Concerns Policy
6. Absent from Education Policy
7. Schools Safer Recruitment Policy
8. Managing Contextual Risks to Children

Aims of this policy

This policy is written to support staff and the DSL and/or the Headteacher better understand:

- What are Low Level concerns
- How to manage concerns or allegations that do not meet the harm threshold
- How to share Low Level concerns
- The procedure for sharing Low Level concerns
- How to record Low Level concerns

What is a Low-Level Concern?

The Department of Education DfE describe this in KCSiE 2025 as:

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 / 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 children.

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.

Managing concerns or allegations that do not meet the harm threshold

As part our whole school / college approach to safeguarding, our schools / colleges promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. In doing this we aim to ensure:

- identify inappropriate, problematic or concerning behaviour early
- reduce the risk of abuse, and
- ensure that adults working in or on behalf of the school/college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the school/college.

All concerns must be reported to the DSL immediately. The DSL will need basic information to decide on how to escalate, this information will include, the names of the child/children involved, their age, a description of the allegation and any factors which could place the child at further risk.

The DSL will then discuss with the headteacher/principal and decide whether this can be managed as a low-level concern or will require a referral to an external agency such as LADO.

Sharing low-level concerns

Schools and colleges should ensure that their low-level concerns policy contains a procedure for sharing confidentially such concerns which is clear, easy to understand and implement.

The DSL must inform the headteacher/principal of all the low-level concerns without delay. The headteacher/principal should be the ultimate decision maker in respect of all low-level concerns, the headteacher/principal may wish to consult with the DSL and take a more collaborative decision-making approach.

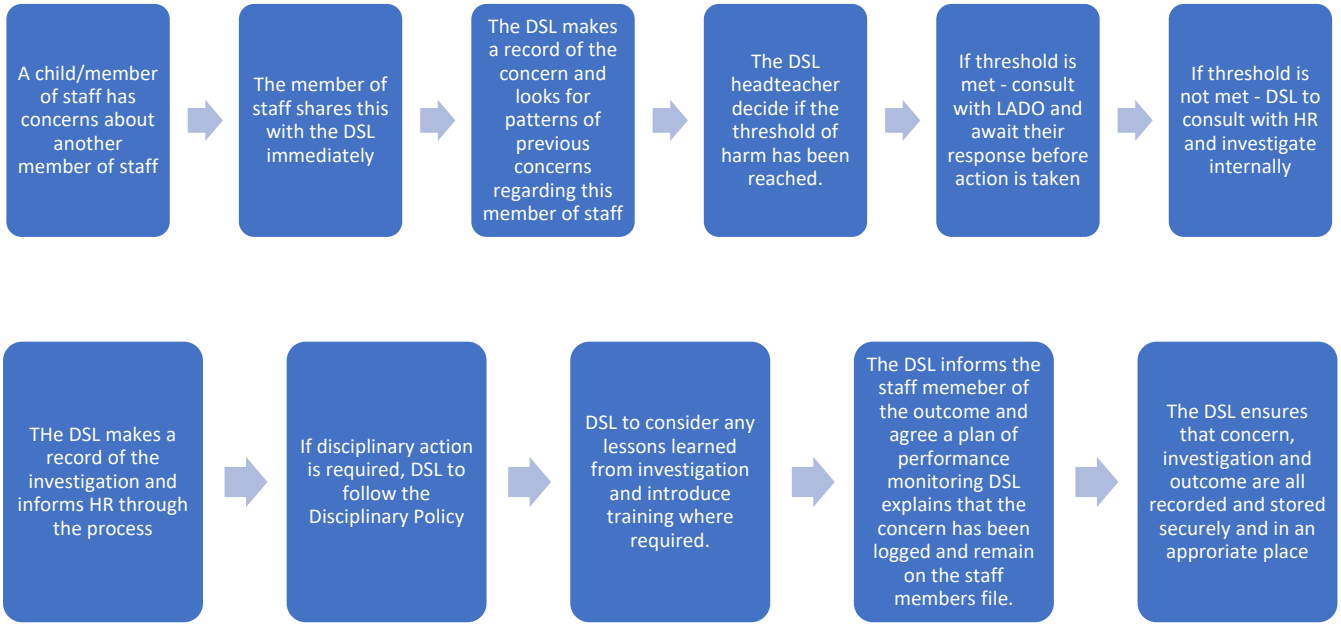
Low-level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

If schools and colleges 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.

Schools and colleges should ensure they create an environment where staff are encouraged and feel confident 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.

The Procedure for sharing Low Level Concerns



When appointed, the DSL must contact their local safeguarding partner to agree the threshold for concerns. The DSL must review this annually as a minimum to ensure they are confident of the threshold for allegations.

Recording low-level concerns

All low-level concerns should be recorded in writing on Behaviourwatch. The 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, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Records should be reviewed so that potential patterns of inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the school / college should decide on a course of action, either through its disciplinary procedures (HR) Disciplinary Policy – onrezume.com or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the LADO Report child abuse to a local council - GOV.UK (www.gov.uk).

Consideration should also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur. In this case Headteachers / Principals should contact the Head of Policy or Head of Quality and Improvement and where

appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again.

Schools and colleges to retain concerns at least until the individual leaves their employment.

Review

This Policy was written on 08 November 2023. A review will be annually as a minimum. Last reviewed September 2025

However, subject to a significant safeguarding concern this policy and all other attached policies will be reviewed and monitored as part of a lessons learned review.

Written by:

This policy was written by Matt Nicholls – Head of Policy Children's Services, it was reviewed by Christina Leath – Group Safeguarding Director. This policy has been reviewed by the DSL of the School and agreed by the head of the Governance Board.

Proprietor: Farouk Sheikh