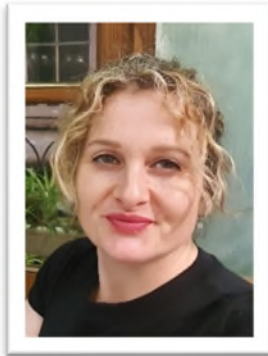


Lufton College

Safeguarding Policy –

(5) Managing Low Level Concerns Policy



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Introduction

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

Please refer to links below

[Keeping children safe in education 2025](#)

[Working together to safeguard children 2023: statutory guidance](#)

We also provide education to individuals over the age of 18 years. With that in mind, this policy has also been written in line with the Care Act 2014, Education Act 2002 and the Mental Capacity Act 2005. Those over the age of 18 are referred to as Students.

Wider Policies support this Policy and are outlined below.

1. The Role of the DSL Policy
2. Child Protection Policy
3. Child on Child Abuse Policy
4. Filtering and Monitoring Policy
5. Missing From Education
6. Absent from Education Policy
7. Schools Safer Recruitment Policy
8. Managing Contextual Risks to Children
9. Safeguarding Over 18s Policy
10. Remote Learning Policy
11. Online Safety Policy
12. Whistleblowing Policy
13. Behaviour Policy
14. PREVENT Policy
15. Physical Intervention Policy
16. SEND Policy
17. Staff Behaviour Policy/Code of Conduct
18. Absent from Education Policy

Aims of this policy

This policy is written to support staff and the DSL and/or the Headteacher/Principal to 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/students
- having favourites
- taking photographs of children/students on their mobile phone, contrary to school/college policy
- engaging with a child/student on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children/students
- behaving in a manner inside or outside of work which brings into question their suitability to work with vulnerable individuals

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/student, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

All low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively also protects those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings.

Inappropriate conduct also extends to excessive use of social media messaging or video calling outside school hours.

Managing concerns or allegations that do not meet the harm threshold

As part of 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:

- 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 are reported to the DSL immediately. The DSL gathers basic information to decide on how to escalate. This information includes, the names of the child/children/students involved, their age, a description of the allegation and any factors which could place the individuals at further risk.

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

All low-level concerns are recorded and escalated (or closed) within 24 hours of the concern being raised, with a central register being accessible to the DSL and headteacher for auditing.

Sharing low-level concerns

Our school/college ensures the low-level concerns policy contains a procedure for sharing concerns which is clear, easy to understand and implement.

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

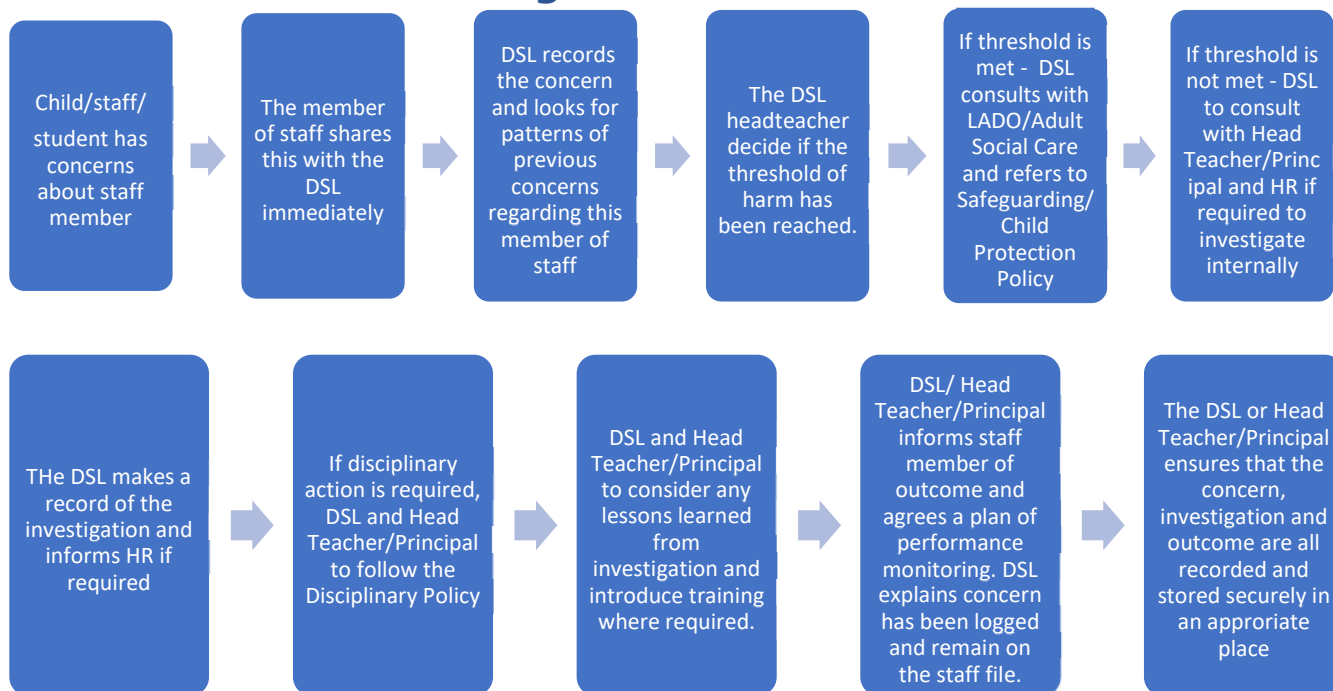
Low-level concerns which are shared about supply staff and contractors will be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

If schools and colleges are in any doubt as to whether the information which has been shared about a member of staff is a low-level concern or in fact meets the harm threshold, they consult with their LADO/Adult Social Care Dept.

Our school/college has created 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.

Staff are mindful that self-referrals relating to sexual behaviour, child on child/student on student abuse, or online harm must be treated with the same urgency as any other low level concern.

The Procedure for sharing Low Level Concerns



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

The DSL reviews and signs off on the local threshold agreement every 12 months, with documented evidence of that review.

Recording low-level concerns

All low-level concerns are recorded in writing on Behaviourwatch and/or Data Bridge. The record includes details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns are also noted. If the individual wishes to remain anonymous then that is respected as far as reasonably possible.

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/college decides 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 \(www.gov.uk\)](https://www.gov.uk) or Adult Local Authority Safeguarding Team (for concerns related to over 18s) with the Safeguarding/Child Protection Policy guiding this process.

Consideration is also given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur. In this case the Headteacher/Principal contacts the Head of Policy and Head of Quality and Improvement to update and where appropriate policies are revised and/or extra training is delivered to minimise the risk of it happening again.

Records of low-level concerns are retained for a minimum of 10 years after the member of staff leaves, or until their retirement if later. Annual audits of the record-keeping system are conducted by the DSL.

Review History

A review will be undertaken annually as a minimum. 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.

This policy was reviewed in August 2025 by Laura Dickie (Head of Policy), Jo Dunn (Director of Compliance, Quality and Regulation - Children), Lindsey Appleby-Flynn (Head of Learning and Development), the DSL of the School and agreed by the Head of the Governance Board.

Next Review – September 2026