Inspiring Futures through Learning

Staff Low Level Concerns Policy

September 2026 to September 2027

Policy name:	IFtL Staff Low Level Concerns Policy
Version:	V1
Date relevant from:	September 2026
Date to be reviewed:	September 2027 *This policy will be reviewed every two years unless legislation dictates otherwise. Recent changes in Legislation will need to be read and used to review this Policy.*
Role of reviewer:	IFtL Head of Safeguarding, Health, Children & Families.
Statutory (Y/N):	Y
Published on website*:	1B

Policy level:**	1
Relevant to:	All employees through all IFtL schools and departments
Bodies consulted:	Employees Trade unions School / department governance bodies
Approved by:	IFtL Board of Trustees
Approval date:	28th August 2025

Key:

**** Publication on website:***

IFtL website		**School website**	
1	Statutory publication	A	Statutory publication
2	Good practice	B	Good practice
3	Not required	C	Not required

***** Policy level:***

1. Trust wide:
   - This one policy is relevant to everyone and consistently applied across all schools and Trust departments with no variations.
     - *Approved by the IFtL Board of Trustees.*
2. Trust core values:
   - This policy defines the values to be incorporated fully in all other policies on this subject across all schools and Trust departments. This policy should therefore from the basis of a localised school / department policy that in addition contains relevant information, procedures and / or processes contextualised to that school / department.
     - *Approved by the IFtL Board of Trustees as a Trust Core Values policy.*
     - *Approved by school / department governance bodies as a relevantly contextualised school / department policy.*

3. School / department policies
   - These are defined independently by schools / departments as appropriate

Low-Level Concerns Policy

Introduction

At IFtL and across all our schools and ITT, we take safeguarding very seriously. This includes ensuring that all adults working in or on behalf of the Trust act in accordance with the Trust's ethos, policies and staff code of conduct. This policy applies to all adults working in or on behalf of the Trust, including employees, agency and supply staff, volunteers, governors, trustees, contractors and anyone providing services on behalf of the Trust. It sets out the processes for recognising, reporting and managing low-level concerns (see Appendix 1).

Summary

This policy applies to all adults working in or on behalf of the Trust. It recognises that an adult may sometimes behave in a way that is inconsistent with the staff code of conduct but does not meet the harm threshold for referral to the Local Authority Designated Officer (LADO). Such behaviour should still be reported, recorded and managed appropriately.

Any adult who has a concern about the behaviour of another adult should report it to the headteacher or DSL using a Low-Level Record of Concern form. If neither the headteacher nor DSL can be contacted, the Deputy Designated Safeguarding lead (DDSL). The headteacher, DSL or DDSL will record the concern on Staff Safe. A Low-Level Record of Concern form should also be completed in all cases.

The form will be available on the school system or directly from:

- The headteacher
- Designated Safeguarding Lead (DSL)
- Deputy Designated Safeguarding Lead (DDSL)

It can also be requested via email from the above people.

If the Head Teacher is involved in the concern, staff should escalate it to the IFtL Designated Safeguarding Lead or the IFtL Deputy designated safeguarding Lead.

We adhere to all the recommendations and requirements made within KCSIE 2026 Part four Section two: Concerns or allegations that do not meet the harm threshold (pages 118 to 122).

Low level Concerns

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 (including supply teachers, volunteers and contractors) 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.

At IFtL and across all our schools, we believe it is critical to create a culture in which all concerns about adults are shared responsibly with the right person, recorded and dealt with appropriately. If implemented correctly, this should:

- enable schools and colleges to identify inappropriate, problematic or concerning behaviour early,
- minimise the risk of abuse, and
- ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution (KCSIE 2026, Para 505)

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.

(KCSIE 2026 para 506)

Low-level concerns may result from carelessness, thoughtlessness or a misunderstanding, but they may also indicate emerging patterns of behaviour. They do not necessarily meet the harm threshold for referral to the LADO. Where there is any doubt, advice should be sought from the headteacher, DSL and/or DDSL who will determine whether consultation with the LADO is required.

We will ensure all staff receive regular training to help them identify and report safeguarding-related low-level concerns and understand the importance of maintaining a culture where these concerns are taken seriously.

Staff are encouraged to self-refer where they believe their actions may have been misunderstood, could appear compromising to others or, on reflection, may have fallen below expected professional standards. Self-reporting supports the Trust's culture of openness, transparency and safeguarding.

Where a person wishes to remain anonymous, this will be respected as far as reasonably possible.

Investigation of low-level concerns

The headteacher will ensure that all reported low-level concerns are followed up appropriately. The headteacher may work collaboratively with the DSL and/or the DDSL when considering the concern. They should talk to the person reporting the concern (unless this is anonymous) and follow up with the person who the concern is raised about and any witnesses.

The Head Teacher will consider the full details of concerns, if they are unsure if the allegation meets the harm criteria or not then they will always consult the LADO for advice

and guidance. Where there is uncertainty about whether the concern meets the harm threshold, the headteacher will consult the LADO for advice and may also seek advice from the Trust DSL or Deputy DSL.

If the concern is deemed low level, they will gather information and take any appropriate action, this may involve a disciplinary, retraining or rewriting policies.

If a low-level concern is found to be related to a lack of understanding or a one-off mistake, the staff member involved should be offered support, such as additional training or mentoring, to prevent it from happening again.

The record will always be kept on the individual's personnel file and in Staff Safe, and the individual will be made aware of this. Where subsequent concerns or allegations meet the harm threshold for a referral to the LADO, the headteacher will share the relevant information with the LADO to assist in identifying any patterns of behaviour. Where patterns of behaviour are identified, consideration will also be given to whether there are wider cultural or systemic issues within the school that require changes to policy, practice or staff training.

In respect of agency staff, contractors or organisations using school premises, their employer or manager/DSL will be informed so that any emerging patterns of behaviour can be identified and recorded.

Storage and use of Low-Level Concerns and follow-up information

Low-Level Concern forms (Appendix 2) and follow up information will be stored securely. This will be stored in accordance with the school's GDPR and data protection policies.

The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Head Teacher or in their absence the DSL and the DDSL.

Low-level concerns will not normally be included in employment references unless they relate to misconduct or poor performance that would ordinarily be disclosed in a reference.

Low-level concern records will normally be retained until the individual leaves employment with the Trust. When staff leave any IFtL school or ITT, any records of low-level concerns held about them will be reviewed to determine whether the information needs to be retained and/or shared, in accordance with this policy and data protection requirements. The staff member will be made aware of the decision.

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 ort 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.

Organisations or Individuals using school premises and Contractors.

The Head teacher may receive a low-level concern relating to an incident that happened when a contractor was completing contracted work or an individual/organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular

activities). As with any safeguarding concern, schools and colleges should follow their safeguarding policies and procedures, including informing the employer, LADO or companies DSL. The school will ensure this information is stored and will consider a risk assessment based on the concern raised.

SAFEGUARDING STATEMENT

Safeguarding is everybody's business. IFtL MAT is committed to ensuring that all our children are safe and feel safe. The right of every child and young person within the IFtL community to be safe and feel safe is fundamental. Safeguarding and child protection is crucial, and we are fully committed to ensuring the welfare and safety of all our children and staff. IFtL and all the schools within the Trust must fully adhere to all safeguarding and child protection legislation, policy, and procedures at all times and under any circumstances. Safeguarding concerns relating to Trust-wide matters will be referred to the Trust Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Leads (DDSLs). Concerns relating to individual pupils will be managed by the DSL within the relevant school in accordance with this policy and local safeguarding procedures. IFtL will comply with all applicable safeguarding legislation, statutory guidance and local safeguarding partnership arrangements.

Our Governors and Trustees are fully engaged with the development and implementation of policies and procedures within individual schools. They are clear about their legal responsibilities and the need to question, challenge and audit school processes and procedures. They have responsibility for monitoring and ensuring that policies and procedures are fully implemented and effective within schools. There are regular reports to governors and trustees from headteachers and DSLs that monitor the number of concerns raised, the referrals made and the outcomes. Governors receive appropriate information regarding safeguarding concerns, including allegations against staff, in accordance with confidentiality requirements. Governors and trustees receive appropriate safeguarding training at induction and at regular intervals thereafter to enable them to provide effective challenge, scrutiny and strategic oversight of safeguarding arrangements.

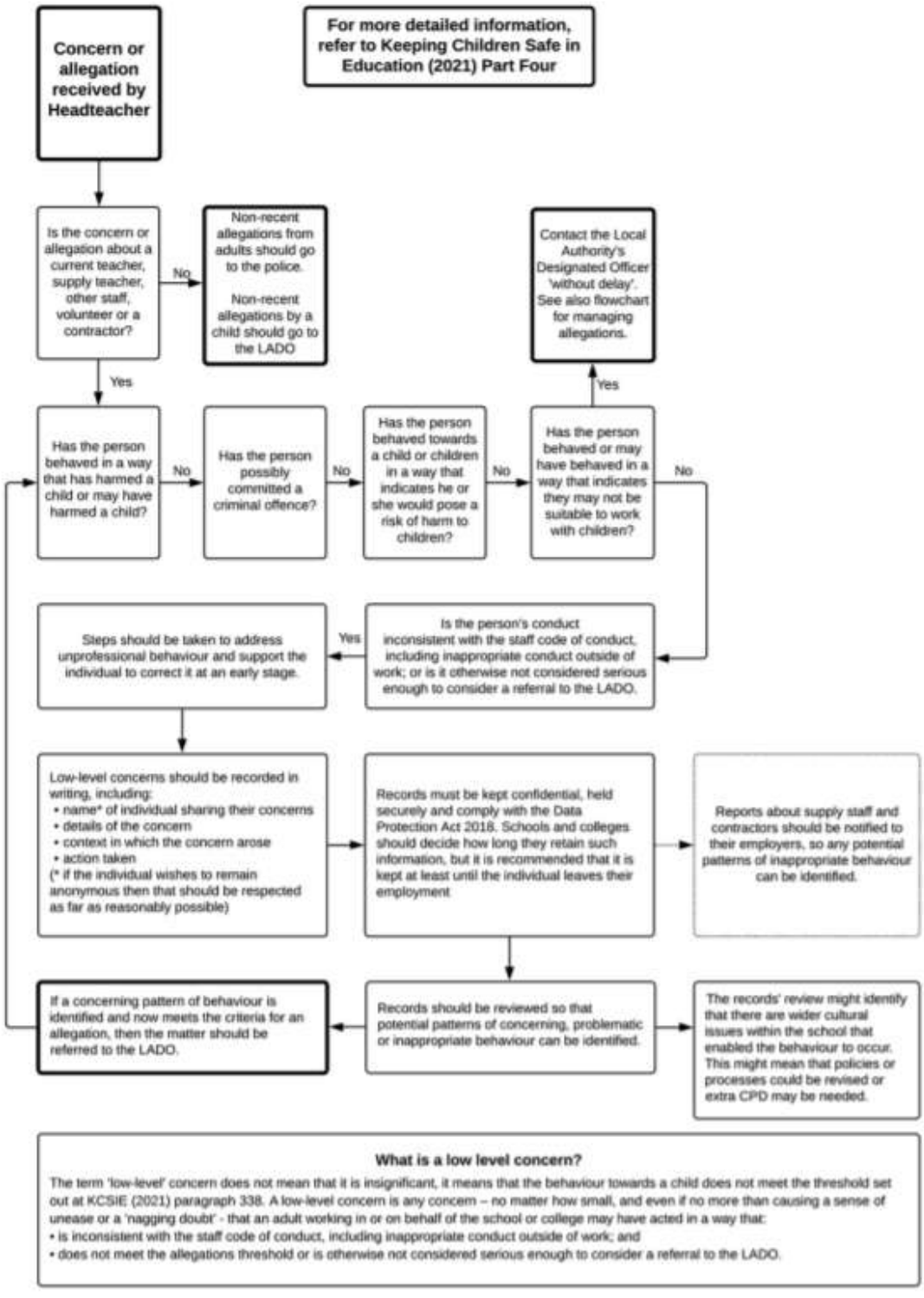
Governors receive safeguarding training at induction, exploring how to scrutinise and challenge information and data. This training is regularly updated.

Regular safeguarding audits, quality assurance and policy reviews are undertaken to ensure safeguarding arrangements remain effective, compliant and fit for purpose.

For further contact details, see:

- IFtL Child Protection and Safeguarding policy
- IFtL Whistleblowing policy

Appendix 1



NB: As of yet the 2026 KCSIE flow chart is not available; however the process to follow remains the same in KCSIE 2021

Appendix 2 - Low-Level Concern Form

To be uploaded and recorded on Staff Safe

Low-Level Record of Concern Regarding a Staff Member	
Please use this form to share any concern – no matter how small, and even if no more than a 'nagging doubt' – that an adult may have acted in a manner which: • Is not consistent with our Code of conduct, and/or; • Relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about an adult's suitability to work with children. Where possible please speak with the Head Teacher as soon as possible. It is also helpful to document your concerns, which can be done using this form and them passed to the Head Teacher. When completed, please pass this form to the Head Teacher. If the concern is about the Head Teacher, please pass on to the Chair of governors. **Remember a low-level concern is different to an allegation.**	
Date of low-level concern:	
Member of staff involved (Including Contractors, supply staff, volunteers and individuals using the premises):	
Concern information:	
Reported by:	
Discussion with LADO: Date and details of discussion	
Outcome:	