

**HANDEL HOUSE SCHOOL**  
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**HANDEL HOUSE SCHOOL**  
**SAFEGUARDING CHILDREN – LOW LEVEL CONCERN POLICY AND PROCEDURES**

*This policy which applies to the whole school including the Early Years Foundation Stage (EYFS) is available on the school website and upon request from the school office.*

Last Review	October 2025
Revised	June 2026
Next Review	September 2026

**Policy Owner:** Headteacher/Proprietor  
**Approved By:** Advisory Board  
**Review Date:** Annually  
**Date of Review:** September 2026

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## **1. Introduction**

At Handel House School, safeguarding and promoting the welfare of children is everyone's responsibility. We are committed to creating and maintaining a culture of openness, transparency and accountability in which all concerns about the behaviour of adults working in or on behalf of the school are shared appropriately, recorded and managed effectively.

This policy should be read alongside the school's:

- Safeguarding and Child Protection Policy
- Staff Code of Conduct
- Whistleblowing Policy
- Staff Behaviour Policy
- KCSIE 2025

The purpose of this policy is to ensure that concerns about adults' behaviour are identified and addressed at an early stage, helping to maintain professional standards and safeguard children.

## **2. Policy Statement**

Handel House School recognises that concerns about adults working with children may arise which do not meet the threshold for a referral to the Local Authority Designated Officer (LADO) but which nevertheless warrant attention.

All staff have a professional responsibility to share concerns, however small, about the conduct of another adult working in or on behalf of the school.

The school actively encourages both the reporting of concerns about others and self-reporting by staff where they believe their own conduct may have fallen below expected professional standards.

Creating a culture in which concerns can be raised without fear of reprisal helps to:

- Identify inappropriate, concerning or problematic behaviour at an early stage.
- Promote professional boundaries.
- Protect children from harm.
- Protect staff from misunderstandings or false allegations.
- Maintain confidence in safeguarding practices throughout the school.

## **3. Keeping Children Safe in Education (KCSIE) 2025**

In accordance with paragraphs 428–433 of Keeping Children Safe in Education (September 2025), schools should promote an open and transparent culture in which all concerns about adults working in or on behalf of the school are dealt with promptly and appropriately.

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A culture where concerns are shared responsibly and recorded effectively enables schools to identify concerning behaviours early, minimise the risk of abuse, and ensure adults understand and maintain professional boundaries.

#### **4. A Culture of Vigilance and Staff Training on Low Level Concerns**

Handel House School aims to ensure that a culture of openness and trust is fostered within the school in which staff can share any concerns about the conduct of colleagues and be assured that these will be received in a sensitive manner. If we educate adults to be informed about, and to identify concerning, problematic or inappropriate behaviour, they can be prepared to act when they observe behaviour that contravenes Handel House School's code of conduct. At Handel House School there is a shared commitment from all staff, volunteers, visitors and members of the Advisory Board, to adhere to, enforce and reinforce the staff code of conduct and its expectations, and to address any attempt to bypass policies and procedures - regardless of the person in question's status. Staff are briefed on the staff code of conduct and low level concerns policy so that everyone is familiar with it, and clear on the standard of behaviour expected of them. All new staff receive a briefing on low level concerns and a copy of this policy.

#### **5. Understanding Different Types of Concern**

##### **5.1 Appropriate Conduct**

Appropriate conduct is behaviour that is consistent with:

- The Staff Code of Conduct.
- Professional standards.
- The school's safeguarding expectations.
- The ethos and values of Handel House School.

##### **5.2 Low-Level Concern**

A low-level concern is any concern, no matter how small, including behaviour that creates a sense of unease or a "nagging doubt", that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the Staff Code of Conduct, including conduct outside of work; and
- Does not meet the harm threshold for referral to the LADO.

Examples may include:

- Being over-familiar with pupils.
- Showing favouritism.
- Taking photographs of pupils on a personal mobile device contrary to school policy.
- Meeting with a pupil alone behind a closed door without appropriate justification.
- Using inappropriate language.

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- Humiliating, belittling or undermining pupils.
- Inappropriate contact through social media or electronic communication.

The term "low-level" does not mean that the concern is insignificant. Such behaviour may exist on a spectrum from poor judgement through to behaviour intended to enable abuse.

### 5.3 Allegations that Meet the Harm Threshold

An allegation meets the harm threshold where an adult has:

- Behaved in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offence against or related to a child.
- Behaved towards a child in a way that indicates they may pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Such concerns must be dealt with in accordance with the school's Safeguarding and Child Protection Policy and relevant LADO procedures.

## 6. Reporting a Low-Level Concern

All staff, volunteers, visitors and Advisory Board members have a responsibility to report low-level concerns.

Low-level concerns should be reported as soon as possible using the school's Low-Level Concern Form.

### Where to report concerns

Concern relates to	Report to
Member of staff, volunteer or visitor	Headteacher/Proprietor or Safeguarding Lead
Designated Safeguarding Lead (DSL)	Headteacher/Proprietor
Headteacher/Proprietor	Member of the Advisory Board
Member of the Advisory Board	Another member of the Advisory Board or the Local Authority Designated Officer (LADO) for advice

If the Headteacher/Proprietor is unavailable, concerns should be reported to the DSL or a member of the Advisory Board.

Staff should not:

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- Investigate concerns themselves.
- Discuss concerns widely with colleagues.
- Delay reporting concerns while gathering evidence.

### **Concerns About the Headteacher/Proprietor**

Where a low-level concern relates to the conduct of the Headteacher/Proprietor, the concern must be reported directly to a member of the Advisory Board.

That member of the Advisory Board will:

- Review the concern promptly.
- Determine whether it constitutes a low-level concern or meets the harm threshold.
- Seek advice from the LADO where necessary.
- Ensure appropriate recording and follow-up action.
- Maintain confidentiality and fairness throughout the process.

The Headteacher/Proprietor will not be responsible for managing concerns raised about their own conduct.

### **7. Self-Reporting**

Handel House School encourages a culture of openness, honesty and professional accountability. Staff are expected to self-report any incident where they believe their own conduct may have fallen below the standards set out in the Staff Code of Conduct, safeguarding policies or professional expectations.

Self-reporting enables concerns to be addressed promptly, supports professional reflection and learning, and helps safeguard both pupils and staff.

Examples of situations that should be self-reported include, but are not limited to:

- Accidental contact with a pupil through a personal social media account or personal telephone number.
- Being alone with a pupil in circumstances that could be misinterpreted.
- A lapse in professional judgement or professional boundaries.
- Failure to follow a school safeguarding procedure or policy.
- Conduct outside school that may be viewed as inconsistent with the standards expected of staff.
- Any incident that could give rise to a complaint, allegation or misunderstanding.

Self-reports should be made as soon as reasonably practicable to the Headteacher/Proprietor.

Where the self-report concerns the Headteacher/Proprietor, the matter should be reported directly to a member of the Advisory Board.

The recipient of the self-report will:

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- Consider the information provided and determine whether the matter constitutes a low-level concern, misconduct issue or safeguarding concern.
- Record the matter appropriately.
- Decide whether any further action, support, advice or training is required.
- Ensure that the matter is managed fairly, proportionately and confidentially.

The purpose of self-reporting is not to create a punitive culture but to support a transparent safeguarding environment where concerns can be identified and addressed at the earliest opportunity. Where appropriate, a staff member's willingness to self-report will be taken into account when determining any subsequent management response.

## **8. Responding to a Low-Level Concern**

The person receiving the concern will:

1. Acknowledge receipt of the concern.
2. Review the information provided.
3. Determine whether:
  - The matter is a low-level concern;
  - No further action is required; or
  - The concern meets the harm threshold and requires referral under safeguarding procedures.
4. Speak with the individual concerned where appropriate.
5. Identify any patterns of behaviour from previous records.
6. Determine any necessary actions, support or guidance.
7. Record decisions and outcomes.

Possible outcomes may include:

- No further action.
- Clarification of expectations.
- Advice, support or mentoring.
- Additional training.
- Formal management action where appropriate.
- Escalation under disciplinary or safeguarding procedures.

## **9. Confidentiality**

Low-level concerns must be handled sensitively and confidentially.

Information will only be shared with those who have a legitimate need to know.

Individuals reporting concerns should maintain confidentiality and should not discuss the matter with other colleagues unless authorised to do so.

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## **10. Recording and Storage**

All low-level concerns will be recorded using the school's Low-Level Concern Form and stored securely within the school's safeguarding systems.

Records will:

- Be maintained separately from personnel files.
- Be accessible only to authorised senior leaders and, where appropriate, the Chair of the Advisory Board.
- Comply with UK GDPR and the school's Data Protection Policy.
- Include details of actions taken and outcomes reached.

## **11. Use of Records and References**

Low-level concerns will not normally be referred to in employment references.

Information may only be included in references where concerns have progressed to formal findings through disciplinary, misconduct or safeguarding procedures.

## **12. Retention and Disposal of Records**

When an individual leaves the school, any low-level concern records relating to them will be reviewed.

Consideration will be given to:

- Whether the information may have future safeguarding relevance.
- Whether it may assist in responding to historic safeguarding or employment-related concerns.
- Whether there remains any actionable safeguarding concern.

Where there is no reasonable justification for retaining the information, records will be securely deleted in accordance with the school's retention schedule and data protection requirements.

## **13. Availability of the Low-Level Concern Form**

The Low-Level Concern Form is available from:

- The School Staffroom
- The Designated Safeguarding Lead (DSL)
- Member of the Advisory Board (for concerns regarding the Headteacher/Proprietor)

## **14. Monitoring and Review**

This policy will be reviewed annually or sooner if:

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- Legislative or statutory guidance changes.
- KCSIE is updated.
- A safeguarding review identifies the need for amendment.

The Advisory Board will monitor the implementation and effectiveness of this policy.

Revised June 2026

## Appendix A

### Diagram: Spectrum of Behaviour

#### Allegation

Behaviour which indicates that an adult who works with children 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 they 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

Does not mean that it is insignificant, it means that the adult's behaviour towards a child does not meet the threshold set out above. 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 may have acted in a way that:

- Is inconsistent with our school's staff code of conduct, including inappropriate conduct outside of work, and
- Does not meet the allegation threshold, or is not serious enough to consider a referral to the LADO - but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary

#### Appropriate Conduct

Behaviour which is entirely consistent with the school's staff code of conduct, and the law.

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