




Low Level Concerns Policy

September 2025

Signed (Chair of Trust Board):	
Date:	September 2025
Review:	September 2026

Arbor Academy Trust reviews this policy annually. The Trustees may, however, review the policy earlier than this, if the Government introduces new regulations, or if the Trust receives recommendations on how the policy might be improved. This document is also available in other formats e.g. e-mail and enlarged print version, on request to the School Offices and is displayed on the schools' websites.

LOW-LEVEL CONCERNS

Low level concerns should be evaluated in consultation with the LADO in line with the expectations as outlined within [Chapter 7 of the London Safeguarding Children Procedures](#). The consultation process allows for concerns to be evaluated objectively and to ascertain whether similar concerns may have been raised previously but not met the threshold for an allegation.

A low-level concern is any concern that an adult has acted 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 following consultation with the Designated Officer for the Local Authority (LADO).

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Examples of low-level concerns could include:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone
- engaging with a child one-to-one in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating, or offensive language.

Sharing Concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

Any member of staff being aware of a low-level concern should inform the Designated Safeguarding Lead (DSL) immediately. This includes concerns relating to agency and supply staff and volunteers.

Should a low-level concern be raised against the Headteacher/Head of School, this will be reported to the Chair of Governors unless this is not possible.

In such cases where it is not possible, a consultation will be sought by that staff member with the LADO.

The Designated Safeguarding Lead (DSL) or Chair of Governors will seek advice from the LADO within one working day. No member of staff will undertake further investigations before receiving advice from the LADO.

Any member of staff or volunteer who does not feel confident to raise their concerns within the Organisation should contact the LADO directly:

*The LADO can be contacted to request a consultation or to make a referral via e-mail: **lado@hackney.gov.uk** or via their LADO referral form for advice, consultation and for making a referral.*

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to possibly meeting the harm/risk of harm threshold we will refer it back to the LADO for consideration under our Managing Allegations against Staff Policy.
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the harm/risk of harm threshold warranting LADO oversight, and is found to be substantiated; and/or

The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.