

The Federation of St Martin's and Seabrook CEP School's
Low-level Concerns Safeguarding Policy

September 2026

Reviewed: September 2026

Next Review: September 2027

Adopted by Governing Body: September 2026

Contents:**Statement of intent**

The purpose of this policy is to create and maintain an open, transparent and professional culture in which the Federation's values and expected behaviour, as set out in the Staff Code of Conduct, are lived, monitored and reinforced by all staff. Low-level concerns are not treated as insignificant. Sharing them early helps prevent inappropriate behaviour from escalating, supports staff to maintain professional boundaries, and enables the Federation to identify patterns or weaknesses in its safeguarding arrangements. Concerns may arise from suspicion, observation, complaint or disclosure, including from a child, parent/carer or another adult, and may also arise from information received outside the school.

1. Legal framework

KCSIE 2026 comes into force on 1 September 2026. All staff must read Part 1 of KCSIE 2026 in full and follow the Federation's safeguarding and child protection procedures. This includes staff who do not work directly with children. All staff must understand how to report concerns about adults working in or on behalf of the Federation. Safeguarding is everyone's responsibility and the Federation will promote the principle that "it could happen here".

2. Definitions

This policy applies to concerns about any adult working in or on behalf of the Federation, including employees, supply and agency staff, contractors, volunteers, trainee teachers and other adults working on placement. It applies to conduct towards children in school, on Federation activities or trips, online, and outside work where the behaviour may affect an individual's suitability to work with children or their professional role.

3. Roles and responsibilities**4. Prevention amongst staff**

Low-level concerns may relate to behaviour that appears inappropriate, unprofessional or inconsistent with expected standards, even where there is no apparent intent to cause harm. Examples include, but are not limited to:

- ☐ excessive or inappropriate familiarity with a child;
- ☐ having favourites, giving gifts or providing special treatment;
- ☐ inappropriate communication with children, including through personal devices or social media;
- ☐ using personal mobile phones or other personal devices to photograph or record children;
- ☐ unnecessary one-to-one contact in secluded areas or behind closed doors;
- ☐ inappropriate physical contact;
- ☐ humiliating, belittling or unnecessarily embarrassing a child;
- ☐ using inappropriate, discriminatory, sexualised or offensive language;
- ☐ failing to maintain appropriate professional boundaries;
- ☐ conduct online or outside work that may call into question an individual's suitability to work with children; and
- ☐ any other behaviour inconsistent with the Staff Code of Conduct or safer working practice.

These examples are illustrative, not exhaustive. Context, the child's age and needs, the nature and frequency of the behaviour, and any other relevant information must be considered. A concern that initially appears low-level may meet the harm threshold when considered in context or alongside other information.

5. Reporting concerns

If the concern relates to the Executive Headteacher, it must be reported to the Chair of Governors. If the concern relates to the DSL, it should be reported to the Executive Headteacher or another appropriate senior leader, with advice sought from the LADO where required. If a member of staff is unable to raise a safeguarding concern internally, they should use the Federation's Whistleblowing arrangements and seek appropriate external advice in line with KCSIE 2026.

6. Self-reporting

7. Evaluating concerns

The person receiving a concern will not conduct an informal investigation before deciding the appropriate safeguarding route. The initial task is to establish enough information to determine whether the concern is a low-level concern or an allegation requiring management under the Federation's allegations procedures. Where there is any uncertainty about the threshold or the appropriate response, the Federation will seek advice from the LADO. Where a concern may indicate immediate risk of harm, safeguarding action will take priority and will not be delayed by the low-level concerns process.

8. Acting on concerns

9. Record keeping

Records will be sufficiently detailed to support effective safeguarding decision-making and future pattern recognition. In addition to the information listed below, records should capture the rationale for decisions made and the outcome of the concern. Records should be factual, objective, proportionate and avoid unnecessary personal information. Low-level concerns should be kept securely and confidentially, with access restricted to those who need the information for safeguarding or employment purposes.

The Federation will review low-level concerns in a timely and proportionate way, both individually and collectively, to identify patterns of behaviour, emerging risks and potential weaknesses in safeguarding systems. A pattern may indicate that a concern should be reclassified and managed as an allegation. Patterns may also indicate the need for wider action, such as changes to supervision, training, safer working practice, policies or the Federation's safeguarding culture.

Low-level concern records will be managed in accordance with the Federation's records retention schedule, data protection requirements and applicable safeguarding guidance. The Federation will not automatically transfer every low-level concern to an individual's personnel file. Where concerns become a formal safeguarding allegation or are otherwise relevant to employment decisions, records will be managed in accordance with the relevant allegations, disciplinary and HR procedures.

10. Monitoring and review

As part of the annual review, the Executive Headteacher and DSL will consider the number and nature of low-level concerns, whether there are patterns involving individuals, teams, locations, activities or types of behaviour, whether staff feel confident reporting concerns, and whether further training or changes to practice are required. The governing body will receive appropriate assurance about the operation and effectiveness of this policy while maintaining confidentiality.

The policy will also be reviewed following any significant safeguarding incident, change in statutory guidance, LADO advice, serious concern about staff conduct, or identified weakness in the Federation's safeguarding culture.

Appendices

A. Low-level Concern Reporting Form

Statement of intent

Staff at The Federation of St Martin's and Seabrook C.E.P Schools understand the importance of acknowledging, recording and reporting **all** safeguarding concerns, regardless of their perceived severity. We understand that, while a concern may be low-level, that concern can escalate over time to become much more serious.

Our school prides itself on creating a safe and prosperous environment for pupils, and our staff are expected to adhere to high standards of behaviour when it comes to professional conduct regarding pupils. The school has clear professional boundaries which all staff are made aware of and will adhere to. We are committed to ensuring that any safeguarding concerns are dealt with as soon as they arise and before they have had a chance to become more severe, to minimise the risk of harm posed to our pupils and other children.

1. Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- DfE (2022) 'Keeping children safe in education 2024'
- DfE (2018) 'Working Together to Safeguard Children'

This policy operates in conjunction with the following school policies:

- Child Protection Policy
- Staff Code of Conduct
- Behaviour Policy
- Allegations of Abuse Against Staff Policy
- Whistleblowing Policy
- GDPR Policy

2. Definitions

For the purposes of this policy, 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 Federation may have acted in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work where relevant, but does not meet the harm threshold and is not otherwise serious enough to consider a referral to the LADO.

Low-level concerns refer to behaviour on the part of a staff member towards pupils that is considered inappropriate in line with statutory safeguarding advice, the Staff Code of Conduct, and the ['Appropriate and inappropriate behaviour'](#) section 4 of this policy.

The harm threshold is met 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 in a way that indicates they may not be suitable to work with children, including behaviour that has happened outside of school.

While low-level concerns are, by their nature, less serious than concerns which meet the harm threshold, the school understands that many serious safeguarding concerns often begin with low-level concerns, e.g. being overly friendly with children. The school will ensure that all staff are aware of the importance of recognising concerns before they have an opportunity to escalate from low-level to serious.

3. Roles and responsibilities

The governing board is responsible for:

- Ensuring that the school complies with its duties under child protection and safeguarding legislation.
- Ensuring that policies, procedures, and training opportunities with regard to reporting safeguarding concerns are compliant and effective.
- Guaranteeing that there is an effective Staff Code of Conduct that outlines behavioural expectations.
- Ensuring that a suitably trained DSL has been appointed, alongside deputy DSLs where appropriate.
- Ensuring that there are robust reporting arrangements, including inter-agency collaboration.
- Ensuring that there are appropriate procedures in place to handle allegations and low-level concerns reported against members of staff.

The Executive Headteacher is responsible for:

- Being a point of contact for all staff when they have safeguarding concerns, whether serious or low-level.
- Assessing whether safeguarding concerns about staff members meet the threshold for being termed an allegation, or whether they are low-level concerns.
- Implementing this policy, and all related policies, throughout the school, and ensuring that staff adhere to it at all times.
- Safeguarding pupils' wellbeing and maintaining public trust in the teaching profession.
- Ensuring that all staff have undertaken safeguarding training.
- Ensuring that all staff have an ongoing awareness of low-level concerns and reporting procedures.

The DSL is responsible for:

- Being a point of contact for all staff when they have safeguarding concerns, whether serious or low-level.
- Assessing whether safeguarding concerns about staff members meet the

threshold for being termed an allegation, or whether they are low-level concerns.

- Following all procedures outlined in this policy for acting upon low-level concerns.

- Liaising with the Executive Headteacher, staff members, the governing board and all relevant agencies to act upon concerns, where necessary.
- Keeping detailed, accurate and secure records of all low-level concerns and any actions taken.

Staff are responsible for:

- Adhering to all the relevant policies and procedures, including acting within the Staff Code of Conduct at all times.
- Interacting with pupils in a way that is respectful and appropriate for their level of authority and has due regard to the power imbalance between pupils and staff members.
- Understanding the importance of reporting low-level safeguarding concerns.
- Reporting any and all safeguarding concerns they may have about pupils immediately.
- Reporting any and all safeguarding concerns they may have about the behaviour of a member of staff immediately.

4. Prevention amongst staff Appropriate

and inappropriate behaviour

The school will ensure that all staff members are aware of the standards of appropriate behaviour expected towards pupils.

Staff will ensure that they pay due regard to the fact that:

- They are in a unique position of trust, care, responsibility, authority, and influence in relation to pupils.
- There is a significant power imbalance in the pupil-staff dynamic.
- There are more stringent expectations on their behaviour with regard to pupils due to their position as a public professional.

Staff will remain aware of the fact that all pupils under the age of 18, regardless of the phase and year group they are at within the school, are children by law – resultantly, staff will ensure that they do not assume maturity on behalf of a pupil and do not engage with pupils as they would with their own peers. Staff will be aware that where there is any doubt regarding whether the behaviour of another adult is appropriate, this should be reported to the DSL, Executive Headteacher or other nominated person immediately.

Inappropriate behaviour can exist on a wide spectrum, from inadvertent or thoughtless behaviour to behaviour which is ultimately intended to enable abuse. Examples of inappropriate behaviour that would constitute a low-level concern that should be reported to the DSL include, but are not limited to:

- Being overly friendly with children – this could include, but is not limited to, communicating with a child through personal social media or allowing

inappropriate conversations or enquiries to occur with pupils, e.g. conversations that are about a staff member's personal life or are of a sexual nature.

- Having favourites – this could include, but is not limited to, calling pupils by pet names or terms of endearment or buying pupils gifts.

- Taking photographs of children on their personal mobile phones or devices.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- Humiliating pupils.

Staff will be aware that some of the above low-level concerns may meet the harms threshold depending on certain factors, e.g. the age or needs of the child or the content of exchanged messages, and that some of the above incidents may not be concerns in context, e.g. a pre-approved, one-to-one meeting with a child behind a closed door between the child and a school counsellor who has received all appropriate safety checks.

Staff will also be made aware that behaviour which raises concerns may not be intentionally inappropriate, and that this does not negate the need to report the behaviour. Staff members who engage in low-level inappropriate behaviour in relation to pupils inadvertently will be made aware and supported to correct this behaviour in line with the Staff Code of Conduct. The Executive Headteacher will also evaluate whether additional training would be beneficial for any staff members exhibiting concerning behaviour, or the staff cohort as a whole where low-level concerning behaviour is seen more widely.

School culture

The school understands that spotting the early signs of harmful behaviour towards children can be difficult, and that many will be hesitant to report concerns they have about their colleagues' behaviour, particularly the behaviour of their superiors. Staff are encouraged to maintain an attitude that recognises that abuse can happen anywhere, in any setting, and that anyone can be a perpetrator regardless of their age, sex, level of authority, personality, etc.

The school will ensure that all staff members have received training as part of their induction that outlines appropriate behaviour towards pupils for staff members. All staff will read, understand, and adhere to the Appropriate and inappropriate behaviour subsection of this policy, as well as the Staff Code of Conduct content in relation to maintaining appropriate relationships with pupils.

Staff will address any questions they have regarding safeguarding to the DSL. The school will work to foster an environment where personal and professional boundaries are clearly set and respected for all individuals in the school community, e.g. pupils are not treated as friends and an appropriate professional distance is maintained by staff.

The school will ensure that all staff are sufficiently trained surrounding the reporting of safeguarding concerns as part of their induction, and that refresher training is conducted as necessary. The school will ensure that all staff understand how to recognise and report safeguarding concerns. Staff will be trained to identify inappropriate, concerning, or problematic behaviour towards pupils that may indicate a safeguarding concern, and how to identify signs of abuse or harm in pupils.

Evaluating school culture following concerns

The school will ensure that appropriate consideration is given to the school's culture and whether or not it has enabled the inappropriate behaviour to occur. The Executive Headteacher will review whether any changes need to be made to relevant policies or training programmes in

light of any evaluations of the school's culture, in order to achieve an open and transparent culture that deals with all concerns promptly and appropriately.

5. Reporting concerns

The school will promote a culture in which safeguarding pupils is the uppermost priority, beyond any perceived professional loyalties to colleagues, ensuring that staff are actively encouraged to report concerns, regardless of their relationship with the staff member.

Staff will report all safeguarding concerns they have to the Executive Headteacher, DSL, or Deputy DSL immediately in line with the procedures laid out in the Child Protection and Safeguarding Policy. Staff members will report concerns without undue delay. Concerns must be shared without delay. Staff must not wait until a concern appears serious or until they have gathered further evidence. Staff members will be aware that concerns are still worth reporting even if they do not seem serious.

Staff members will report their concerns to the Executive Headteacher or Head of School verbally, or by submitting a [Low-level Concern Reporting Form](#). When submitting concerns, staff will take care to ensure that they observe the Confidentiality Policy and the Allegations of Abuse Against Staff Policy and protect the identity of all individuals to which the concern pertains as far as possible.

Staff members may ask for their identity to be kept confidential where possible. The Federation cannot guarantee anonymity where disclosure is necessary to safeguard children, to ensure a fair process, or to comply with legal or professional requirements. Staff who raise genuine concerns in good faith will be supported and protected from victimisation in accordance with the Whistleblowing Policy.

E.g. where it is necessary for a fair disciplinary hearing. In line with the Whistleblowing Policy, staff will be protected from potential repercussions caused by reporting a genuine concern.

Where a low-level concern relates to the Executive Headteacher, it should be reported to the chair of governors.

Where a low-level concern relates to a person employed by a supply agency or a contractor to work in the school, staff will also be required to report this to the Executive Headteacher, who will, in turn, inform the employer of the subject of the concern.

All concerns reported to the Executive Headteacher will be documented in line with the Records Policy.

6. Self-reporting

On occasion, a member of staff may feel as though they have acted in a way that:

- Could be misinterpreted.
- Could appear compromising to others.

- They realise, upon reflection, falls below the standards set out in the Staff Code of Conduct in relation to appropriate relationships.

The school will ensure that an environment is maintained that encourages staff members to self-report if they feel as though they have acted inappropriately or in a way that could be construed as inappropriate upon reflection. The Executive Headteacher and DSL will, to the best of the

abilities, maintain a culture of approachability for staff members, and will be understanding and sensitive towards those who self-report.

Staff members who self-report will not be treated more favorably during any resulting investigations than staff members who were reported by someone else; however, their self-awareness and intentions will be taken into consideration.

7. Evaluating concerns

Where the Executive Headteacher is notified of a safeguarding concern, they will use their professional judgement to determine if the concern is low-level or if it must be immediately escalated, e.g. where a child is at immediate risk of harm. When deciding if a concern is low-level, the Executive Headteacher will discuss the concern with the DSL and the Head of School and will seek advice from the LADO where there is any doubt about whether the concern in fact meets the harm threshold. When seeking external advice, the Executive Headteacher will ensure they adhere to the Data Protection Policy, and the information sharing principles outlined in the Child Protection and Safeguarding Policy, at all times.

To evaluate a concern, the Executive Headteacher and DSL will:

- Speak to the individual who raised the concern to determine the facts and obtain any relevant additional information.
- Review the information and determine whether the behaviour displayed by the individual about whom the concern was reported is consistent with the Staff Code of Conduct and the law.
- Determine whether the concern, when considered alongside any other low-level concerns previously made about the same individual, should be reclassified as an allegation and dealt with alongside the Allegations of Abuse Against Staff Policy.
- Consult with, and seek advice from, external agencies when in doubt over the course of action to follow.
- ☐ Where appropriate and safe to do so, provide the individual with an opportunity to respond as part of the proportionate management of the concern. This will not take place where doing so could prejudice a safeguarding response, an investigation, or advice from external agencies.
- Ensure that accurate and detailed records are kept of all internal and external conversations regarding evaluating the concern, and any actions or decisions taken.

8. Acting on concerns

Where the concern is unfounded

If it is discovered upon evaluation that the low-level concern refers to behaviour that was not considered to be in breach of the Staff Code of Conduct and the law, the Executive Headteacher will speak to the individual about whom the concern was made

to discuss their behaviour, why and how the behaviour may have been misconstrued, and what they can do to avoid such misunderstandings in the future. The Headteacher will also speak to the individual who shared the concern, outlining why the behaviour reported is consistent with school standards and the law. The Executive Headteacher will take care to ensure that conversations with individuals who reported concerns that transpired to be unfounded do not deter that individual from reporting concerns in the future.

The Executive Headteacher will discuss the concern with the DSL (and if they have been involved, the LADO) to discern whether the behaviour, and the reporting of this behaviour, is indicative of ambiguity in the school's policies or procedures, or the training it offers to staff. Where such ambiguity is found, the DSL and Executive Headteacher will work together to resolve this with input from other staff members, as necessary.

Where the concern is low-level

Where the Executive Headteacher determines that a concern is low-level, the school will respond to this in a sensitive and proportionate manner. The following procedure will be followed:

- The DSL holds a meeting with the individual about whom the concern was reported, during which they will:
 - Talk to the individual in a non-accusatory and sympathetic manner.
 - Inform them of how their behaviour was perceived by the individual who reported the concern (without naming them, where possible).
 - Clearly state what about their behaviour was inappropriate and problematic.
 - Discuss the reasons for the behaviour with the individual.
 - Inform the individual clearly what about their behaviour needs to change.
 - Discuss any support that the individual may require in order to achieve the proper standards of behaviour.
 - Allow the individual the opportunity to respond to the concern in their own words.
- The DSL asks the individual to re-read the Staff Code of Conduct, depending on the nature of the concern.
- The DSL and the Executive Headteacher will consider whether the individual should receive guidance, supervision or any further training.
- Where considered appropriate in the circumstances, the Executive Headteacher will develop an action plan, with input from the individual, that outlines ongoing and transparent monitoring of the individual's behaviour and any other support measures implemented to ensure the staff member's behaviour improves.
- Where it is necessary to undergo an investigation into the behaviour, this will be done discreetly, and information will only be disclosed to individuals on a need-to-know basis.
- Where any pupil or other individual has been made to feel uncomfortable by the individual's behaviour, they will be offered pastoral support, where appropriate.

The Executive Headteacher will ensure that all details of the low-level concern, including any resultant actions taken, are recorded and securely stored in line with the Records Management Policy and the Data Protection Policy. The Headteacher will ensure that these records are kept organised and up-to-date, and that it is easy to refer

back to them if any other concerns are reported about the same individual.

The specific approach to handling low-level concerns will be adapted on a case-by-case basis. It is unlikely that a low-level concern will result in disciplinary procedures; however, individuals may be given warnings in line with the Disciplinary Policy and Procedure where behaviour does not improve once it is brought to their attention. Where behaviour does not improve over

a longer period of time, the concerns will be escalated and dealt with in line with the Allegations of Abuse Against Staff Policy.

Where the concern is serious

The Executive Headteacher may decide upon evaluation that a concern is more serious than the reporter originally thought, e.g. when viewed in conjunction with other evidence or other concerns made about the same individual. Where this decision is made, the concern will be escalated, and dealt with as an allegation. The Executive Headteacher will then follow the procedures laid out in the Allegations of Abuse Against Staff Policy.

9. Record keeping

The school will retain all records of low-level concerns, including those that were found to be unfounded. The Executive Headteacher will ensure that all records include the most accurate and up-to-date information and will store them in the electronic low-level concerns file. The Executive Headteacher will ensure that all low-level concerns are stored together, in an organised and consistent manner, to ensure they can be easily reviewed and analysed where necessary.

Records will include:

- A clear and comprehensive summary of the concern.
- The context in which the concern arose.
- Details of how the concern was followed up and resolved.
- A note of any action taken, decisions reached, and the outcome.
- The name of the individual sharing concerns – if the individual wishes to remain anonymous, this will be respected as far as reasonably possible.

The DSL will periodically review the recent low-level concerns made to ensure that they are being appropriately dealt with and to check for any concerning behaviour patterns amongst the staff cohort as a whole. The DSL will keep records of these reviews.

Where any concerning patterns of behaviour have been identified with regard to a member of staff, the DSL will consult with the Executive Headteacher to decide on a course of action. Where a pattern of behaviour has become so concerning that it meets the harms threshold, this will be referred to the LADO as soon as practicable. It should be considered whether there are any wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies, including this one, could be revised, or extra training provided to staff to decrease the risk of it happening again.

Records of low-level concerns will not be kept in the personnel file of the individuals to whom the concerns pertain, unless there have been multiple low-level concerns made about the same individual. Where a concern is thought to be serious and is processed as an allegation, records of this will be kept in staff personnel files. Where multiple low-

level concerns have been made about the same individual, these will be kept together, and in chronological order.

Where an allegation is made about an individual who has previously been subject to such allegations, or where a low-level concern is reclassified as a serious concern after meeting the harm threshold, all records of low-level concerns about that individual will be moved to the staff personnel file and kept alongside records of the allegation.

There is no single statutory retention period specified in KCSIE for low-level concern records. The Federation will retain records in accordance with its records retention schedule, data protection requirements and safeguarding needs. Records will be securely stored and disposed of when no longer required.

Low-level concerns will not normally be included in employment references unless the concern has become a substantiated safeguarding allegation or is otherwise relevant to information that the Federation is lawfully required or entitled to provide. Any reference will be accurate, fair and consistent with employment law, data protection requirements and the Federation's HR procedures.

e.g. misconduct or poor performance. Low-level safeguarding concerns will not be included in a reference, unless they have comprised a pattern of behaviour that has met the harms threshold.

10. Monitoring and review

This policy will be reviewed annually by the Executive Headteacher and DSL, and in response to any new safeguarding requirements or concerns surrounding the wider cultural issues in the school.

Appendix A - Low-level Concern Reporting Form

KCSIE 2026 alignment note: This policy should be read alongside the Federation's Child Protection and Safeguarding Policy, Staff Code of Conduct, Allegations of Abuse Against Staff Policy, Whistleblowing Policy, Online Safety/Acceptable Use Policy and Data Protection/Records Management arrangements. All staff must follow the current KCSIE requirements and the Federation's local safeguarding procedures.

Please provide the information directly to the Executive Headteacher, DSL or deputy DSL and avoid discussing the concern more widely. Information will be handled confidentially and shared only where necessary for safeguarding, investigation or other lawful purposes.

Your details	
Name (optional)	
Role	
Date and time of completing this form	
Details of individual whom the concern is about	
Name	
Role	
Relationship to the individual reporting the concern, e.g. manager, colleague	
Details of concern	
Please include as much detail as possible. Think about the following: What behaviour and/or incident are you reporting? What exactly happened? Why does the behaviour and/or incident worry you? Why do you believe the behaviour and/or incident is not consistent with our Staff Code of Conduct?	
Details of any children or young people involved	
Name(s)	
Do you believe there is a risk of harm to the above children or young people, either now or in the future, as a result of the individual's behaviour? Explain your answer.	

Next steps		
What would you like to see happen in response to your concern?		
Are you willing to meet with the Executive Headteacher and DSL to discuss your concern? Please circle as appropriate.	Yes	No
Please state any other information that you believe is relevant to the processing of this concern.		
Signature		
For use by safeguarding team upon receipt of concern		
Date and time concern received		
Signature of DSL or deputy DSL		
Actions to be taken (e.g. no action, investigation, reclassification as allegation meeting the harms threshold.)		