



SOUTH CAMBERLEY PRIMARY AND NURSERY SCHOOL

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Low-Level Concern Policy 2025 -2026

Date of Approval	Date of Review
November 2025	November 2026
Status and Review Cycle	Statutory Annual



South Camberley Primary and Nursery School

Low-Level Concern Policy

“It could happen here”

Introduction

Safeguarding is everyone’s business. At South Camberley Primary and Nursery School, we recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. This includes ensuring that adults who work with children do so in a way that is in accordance with the ethos and policies set out by the school, including the Staff Behaviour (Code of Conduct) Policy. This policy sets out the detail and processes for staff regarding low-level concerns they may have.

It may be possible that a member of staff acts in a way that does not cause risk to children or meet the ‘harms threshold’ but is inappropriate. A member of staff who has a concern about another member of staff should inform the Headship team (Head of Sites/Executive Head Teacher) about their concern using a Low-Level Record of Concern Form (see Appendix).

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

Annual safeguarding training delivered at the beginning of each academic year always includes a section on low level concern and staff are required to read this policy as part of the training.

Keeping Children Safe in Education September 2025

The following is taken from Keeping Children Safe in Education September 2025:

428. As part of their whole school or college approach to safeguarding, schools and colleges should ensure that they 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.

429: Creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. 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.*

What is a low-level concern?

430. 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 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*
- *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.*

431. Such behaviour may range from inadvertent or unintentional behaviour, through to behaviour that appears inappropriate but may be explained by context, and behaviour which, if unaddressed, could lead towards abuse.

432. Low-level concerns can arise in several ways: suspicion; complaint; disclosure from a child, parent, or adult; concerns raised externally; or from vetting checks.

433. It is crucial that all low-level concerns are shared responsibly, recorded clearly, and handled appropriately. Effective handling protects children and also protects staff from potential false allegations or misunderstandings.

441. All low-level concerns are recorded in writing. Records include details of the concern, the context, and the actions taken. Names should be recorded unless the person raising the concern wishes to remain anonymous.

442. Records are held securely in line with the Data Protection Act 2018 and UK GDPR.

443. Records are reviewed to identify any patterns of concerning behaviour. Identified patterns may require further action, training, or policy review.

444. Record of low level concerns are retained at least until the individual leaves employment. Retention may be extended where necessary for safeguarding or legal purposes.

445. Low-level concerns will not be included in references unless they meet the harm threshold or amount to misconduct or poor performance normally referenced.

Allegation: The 'Harms Threshold.'

An 'allegation of harm' is where it is alleged that a person who works with children has or may have behaved in a way that meets the harm threshold as specified below:

- 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 he or she 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.

This includes behaviour that may have happened outside of school, that might make an individual unsuitable to work with children, this is known as transferable risk.

Low-Level Concern

Any concern – no matter how small, even if no more than a ‘nagging doubt’ – that an adult may have acted in a manner which:

- is not consistent with an organisation’s 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 that adult’s suitability to work with children.

Appropriate Conduct

Behaviour which is entirely consistent with the organisation’s Code of Conduct, and the law.

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately. We 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.
- Empowering staff to self-refer where they are aware their behaviour may be viewed as inappropriate or they have accidentally hurt a child. This should include online or offline activity and events in and out of school.
- 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.

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

LLC (Low Level Concern) forms and follow-up information will be stored securely within the schools safeguarding systems, with access only by the senior leadership team. 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 Headship team (head of site/ Executive Headteacher).

LLC forms will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Low-level concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

Whenever staff leave South Camberley Primary and Nursery School, any record of low-level concerns which are stored about them will be reviewed as to whether or not that information needs to be kept. 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 or 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.

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

Read this document for further information about Low-Level Concerns, which is referenced to in KCSIE 2025

<https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/developing-and-implementing-a-low-level-concerns-policy.pdf>

[SCPNS Whistleblowing Policy](#)

[SCPNS Safeguarding Policy](#)

Low-Level Concern Form

This form will be available to staff

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 South Camberley School's Staff Behaviour (Code of Conduct) Policy, 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 that adult's suitability to work with children.

Where possible please speak with the headship team (Heads of Site/Executive Head Teacher) as soon as possible. It is also helpful to document your concerns, which can be done using this form and then passed to a member of the headship team or Executive Head who may seek advice from the LADO.

If the concern is about the Executive Head Teacher, please pass it onto the Chair of the Local Advisory Committee.

Remember, a low-level concern is different to an allegation.

Low-Level Concern Form	
Name of adult writing the concern:	
Name of adult whom this concern is about:	
Date Written:	
Signature:	
Please write your concerns below (continue overleaf) You should provide a concise record – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s) (and please use a separate sheet if necessary). Consider any contextual information that may be appropriate to know.	

