



Low-Level Concerns Policy

Version	4.0
Approved By	Trustee Board
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REVIEW HISTORY

VERSION NO.	DATE OF CHANGE	CHANGE SUMMARY	REF.
0.1	29.9.21	Draft	
0.2	12.10.21	Draft – updated flowchart	
1.0	25.08.22	Updated flowchart	
1.0	30.08.22	Updated new brand	
2.0	18.07.23	Minor changes to dates and formatting Paragraph added	6
3.0	08.11.24	Updated the policy in line with KCSIE 2024	4,5,8,9
4.0	26.02.26	Updated the policy in line with KCSIE 2025	4,5,8,9
		Updated Statement of Intent	4
		Updated escalation details with Director of People & Culture	4
		Added a paragraph regarding protecting staff from malicious and vexatious reports	6

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Statement of intent

At OAK Multi Academy Trust, we take safeguarding very seriously. 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 Employee Code of Conduct. This policy sets out the detail and processes for staff regarding low-level concerns they may have.

Staff are also encouraged to self-report. This includes situations where a member of staff feels their own conduct may have fallen below the standards of the Code of Conduct, or where they believe an action or oversight could be misinterpreted by others. Self-reporting is viewed as a sign of professional integrity and a commitment to a transparent safeguarding culture.

Summary

It may be possible that a member of staff acts in a way that does not cause risk to children but is however inappropriate. A member of staff who has a concern about another member of staff should inform the Headteacher about their concern. The Headteacher will decide whether the concern has sufficient merit to record using a Low-level Record of Concern Form. They will consider all the facts regarding the concern including where the concern originated. If the Headteacher cannot be contacted or the concern is about the Headteacher, the Trust Central Team should be contacted in the following order, until a person is reached: CEO – Andrew Wilson, Director of Education – Craig Brown and Director of People and Culture – Irena Stevens.

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 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 considered 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 can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

432 Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

433 It is crucial that all low-level concerns are shared responsibly with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings.

The Trust is committed to protecting staff from malicious or vexatious reports. While all concerns will be taken seriously and investigated to ensure child safety, where evidence suggests a report was made in bad faith to deliberately cause distress or reputational damage,

this may be treated as a disciplinary matter or subject to our Unacceptable Conduct and Parental Dispute policy.

Clarity around Allegation vs Low-level concern vs Appropriate conduct

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;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child or children in a way that indicates they may pose a risk or harm to children.

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 the Employee 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 Employee Code of Conduct and the law.

Where concerns are raised directly or indirectly concerning a member of staff but the harm threshold hasn’t been met and the Low-level Concerns policy does not strictly apply, the Headteacher or case manager will conduct a risk assessment of the situation and act accordingly. Mitigations regarding the concerns may be agreed with the member of staff and actioned appropriately.

Storing and use of low-level concerns and follow-up information

Low-level concern forms and follow-up information will be stored securely within the school’s secure personnel files and if necessary, safeguarding systems. All related paperwork will be stored within a separate sealed envelope in the personnel file (or alternative secure storage if appropriate). Access is only for the Headteacher and senior staff where delegated if necessary. This will be stored in accordance with the school’s GDPR and data protection policies at least until the relevant member of staff ceases employment with the Trust.

The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Headteacher or those aware in the senior leadership team.

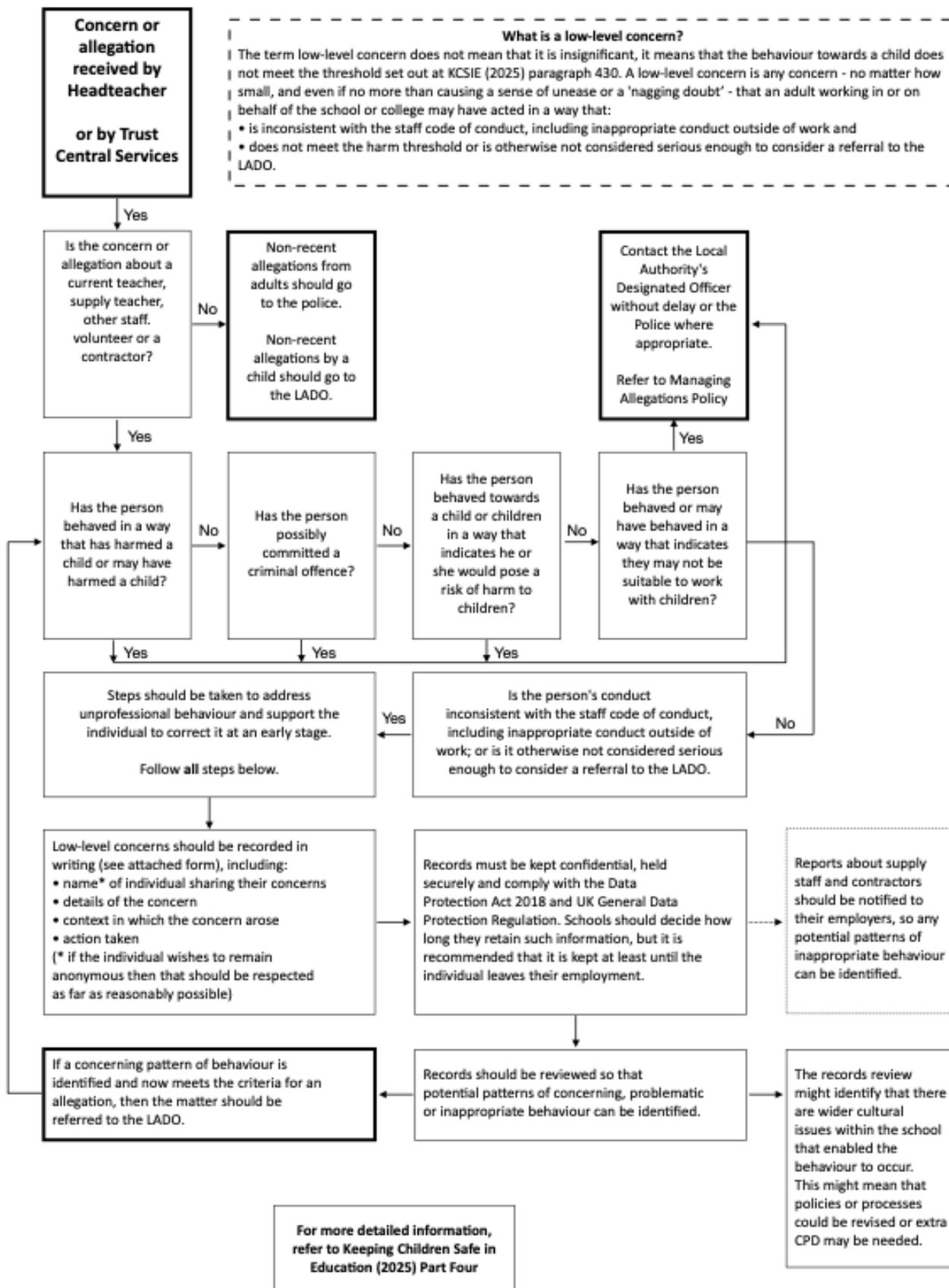
Low-level concerns will not be referred to in references, including those in settlement agreements, unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

Whenever staff leave the Trust, 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:

- 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
- if, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted accordingly.
- If low-level concerns had not been escalated and no concerns around patterns

Process to follow when a low-level concern is raised



Low-level Concern Form

Keeping Children Safe in Education 2025 – Low-level Concerns

This document should be used when low-level concerns as defined in Section 2 of Part 4 of Keeping Children Safe in Education 2025 are reported. This document does not to replace suspension/formal disciplinary investigations in the event that concerns are either categorised as more serious than low-level or when formal disciplinary procedures are required in relation to the low-level concern.

1. Name of individual raising the concern <i>Leave blank if concern was raised anonymously or the individual wishes to remain anonymous</i>	
2. Date the concern was raised	
3. Name and role of individual about whom concern has been raised	
4. Details of the concern(s) reported (give description and context) <i>A 'low-level' concern is any 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 the staff code of conduct but does not meet the allegations threshold set out in Section 1 of Part 4.</i>	

<p>5. Details of steps have been taken to investigate this concern</p> <p><i>Steps should include speaking to the individual who raised the concern, the individual about whom the concern is raised and any witnesses. You will need to review the Employee Code of Conduct and Safeguarding Policies to determine if there has been a breach.</i></p>	
<p>6. Set out the Individual’s response to the concern</p>	
<p>7. Is this concern ‘low-level’ or should it be treated as an allegation against staff and managed in accordance with Section 1 of Part 4?</p> <p><i>To reach this decision, consider the information set out in 5 and 6 above. If you are unsure, seek advice from HR and/or safeguarding advisors and/or discuss the matter with your LADO. Set out your reasons for reaching your conclusion, including the advice provided by your advisors and any discussions with your LADO.</i></p>	
<p>8. Have ‘low-level’ or other concerns been raised about this individual previously?</p>	<p>Yes [] No []</p>

<p><i>If so, please provides dates, brief details and relevant file/document reference for the concern(s). Also consider whether previous concern(s) raised coupled with this new concern meet the threshold set out in Section 1 of Part 4.</i></p> <p><i>Also consider that malicious accusations can be made.</i></p>	
<p>Details of further action required</p> <p><i>Action could range from no action or a conversation to discuss the concern, to being clear why the behaviour is concerning and formal disciplinary action.</i></p>	

<p>Completed by:</p>	<p>Name</p>	
	<p>Position</p>	
<p>Date:</p>		
<p>Signature:</p>		