



Redesdale Primary School

Low Level Concerns Policy

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Policy Owner: Headteacher / Designated Safeguarding Lead



REDESDALE PRIMARY SCHOOL

Low Level Concerns Policy

1. Introduction

As part of our whole school approach to safeguarding, we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is crucial. When implemented correctly, this should encourage an open and transparent culture; enabling the school to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of our school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of our school.

The school recognises that an effective safeguarding culture is characterised by openness, transparency, accountability, professional curiosity, professional challenge and a willingness to identify and respond to early indicators of risk. All adults working in or on behalf of the school have a responsibility to share concerns about the behaviour of another adult, no matter how small those concerns may appear.

2. Who does the policy apply to?

This policy applies to all staff and other individuals who work or volunteer in school. 'Staff' should be interpreted very widely to mean anyone associated with our school, i.e., whether working in or on behalf of the school, engaged as a paid employee (including supply teachers) worker or contractor or unpaid member of staff or volunteer. It also includes anyone who is part of the Governing Body.

3. Statement of Intent

Redesdale Primary School understands 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.

4. 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 (2026) Keeping Children Safe in Education (September 2026)
- DfE (2026) Working Together to Safeguard Children (2026)
- Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings (Safer Recruitment Consortium)

5. Definition of a low-level concern

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 may have acted in a way which:

- is inconsistent with the Staff Handbook (Code of Conduct), including inappropriate conduct outside of work; and
- does not meet the harms threshold or is otherwise not serious enough to consider a referral to the Local Authority Designated Officer (LADO).

Low-level concerns are differentiated from concerns that can cause harm. The harms threshold is the point at which a concern is no longer low-level and constitutes a potential risk of harm to a child.

The harms threshold is met where there is an allegation that 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 or children in a way that indicates he or she 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, including behaviour that has happened outside of school.

Low-level concerns may arise from a number of sources including observations by staff, disclosures made by children, complaints, reports from parents or carers, information received from external agencies, self-reporting by staff, whistleblowing, or information obtained through recruitment and vetting processes.

While low-level concerns are, by their nature, less serious than concerns which meet the harms threshold, the school understands that many serious safeguarding concerns, e.g. child sexual abuse, 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 escalate from low-level to serious, wherever possible.

6. Roles and Responsibilities

The Governing Body 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 Handbook (Code of Conduct) that outlines behavioural expectations.
- Ensuring that a suitably trained Designated Safeguarding Lead has been appointed, alongside Deputy Designated Safeguarding Leads 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 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.

In our school the Headteacher is the Designated Safeguarding Lead (DSL) and the Deputy Headteacher and SENDCO are the Deputy Designated Safeguarding Leads (DDSLs).

The Designated Safeguarding Lead and/or Deputy Designated Safeguarding Leads are 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 **ALL** staff 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 Headteacher, staff members, the Governing Body 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 Handbook (Code of Conduct) at all times.
- Interacting with pupils in a manner that is respectful, appropriate and professional and mindful of the power imbalance that exists 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, supply staff, contractors, volunteers or governors, immediately.

7. Prevention amongst staff members in school

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 Designated Safeguarding Lead and/or Deputy Designated Safeguarding Leads 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 Designated Safeguarding Lead and/or Deputy Designated Safeguarding Leads include:

- **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, contrary to school policy.**
- **Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.**
- **Humiliating children.**
- **Communicating with pupils through personal social media accounts.**
- **Sharing personal contact details with pupils without a legitimate professional reason.**
- **Excessive or unnecessary online communication with pupils or former pupils.**
- **Creating private online groups or communication channels involving pupils.**
- **Using personal messaging applications to communicate with pupils.**
- **Inappropriate use of school technology or generative artificial intelligence systems involving pupil information.**

- **Failing to follow school policies relating to online safety, filtering, monitoring and professional use of technology.**
- **Behaviour online which may call into question a person's suitability to work with children.**

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 an individual 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 Handbook (Code of Conduct). The 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. **(See Appendix 1 – Spectrum of Behaviour, Clarity around Allegation vs Low Level Concern vs Appropriate Conduct)**

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. All 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 this current **Section 7: Prevention amongst staff members in School – Appropriate and Inappropriate behaviour**, as well as the Staff Handbook (Code of Conduct.)

Staff will address any questions they have regarding safeguarding to the Designated Safeguarding Lead (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 concerning or problematic behaviour

towards pupils that may indicate a safeguarding concern, and how to identify signs of abuse or harm in pupils.

Professional Curiosity and Professional Challenge

All staff are expected to demonstrate professional curiosity and professional challenge as part of their safeguarding responsibilities.

Staff should not assume that behaviour is acceptable simply because it has not previously been challenged, because the person concerned is experienced or well-respected, or because no harm has been identified.

Where a member of staff experiences a sense of unease or a nagging doubt regarding the conduct of an adult working in or on behalf of the school, they should share that concern with the DSL without delay.

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 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.

8. 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.

Low-level concerns may arise through:

- observations by staff;
- disclosures made by children;
- reports from parents or carers;
- complaints;
- whistleblowing disclosures;
- self-reporting by staff members;
- information obtained through recruitment or vetting checks;
- information provided by external agencies or members of the public.

Staff will report all safeguarding concerns they have to the Headteacher (DSL) immediately in line with the procedures as laid out in this policy. Concerns relating directly to the safety or welfare of a child must continue to be reported in accordance with the school's Safeguarding and Child Protection Policy. Staff members will report concerns without undue delay. Where the report concerns a specific incident, staff members will report their concerns **as soon as**

possible after the incident. 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 Headteacher (DSL) or Deputy Headteacher/SENDSCO (DDSLs) verbally, or by submitting a **Low-level Concern Reporting Form (See Appendix 2)**. When submitting concerns, staff will take care to ensure that they observe the **'Safeguarding concerns or allegations made about staff, including supply teachers, volunteers and contractors, Procedures and Guidance'**, and protect the identity of all individuals to which the concern pertains as far as possible.

Staff members may request anonymity when reporting a concern, and the school will endeavour to respect this as far as possible. The school will not, however, promise anonymity to staff members who report concerns in case the situation arises where they must be named, 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 a volunteer in school, it should be reported to the Headteacher (DSL) or Deputy Headteacher/SENDSCO (DDSLs).

Where a low-level concern relates to the Headteacher, it should be reported to the Chair of Governors.

Where a low-level concern relates to a Governor, 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 Headteacher, who will, in turn, inform the employer of the subject of the concern.

Self-Reporting

The school recognises that self-reporting can be an important feature of a strong safeguarding culture. Staff are encouraged to report incidents that may have been misinterpreted, could appear unprofessional, or may have breached professional boundaries, even where no complaint has been made.

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 Handbook (Code of Conduct).

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 Headteacher (DSL) and/or Deputy Headteacher/SENDSCO (DDSLs) will, to the best of their 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 favourably during any resulting investigations than staff members who were reported by someone else; however, their self-awareness and intentions will be taken into consideration.

Recording concerns

A summary of the low-level concern should be written down, signed, timed, dated and shared by the person bringing the information forward. **(See Appendix 2 – Low Level Reporting Form)**

Where concerns are reported verbally to the Headteacher a record of the conversation will be made by the Headteacher which will be signed, timed, and dated.

9. Responding to concerns

Evaluating Concerns

Where the 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 Headteacher (DSL) will discuss the concern with the Deputy Headteacher/SENDSCO (DDSLs) and will seek advice from external agencies where there is any doubt about how seriously to take the concern. When seeking external advice, the 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 Headteacher 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 Handbook (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 'Safeguarding concerns or allegations made

about staff, including supply teachers, volunteers and contractors, Procedures and Guidance’.

- Consult with, and seek advice from, external agencies when in doubt over the course of action to follow.
- Where there is any doubt as to whether a concern meets the harms threshold, consultation will take place with the LADO before a final decision is reached.
- Speak to the individual about whom the concern has been raised to inform them of the concern and to give them an opportunity to respond to it.
- Ensure that accurate and detailed records are kept of all internal and external conversations regarding evaluating the concern, and any actions or decisions taken.

Considering Patterns of Behaviour

A single low-level concern may not meet the harms threshold. However, a series of low-level concerns, when considered together, may indicate a pattern of concerning, problematic or inappropriate behaviour. Where a pattern of behaviour is identified, the Headteacher (DSL) will consider whether the concerns collectively meet the harms threshold and whether referral to the Local Authority Designated Officer (LADO) is required.

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 Handbook (Code of Conduct) and the law, the 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 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 Headteacher (DSL) will discuss the concern with the Deputy Headteacher/SENDCO (DDSLs) 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 Headteacher (DSL) and Deputy Headteacher/SENDCO (DDSLs) will work together to resolve this with input from other staff members, if necessary.

Where the concern has been determined as low-level

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

- The Headteacher (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 Headteacher (DSL) asks the individual to re-read the Staff Handbook (Code of Conduct).
- The Headteacher (DSL) will consider whether the individual should receive guidance, supervision or any further training.
- The Headteacher (DSL) will develop an action plan, with input from the individual, where necessary.

The school's approach should also be informed by the following guidance '**Developing and implementing a low-level concerns policy**', **Farrer & Co Safeguarding Unit**, which advises,

If it is determined that the behaviour constitutes a low-level concern:

- a) it should also be responded to in a sensitive and proportionate way – on the one hand maintaining confidence that such concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff from any potential false allegations or misunderstandings. Any investigation of low-level concerns should be done discreetly and, on a need-to-know basis;
- b) most low-level concerns by their very nature are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action. Others may be most appropriately dealt with by means of management guidance and/or training;
- c) in many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised. It has long been understood that lasting change in behaviour is least likely to be achieved by an approach experienced as critical or threatening;
- d) any such conversation should include being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that, and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of

the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual, and regularly reviewed with them, may also be appropriate;

- e) some low-level concerns may also raise issues of misconduct or poor performance. The Headteacher (DSL) should also consider whether this is the case – by referring to the organisation's Disciplinary and/or Capability Procedures.
- f) this Low-Level Concerns Policy should apply to any adult working in or on behalf of the school – so that low-level concerns can be self-reported by and/or shared about them. Keeping Children Safe in Education (September 2026) states that where a low-level concern relates to a person employed by a supply agency or a contractor, that concern should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified. How the school responds to a low-level concern may be different depending on the employment status of the individual who is the subject of the concern - i.e. whether they are an employee, or worker to whom the school's disciplinary procedure would apply; or a contractor, Governor or volunteer who may be subject to alternative procedures. The school's response will need to be tailored accordingly.
- g) some concerns may trigger the school's Disciplinary, Grievance or Whistleblowing Procedures, which should be followed where appropriate. The school will exercise their professional judgement and, if in any doubt, they should seek advice from other external agencies including the LADO.

Where the concern is serious

The 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 Headteacher will then follow the procedures laid out in the 'Safeguarding concerns or allegations made about staff, including supply teachers, volunteers and contractors, Procedures and Guidance'. Where there is any doubt whatsoever, the Headteacher will seek advice from the LADO, on a no-name basis if necessary.

10. Record Keeping

Redesdale Primary School will retain all records of low-level concerns, including those that were found to be unfounded. The Headteacher (DSL) will ensure that all records include the most accurate and up-to-date information and 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.

The Headteacher (DSL) will ensure that all details of the low-level concern, including any resultant actions taken, are recorded and securely stored in accordance with the school's data protection and records management procedures.

The Headteacher (DSL) will ensure that these records are kept organised and up-to-date, and that it is easy to refer to them if any other concerns are reported about the same individual.

Records will include:

- A clear and comprehensive summary of the concern.
- 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 Headteacher (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 Headteacher (DSL) will keep records of these reviews.

Where any concerning patterns of behaviour have been identified with regard to a member of staff, the Headteacher (DSL) will 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.

Low-level concerns will be retained securely in a central low-level concerns file maintained by the Headteacher (DSL). Where multiple concerns relate to the same individual, records will be reviewed collectively to identify any emerging patterns of behaviour.

Where a concern is subsequently determined to meet the harms threshold, relevant records will be retained and managed in accordance with the school's procedures for allegations against staff.

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 harms 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 statutory retention period for low-level concerns records.

Low-level concerns records will be retained in accordance with the school's Records Management and Data Retention Schedule, taking account of safeguarding considerations, employment law requirements, potential patterns of behaviour, and advice from the school's Data Protection Officer where appropriate.

Records will be kept secure, confidential and accessible only to those with an appropriate safeguarding responsibility.

The school will only refer to concerns about a staff member in employment references where they have amounted to a substantiated safeguarding allegation, i.e., it has met the harms threshold and has been found to have basis through investigation, or where it is not exclusively

a safeguarding issue and forms part of an issue that would normally be included in a reference, 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.

Reviewing the Low-Level Concerns file

The records will be reviewed periodically, and whenever a new low-level concern is added, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and referred to the LADO if required. A record of these reviews will be retained in line with the Data Protection Act 2018.

The Role of the Governing Body

The Headteacher will provide governors with safeguarding assurance regarding the implementation and effectiveness of the Low-Level Concerns Policy through the annual safeguarding report and any other reporting arrangements determined by the Governing Body.

Governors will not routinely review individual low-level concern records but may review anonymised information and safeguarding processes to assure themselves that concerns are being managed appropriately, consistently and in accordance with statutory guidance.

Monitoring and Review

This policy will be reviewed annually by the Headteacher and Governing Body, and in response to any new safeguarding requirements and concerns.

This policy should be read alongside:

- Keeping Children Safe in Education (DfE 2026)
- Working Together to Safeguard Children (DfE 2026)
- Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings (Safer Recruitment Consortium)
- Child Protection and Safeguarding Policy
- Staff Handbook (Code of Conduct)
- Whistleblowing Policy
- Staff Disciplinary Policy
- Safeguarding Concerns or Allegations Made About Staff, Including Supply Teachers, Volunteers and Contractors Procedures and Guidance
- Online Safety Policy
- Acceptable Use of Technology Policy

Appendix 1 – Spectrum of Behaviour

Clarity around Allegation vs Low Level Concern vs Appropriate Conduct

Allegation:

Any adult linked to our school who 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 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.**

Low Level Concern:

Any concern, no matter how small, including a sense of unease or nagging doubt, that an adult linked to our school may have behaved in a way that:

- **Is inconsistent with the Staff Handbook (Code of Conduct), including inappropriate conduct outside of work; and**
- **Does not meet the harms threshold or is otherwise not considered serious enough to consider a referral to the LADO.**

Appropriate:

- **Behaviour which is entirely consistent with our school's Staff Handbook (Code of Conduct), and the Law.**

Appendix 2 - Low Level Concerns Report Form

REDESDALE PRIMARY SCHOOL	
Name:	
Role:	
Date and time of completing this form	
Details of individual (including yourself for self-reporting) whom the concern is about	
Name	
Role	
Relationship to the individual reporting eg manager, colleague	
Details of Concern	
<i>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 Handbook (Code of Conduct) and/or Keeping Children Safe in Education (September 2026)?</i>	
Details of any children or young people involved	
Name	
For use by HT/Safeguarding Team upon receipt of the concern	
Date and time concern received	
Signature	
Role	
Actions to be taken and follow-up	