

LOVE, COURAGE & RESPECT
Learning and Achieving Through Love, Courage and Respect

BRIGHSTONE C.E. PRIMARY SCHOOL



Low Level Concerns (LLC) Policy September 2025

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Contents

1. Introduction	1
2. Summary	1
3. Keeping Children Safe in Education September 2025.....	1
4. Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct.....	2
5. Storing and use of Low-Level Concerns and follow-up information.....	2
6. Process to follow when a Low-Level Concern is raised.....	4
7. Key Reference Document.....	5
8. Low Level Concern Form	5

1. Introduction

At Brighstone Primary School, safeguarding is our top priority. 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 Code of Conduct. This policy sets out the detail and processes for staff regarding low-level concerns they may have.

2. 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's conduct or safeguarding processes should inform the Headteacher about their concern using a Low-Level Record of Concern Form (Section 8). If the concern is regarding the Headteacher or the DSL, the Chair of Governors should be contacted instead.

3. 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 108 (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.*

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 (unless given prior permission by the headteacher; if this is the case, the photos will be uploaded to the school's network as soon as possible, and deleted from the mobile phone)*

- *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 made 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.*

4. Clarity around Allegation (LADO referral) vs Low-Level Concern (advice from HR or LADO) vs Appropriate Conduct (in accordance with the school's Code of 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 of 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 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.

5. Storing and use of Low-Level Concerns (LLC) and follow-up information

LLC forms and follow-up information will be stored securely within the school's safeguarding systems, with access only by the 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 DSL and Headteacher or those aware in the senior leadership team.

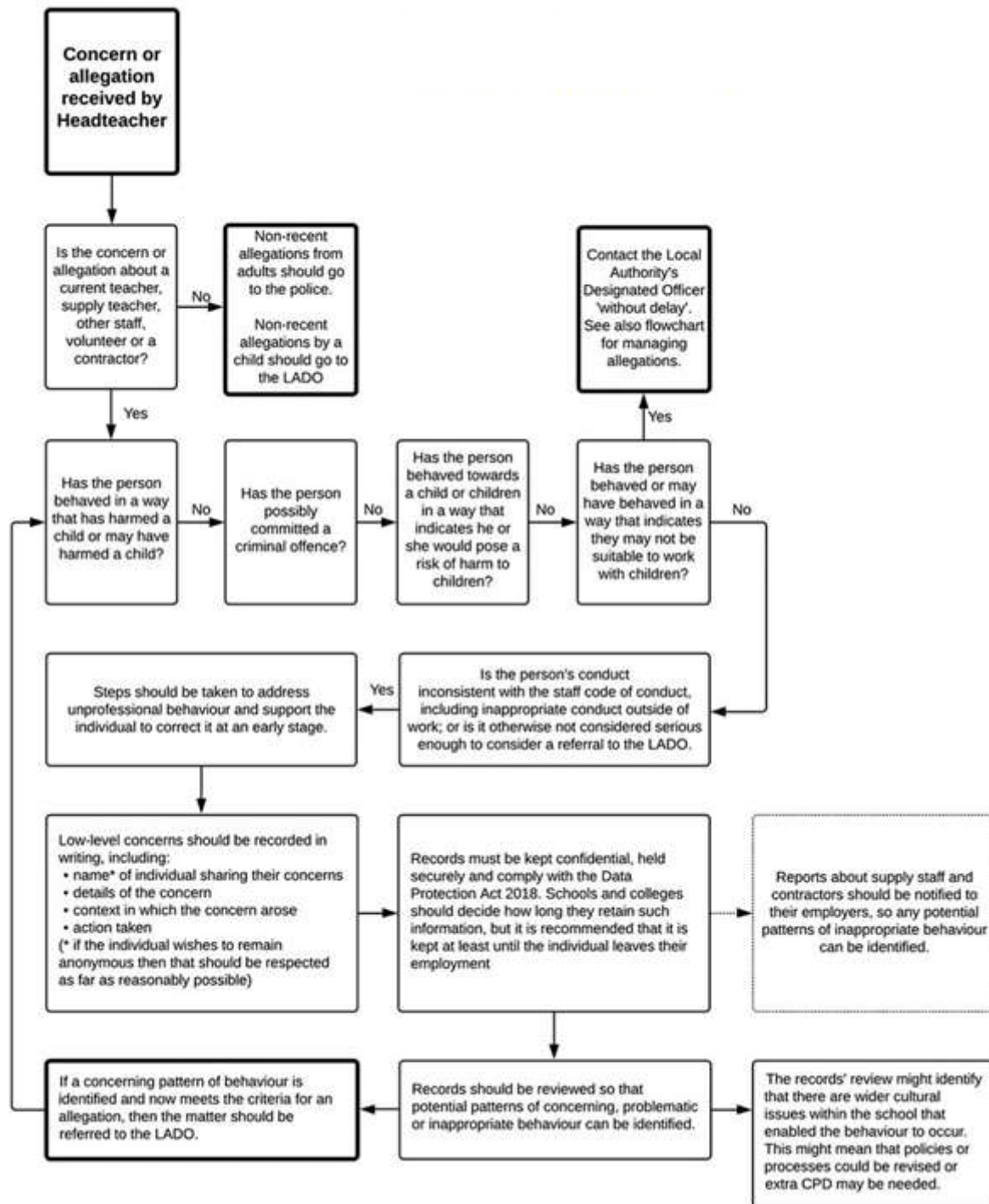
Low-Level Concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

Whenever staff leave Brighstone Primary School, any record of low-level concerns that 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.

6. Process to follow when a Low-Level Concern is raised

If the concern is regarding the Headteacher or the DSL, the Chair of Governors should be contacted instead.



7. Key Reference Document

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

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

8. Low Level Concern Form

This form will be available to staff via:

- The office
- The DSL
- MyConcern
- The Senior Leadership Team
- The website
- The staff room

Low Level Concern Form

Please use this form to share 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 meets the concerns below:

Low-Level Concern

Does not mean that it is insignificant, it means that the adult's behaviour towards a child does not meet the threshold set out above. 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 may have acted in a way that:

- is inconsistent with an organisation's staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO - but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary.

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). The record should be signed, timed and dated.

Allegation Threshold for the LADO:

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; 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 they 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.

Name of Staff/Volunteer/Visitor concern refers to	
Date and time	
Concern details	

Signed
Print Name

Received by HT/DSL/DDSL	
Time and Date	
Action Taken/outcome	