



LOW-LEVEL CONCERNS POLICY

This policy applies to all Schools within the Royal Russell Trust Group of Schools.

POLICY STATEMENT

The School understands the importance of a positive culture where concerns can be identified and spoken about openly and acknowledges that this is a key element of a strong safeguarding system. This Low-Level Concerns Policy seeks to ensure that all staff who work with children behave appropriately and to enable the early identification and prompt and appropriate management of concerns.

As part of its whole school approach to safeguarding, the School will ensure that it promotes 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 harm threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage an open and transparent culture; enable 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 the School are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the School.

WHO DOES THE POLICY APPLY TO?

The policy applies to **all staff** whether working in or on behalf of the School, engaged as a paid employee (including supply teacher), worker or contractor, or unpaid member of staff or volunteer. It also includes anyone who is part of the Governing Board.

Our Whole School approach to safeguarding is **that safeguarding is everyone's responsibility**.

The framework for this policy is set out in the ['Keeping children safe in education'](#) (KCSIE) statutory guidance for schools and colleges published 1 September 2025.

INTRODUCTION TO THE CONCEPT AND IMPORTANCE OF SHARING LOW-LEVEL CONCERNS

Behaviour which is not consistent with the standards and values of an organisation, and which does not meet the organisational expectations encapsulated in the School's Staff Code of Conduct, needs to be addressed. Such behaviour can exist on a wide spectrum – from the inadvertent or thoughtless, through to that which is ultimately intended to enable abuse.

All staff need to be informed about and be able to identify concerning, problematic or inappropriate behaviour and understand the importance of sharing concerns when they observe behaviour which violates the School's Staff Code of Conduct.

This policy focuses on low-level concerns regarding adults' behaviour towards children. It includes the option of self-referring by adults, or adults sharing such concern about the behaviour of other adults towards children. This policy does not focus on the sharing of concerns about adults by children.

WHAT IS THE AIM OF THE LOW-LEVEL CONCERNS POLICY?

The aim of the Low-Level Concerns Policy is to create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour which are set out in the School's Staff Code of Conduct are constantly lived, monitored and reinforced by all staff.

It is also to ensure that 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, and the delineation of professional boundaries and reporting lines.

The specific aims of the Low-Level Concerns Policy are to:

- Empower staff to share any low-level concerns with the Headmaster/Head and/or the Designated Safeguarding Lead (DSL) and to help all staff to interpret the sharing of such concerns as a neutral act;
- Address unprofessional behaviour and support the individual to correct it at an early stage;
- Identify concerning, problematic or inappropriate behaviour – including any patterns – that may need to be consulted upon with (on a no-names basis if appropriate), or referred to, the Local Authority Designated Officer (LADO);
- Provide for responsive, sensitive and proportionate handling of such concerns when they are raised; and
- Help identify any weaknesses in the School's safeguarding system.

DEFINITION OF LOW-LEVEL CONCERN

A low-level concern is any concern no matter how small, even if no more than causing a sense of unease or "nagging doubt" - that an adult working in or on the behalf of the School 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 allegation 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 overfriendly with children
- Having favourites
- Taking photographs of children on the staff member's personal mobile phone
- Engaging with child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating children

Such behaviour can exist on the 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.

A spectrum of behaviour can be found in Annex A.

It is crucial that any such concerns, including those which do not meet the allegation/harm threshold, are shared responsibly, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of the School from potential false allegation or misunderstandings.

REPORTING LOW-LEVEL CONCERNS

The School encourages everyone affected by its operation to report any low-level concern to the Head/Headmaster and/or the DSL, as soon as possible, so that appropriate action can be taken.

RR Senior School	Headmaster	Chris Hutchinson	DSL	Sara Ward
RR Junior School	Head	John Evans	DSL	Sarah Pain
St David's School	Head	Sarah Syradd	DSL	Sarah Syradd

See Annex B for flow chart for reporting concerns

Operations/Support staff should report LLCs to the designated person in the part of the school where they work. If there is any doubt, then Operations/Support staff should report their LLC to the Headmaster.

If any low-level concern relates to the behaviour of the Headmaster, it should be referred to the Chair of Governors.

Staff should also share concerns about themselves (i.e. self-refer)

Occasionally a member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, a member of staff may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the School's Staff Code of Conduct. Self-referring in these circumstances can be positive for a number of reasons, and staff are encouraged to self-refer on the basis that:

- It is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity;
- It demonstrates awareness of the expected behavioural standards and self-awareness as to the member of staff's own actions or how they could be perceived; and
- Crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

The School's aim is to create an environment where staff are encouraged and feel confident to self-refer.

Where the low-level concern relates to a person employed by a supply agency or a contractor working in the School, the concern should be shared with the Head and/or DSL and be recorded in accordance with the School's Low-Level Concerns Policy. Their employers should also be notified about the concern so that any potential patterns of inappropriate behaviour can be identified.

The Head will regularly inform the Governing Board about the implementation of the Low-Level Concerns Policy and any evidence of its effectiveness, e.g. by including reference to it in Safeguarding Reports provided to the Governing Board.

RESPONDING TO LOW-LEVEL CONCERNS

The Head/Headmaster and/or Designated Safeguarding Lead will record the concern.

RR Senior School	Headmaster	Chris Hutchinson	DSL	Sara Ward
RR Junior School	Head	John Evans	DSL	Sarah Pain
St David's School	Head	Sarah Syradd	DSL	Sarah Syradd

The Headmaster will be the ultimate decision maker in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns and/or the role of the DSL, the Head may wish to consult with the Designated Safeguarding Lead and take a more collaborative decision making approach. Where the Head/Headmaster is in any doubt whatsoever, advice will be sought from the LADO.

The Head/Headmaster and the Designated Safeguarding Lead will review the information and consider if the incident is entirely consistent with the School Code of Conduct, constitutes a low-level concern or is an allegation.

The member of staff about whom the concern has been raised, will be informed of the concern by the Head or the Designated Safeguarding Lead.

If this is not the first low-level concern received about an individual, careful consideration will be given as to whether the incident should be reclassified to an allegation and refer to the LADO. The Head or the Designated Safeguarding Lead, will then speak to the individual about whom the low-level concern has been raised, unless advised not to by the LADO or external agencies.

If a concern raised is found to be unsubstantiated or even malicious, this will be clearly recorded and the matter will be followed up using the appropriate disciplinary procedure.

RECORDING AND REVIEWING LOW-LEVEL CONCERNS

All low-level concerns are recorded securely by the Headmaster/Head and or Designated Safeguarding Lead using a confidential file.
All data is held securely in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

The information recorded includes the concern, the context in which the concern arose and the action taken.

Records are reviewed regularly by the Headmaster/Head and DSL. All records remain at least until the individual leaves the School.

Records of low-level concerns are reviewed regularly so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and responded to. Where a pattern of behaviour is identified, the School should decide on a course of action. This might be internal disciplinary procedures, or referral to the LADO if the harm threshold is met.
The School must consider if any wider cultural issues in school enabled the behaviour to occur and if appropriate policies could be revised or extra training delivered to minimise the risk of reoccurrence.

The rationale for all decisions and actions taken will be recorded.

REFERENCES

[KCSIE 2025](#) paragraph 445, is clear that the School should only provide substantiated safeguarding concerns/allegations (including a group of low level concerns about the same individual) that meet the harm threshold in references. Low-level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance.

It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and has been found to be substantiated, it should be referred to in a reference.

MONITORING AND EVALUATION

The Board of Governors will review an anonymised sample of low-level concerns at regular intervals, in order to ensure that these concerns have been responded to promptly and appropriately.

The Low-Level Concerns Policy will be monitored to ensure that it is being effectively implemented in practice and will be reviewed annually by the Head of the Royal Russell School and in response to any relevant legislative, statutory or regulatory changes and/or changes in relevant guidance and/or safeguarding best practice.

ORIGIN OF THE POLICY

This policy has been created by the Headmaster of the Royal Russell School in consultation with the DSL's, School Leadership Teams and Safeguarding Governor.

LINKS

This Low-Level Concerns Policy operates in conjunction with the following policies and Government Guidance

- [Keeping Children Safe in Education 2025](#)
- Staff Code of Conduct
- Safeguarding Policy
- Disciplinary Procedure
- Capability Procedure
- Grievance Procedure
- Whistleblowing Policy
- Data Protection Policy

Updated by	CJH & DSL's	September 2025
Reviewed and approved by	EWC	October 2025
Reviewed and approved by	Board	December 2025
Next review		September 2026

ANNEX A: SPECTRUM OF BEHAVIOUR

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.

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 the School'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.

Appropriate Conduct

Behaviour which is entirely consistent with the School's Staff Code of Conduct, and the law.

ANNEX B: SHARING LOW LEVEL SAFEGUARDING CONCERNS

