



# HMFA

## Low Level Concerns Policy

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| Date Approved by The Board of Trustees | 11.12.25            |
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| Reviewer                               | Jan McColl          |
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## **1. Introduction**

At HMFA, we aim to create an open and transparent culture where all concerns about all adults involved with our school are dealt with promptly and appropriately. We aim to identify any 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 our school ethos.

This policy should be read alongside our Safeguarding and Child Protection, Managing Allegations Against Staff and Staff Code of Conduct Policies.

## **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, volunteer, contractor or who, on reflection, recognises that their actions could have been viewed as a risk should inform the Headteacher or Safeguarding Director by speaking directly to them.

## **3. Keeping Children Safe in Education September 2025**

The following is taken from Keeping Children Safe in Education September 2025 and identifies what may be considered behaviour relating to low level concern:

What is a low level concern (LLC)?

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out at paragraph 338 (and on page three of this policy in the red box). 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 allegations 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;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

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.

It is crucial that any such concerns, including those which do not meet the harm threshold are shared responsibly and 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 potential false allegations or misunderstandings.

#### **4. 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 adult linked to our school who has behaved in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations 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 Code of Conduct, and the Law.

See flowchart at the end of this policy.

#### **5. Storing and use of Low-Level Concerns and follow-up information**

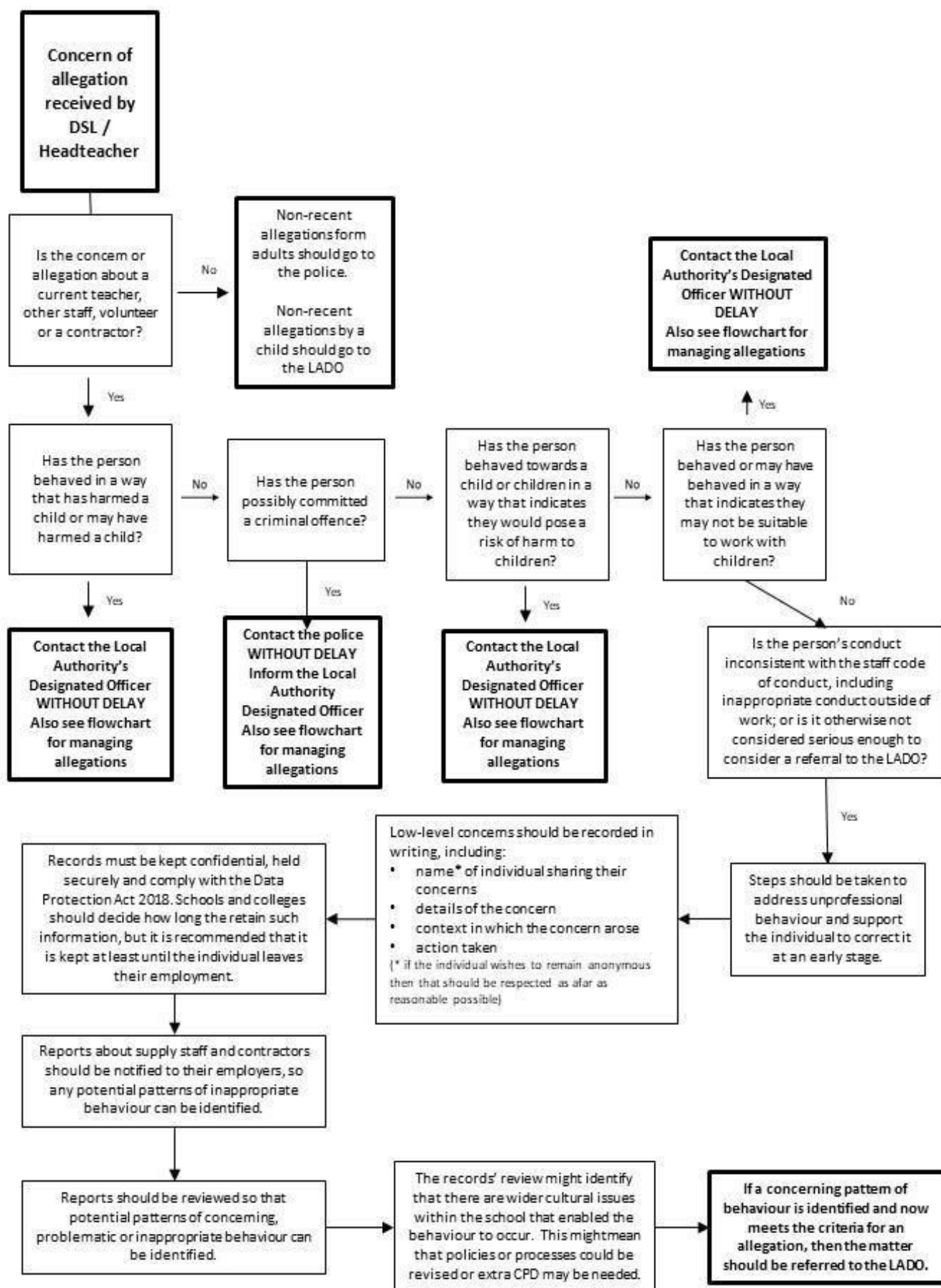
Records of LLCs (see appendix 1) and follow-up information will be stored securely within the schools safeguarding systems, with access only by the Headteacher and Safeguarding Director. This will be stored in accordance with the school's GDPR and data protection policies.

The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the 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 HMFA, 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.



## APPENDIX 1



### HMFA

#### Low Level Concern form

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 HMFA’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

Where possible please speak with the Headteacher or Safeguarding Director as soon as possible. It is also helpful to document your concerns, which can be done using this form and then passed to the Headteacher or Safeguarding Director.

If the concern is about the Head Teacher, please pass it on to the Chair of Governors

Remember, a low-level concern is different to an allegation (which uses a different form). See the table below for a definition:

#### **Allegation:**

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- 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
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#### **Low Level Concern:**

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- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations 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 Code of Conduct, and the Law.

Continued on next page.

**Name of adult completing form**

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**Name of adult whom concern is regarding**

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**Date**

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**Concerns:**

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.

**Signature:**

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