



BELMONT SCHOOL
(Additionally Resourced Mainstream School)

Low Level Concern Policy
SEPTEMBER 2025



<p>UNCRC Article 19 - Every child has the right to protection Global Goal 3 - Good Health and Well-being Ensure healthy lives and promote well-being for all at all ages Global Goal 10 - Reduced Inequalities Reduce inequality within and among countries.</p>	
Head Teacher	
Name	Mrs P Aggarwall
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Date Ratified	14 th October 2025
Review Date	Annually

Introduction

At Belmont School, 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 and Staff Code of Conduct Policies.

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 Head Teacher about their concern using a Low-Level Record of Concern Form. In the Head Teacher's absence, the Deputy Head should be contacted instead. If both Head and Deputy Head cannot be contacted, then either of the following senior leaders must be approached; Assistant Headteachers and the Business and Personnel Manager as they are all Designated Safeguarding Leads.

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 (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 a low-level concern is

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
- 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.

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring 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.
- Empowering staff to share any low-level concerns as per section appendix 1 of this policy.
- Empowering staff to self-refer.
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage.
- Providing a responsive, sensitive, and proportionate handling of such concerns when they are raised.
- Helping to identify any weakness in the school's safeguarding system.

Any low-level concern must be shared with the DSL or DDSL without delay and within 12 hours of the incident or becoming aware of it. The DSL and DDSL can be contacted by emailing cp@belmont.harrow.sch.uk.

Where the concern relates to the DSL or DDSL, it must be raised with the clerk to governors by emailing clerk@belmont.harrow.sch.uk for the attention of the Chair of Governors.

If for any reason, a Low-Level Concern is not shared within the 12 hours, delay should never be seen as a barrier to raising it with the DSL.

In such circumstances, the DSL/DDSL may speak to the appropriate LADO or other relevant professionals to seek advice and ensure that appropriate action is taken to safeguard participants and the public.

Recording low-level concerns

Emails must have the subject as 'Low Level Concern' and sent to cp@belmont.harrow.sch.uk. The detail to be recorded within the email must include:

- **name and role of the person sharing the concern**
- **name and role of the person about whom the concern is raised (including their role at the time of the concern, if different)**
- **brief context in which the concern arose**
- **details of the concern including dates, ensuring information is accurate as possible and chronological**
- **the record must be signed and dated. The time the record was made should also be included**

Anonymity

Where the person raising the concern wishes to remain anonymous, this will be respected as far as possible. However, to conduct a fair and thorough investigation it may be necessary to use names and so anonymity cannot be promised. In the spirit of an open and transparent culture, staff and volunteers are encouraged to give their consent to be named, wherever possible.

Self-reporting

Belmont School recognises that staff or volunteers may find themselves in a situation which could be misinterpreted, or might appear compromising to others, or, on reflection feel they behaved in a manner which they consider falls below the standard set out in the code of conduct.

Belmont School encourages self-reporting in these circumstances, and it is seen as a positive action. Self-reporting promotes safeguarding and safer practice by:

- enabling staff and volunteers to get support with a potentially difficult issue and/or addressing it at the earliest opportunity;
- demonstrating awareness of the expected behavioural standards and self-awareness as to the person's own actions or how they could be perceived; and,
- contributing to maintaining a culture where everyone aspires to the highest standards of conduct and behaviour

Self-reporting can be done in the first instance by speaking to your line manager as soon as possible. The line manager will share the information with the DSL:

- for support and advice;
- to identify actions or wider implications for the organisation such as policy or training

The line manager will follow the Recording the Concern procedure above and send securely to the DSL with a follow-up phone call.

Responding to low-level concerns

Investigation into a low-level concern will be done discreetly and, on a need,-to-know basis.

On receipt of the concern, the DSL will take the following actions (not necessarily in the order set out)

- speak to the person who raised the concern (unless it has been raised anonymously), regardless of whether a written summary, or completed low-level concerns form has been provided;
- speak to any potential witnesses (unless advised not to do so by the LADO or equivalent professional and/or other relevant external agencies, where they have been contacted);
- speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO or equivalent professional and/or other relevant external agencies, where they have been contacted);
- where the concern relates to the individual's behaviour or relationships outside the workplace, the DSL must conduct a risk assessment concerning transferrable risk into the workplace and the safety of children or adults at risk they work or volunteer
- review the information and determine whether the behaviour:
 - is entirely consistent with the Belmont School code of conduct and the law
 - constitutes a low-level concern
 - is not serious enough to consider a referral to the local authority – but may merit consulting with and seeking advice from them
 - when considered with any other low-level concerns that have previously been raised about the same individual, could now meet the threshold of an allegation and should be referred to the LADO or equivalent local authority professional
 - in and of itself meets the threshold of an allegation and should be referred to the LADO or equivalent local authority professional.

Records during investigation

Whilst conducting the investigation and making decisions, the DSL will make a record of

- all internal conversations
- all external conversations – for example, with the LADO or equivalent local authority professional, other professionals
- the rationale for decisions
- actions to be taken and by whom

The record will include the names, roles, dates and times of conversations, emails and other relevant documentation.

Possible Outcomes

If the behaviour is found to be entirely consistent with Belmont School Code of Conduct and the law, the DSL will:

- update the individual in question and inform them of the action taken as above
- speak to the person who shared the low-level concern to provide them with feedback about how and why the behaviour is consistent with the Belmont School's Code of Conduct and the law
- consider if the situation may indicate that the Code of Conduct and Professional boundaries Policy or Low-Level Concerns Policy are not clear enough, or if further training is needed

If the same or a similar low-level concern is subsequently shared about the same individual, and the behaviour in question is also consistent with Belmont School's Code of Conduct and the law, then an issue may need to be addressed about how the subject of the concern's behaviour is being perceived by others.

If the behaviour is found to constitute a low-level concern, it will 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 and volunteers from any potential false allegations or misunderstandings.

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern unless it has been raised anonymously.
- To the individual involved and any witnesses.

Other concerns may most appropriately require management guidance and/or training including a refresher about the Code of Conduct and Professional Boundaries.

Conversations will include

- being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, using examples
- explaining clearly what change is required in their behaviour
- discussing what, if any, support they might need in order to achieve and maintain the required behaviour
- being clear about the consequences if they fail to be consistent with the Code of Conduct and/or repeat the behaviour in question

The approach should be positive and avoid critical, threatening or blaming language or behaviour.

Follow up actions may include:

- ongoing and transparent monitoring of the individual's behaviour
- an action plan or risk assessment which is agreed with the individual, and regularly reviewed with them

Where the low-level concern raises issues of misconduct or poor performance, the DSL will seek advice from the Harrow Human Resource Services (HR) and may discuss this with the individual's line manager regarding who has the follow up conversation with the individual.

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff code of conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Low-Level Concerns and other Policies and Procedures

Where the concern is found to require other internal processes to be followed, such as disciplinary, the DSL will exercise their professional judgement and, if in any doubt, they will

seek advice from other external agencies including the LADO or equivalent professional.

Where Belmont School's disciplinary procedure (Staff and Volunteer) is triggered, Belmont School will ensure that the individual has a full opportunity to respond to any factual allegations which form the basis of a disciplinary or volunteer management case against them.

If the behaviour, whilst not sufficiently serious to consider a referral to the LADO or equivalent professional but nonetheless merits consulting with and seeking advice from them, then action (if/as necessary) will be taken in accordance with such advice.

If, when considered with any other low level concerns that have previously been shared about the same individual, the present concern could now meet the threshold of an allegation, then it will be referred to the LADO or equivalent professional

If the behaviour in and of itself meets the threshold of an allegation, it will be referred to the LADO or equivalent professional and the Managing Allegations Against Adults Procedures will apply

Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

<p>Allegation:</p> <p>Any adult linked to our school who has:</p> <ul style="list-style-type: none">• 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.
<p>Low Level Concern:</p> <p>Any adult linked to our school who has behaved in a way that:</p> <ul style="list-style-type: none">• 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.
<p>Appropriate:</p> <ul style="list-style-type: none">• Behaviour which is entirely consistent with our school's Code of Conduct, and the Law.

Storage and Retention

Storage

Belmont School will retain all records of low-level concerns (including those which are subsequently deemed by the DSL to relate to behaviour which is entirely consistent with the Belmont School's Code of Conduct in a central electronic low-level concerns file. The records will be kept confidential and held securely with limited access given to the DSL and the DDSL. Records will contain referrals made to the LADO or equivalent professional Where multiple low-level concerns have been shared regarding the same individual, these will be kept in chronological order. Low-level concerns will not be stored on personnel files. In line with best practice, keeping low-level concerns separately will allow Belmont School to spot any potential patterns of behaviour whilst reassuring staff and volunteers to share their concerns. Records relating to behaviour which meets the above criteria, should be placed and retained on the staff member's personnel file, whilst also being retained on the central low level concerns file.

The information on the personnel file will be retained to allow Belmont School to hold a clear and comprehensive summary of all allegations (except those which are found to have been malicious), details of how the allegation was followed up and resolved, and a note of any action taken, and decisions reached. A copy will be provided to the individual.

Records are kept confidentially, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Information will be retained for at least until the individual leaves their employment.

References

448. Part three of the Keeping Children Safe in Education 2024 guidance is clear that schools and colleges 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.

Review

The DSL will review the central low-level concerns folder periodically to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified and addressed.

The DSL will create a record of these reviews, and it will be stored alongside the folder, along with any subsequent actions taken.

The Safeguarding Board and Trustees will receive relevant data relating to Low-Level Concerns. This will include a review of anonymised samples of low-level concerns at regular intervals, in order to ensure that these concerns have been responded to promptly and appropriately.

Retention

Low-level concerns will be retained electronically in a secure central low-level concerns folder.

When a staff member or volunteer leaves and/or takes up new employment, this should be seen as a reminder for the DSL to review the content of the individual's file to ensure it still has value (either as a safeguarding measure or because of its possible relevance to future claims) and is therefore necessary to keep.

This is subject to the rights of individuals to object to or seek to erase or correct records about them under data protection law.

References

We will not include low-level concerns in references unless:

The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or

The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.