



Low Level Concerns Policy and Procedure – September 2025

Person(s) responsible for updating the policy:	Richard Woodland, Director of Safeguarding & Joss Davis, Director of People
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WeST Vision, Mission and Values

[Westcountry Schools Trust - Our Vision, Mission and Values](#)

Providing Accessible Formats

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WeST Policy Suite

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HR Helpline: 01752 891754 ext. 1765

HR Email: HR@westst.org.uk

Policy Quick Read

This policy outlines the framework for reporting, recording, and responding to low-level concerns about staff behaviour within Westcountry Schools Trust (WeST) schools and business units. It aims to foster a culture of openness, trust, and transparency to uphold safeguarding standards and protect all parties involved.

- **Policy scope and application:** The policy applies to all staff and volunteers working in WeST schools or units, and covers concerns about any individual working on behalf of WeST.
- **Definition of low-level concern:** A low-level concern is any behaviour that does not meet the threshold for harm but is inconsistent with the Staff Code of Conduct, such as being overly friendly with children or inappropriate use of language. These concerns range from inadvertent actions to those that might enable abuse.
- **Reporting procedures:** Low-level concerns must be reported promptly to the Headteacher/Principal or CEO, with alternative reporting lines specified if these individuals are unavailable or implicated. Self-reporting is encouraged to address potential misunderstandings early.
- **Confidentiality and anonymity:** While the identity of the person reporting is recorded, requests for anonymity are respected when possible, except where investigations require disclosure. Confidentiality is emphasised to protect all parties and maintain policy integrity.
- **Recording and retention:** Concerns are documented using a designated on-line form, with copies securely stored in a single file per school or unit, and retained for the duration of employment plus six years, or longer if safeguarding or legal reasons apply. Annual reviews identify any concerning patterns.
- **Response to concerns:** The relevant senior leader will gather information, consult the Local Authority Designated Officer (LADO) if necessary, and determine appropriate actions ranging from no further action to formal disciplinary procedures, based on the severity and context of the behaviour.
- **References and disclosures:** Only substantiated safeguarding concerns meeting the harm threshold are included in references. Low-level concerns related solely to safeguarding without misconduct or poor performance are excluded from references.

- **Support and guidance:** The Directors of Safeguarding and People provide advice and support throughout the process, with employees encouraged to seek trade union support and access occupational health or counselling services as needed.

Contents

1. Introduction	5
2. Purpose	5
3. To whom does the policy apply?	5
4. Responsibilities	5
5. Definition of a low-level concern	6
6. Reporting low-level concerns	6
7. Recording and retention of concerns	8
8. Responding to low-level concerns	10
9. References	11
10. Advice and support	12
11. Confidentiality	12
APPENDIX A – Copy of Low-Level Concern and Staff Allegation Form	13
POLICY HISTORY	17

1. Introduction

This policy has been developed with reference to [Developing and Implementing a Low-Level Concerns Policy \(Farrer & Co\)](#). The policy relates to all schools and business units within Westcountry Schools Trust (WeST) including the Early Years Foundation Stage where such provision exists. The policy will be reviewed annually to ensure compliance with current regulations and law and must be read in conjunction with the current version of KCSIE (in particular Part 4) and the WeST Child Protection and Safeguarding Policy.

2. Purpose

This policy sets out a framework whereby all staff are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working at a WeST school or site.

Its purpose is to help create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour set out in the WeST Child Protection and Safeguarding policy are lived, monitored, and reinforced.

3. To whom does the policy apply?

This policy applies to all staff and other individuals who work or volunteer in a WeST school or business unit. Where staff work across multiple sites any low-level concerns about colleagues should be reported to the relevant person at the site in question, e.g. Headteacher/Principal.

4. Responsibilities

The WeST Director of People and Director of Safeguarding will liaise to ensure that Trust Board, via the Education Standards Panel, receives appropriate information from executive team activity about the efficacy of this policy and its implementation across the Trust.

5. Definition of a 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 a 'nagging doubt', that a person working in or on behalf of WeST may have acted in a way that:

- is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work (specifically related to safeguarding), and
- does not meet the allegations threshold of harm, or is otherwise not considered serious enough, to make a referral to the LADO.

Examples of behaviour that could require reporting of a low-level concern 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;
- using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, to 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 with the right person, and are recorded and dealt with appropriately.

Ensuring all concerns are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

6. Reporting low-level concerns

Where a low-level concern has been identified, this must be reported as soon as possible to the Headteacher/Principal (or CEO in the case of the WeST core team); this includes self-reported

concerns. However, it is never too late to share a low-level concern if this has not already happened.

Where the Headteacher/Principal (or CEO in the case of the WeST core team) is not available, the information will be reported to the Designated Safeguarding Lead (or Deputy), i.e. the most senior member of staff acting in this role.

Low-level concerns about the Headteacher/Principal will be reported to the CEO. If the CEO is not available such concerns will be reported to the DCEO. If the DCEO is not available such concerns will be reported to the relevant a Director of Education.

Low-level concerns about the CEO will be reported to the Chair of Trust.

Low-level concerns about those in governance will be reported to the Chair of Trust.

Where the low-level concern has been reported to the Designated Safeguarding Lead (or Deputy), they will inform the Headteacher/Principal (or CEO in the case of the WeST core team) of the details as soon as possible.

Can the person reporting the low-level concern remain anonymous?

The person bringing forward the concern will be named in the reporting form¹. Where they request to remain anonymous, this will be respected as far as possible. However, there may be circumstances where this is not possible, e.g. where a fair disciplinary investigation is needed or where a later criminal investigation is required and in such cases this will be explained and signposting to relevant support will be offered.

Should staff report concerns about themselves (i.e. self-report)?

It may be the case that a person finds themselves in a situation which could be misinterpreted, or might appear compromising to others. Equally, they may have behaved in a manner which on

¹ <https://forms.office.com/e/CLcwZ6nYeY>

reflection they consider falls below the standard set out in the Staff Code of Conduct. In these circumstances they should self-report. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary. WeST schools and business units will work proactively to create an environment where staff are encouraged and feel safe to self-refer.

Where behaviour is consistent with the Staff Code of Conduct, feedback will be given to both parties to explain why the behaviour was consistent with the Staff Code of Conduct. Where behaviour is not consistent with the Staff Code of Conduct, the necessary action will be taken in line with this policy and where appropriate the WeST Disciplinary Policy. This may result in informal action, such as professional advice, training or development and/or formal action.

7. Recording and retention of concerns

A summary of the low-level concern should be recorded using the ‘Low Level Concern and Staff Allegation Form’ via this [link](#)². Appendix A contains a copy of the form FOR INFORMATION ONLY. Not having access to the form should not prevent a concern being shared by alternative means.

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

Where concerns are reported verbally to the Headteacher/Principal (or CEO in the case of the WeST core team) a record of the conversation will be made by the Headteacher/Principal (or CEO in the case of the WeST core team) which will be signed, timed, and dated in readiness for completion of the Low Level Concern and Staff Allegation Form at the earliest opportunity.

Copies of all LLC and Staff Allegation Forms³ or written records will be held in a single file within each WeST school or business unit, with copies provided to the employee as appropriate.

² <https://forms.office.com/e/cLcwZ6nYeY>

³ A PDF copy of the form is suggested.

Whether held electronically or in hard copy this file must be stored securely and in accordance with GDPR and the Data Protection Policy.

In all cases of low-level concerns the following records will be made and appended to the LLC Form/written record:

- all internal conversations, including any relevant witness statements;
- all external conversations, e.g. with the LADO;
- the decision made and the rationale for it;
- any action taken.

Where multiple low-level concerns have been shared regarding the same individual these should be kept in chronological order as a running record.

Where there is a change of Headteacher/Principal that does not allow for a direct hand-over of the LLC file, appropriate arrangements will be made for the records to be stored securely and passed to the new Headteacher/Principal immediately that they start in post.

Should the low-level concerns file be reviewed?

The Headteacher/Director will review the central forms data for each WeST school or business unit annually and/or when a new concern is filed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and referred to the LADO if required. Such patterns of behaviour might include those associated with a particular location or setting, group of staff or interactions with an individual staff member. A central record will be made stating the date of review, person conducting review and any actions taken.

A record of these reviews will be retained and will be available to appropriate members of the WeST Executive Leadership team as required to allow them to fulfil their wider quality assurance role.

Records will be retained for the entire term of employment plus six years (in accordance with the Trust's record retention guidance). If there is a clear safeguarding purpose for retaining

specific information, then – in line with other records of safeguarding value – such information should be retained for the longer term; similarly, longer-term retention is also justifiable (and to be recommended) where a record may be necessary to keep in connection with an employment claim, or a claim brought by a pupil. This is subject to the rights of the individuals to object to or seek to erase or correct records about them under the data protection law.

KCSIE makes clear that such retention periods are for the data controller to determine in accordance with need. In the case of doubt the Trust’s Data Protection Officer should be consulted.

8. Responding to low-level concerns

Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The Headteacher/Principal or CEO (in the case of the WeST core team), or Chair of Trust (in the case of the CEO) will:

- Speak to the person reporting the concern to gather all the relevant information;
- Consider whether it is appropriate to contact the LADO for advice and guidance;
- Speak to the individual, unless advised not to do so by the LADO or police, about the concern raised to ascertain their response;
- If appropriate, take advice from the WeST HR team.

Where necessary to form a view on next steps, further relevant information will be gathered via a ‘fact find’ process. This may involve speaking to any potential witnesses to establish factual information related to the concern. **In all such cases, advice should be sought from the WeST HR Team.** The information reported and gathered will then be reviewed to determine whether the behaviour:

- is consistent with WeST’s Code of Conduct and Dignity at Work Policies, in which case no further action will be required;
- constitutes a low-level concern, in which case no further action may be required, or additional training/guidance/support may be required to rectify the behaviour via normal day-to-day management processes. The employee should understand that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g. via the

Capability and Disciplinary Procedures. WeST recognises the advice⁴ around the benefit of ‘values-based conversations’ rather than a critical or threatening approach when speaking to staff about concerns. Management advice, guidance or support (outside of the Disciplinary Policy) should be recorded and followed up in writing within 5 working days;

- is serious enough to consult with or refer to the LADO, in which case the LADO should be contacted and their advice followed as to whether referral should be made;
- when considered with previous low-level concerns about the same individual could now meet the threshold of an allegation, in which case the LADO should be contacted and their advice followed as to whether referral should be made;
- in and of itself meets the threshold of an allegation and should be referred to the LADO and/ or other relevant external agencies.

Where the Headteacher/Principal (or CEO in the case of the WeST core team, or Chair of Trust in case of the CEO) has any doubt whatsoever as to how to respond to a concern they should seek advice from the LADO, on a no-names basis if necessary.

9. References

Schools or business units should only include in references substantiated safeguarding concerns/allegations (including a group of low-level concerns about the same individual) that meet the harm threshold.

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.

⁴ [Developing and Implementing a Low-Level Concerns Policy \(Farrer & Co, 2022\)](#) (page 14)

10. Advice and support

The Director of Safeguarding or Director of People will provide advice and support to the officers, and those in governance involved in the application of this policy at any stage. As part of which they, or their delegate, may attend relevant meetings.

Employees are encouraged to seek support from their trade union/professional association in the first instance.

Procedural guidance relating to this policy is available from the Human Resources Department or the Director of Safeguarding. Where a referral to Occupational Health or the counselling service is necessary, this should be made by the employee's line manager.

11. Confidentiality

Any parties affected by or involved in the application of this policy will be expected to maintain an appropriate level of confidentiality. Breaches of confidentiality will be taken seriously, especially if they hinder the application of the policy. Failure to maintain confidentiality may result in action being taken under the disciplinary policy arrangements.

Disclosure of information may also be a breach under the Data Protection Act (2018) and may lead to action being taken under the provisions of that Act, in addition to action being taken under the disciplinary policy.

APPENDIX A

Low-level Concern and Staff Allegation Form

FOR INFORMATION ONLY, PLEASE USE COMPLETE AND SUBMIT INFORMATION VIA THE [MS FORM](#)⁵

A PDF copy of the MS Form submitted should be held in a single secure file within each WeST school or business unit. This may be electronic form or in hard copy.

Low Level Concern and Staff Allegation Form

This form should be completed by the Headteacher each time a low level concern or a staff allegation is received. The form should be completed at the earliest opportunity, preferably on the same day that the incident is reported, but at the point at which an initial judgement has been made as to whether the threshold for LADO advice has been met.

The data collected will be used by WeST HR and the Director of Safeguarding (DoS) to report to those in governance. Staff names will not be circulated beyond WeST HR, the DoS and any other appropriate person as required on a 'need to know basis' in accordance with safeguarding and data protection principles.

A copy of the completed form should be kept on the staff member's personnel file and as part of the school's low-level concerns/managing allegations records. A PDF copy of the form can be generated using the 'Save Form' option at the end of this MS Form. *

Required

1. Name of person completing this form *
2. Role of person completing this form *
3. School or Business Unit where incident occurred *
4. Seriousness of the concern *

⁵ <https://forms.office.com/e/cLcwZ6nYeY>

When answering please consider the statements below from Keeping Child Safe in Education that refer to whether the threshold for a LADO referral has been met. If in doubt please seek advice from WeST HR or the Director of Safeguarding.

- 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.
- LADO threshold met
- LADO threshold not met
- Unsure - YOU MUST SEEK IMMEDIATE ADVICE FROM WeST HR and then return to complete this form

5. Date of Incident *

NB - this form should be completed as soon as possible, preferably on the day the incident is first reported

6. Name of staff member about whom concern has been raised *

7. Role of staff member about whom concern has been raised *

Choose closest option from the drop down

- Teacher
- Support Staff: pupil facing
- Support Staff: non-pupil facing
- Other

8. Have concerns been raised about this individual previously? *

If 'Yes' then you should consider whether this history, alongside the current concern now meet the threshold for referral set out in KCSIE Section 4, Part 1.

- Yes
- No

9. Did this incident involve a pupil at the school? *

- Yes
- No

10. Year Group *

11. Pupil characteristics (tick all that at apply) *

- Looked After Child
- S47 Child Protection
- S17 Child in Need
- Early Help
- EHCP
- SEND Support
- Disadvantaged
- English as an Additional Language
- None of the above
- Not sure

12. Summary of concern *

13. Does this incident involve sexual harassment? *

- Yes
- No

14. Category of concern *

Choose the ONE option which most closely fits the incident. These categories will be used when compiling anonymous data reports for those in governance.

- Coercion or control - adult
- Coercion or control - child
- Inappropriate language - sexualised
- Inappropriate language - intimidating / verbally abusive
- Neglect - failure to provide basic needs for a child
- Neglect - failure to protect a child from harm
- Professional boundaries - concern over lone/secluded working with a child
- Professional boundaries - inappropriate conduct off-duty
- Physical contact - inappropriate touching/ hitting/pushing/shoving
- Physical contact - inappropriate restraint
- Professional boundaries - over friendliness
- Professional boundaries - favouritism
- Sexual misconduct - engaging in sexual activity with a child
- Sexual misconduct - grooming
- Sexual misconduct - inappropriate sexual activity with an adult (consensual)
- Sexual misconduct - inappropriate sexual activity with an adult (non-consensual)
- Use of technology - inappropriate social media use
- Use of technology - inappropriate internet use
- Use of technology - inappropriate use of personal device
- Breach of professional standards/code of conduct (without direct harm to a child or adult)

15. Action taken so far *

16. Proposed next steps *

Please record 'None' if the actions taken so far have been sufficient to resolve the concern.

POLICY HISTORY

Policy Date	Summary of change	Contact / Responsibility for Policy	Version/ Implementation Date	Review Date
January 2023	Transferred to updated Policy Template. Recording, Retention and References updated, plus other minor amendments to comply with updated guidance and take account of revised governance arrangements.	Richard Woodland	January 2023	September 2023
June 2023	Reviewed in line with updated policy template, checked for gender neutral language and alignment with revised governance arrangements and delegated authority to act	Joss Davis	September 2023	September 2024
July 2024	Policy reviewed. No substantial changes. Minor changes to sections 4 and 6 to account for removal of HR Committee and introduction of DCEO into reporting lines. No change to policy requirements.	Joss Davis & Richard Woodland	September 2024	September 2025
July 2025	Policy reviewed. No substantial changes. Minor amendments made to account for introduction of a MS Form for record keeping and to account for updated governance arrangements. No change to policy requirements	Joss & Davis and Richard Woodland	September 2024	September 2026