



Allen Edwards Low-Level Concerns Policy

MANAGING CONCERNS ABOUT ADULTS THAT DO NOT
MEET THE HARM THRESHOLD

ALLEN EDWARDS PRIMARY SCHOOL

Contents

Purpose and Scope	2
Policy Framework and Principles.....	2
Definitions and Thresholds.....	2
Low-Level Concern.....	2
Concern or Allegation That May Meet the Harm Threshold.....	3
Examples of Low-Level Concerns.....	3
A Culture of Openness, Trust and Transparency	3
Reporting Routes.....	4
Self-Referral	4
Anonymous Reports	4
Responding to a Report	4
Possible Outcomes and Action	5
Recording, Confidentiality and Data Protection	5
Reviewing Patterns and Organisational Learning	6
Support and Fairness	6
Supply Staff, Trainee Teachers, Volunteers and Contractors	7
Employment References	7
Whistleblowing and Escalation	7
Roles and Responsibilities	7
All Adults	7
Headteacher	8
Designated Safeguarding Lead	8
Chair of Governors and Governing Body.....	8
Training, Monitoring and Review.....	8
Related Policies and Guidance.....	8
Appendix 1 - Quick Reporting and Decision Route	10
Headteacher's Decision Categories.....	10
Appendix 2 - Low-Level Concern Record Form	11
Factual, Chronological Account.....	11
Immediate Action Taken	11
Case Manager Record	12

Purpose and Scope

Allen Edwards Primary School is committed to a culture in which every concern about an adult is shared responsibly, recorded and considered promptly. The term 'low-level' describes a concern that does not meet the harm threshold; it does not mean the concern is unimportant.

This policy explains how the school will identify, report, record and respond to low-level concerns. Its purpose is to safeguard children, identify concerning or inappropriate behaviour early, reinforce professional boundaries, support adults to correct conduct promptly and identify weaknesses in school systems or culture.

The policy applies to all adults working in or on behalf of the school, including employees, supply and agency staff, trainee teachers, volunteers, contractors, consultants, governors when acting in school and adults working with children through activities provided on school premises. It applies to concerns arising inside or outside work where conduct may affect suitability, professional boundaries or confidence in the school.

Policy Framework and Principles

This policy reflects Part four, section two of Keeping Children Safe in Education 2026 (KCSIE), the Allen Edwards Child Protection and Safeguarding Policy and the Staff Code of Conduct. It should also be read with Lambeth's arrangements for managing allegations and the London Safeguarding Children Procedures.

The school will:

- put the welfare and best interests of children first
- maintain an attitude of 'it could happen here' and act without delay
- make reporting straightforward and encourage self-referral
- distinguish carefully between appropriate conduct, a low-level concern and a concern that may meet the harm threshold
- respond sensitively, proportionately, consistently and fairly
- protect confidentiality as far as possible while sharing information when safeguarding, legal or employment duties require it
- record decisions, reasons and action clearly
- review patterns and use learning to strengthen professional practice, training and safeguarding arrangements

Definitions and Thresholds

Low-Level Concern

A low-level concern is any concern, however small and even if it is no more than a sense of unease or a 'nagging doubt', that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside work; and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the local authority designated officer (LADO).

The behaviour may be inadvertent or thoughtless, may appear inappropriate but be capable of an innocent explanation, or may be part of behaviour intended to enable abuse. The school will not dismiss a concern because it appears minor when viewed alone.

Concern or Allegation That May Meet the Harm Threshold

The safeguarding allegations procedure, rather than the low-level concerns procedure, must be followed where it is alleged that an adult working in or on behalf of the school 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
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

The final point includes relevant behaviour outside school and is sometimes called transferable risk. If there is any doubt about the threshold, the headteacher or case manager will seek advice from Lambeth LADO. Staff must not try to determine the threshold by investigating the matter themselves.

Examples of Low-Level Concerns

Examples include, but are not limited to:

- being overfriendly with children or encouraging familiarity that blurs professional boundaries
- showing favouritism or giving a child special treatment, gifts, rewards or private attention without a clear professional reason
- taking, storing or sharing images of children on a personal mobile phone or other personal device contrary to school policy
- engaging with a child one-to-one in a secluded area, behind a closed door or without appropriate visibility or oversight
- humiliating, intimidating, ridiculing or using degrading, sexualised, discriminatory or otherwise inappropriate language towards a child
- using personal email, telephone numbers, social-media accounts or unapproved messaging services to communicate with a pupil
- unnecessary, secretive or inappropriate physical contact
- sharing excessive personal information with a pupil, encouraging emotional dependency or failing to maintain appropriate adult-child boundaries
- failing to report or record an accidental boundary issue or situation that could reasonably be misinterpreted
- conduct outside work that may be inconsistent with the Staff Code of Conduct or may affect professional suitability

A single example does not predetermine the outcome. Context matters, but uncertainty must lead to reporting, not silence.

A Culture of Openness, Trust and Transparency

Adults are expected to notice, question and share behaviour that causes concern. Reporting a low-level concern is a safeguarding responsibility, not an accusation or a finding of wrongdoing. Early reporting can protect children, prevent misunderstanding and allow an adult to receive timely guidance or support.

The school will build this culture by:

- making expected conduct and professional boundaries clear through induction, the Staff Code of Conduct, training and supervision

- ensuring staff know the difference between a pupil-welfare concern, a low-level concern and a concern that may meet the harm threshold
- encouraging staff to report concerns promptly and to self-refer where their own conduct could be misinterpreted or fell below the expected standard
- responding without automatic blame and avoiding retaliation against a person who raises a concern honestly
- addressing unprofessional behaviour early and proportionately
- using patterns and themes to improve policy, culture, supervision, premises and training

Reporting Routes

Low-level concerns must be reported promptly to the headteacher, preferably on the same working day. A concern about the headteacher must be reported directly to the Chair of Governors. The Low-Level Concern Record Form in Appendix 2 should be used but reporting must not be delayed because the form is unavailable or incomplete.

The following rules apply:

- Tell the headteacher directly and do not discuss the concern widely with colleagues.
- If the concern may meet the harm threshold, say so immediately. Do not investigate, confront the person or seek agreement from witnesses.
- If a child may be at immediate risk, contact the DSL at once; call 999 where there is immediate danger or a suspected crime requiring an emergency response.
- If the concern is about the headteacher, contact the Chair of Governors using the school's current published safeguarding contact arrangements.
- If there is a conflict of interest in reporting to the headteacher, or the normal route is unsafe or ineffective, use the Chair of Governors, Lambeth LADO or the Whistleblowing Policy as appropriate.
- A verbal report must be followed by a factual written record as soon as possible. The headteacher or Chair will ensure that an urgent verbal report is recorded even if the reporting person cannot complete the form immediately.

Self-Referral

Adults are encouraged to self-refer where they have found themselves in a situation that could be misinterpreted, appears compromising, involved an accidental boundary issue or, on reflection, fell below expected professional standards. Self-referral supports transparency and early resolution; it does not automatically lead to disciplinary action.

Anonymous Reports

Anonymous concerns will be considered. The reporting person's wish to remain anonymous will be respected as far as reasonably possible, but anonymity cannot be guaranteed where disclosure is necessary to protect a child, obtain LADO or police advice, comply with law or ensure a fair process. The school encourages named reporting because it usually enables fuller assessment and appropriate feedback.

Responding to a Report

The headteacher is the ultimate decision-maker for low-level concerns and may consult the DSL, Human Resources and Lambeth LADO. Where the concern is about the headteacher, the Chair of Governors acts as case manager and follows the same principles.

The headteacher or Chair will:

- consider immediate child-safeguarding and staff-safety needs and take proportionate protective action
- establish the basic facts, context and source of the concern without conducting a substantive investigation that could prejudice external enquiries
- speak directly to the person who raised the concern, unless it was anonymous
- where appropriate, speak to the adult concerned and any witnesses, unless advised not to do so by the LADO, police, children's social care or Human Resources
- check relevant previous low-level concerns or conduct records for patterns
- consult Lambeth LADO whenever there is doubt about whether the harm threshold may be met
- decide the category, further action and who needs to know
- record the evidence considered, decision, reasons, action, review arrangements and outcome

Where a child has been harmed, may be at immediate risk or requires support, the DSL will lead the child-welfare response and make referrals to children's social care or the police as required. The adult-conduct process and child-safeguarding process may run alongside one another but their records and decision-making responsibilities remain distinct.

Possible Outcomes and Action

After proportionate fact-finding and advice, the concern may be categorised as:

- conduct that is entirely consistent with the Staff Code of Conduct and requires no further action beyond recording the decision and rationale
- a misunderstanding or situation requiring clarification, support or a change to working arrangements
- a low-level concern requiring advice, coaching, training, supervision, management guidance, mediation, risk management or monitoring
- a conduct, capability or performance matter requiring advice from Human Resources and consideration under the relevant procedure
- a concern which, alone or together with previous concerns, may meet the harm threshold and must be managed under the safeguarding allegations procedure with LADO advice
- a matter requiring referral to children's social care, police, the Disclosure and Barring Service, a professional regulator or another body

Action will be proportionate to the facts, context, seriousness, impact, intent, professional role, previous concerns and any relevant mitigation. A low-level concern is not itself a disciplinary finding. Where formal action may be required, the adult will receive the procedural safeguards provided by the relevant employment or safeguarding process.

A concern that is not substantiated is not automatically false or malicious. No person will be criticised or disadvantaged for raising an honest concern. Knowingly false or deliberately malicious information may be considered under the appropriate staff, complaints or behaviour procedure only after safeguarding implications have been addressed and, where relevant, LADO advice obtained.

Recording, Confidentiality and Data Protection

Every low-level concern will be recorded in writing. The record will include:

- the date, time and method of the report;
- the name and role of the adult whose conduct is being considered

- the reporting person's name, unless anonymity is requested and can reasonably be maintained
- a factual, chronological account of the concern and the context in which it arose;
- the child or children involved, where relevant, and any immediate safeguarding action
- people consulted and evidence considered
- the decision, category, rationale, action, responsible person and review date; and
- the outcome and any learning, training or policy action

Low-level concern records are confidential staff-conduct records. They will be stored securely in the school's restricted central low-level concerns record under the control of the headteacher or under the Chair's control where the concern concerns the headteacher. Access will be limited to those with a legitimate need to know and records will be managed in accordance with the Data Protection Act 2018, UK GDPR and the school's retention arrangements.

Adult low-level concern records must not be stored on a pupil's CPOMS record. Where the same incident gives rise to a concern about a child's welfare, the DSL will ensure that the necessary child-safeguarding information, decisions and action are recorded separately on CPOMS. Cross-references will be limited and must not expose confidential personnel information to unauthorised users.

Records will be retained at least until the adult leaves their employment or engagement with the school, and longer where another legal, safeguarding, employment or records-management requirement applies. Records will be securely disposed of at the end of the approved retention period.

Reviewing Patterns and Organisational Learning

The headteacher will review the central record regularly and whenever a new concern is received. Reviews will look for repeated concerns about one adult, similarities across different adults, locations, times, activities, supervision gaps, boundary uncertainty or features of school culture that may have enabled the behaviour.

Where a pattern is identified, the school will consider:

- whether the combined information now meets the harm threshold and requires LADO advice
- whether disciplinary, capability, supervision, risk-management or other employment action is appropriate
- whether a child or group of children requires additional safeguarding or pastoral support
- whether the Staff Code of Conduct, safeguarding procedures, premises, staffing, communication systems or training need to change
- whether anonymised themes should be reported to governors to support oversight without compromising confidentiality

Support and Fairness

The school will take concerns seriously while avoiding premature conclusions. Information will be shared only with people who need it for safeguarding, advice, investigation, employment action or governance oversight.

- Children will be listened to and supported by the DSL in accordance with the Child Protection and Safeguarding Policy.

- The person raising the concern will be treated respectfully and protected from retaliation for honest reporting. Feedback will be provided where possible, although confidential detail about another person may not be shared.
- The adult who is the subject of the concern will be treated fairly and offered appropriate support. They will normally be told the substance of the concern and given an opportunity to respond when it is safe and procedurally appropriate to do so.
- The school will follow LADO, police, children's social care or Human Resources advice about the timing and content of communication.
- Trade-union or professional-association support may be sought in accordance with the relevant procedure.

Supply Staff, Trainee Teachers, Volunteers and Contractors

The same reporting and safeguarding standards apply to adults who are not directly employed by the school. The school remains responsible for receiving the concern, protecting children, gathering the facts available to it and ensuring that an appropriate outcome is reached.

The headteacher will notify the supply agency, employer, training provider or commissioning organisation of a low-level concern so that potential patterns can be identified. Information will be shared lawfully, proportionately and on a need-to-know basis. Where the harm threshold may be met, the school will follow the safeguarding allegations procedure and work with Lambeth LADO and the relevant employer or provider.

Employment References

Only the headteacher, or the Chair of Governors in relation to the headteacher, may provide an employment reference on behalf of Allen Edwards Primary School, in accordance with the Staff Code of Conduct.

Low-level concerns will not be included in a reference unless they relate to matters that would ordinarily be included, such as misconduct or poor performance. A concern that relates exclusively to safeguarding and has not met the harm threshold will not be included. Substantiated safeguarding concerns or allegations, including a group of low-level concerns that together meet the harm threshold, will be handled in accordance with KCSIE and safer-recruitment requirements. Unsubstantiated, unfounded, false or malicious concerns that do not meet the harm threshold will not be included.

Whistleblowing and Escalation

If a member of staff believes that safeguarding practice is unsafe, a concern is being concealed, the normal reporting route presents a conflict of interest, or appropriate action has not been taken, they must use the Whistleblowing Policy or contact the Chair of Governors, Lambeth LADO, children's social care, police or the NSPCC Whistleblowing Advice Line as appropriate.

Lambeth LADO contact details used by the school are 020 7926 4679 / 07720 828 700 and lado@lambeth.gov.uk. The current safeguarding contacts displayed by the school and in the Child Protection and Safeguarding Policy should always be checked in case details change.

Roles and Responsibilities

All Adults

- Read, understand and follow this policy and the Staff Code of Conduct.

- Report concerns promptly through the correct route and cooperate with authorised enquiries.
- Maintain confidentiality and do not investigate, confront or agree secrecy.
- Self-refer where conduct could be misinterpreted or fell below expected standards.

Headteacher

- Act as the ultimate decision-maker for low-level concerns, consulting the DSL, Human Resources and LADO as appropriate.
- Ensure immediate safeguarding action, fair fact-finding, accurate records, proportionate outcomes and appropriate support.
- Maintain and review the central confidential record, identify patterns and report anonymised themes to governors where appropriate.
- Notify relevant agencies, employers or providers and ensure learning is implemented.

Designated Safeguarding Lead

- Lead any connected child-welfare response and ensure relevant child-safeguarding information is recorded on CPOMS.
- Advise the headteacher on safeguarding risk, professional boundaries and patterns where consulted.
- Maintain the separation between pupil safeguarding records and confidential adult-conduct records.

Chair of Governors and Governing Body

- The Chair acts as case manager for concerns about the headteacher and seeks LADO and Human Resources advice as required.
- The governing body approves the policy, assures itself that systems are effective and receives appropriate anonymised oversight information.
- Governors preserve confidentiality and do not become involved in individual cases unless their formal role requires it.

Training, Monitoring and Review

This policy will be included in induction and reinforced through safeguarding and Staff Code of Conduct training. Staff will receive updates when procedures, statutory guidance or local arrangements change. Leaders will use anonymised themes and learning to strengthen professional practice without compromising individual confidentiality.

The governing body will review the policy at least annually and sooner following a relevant incident, identified pattern, change in legislation, KCSIE, Lambeth or London safeguarding procedures, or a change to school practice.

Related Policies and Guidance

- Allen Edwards Child Protection and Safeguarding Policy
- Allen Edwards Staff Code of Conduct
- Whistleblowing Policy
- Disciplinary, Capability and Grievance procedures
- Safer Recruitment and Selection arrangements
- Online Safety and Acceptable Use Policies
- Data Protection, Confidentiality and Records Management Policies
- Positive Physical Handling Policy
- Complaints Policy

- Keeping Children Safe in Education 2026, Part four
- Working Together to Safeguard Children 2026
- London Safeguarding Children Procedures
- Lambeth arrangements for managing allegations and LADO referrals

Appendix 1 - Quick Reporting and Decision Route

Report promptly. If uncertain, choose the safer route and seek advice; do not investigate the matter yourself.

What is the concern?	Report immediately to	Record / next step
Concern about a child's welfare	DSL or deputy DSL; 999 if immediate danger	Record factual child-welfare information on CPOMS and follow DSL advice.
Adult conduct that may meet the harm threshold	Headteacher	Do not investigate. The case manager follows the safeguarding allegations procedure and seeks LADO advice.
Any concern about the headteacher	Chair of Governors	The Chair decides the route and seeks LADO / HR advice as appropriate.
Low-level concern about an adult	Headteacher	Report verbally if urgent and complete the low-level concern form. Store in the restricted adult-conduct record, not pupil CPOMS.
Self-referral	Headteacher	Explain what happened, the context, why it may be misinterpreted and any immediate action taken.
Unsafe practice, concealment or unresolved concern	Chair of Governors or Whistleblowing route	Follow the Whistleblowing Policy and contact external safeguarding bodies where necessary.

Headteacher's Decision Categories

- Consistent with the Staff Code of Conduct: record the decision and rationale; no further action unless learning is identified.
- Low-level concern: take proportionate guidance, support, training, supervision, risk-management or monitoring action.
- Employment matter: obtain Human Resources advice and use the relevant procedure.
- Possible harm-threshold concern: pause low-level handling, consult Lambeth LADO and follow the safeguarding allegations procedure.
- External referral required: act with the DSL, LADO, police, children's social care, DBS or professional regulator as appropriate.

Appendix 2 - Low-Level Concern Record Form

Use this form to report any concern, however small, that an adult may have acted inconsistently with the Staff Code of Conduct but the information does not appear to meet the harm threshold. If a child may be at immediate risk or the harm threshold may be met, report verbally to the headteacher and DSL immediately; do not wait to complete the form.

Date and time reported	
Name and role of reporting person	
Anonymous reporting requested?	
Name and role of adult concerned	
Child or children involved, if relevant	
Date, time and location of incident	

Factual, Chronological Account

State what was seen, heard or disclosed; the context; the child's own words where relevant; and any witnesses. Distinguish facts from professional judgement. Continue on a securely attached page if necessary.

Immediate Action Taken

Signature of reporting person	
Date and time completed	
Received by / date and time	

Case Manager Record

This section is completed by the headteacher or by the Chair of Governors where the concern is about the headteacher.

Immediate safeguarding or protective action	
People consulted and evidence considered	
Account from the adult concerned	
Relevant previous concerns or patterns checked	
Decision category	
Decision and rationale	
Action, owner and timescale	
Information shared and with whom	
Support offered	
Review date and outcome	
Organisational learning / policy or training action	
Reference declaration, if relevant	
Case manager signature	



Date closed	
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