



Hitches Lane, Fleet,
Hampshire, GU51 5JA

Headteacher: Mr K John

Chair of Governors: Mrs R Wilcox

Rev No.: 04

Date of next review: November 2026

CPS-ST-P-POL-094

Low Level Concern Policy

Revision Number	Comments	Date
01	First issue of new policy	29/11/21
02	Reissue with no changes	5/12/22
03	Reissue with no changes	10/5/24
04	Reissue with minor changes	10/11/25

Endorsement

This policy was reviewed by governors in Autumn 2025

Rights of the Child: The Calthorpe Park Low Level Concern Policy is designed to support the UNCRC Rights of the Child by directly supporting article 3 and article 12 by ensuring that we act in the interests of the child at all times and also listen and act upon concerns raised accordingly.

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Aims of this policy

- To clarify the legal requirements and responsibilities of Calthorpe Park School
- To reinforce and safeguard the safety of students and the whole school community
- To clarify the procedures for responding to and managing any low-level concerns that may occur so that they are managed with confidence and consistency and in the best interests of those involved
- To ensure that the response to incidents involving low-level concerns complement the values and ethos of the school
- To ensure statutory compliance in contributing to national requirements for keeping young people safe.

Policy context

Calthorpe Park School is committed to safeguarding all members of our community. This includes ensuring that adults who work with children do so in a way that is in accordance with the ethos and policies set out by the school including the Staff Code of Conduct. This policy sets out the detail of and processes for staff regarding low-level concerns they may have relating to staff conduct.

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 should inform the Headteacher or the Designated Safeguarding Lead about their concern using a Low-level Record of Concern Form. If neither the Headteacher nor the Designated Safeguarding Lead can be contacted, the Chair of Governors should be contacted instead. Where a concern relates to the Headteacher, the Chair of Governors should be contacted directly.

Definitions

The following is an extract from Keeping Children Safe In Education, September 2025

428: As part of their whole school approach to safeguarding, schools and colleges should ensure they promote and 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 (including allegations that do not meet the harms threshold (see Part Four – Section Two) 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 schools and colleges 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 or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

What is a low level concern?

430: The term ‘low-level’ concern does not mean that it is insignificant, it means that the behaviours towards a child does not meet the threshold set out at paragraph 430. 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

430: 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 without an appropriate viewing panel; or
- Using inappropriate sexualised, intimidating or offensive language

431: Such behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

433: It is crucial that any such concerns, including those which do not meet the harm threshold (see Part Four – Section Two), are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring such concerns are dealt with effectively should also protect those, working in or on behalf of schools, from potential false allegations or misunderstandings.

Clarity around allegations, Low level concerns and appropriate conduct

Storing and the use of Low-Level Concern records and subsequent information will be stored securely as part of our Single Central Record Tracker cloud-based storage system, with access only by the HR System Administrator, Headteacher and the Designated Safeguarding Lead. This will be stored in accordance with the school’s GDPR and data protection policies.

The staff member reporting the concern must keep the information confidential and must not share the concern with others apart from the Headteacher, the DSL or the HR System Administrator.

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 Calthorpe Park School, any record of low-level concerns which are stored about them will be reviewed as to whether or not that information needs to be retained.

Consideration will be given to:

1. Whether some or all of the information contained within any record may have any reasonably likely value in terms of any potential historical employment or abuse claim so as to justify keeping it, in line with normal safeguarding records practice; or
2. If, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted.

Key reference documents

Ref 1: For further information please access, as outlined in Dept. Of Education guidance, KCSIE 2025

Ref 2: [Low Level Concern Flow Chart](#)

Ref 3:

<https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/low-level-concerns-guidance-2021.pdf>

Ref 4: Low-Level Concern Form [here](#).

Evaluation & Review

The implementation of this policy will be monitored by the member of staff with responsibility for Learning and Teaching, by the Senior Leadership Team and by the Governing Body.

The implementation of this policy will be reviewed, and its impact monitored, in accordance with the Governing Body's programme for Policy Review - refer to CPS-NS-X-PRO-002 Document Review Procedure.

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