



Itchen Abbas Primary School

Low Level Concerns (LLCs) Policy

Policy statement

Our school recognises its statutory and moral duty to safeguard and promote the welfare of pupils and understands that staff play a vital role in meeting these responsibilities.

Our school works to ensure that we promote an open and transparent culture in which all concerns about adults working in or on behalf of the school are dealt with promptly and appropriately.

Scope

All employees employed at this school including:

- Teachers
- Support staff
- Supply teachers
- Volunteers
- Local Authority visiting staff
- Contractors

The term 'staff' throughout this policy refers to all of the above.

Policy aims

1. To help create a culture in which all concerns about adults are shared responsibly and with the right person and are recorded and dealt with appropriately.
2. To promote a culture of vigilance, professional curiosity and shared responsibility where all staff feel confident to report concerns promptly and without fear of reprisal.
3. To ensure that concerns are identified, shared and acted upon at the earliest opportunity to prevent escalation.
4. To minimise the risk of abuse occurring.
5. To ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries and in accordance with the ethos and values of the school.
6. To help create an environment where staff are comfortable to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that falls below the expected professional standards

Definition

The term 'low level' concern does not mean that it is insignificant. It means that the behaviour towards a child does not meet the harm threshold for an allegation.

'Keeping Children Safe in Education 2026' defines a low-level concern as:

"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 low-level concerns

Low-level concerns may include, but are not limited to:

- Being overly familiar with a pupil.
- Favouritism towards an individual pupil.
- Inappropriate use of personal devices.
- Direct messaging pupils through unauthorised platforms.
- Taking photographs on personal devices.
- Failing to maintain appropriate professional boundaries.
- Using inappropriate language.
- Being alone with a child unnecessarily.
- Conduct outside school which could bring professional judgment into question.
- Inappropriate use of artificial intelligence (AI), manipulated images, or online communication involving pupils.

Avoiding low level concerning behaviour

Behaviour defined as a ‘low level concern’ can exist on a spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate but is not in specific circumstances, through to that which is ultimately intended to enable abuse.

Staff education and reinforcement on avoiding circumstances which may put them in a difficult situation is key to avoiding the need for dealing with these types of concerns.

Our school ensures that staff are clear about what appropriate behaviour is through their induction and regular reinforcement of documents such as:

- Staff Code of Conduct
- ‘Avoiding Allegations’ guidance
- Whistleblowing Policy
- Safeguarding and Child Protection policies and regular training
- Teachers’ Standards (for teaching staff)

Reporting a low-level concern

Low-level concerns should normally be reported directly to the Headteacher. Where this is not appropriate, concerns may be reported to the Designated Safeguarding Lead, who will ensure they are brought to the attention of the Headteacher. Concerns involving the Headteacher must be reported to the Chair of Governors.

Low level concerns about supply staff, contractors and local authority visiting staff will also be reported to their employer.

Staff are encouraged to self-report where they believe their conduct may have fallen below expected professional standards, even where no complaint has been raised. Self-reporting will be viewed as a positive demonstration of professional responsibility and safeguarding awareness.

Dealing with a low-level concern

Where a concern is raised about the practice or behaviour of a member of staff, this information must be recorded and passed to the Headteacher.

The Headteacher must then make an assessment to determine if the matter is a 'low level concern' or an 'allegation' and follow one of the following routes.

- Allegations that meet the harm threshold will be referred to the LADO for advice.
- Low level concerns that the school feel may need further guidance on will be referred to the LADO for advice.
- Low level concerns that the school feel they can deal with internally will be dealt with via the school's usual child protection investigation process.
- The school will engage with its HR provider where it is necessary to undertake further investigation and/or deal with the concern under relevant processes.

Recording a low-level concern

All low-level concerns should be formally recorded by a member of staff when they are made aware of them. This record should then be passed to the Headteacher (or Chair of Governors if the concern is about the Headteacher).

The record should include:

- Details of the concern,
- The context in which the concern arose,
- The outcome of the investigation and any action taken
- The name of the individual sharing the concern, where known.

Anonymous concerns will be accepted and considered. However, where possible, individuals are encouraged to identify themselves to enable a full and fair assessment of the concern.

Relevant records will be retained confidentially on the personnel file. A separate record will also be kept of low-level concerns to more easily identify patterns that may involve more than one member of staff. All records must be kept in line with data protection principles.

Reviewing a low-level concern

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Where a pattern of such behaviour is identified, the Headteacher will decide on a course of action, which may include:

- Disciplinary investigation and/or proceedings
- Management Advice, including recommendations for training.
- Referral to the LADO (where a pattern of behaviour moves from a concern to meeting the harm threshold).

The school will take advice, where appropriate, from their HR provider in respect of low-level concerns.

The school will also review appropriate policies and training, or other wider cultural issues in the school, to see whether anything needs to be done to minimise the risk of similar behaviour happening again.

Relevant records will be retained confidentially on the personnel file. A separate record will also be kept of low-level concerns to more easily identify patterns that may involve more than one member of staff. All records must be kept in line with data protection principles.

Low level concerns will not be included in a reference unless they relate to issues which would normally be included in a reference (e.g. misconduct or poor performance). Low level concerns which relate solely to safeguarding will not be included in a reference.

A low-level concern (or group or pattern of concerns) which has met the harm threshold and has therefore been referred to the LADO may be included in a reference depending on the circumstances.

Related guidance

The policy links to the following guidance documents:

- Keeping Children Safe in Education 2026 (DfE)
- Model Code of Conduct (Manual of Personnel Practice)
- Avoiding Allegation guidance (Manual of Personnel Practice)
- Safeguarding Policy (Safeguarding Unit)
- Child Protection Policy (Safeguarding Unit)

Online Conduct

Staff must maintain appropriate professional boundaries in all online interactions. Concerns relating to digital communication, social media activity, AI-generated content, manipulated images, or conduct undertaken through electronic platforms may constitute a low-level concern and should be reported and recorded in accordance with this policy.

Monitoring and Oversight

The Headteacher, who is also the DSL, will periodically review records to identify themes, trends, environmental factors or emerging safeguarding risks that may require policy updates, training, supervision arrangements or wider safeguarding action.

The Governing Body will receive appropriate safeguarding reports and assurances that low-level concerns are being recorded, reviewed and managed effectively. Individual staff members will not normally be identified in such reports.

Employees of non-Hampshire County Council bodies are excluded from this policy and should refer to their own employer's policies and procedures.

Date ratified by Governors: **September 2026**

To be reviewed annually

Date for next review: September 2027