

Rise Multi Academy Trust: Low Level Concerns Policy



Date of Policy: December 2025

Approved by the Trust Board: 10th December 2025

Review Date: December 2026

Signed: 

Low-Level Concerns Policy

Purpose

This policy provides a clear framework for identifying, reporting, and managing low-level concerns about staff, volunteers, contractors, or any individual working in or on behalf of the school. It aims to promote openness, trust, and transparency, ensure adherence to professional standards, and protect pupils and staff by addressing concerns early and appropriately.

The Low-Level Concerns policy aligns with following policies and guidance:

- Trust Allegations Management Policy
- Keeping Children Safe in Education (KCSIE)
- Staff Code of Conduct
- Guidance for Safer Working Practice for Those Working with Children and Young People in Education Settings (Feb 2022)

Scope

This policy applies to all staff members, volunteers, supply teachers, contractors, and any other individuals working in or on behalf of the school.

Definition of a Low-Level Concern

A low-level concern is any concern, no matter how small, even if it causes only 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 Employee Code of Conduct or safer working practice guidance, including inappropriate conduct outside of work, and does not meet the threshold for referral to the Local Authority Designated Officer (LADO) or is not considered serious enough to constitute an allegation.

Examples include but are not limited to:

- being overly friendly with pupils - **this could include, but is not limited to, communicating with a child through personal social media or allowing inappropriate conversations or enquiries to occur with pupils, e.g. conversations that are about a staff member's personal life or are of a sexual nature.**
- showing favoritism
- taking photographs of pupils on a personal device contrary to school policy
- engaging with a pupil one-to-one in secluded areas
- humiliating pupils
- Using inappropriate, sexualised, intimidating or offensive language

Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

Allegation

Behaviour which indicates that an adult who works with children 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 or harm to children.

Low-Level Concern

Any concern – no matter how small, even if no more than a ‘nagging doubt’ – that an adult may have acted in a manner which:

- Is not consistent with the Employee Code of Conduct, and/or
- Relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult’s suitability to work with children.

Appropriate conduct

Behaviour which is entirely consistent with the Employee Code of Conduct and the law.

Where concerns are raised directly or indirectly concerning a member of staff, but the harm threshold hasn’t been met and the Low-level Concerns policy does not strictly apply, the Headteacher or case manager will conduct a risk assessment of the situation and act accordingly. Mitigations regarding the concerns may be agreed with the member of staff and actioned appropriately.

Reporting Low-Level Concerns

Concerns should be reported promptly directly to the Headteacher who will determine the appropriate actions and complete the designated Microsoft Form. If the Headteacher is unavailable or the concern relates to them, report to the Trust Director for Safeguarding & Inclusion or a member of the Executive Team.

Staff are expected to self-report any situation where their actions could be misinterpreted, appear compromising to others, or fall below the expected standards of conduct. Additionally, staff should self-report if, upon reflection, they recognise that their behaviour does not meet the standards outlined in the Staff Code of Conduct.

Recording and Storage

The school will retain all records of low-level concerns, including those that were found to be unfounded. The headteacher will ensure that all records include the most accurate and up-to-date information and will store them securely in personnel files or safeguarding systems in line with GDPR and data

protection policies, with access restricted to the Headteacher and designated senior staff.

The headteacher will ensure that all low-level concerns are stored together, in an organised and consistent manner, to ensure they can be easily reviewed and analysed where necessary. Records will include:

- A clear and comprehensive summary of the concern.
- Details of how the concern was followed up and resolved.
- A note of any action taken, decisions reached, and the outcome.

All concerns must be documented using the Microsoft Form [Low Level Concerns Reporting Form](#).

Responding to Concerns

The Headteacher (or designated person) will review the concern, gather relevant information, speak to the reporting individual and, where appropriate, the person subject to the concern, and determine the response. This may include no further action if behaviour aligns with guidance, addressing through advice or training for low-level concerns, or referring to LADO for serious concerns or patterns. All decisions and actions will be documented, and patterns of behaviour will be monitored.

Confidentiality and Anonymity

The reporting person's identity will be recorded, but anonymity will be respected where possible. Confidentiality must be maintained; concerns should not be shared beyond those managing the process.

Review and Monitoring

Records will be reviewed periodically and whenever new concerns arise to identify patterns. The Headteacher will report all concerns via the Microsoft Form to the Trust for oversight by HR and the Trust Safeguarding Lead to monitor policy effectiveness.

References

Low-level concerns will not be included in employment references unless they have been escalated and substantiated through formal safeguarding or disciplinary procedures.

Data Retention

Low-level concern forms and follow-up information will be stored securely within the school's secure personnel files and, if necessary, safeguarding systems. All related paperwork will be stored within a separate sealed envelope in the personnel file (or alternative secure storage if appropriate). Access is only for the Headteacher and senior staff where delegated if necessary. This will be stored in accordance with the school's GDPR and data

protection policies at least until the relevant member of staff ceases employment with the Trust.

The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Headteacher or those aware in the senior leadership team.

Low-level concerns will not be referred to in references, including those in settlement agreements, unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures. Whenever staff leave the Trust, any record of low-level concerns which are stored about them will be reviewed as to whether or not that information needs to be kept.

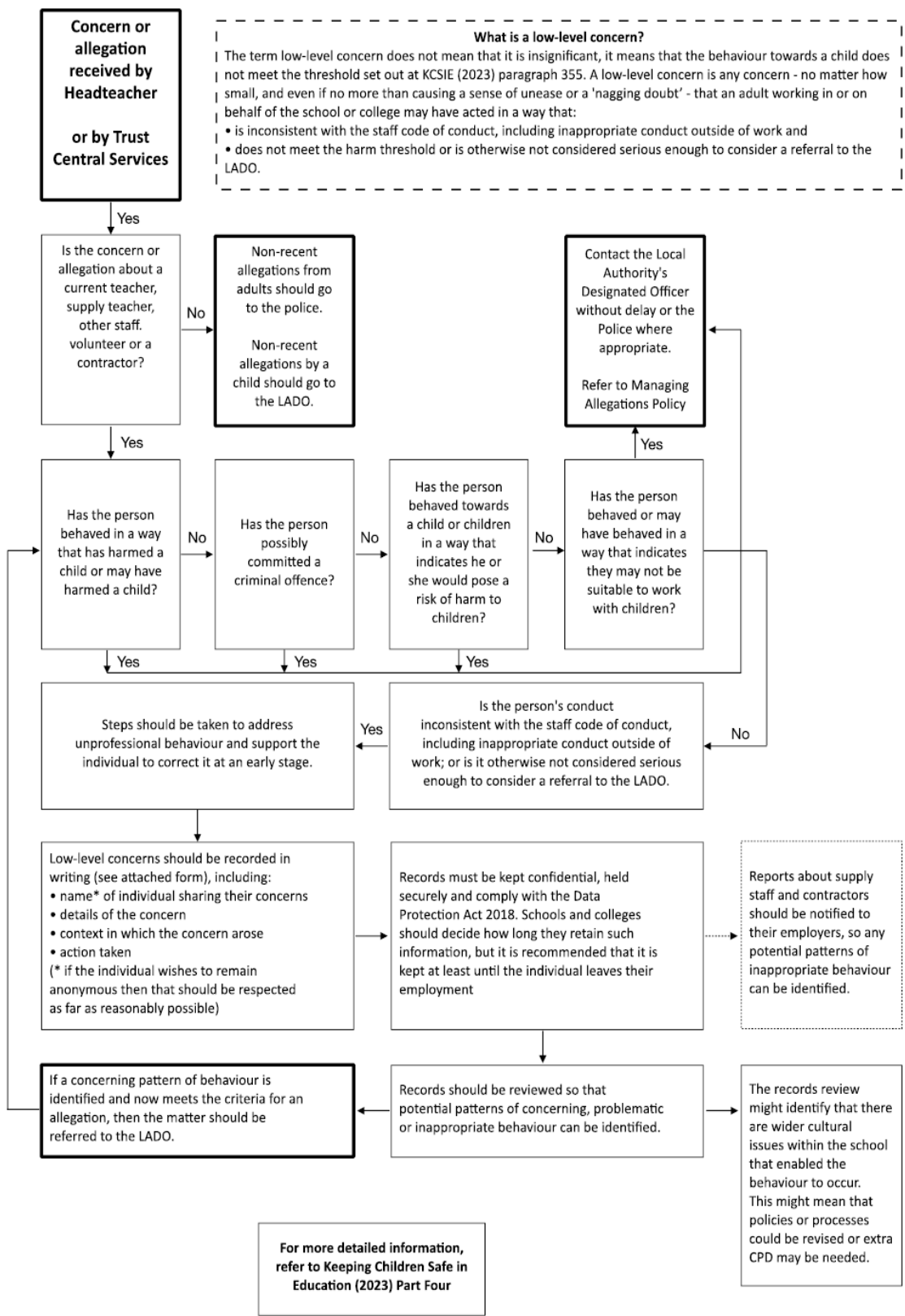
Consideration will be given to:

- whether some or all of the information contained within any record may have any reasonably likely value in terms of any potential historic employment or abuse claim so as to justify keeping it, in line with normal safeguarding records practice; or
- if, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted accordingly.
- If low-level concerns had not been escalated and no concerns around patterns

Process Overview

When a concern is identified, staff must report it promptly directly to the Headteacher who will complete the [Low Level Concern Reporting Form](#) if a low level concern has been reported. If the Headteacher is unavailable or implicated, escalate to the Trust Director for Safeguarding & Inclusion or a member of the Executive Team. The Headteacher should gather information, speak to relevant parties, and decide on the response: no action if behaviour aligns with guidance, address through advice or training for low-level concerns, or refer to LADO for serious concerns or patterns. All actions and decisions are recorded, and records are stored securely, reviewed periodically, and reported using the Microsoft Form above for Trust oversight.

Process Flowchart



Appendix A