WIMBLEDON CHASE PRIMARY SCHOOL

Empowering individuals to thrive and contribute positively in a diverse and ever-changing world

Low Level Concerns Policy

September 2026

At Wimbledon Chase Primary School, policies are designed to ensure that the child is at the centre of all our decision making. All staff are aware that whole school and class systems are established to ensure that every child is able to share and express their concerns in a safe and confidential manner. We constantly strive to ensure that all children know their worries and views will be taken seriously by all staff and that every child will be treated with respect.

1.0 Policy statement

1.1 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.

1.2 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.

2.0 Scope

2.1 All employees employed at this school including:

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

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

3.0 Policy aims

3.1 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.

3.2 To enable schools to identify concerning, problematic or inappropriate behaviour early.

3.3 To minimise the risk of abuse occurring.

3.4 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.

3.5 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 they consider falls below the expected professional standards.

4.0 Definition

4.1 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.

4.2 '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"*

5.0 Avoiding low level concerning behaviour

5.1 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.

5.2 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.

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

- Staff Behaviour Policy (Code of Conduct)
- Child Protection and Safeguarding policy
- Teachers' Standards (for teaching staff)

6.0 Reporting a low-level concern

6.1 All low-level concerns, no matter how small, should be shared promptly and confidentially with the Headteacher. Staff should not determine for themselves that a concern is too minor to report. If the concern relates to the Headteacher, it should be reported to the Chair of Governors. Staff are also encouraged to self-refer where they believe that their own behaviour may have been misinterpreted, could appear compromising to others or may have fallen below the expected professional standards.

6.2 Low-level concerns may arise in a number of ways, including through a concern raised by a pupil, parent, member of staff or other person, through observation of behaviour or through a member of staff self-referring. All such concerns will be considered and responded to in accordance with this policy.

7.0 Dealing with a low-level concern

7.1 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. On receiving a low-level concern, the Headteacher will collect as much evidence as possible by speaking directly to the person

who raised the concern, unless it was raised anonymously, and to the individual involved and any witnesses where appropriate. The information collected will help the Headteacher determine whether the behaviour is consistent with the Staff Code of Conduct, constitutes a low-level concern or may meet the harm threshold. Where there is any doubt, advice will be sought from the LADO.

7.2 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.

7.3 The school will engage with its HR partner where it is necessary to undertake further investigation and/or deal with the concern under relevant processes.

8.0 Recording a low-level concern

8.1 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).

8.2 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 rationale for decisions made and action taken, including where it is determined that the behaviour was consistent with the Staff Code of Conduct and does not constitute a low-level concern. and
- The name of the individual sharing their concerns (if known) (unless the individual wishes to remain anonymous which must be respected as far as possible).

8.3 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.

9.0 Reviewing a low-level concern

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

9.2 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).

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

9.4 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.

9.5 The Headteacher will periodically review low-level concerns records, including concerns relating to individual members of staff and the wider staff body, to identify patterns, recurring behaviours or wider cultural, training or safeguarding issues that may require action. Low level concerns will not be included in a reference unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance.

9.6 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.

10.0 Related guidance

10.1 The policy links to the following guidance documents:

- Keeping Children Safe in Education 2026 (DfE)
- Staff Behaviour Policy (Code of Conduct)
- Child Protection and Safeguarding Policy

Key contact:

John Shelley, Local Authority Designated Officer (LADO), London Borough of Merton. Email: John.Shelley@merton.gov.uk Tel: 020 8545 3187

Safeguarding Governor: Mr Jon Fuller
Designated Safeguarding Lead: Mrs Caroline Gibbins
Status & Review Cycle: Statutory Annual
Date agreed: September 2026
Next Review Date: September 2027