



Education Trust

**Inspiring the individuals of today, for a better society tomorrow,
“Aspire, Belong, Collaborate”**

LOW LEVEL CONCERNS POLICY & GUIDANCE

Review Frequency	Annual
Reviewed	September 2026
Next Review	September 2027
Agreed by Trustees	2 nd October 2026



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Requirements for sharing, recording and responding to low-level concerns

The Headteacher is the ultimate decision-maker for low-level concerns and should consult the DSL where appropriate, particularly where there are safeguarding implications.

Low-level concerns about supply staff and contractors should be notified to their employers so that potential patterns of inappropriate behaviour can be identified.

If there is any doubt about whether information shared as a low-level concern meets the harm threshold, the Trust should consult the LADO.

Staff should be encouraged and feel confident to self-refer where they have found themselves in a situation that could be misinterpreted, appears compromising, or on reflection falls below expected professional standards.

When a concern is raised by a third party, the Headteacher (or nominated deputy) should, where appropriate, gather as much evidence as possible by speaking to the person who raised the concern and to the individual involved and any witnesses.

Introduction

At Riviera Education Trust, we aim to create an open and transparent culture where all concerns about all adults involved with our Trust are dealt with promptly and appropriately. We aim to identify any concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of our Trust are clear about professional boundaries and act within these boundaries, and in accordance with our Trust ethos.

The procedures within this policy apply equally to adults working within EYFS provision. Appropriate caring, physical and personal-care interactions within the EYFS should be understood in the context of children's age, development and individual needs and the expectations set out within the Staff Code of Conduct, Safe Touch and Physical Intervention Policy and Intimate Care Policy.

Summary

A member of staff may act in a way that does not pose a risk of harm to children but is nevertheless inappropriate. A member of staff who has a concern about another member of staff, volunteer, contractor or who, on reflection, recognises that their actions could have been viewed as a risk should report the concern without delay using a Low-Level Record of Concern Form. The Trust's chosen initial reporting route is the Headteacher. The Headteacher is the ultimate decision-maker in relation to low-level concerns and should consult the DSL where appropriate, particularly where there are safeguarding implications. If the Headteacher cannot be contacted, the CEO should be contacted instead. If the concern is about the Headteacher, the CEO should be informed. If the concern is about the CEO, the Chair of Trustees should be informed. Where there is any doubt as to whether a concern meets the harm threshold, the LADO should be consulted.



Keeping Children Safe in Education

The following reflects the low-level concerns requirements in Keeping Children Safe in Education 2026 (KCSIE), Part Four, Section Two. KCSIE 2026 is in force from 1 September 2026.

KCSIE 2026 requires governing bodies and proprietors to have policies and processes to deal with concerns or allegations which do not meet the harm threshold, referred to as low-level concerns, and to manage, record and respond to them appropriately to safeguard children.

Schools and colleges should promote an open and transparent culture in which all concerns about adults working in or on behalf of the school or college, including supply staff, trainee teachers, volunteers and contractors, are dealt with promptly and appropriately.

The purpose of the low-level concerns policy is to create and embed a culture of openness, trust and transparency in which the Trust's values and expected behaviour, as set out in the Staff Code of Conduct, are constantly lived, monitored and reinforced by all staff.

Such a culture should:

- enable schools and colleges to identify inappropriate, problematic or concerning behaviour early;
- minimise the risk of abuse; and
- ensure that adults working in or on behalf of the Trust or its schools 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?

The term 'low-level' concern does not mean that it is insignificant. 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 may have acted in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside work, but which does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

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, contrary to Trust policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children.

Such behaviour can exist on a wide spectrum, from inadvertent or thoughtless behaviour, or behaviour that may look inappropriate but may be appropriate in the circumstances, through to behaviour that is ultimately intended to enable abuse.



Low-level concerns may arise from suspicion, complaint, disclosure by a child, parent or another adult inside or outside the organisation, or as a result of vetting checks undertaken.

All low-level concerns should be shared responsibly with the right person, recorded and dealt with appropriately. Effective handling should also help protect adults from false concerns or misunderstandings.

Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

Allegation:

Any adult linked to our Trust who has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Low Level Concern:

Any adult linked to our Trust who has behaved in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the harm threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Appropriate:

Behaviour which is entirely consistent with our Trust's Code of Conduct, and the Law.



Storing and use of low-level concerns and follow-up information

All low-level concerns, including self-referrals, should be recorded in writing. The record should include details of the concern, the context in which the concern arose and the action taken. The name of the individual sharing the concern should also be recorded. Where the individual wishes to remain anonymous, this should be respected as far as reasonably possible.

LLC forms and follow-up information will be stored securely within the Trust's safeguarding systems, with access only by HR, Headteacher (only for staff within their own school) and the CEO, subject to need-to-know access. Records will be kept confidential, held securely and managed in accordance with data protection laws and the Trust's data retention schedule.

The staff member(s) reporting the concern must keep the information confidential and should not share the concern beyond those who need to know for safeguarding, management or processing purposes, normally the Headteacher, DSL and relevant senior leaders.

Low-level concerns should not normally be included in references. However, where a low-level concern relates to issues which would normally be included in a reference, for example misconduct or poor performance, relevant factual information may be included in accordance with the Trust's reference procedure and data protection requirements. A low-level concern relating exclusively to safeguarding, and not to misconduct or poor performance, should not be included in a reference.

Records of low-level concerns will be reviewed periodically, and whenever a further concern is received about the same individual, to identify any pattern of inappropriate, problematic or concerning behaviour. Where a pattern is identified, the Headteacher will determine whether the matter should be addressed through the Trust's disciplinary procedures or whether the harm threshold may now be met, in which case the LADO will be consulted. Consideration will also be given to whether wider cultural or systemic issues contributed to the behaviour and whether changes to policy, practice, supervision or training are required.

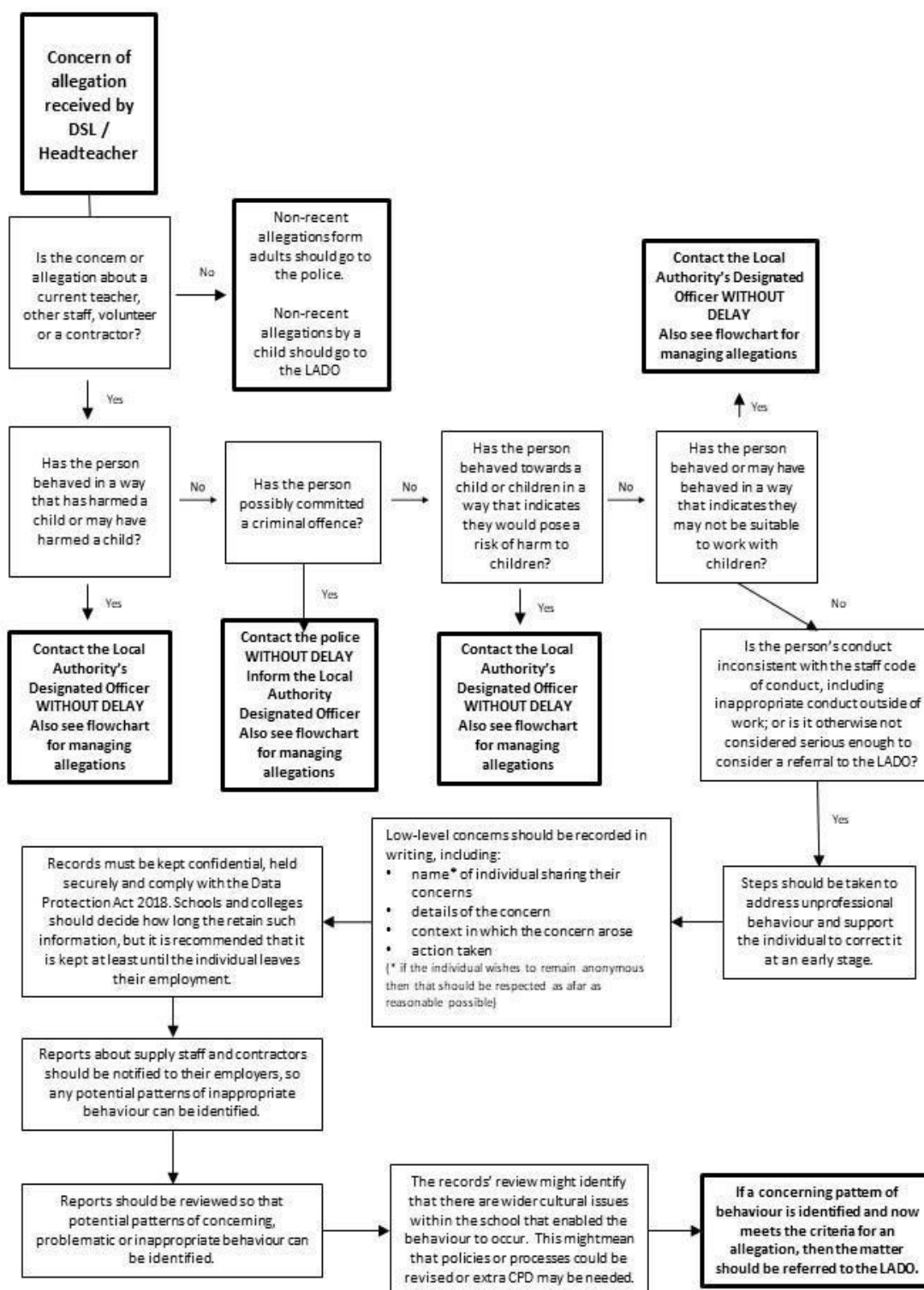
Whenever staff leave Riviera Education Trust, any record of low-level concerns stored about them will be reviewed. Low-level concern information will be retained at least until the individual leaves their employment, unless the Trust's retention schedule and applicable data protection requirements require a different approach.

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.



PROCESS TO FOLLOW WHEN A LOW-LEVEL CONCERN IS RAISED



*NB – if the concern is about the Headteacher, then the CEO should be informed. Concerns about the CEO should be reported to the Chair of Trustees. The Headteacher remains the ultimate decision-maker for low-level concerns and should consult the DSL where appropriate. Supply staff and contractors: notify their employer. If there is doubt about the harm threshold, consult the LADO.

Following consideration of the available information, the Headteacher will determine whether the behaviour:

- (a) is consistent with the Staff Code of Conduct and therefore requires no safeguarding action;
- (b) constitutes a low-level concern;
- (c) constitutes a conduct, capability or disciplinary matter requiring management action; or
- (d) may meet the harm threshold, in which case the Trust's allegations procedure will be followed and the LADO consulted as appropriate.

The decision, rationale, action taken and any consultation or advice received will be recorded in writing.



Low-Level Concerns Reporting Form – Riviera Education Trust

Your details		
Name (unless anonymity is requested)		
Role		
Date and time of completing this form		
Details of individual (including yourself for self-reporting) whom the concern is about		
Name		
Role		
Relationship to the individual reporting e.g. manager, colleague		
Details of concern		
Please include as much detail as possible. Think about the following: What behaviour and/or incident are you reporting? What exactly happened? What was the context in which the concern arose? Why does the behaviour and/or incident worry you? Why do you believe the behaviour and/or incident is not consistent with our Staff Code of Conduct? If relevant, identify any witnesses and any immediate safeguarding action taken.		
Details of any children or young people involved		
Name(s)		
Next Steps		
Are you willing to meet with the Headteacher and DSL to discuss your concern? Please circle as appropriate.	Yes	No



Please state any other information that you feel is relevant to the processing of this concern.	
Signature	
For use by Headteacher upon receipt of the LLC form	
Date and time concern received	
Signature	
Role	
Actions to be taken and follow-up.	

Decision

/

outcome

Record the decision reached and the outcome, including whether the matter remains a low-level concern, is addressed through management/disciplinary processes, or is escalated.

Rationale

Record the rationale for the decision and any advice or consultation obtained, including LADO consultation where applicable.

Follow-up / review

Record any follow-up action, review date, pattern review, training or policy action, and the outcome of that follow-up.

Supply staff / contractor employer notified

Yes / No / Not applicable. If yes, record date, organisation and contact.

LADO consultation / referral

Yes / No. If yes, record date, advice/outcome and reference where appropriate.



DETAILS OF AMENDMENTS

October 2021

- Policy adopted.

June 2023

- Important KCSiE updates added.

September 2024

- KCSiE references updated

September 2025

- No changes

December 2025

- Formatting changes
Policy updated to reflect KCSiE 2026, including reporting routes, supply staff and contractors, LADO consultation, recording, retention, references and follow-up.
- KCSiE references updated to reflect September 2025 guidance

September 2026

- KCSiE references updated to reflect Keeping Children Safe in Education 2026.
- Reporting arrangements clarified, including the Headteacher as the ultimate decision-maker and consultation with the DSL where appropriate.
- LADO consultation added where there is uncertainty about whether the harm threshold is met.
- Specific provision added for low-level concerns relating to supply staff and contractors, including notification to their employers.
- Guidance added on self-reporting and gathering evidence where a concern is raised by a third party.
- Recording requirements strengthened to include the details and context of the concern, action taken, decisions, rationale, follow-up and outcomes.
- Retention arrangements updated to reflect retention of low-level concern information at least until the individual leaves employment, subject to the Trust's retention schedule and data protection requirements.
- Reference wording amended to clarify when information relating to low-level concerns may be included in references.
- Low-Level Concerns Reporting Form updated to capture context, decision/outcome, rationale, follow-up/review, supply staff/contractor employer notification and LADO consultation/referral.
- Review date updated to September 2027.

