

West Exmoor Federation



Low Level Concerns Policy

January 2026

‘Educating with love for life in all its fullness’

West Exmoor Federation – Low Level Concerns Policy

Core purpose statement

In a caring environment, we all support and challenge one another to develop the confidence and independence to live life in all its fullness.

Equality and Inclusion

The West Exmoor Federation is committed to the inclusion of pupils and stakeholders, regardless of age, race, gender or disability and expects all members of our federation community to share in this commitment. Wherever possible we will make reasonable adjustments to ensure inclusion for all. We have carefully considered and analysed the impact of this policy on equality and the possible implications for pupils with protected characteristics, as part of our commitment to meet the Public Sector Equality Duty (PSED) requirement to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations.

Whilst being fully inclusive of all faiths and none, at our Church of England schools we aim for all elements of school life to reflect our Christian ethos. Through our CARIS values we learn to grow together in community enabling children and adults to become their very best selves and enjoy life in all its fullness. These values underpin our understanding and promotion of the British Values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.

The West Exmoor Federation is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. This means that the federation promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the federation (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

Rationale

The West Exmoor Federation's Child Protection and Safeguarding Policy and Whistle-blowing Policy set out the process for dealing with concerns that meet the threshold for referral to the LADO or NSPCC Whistle-blowing helpline. This policy addresses concerns (including allegations) which do not meet the harm threshold set out in Keeping Children Safe in Education Part Four - Section 1, when these policies would be followed. These are known as low level concerns. This policy should encourage an open and transparent culture; enable our schools to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the West Exmoor Federation are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the federation.

What is a low level concern?

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out in Keeping Children Safe in Education [2021] at paragraph 338. 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 West Exmoor Federation may have acted in a way that is inconsistent with the staff code of conduct but does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO. This includes inappropriate conduct outside of work. 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 (unless within the remit of our Online Safety Policy);
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door;
- using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. It is crucial that any such concerns, including those which do not meet the allegation/harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools from potential false allegations or misunderstandings.

Sharing low-level concerns

Low-level concerns about a member of staff should be reported to the Designated Safeguarding Lead (or Deputies). Where a low-level concern is raised about one of the Deputy Designated Safeguarding Leads, it should be shared with the Executive Headteacher. If the concern is raised about the Executive Headteacher, it should be shared with the Chair of Governors. West Exmoor Federation staff are also encouraged and feel confident 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.

Where a low-level concern relates to a person employed by a supply agency or a contractor to work in a school, that concern should be shared with the Designated Safeguarding Lead (or Deputies), and recorded in accordance with the West Exmoor Federation's Low Level Concern Policy. Their employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

Recording low-level concerns

All low-level concerns should be recorded in writing by the Designated Safeguarding Lead (or Deputies) using the form at Appendix A of this policy. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. Records of concerns raised will be kept in individual personnel files, where they must be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) (see KCSiE 2021 paragraph 109 for more information).

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the Designated Safeguarding Lead should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the West Exmoor Federation that enabled the behaviour to occur and where appropriate policies should be revised or extra training delivered to minimise the risk of it happening again. This information should be retained at least until the individual leaves their employment.

References

Keeping Children Safe in Education [2022] Part 3 is clear that schools should only provide substantiated safeguarding allegations in references. Low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

Responding to low-level concerns

Concerns about safeguarding should be reported to the Designated Safeguarding Lead or their Deputies. If the concern has been raised via a third party, the Designated Safeguarding Lead should collect as much evidence as possible by speaking directly to the person who raised the concern, unless it has been raised anonymously or to the individual involved and any witnesses. The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. All of this needs to be recorded along with the rationale for their decisions and action taken.

Low-Level Concern Form

Please use this form to share any concern, no matter how small, and even if no more than a 'nagging doubt' that an adult may have acted in a manner which:

- is not consistent with the West Exmoor Federation's Code of Conduct;
- 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.

You should provide a concise record, including brief context in which the low level concern arose and details which are chronological and as precise and accurate as possible, of any concern and relevant incident(s). Please use a separate sheet if needed.

Please ensure the record is signed and dated and handed to the DSL or DDSL.

Name of staff Member:

School and role:

Details of concern:

Signed:

Time & Date:

Received by:

At: (Time)

On: (Date)

Action Taken: (Specify):

This record will be held securely in accordance with the West Exmoor Federation's Low Level Concerns Policy. Please note that low level concerns will be treated in confidence as far as possible but the West Exmoor Federation may, in certain circumstances, be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.