

Low-Level Concerns Procedure

Daffodil Grammar School for Girls is committed to promoting a strong safeguarding culture based on openness, trust, vigilance and professional accountability. The school recognises that creating a culture in which concerns about adults are identified, shared, recorded and dealt with promptly is an essential part of safeguarding and promoting the welfare of children. Current statutory safeguarding guidance expects schools to have clear procedures for sharing concerns about adults working in or on behalf of the school, including low-level concerns.

1. Purpose

The purpose of this procedure is to ensure that:

- any concern about the behaviour, conduct or professional boundaries of an adult working in or on behalf of the school is recognised early
- concerns are reported promptly
- concerns are dealt with fairly, consistently and proportionately
- patterns of behaviour are identified where relevant
- pupils are protected
- staff understand the difference between a low-level concern and an allegation that may meet the harm threshold

2. Scope

This procedure applies to all adults working in or on behalf of Daffodil Grammar School for Girls, including:

- employees
- agency and supply staff
- contractors
- volunteers
- governors or proprietors
- peripatetic staff
- visiting professionals
- any adult otherwise engaged to work with pupils or on the school site

3. Definition of a low-level concern

A low-level concern is any concern, no matter how small, that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the school's Staff Code of Conduct, including inappropriate conduct outside work, but does not appear to meet the harm threshold for an allegation. KCSIE 2025

uses this definition and requires schools to have a clear procedure for sharing, recording and responding to such concerns.

A low-level concern may arise from a single incident or from a pattern of behaviour. The fact that a concern appears minor does not remove the requirement to report it.

4. Examples of low-level concerns

A low-level concern may include, but is not limited to:

- being over-familiar with a pupil
- using inappropriate language or tone
- having unnecessary one-to-one contact with a pupil behind a closed door
- contacting a pupil through an unauthorised communication route
- failing to maintain professional boundaries
- favouritism
- using a personal device in a way that is inconsistent with school expectations
- conduct outside school that may undermine confidence in the adult's suitability to work with children, where the harm threshold is not met

These examples are illustrative only. Staff must report the concern rather than decide alone that it is too minor to share.

5. Harm threshold and distinction from allegations

A low-level concern is different from an allegation that may meet the harm threshold. The harm threshold applies where an adult 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 of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

If there is any doubt about whether a concern meets the harm threshold, the matter must be treated seriously and referred immediately to the Headteacher. If necessary, advice must be sought from the Local Authority Designated Officer. KCSIE 2025 states that where schools are unsure whether the harm threshold is met, they should consult the LADO.

6. Named reporting routes at Daffodil Grammar School for Girls

At Daffodil Grammar School for Girls, all low-level concerns must be reported to the **Headteacher**.

If the concern relates to the **Headteacher**, it must be reported directly to the **Proprietor**.

If the concern appears to meet the harm threshold, or if there is uncertainty about threshold, the Headteacher or Proprietor must seek advice without delay from the **Tower Hamlets Local Authority Designated Officer, LADO**, on **020 7364 0677** or by email at **LADO@towerhamlets.gov.uk**. Tower Hamlets states that referrals should be made using its referral form and emailed to the LADO mailbox.

For immediate child protection risk, the school should also contact the relevant safeguarding agencies without delay. The existing safeguarding policy you uploaded already records Tower Hamlets Children's Social Care daytime contact numbers as **020 7364 5601 / 020 7364 5606**, the Emergency Duty Team as **020 7364 4079**, police non-emergency as **101**, and emergency as **999**.

7. How concerns must be reported

Low-level concerns must be reported:

- as soon as possible
- on the same working day where reasonably practicable
- verbally in the first instance where necessary, followed by a written record

The written record must include:

- the name of the adult whose conduct is of concern
- the name of the person raising the concern, unless anonymity is requested
- the date, time and location
- a factual account of what was seen, heard or reported
- the context in which the concern arose
- any immediate action taken
- the names of any witnesses

KCSIE 2025 states that all low-level concerns should be recorded in writing, including the details of the concern, the context in which it arose, and the action taken.

8. Anonymous reporting

The school will respect a request for anonymity as far as reasonably possible. However, anonymous reporting will not prevent the concern from being considered and acted upon. KCSIE 2025 states that where the individual sharing

the concern wishes to remain anonymous, that should be respected as far as reasonably possible.

9. Immediate response by the Headteacher

On receiving a low-level concern, the Headteacher will:

- review the information promptly
- determine whether the matter appears to be a low-level concern or a possible harm-threshold allegation
- seek further information where necessary
- speak to the reporting person, the adult concerned, and any witnesses where appropriate
- consider whether any immediate safeguarding action is needed
- decide what action is required
- record the decision, rationale and action taken in writing

Where the concern relates to the Headteacher, these steps must be carried out by the Proprietor.

10. Possible outcomes

Following review, the Headteacher or Proprietor may decide that:

- no further action is required, but the concern will remain recorded
- advice, guidance or clarification should be given
- a professional boundaries conversation should take place
- additional supervision or support is required
- training is required
- the issue should be managed through staff conduct, capability or disciplinary procedures
- the concern, either on its own or taken together with previous concerns, indicates a pattern of behaviour requiring escalation
- the matter meets, or may meet, the harm threshold and must be referred to the LADO

11. Record-keeping

All low-level concerns will be retained in a central, secure low-level concerns record maintained by the school.

The record will include:

- the concern raised

- the context
- the action taken
- the decision reached
- the rationale for the decision
- any follow-up action

The low-level concerns record must be kept securely and separately from general personnel files, although relevant management outcomes may also be reflected in staff records where appropriate. KCSIE 2025 recommends retaining low-level concerns information at least until the individual leaves employment.

12. Pattern review

The Headteacher will review the low-level concerns record regularly to identify:

- repeated similar behaviour
- cumulative concerns about one individual
- wider cultural weaknesses
- training needs
- procedural weaknesses in supervision or professional boundaries

A series of low-level concerns may, taken together, indicate behaviour that requires formal action or referral.

13. Supply staff, contractors and external adults

Where a low-level concern relates to a supply worker, contractor or other external adult, the school will:

- record the concern in the school's low-level concerns record
- notify the person's employer, agency or organisation where appropriate
- consider whether that person should continue to have access to the school site
- decide whether the matter should be escalated to the LADO

KCSIE 2025 states that schools should notify employers of supply staff and contractors about low-level concerns shared about them, so that any pattern of inappropriate behaviour can be identified.

14. Confidentiality

Low-level concerns will be handled sensitively and confidentially. Information will be shared only with those who need to know in order to:

- safeguard pupils
- ensure fair and proportionate decision-making

- manage staff appropriately
- comply with legal and safeguarding duties

15. Staff responsibility and self-reporting

All staff at Daffodil Grammar School for Girls are expected to:

- maintain clear professional boundaries at all times
- act in line with the Staff Code of Conduct
- report low-level concerns promptly
- self-report where they believe their own conduct may have fallen below the expected standard
- contribute to a culture in which safeguarding concerns are shared rather than minimised

16. Related documents

This procedure should be read alongside:

- Safeguarding and Child Protection Policy
- Staff Code of Conduct
- Allegations Against Staff Procedure
- Whistleblowing Policy
- Safer Recruitment Policy and Procedures
- Disciplinary Procedure