

Policy Title: Staff Low Level Concerns Policy

Academic Year 2026 - 2027

Mortimer



Leader: Mr S Hignett

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CONTENTS:

1. Introduction	p.2
2. Summary	p.2
3. Keeping Children Safe in Education September 2026	p.2&3
4. Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct	p.3
5. Storing and use of Low-Level Concerns and follow-up information	p.4
6. Process to follow when a Low-Level Concern is raised	p.5
7. Key Reference Document	p.6
8. Low Level Concern Form	p.7&8

1. Introduction

At Mortimer Community College, we take safeguarding very seriously. This includes ensuring that adults who work with children do so in a way that is in accordance with the ethos and policies set out by the school, including the Staff Code of Conduct.

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

This policy sets out the detail and processes for staff regarding low-level concerns they may have.

2. Summary

It may be possible that a member of staff acts in a way that does not pose a risk to children but is, however, inappropriate. A member of staff who has a low-level concern about another member of staff should report the concern without delay to the Headteacher and/or Designated Safeguarding Lead (DSL), using the Low-Level Record of Concern Form. Concerns about the Headteacher should be reported to the Chair of Governors.

3. Keeping Children Safe in Education September 2026

The following is taken from Keeping Children Safe in Education September 2026

504. *As part of their whole school or college approach to safeguarding, schools and colleges should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. (Pages 118–119)*

505. *Creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this 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 school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution. **(Page 119)**

What is a low-level concern?

506. 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 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 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 school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating pupils. **(Page 119)**

507. 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. **(Page 119)**

508. Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken. **(Page 119-120)**

509. It is crucial that all low-level concerns are shared responsibly 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 and colleges from becoming the subject of potential false low-level concerns or misunderstandings. **(Page 120)**

4. 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 of 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 an organisation's 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 organisation's Code of Conduct, and the law.

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

Low level concern forms and follow up information will be stored securely within the schools safeguarding systems, with access only by the senior leadership team. This will be stored in accordance with the school's GDPR and data protection policies.

The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Designated Safeguarding Lead (Mr Liddle) and/or the Head Teacher (Mr Hignett) or those aware in the senior leadership team.

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. Substantiated safeguarding concerns or allegations that meet the harm threshold will be dealt with in accordance with Keeping Children Safe in Education.

Records of low-level concerns will be retained at least until the individual leaves their employment with Mortimer Community College. At that point, any records held will be reviewed to determine whether there is an ongoing need to retain the information.

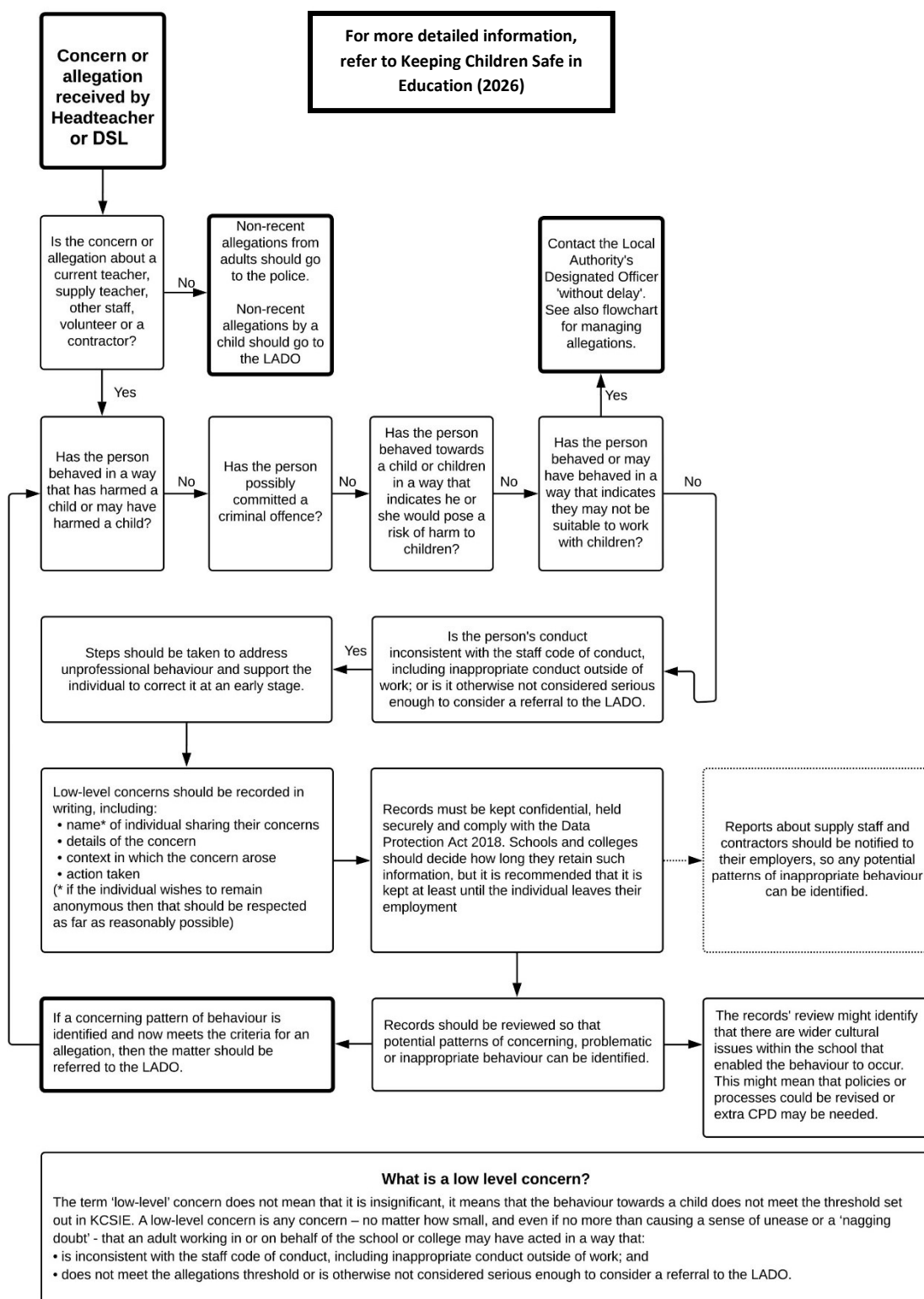
Consideration will be given to:

(a) 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

(b) if, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted accordingly.

6. Process to follow when a Low-Level Concern is raised

Managing low level concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors



7. Key Reference Document

Read this document for further information about Low-Level Concerns, which is referenced in KCSIE 2026.

<https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/developing-and-implementing-a-low-level-concerns-policy.pdf>

8. Low Level Concern Form

This form will be available to staff in Appendix A below or via:

- Downloaded from the Staff Safeguarding webpage
- The Office
- DSL
- Head Teacher

Appendix A: Low Level Concern Form - MCC 2026-2027

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 Mortimer Community College 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.

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 such concern and relevant incident(s) (and please use a separate sheet if necessary).

Name of staff member reporting concern:

Department & Role:

Name of staff member concern is about:

Details of concern:

Signed:

Time & Date:

The record should be signed, timed and dated.

Received by:	At: (Time)	On: (Date)
Action Taken: (Specify)		

Signed:	Time & Date:
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This record will be held securely in accordance with Mortimer Community College's low-level concerns policy. Please note that low-level concerns will be treated in confidence as far as possible, but Mortimer Community College 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.