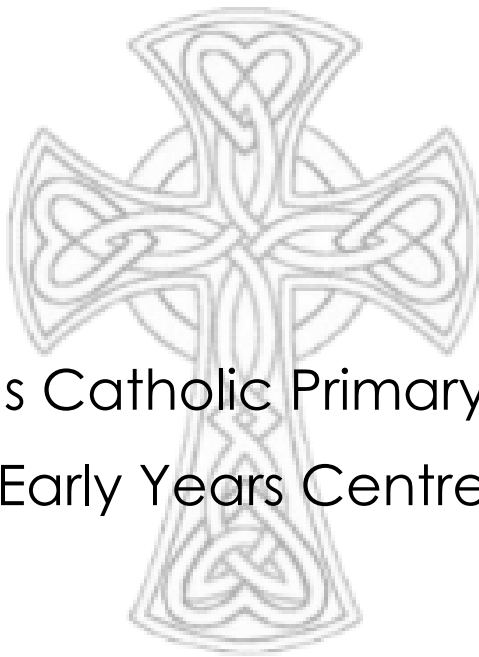


# St. Finbar's Catholic Primary School



St. Finbar's Catholic Primary School  
& Early Years Centre

## **Low-level Concerns Policy**

2026 - 2027

## Our Mission Statement

*In God's love we learn and grow together*

Founded upon Catholic principles of; dignity, solidarity,  
the common good and peace,  
we aim to inspire and celebrate each child's spiritual,  
intellectual, emotional,  
physical and creative growth.

In our safe and caring environment, we share strong,  
positive relationships with each other as well as the local  
community. Learning about each other's lives locally  
and the wider world teaches us the value and unique  
talents of everyone.

We will achieve our goals by enhancing pupils' self-  
esteem, their self-respect, respect for others  
and for all of God's creation.



We will learn and grow together



*In God's love we learn and grow together*

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## CHANGE LOG

Date	Page number	Description of change(s)	Person responsible

## 1. Statutory, Guidance and Legal framework

This policy is informed by and should be read in conjunction with:

- Keeping Children Safe in Education (KCSIE) 2025
- Working Together to Safeguard Children
- The school's Child Protection and Safeguarding Policy
- Staff Code of Conduct
- Whistleblowing Policy

KCSIE 2025 makes clear that schools must foster a culture in which staff feel confident to share concerns about adults, including concerns which do not meet the threshold for an allegation.

## 2. Ethos and Safeguarding Culture

At St. Finbar's Catholic Primary School, safeguarding is a collective responsibility rooted in our Catholic mission to protect the dignity and wellbeing of every child. Our Mission Statement and our core values (**F**riendship, **I**ndependence, **N**obility, **B**ravery, **A**spiration, **R**espect and **S**ervice) underpin our work and commitment to keeping everyone safe.

In line with KCSIE 2025, we are committed to:

- A culture of openness, trust and transparency
- Encouraging staff to share concerns early
- Ensuring low-level concerns are recorded, reviewed and acted upon appropriately
- Preventing escalation through early identification and professional support

Low-level concerns are not allegations and are not about blame. They are a safeguarding tool to help ensure consistent professional standards and keep children safe.

## 3. Scope of the Policy

This policy applies to **all adults** working with or on behalf of the school, including:

- Teachers and support staff
- Supply staff
- Volunteers and governors
- Students on placement
- Contractors and visitors (where relevant)

## 4. Definition of a Low-Level Concern (KCSIE 2025)

In line with KCSIE 2025, a low-level concern is defined as:

*A concern about an adult's behaviour which does not meet the threshold for an allegation or child protection concern, but is inconsistent with the school's staff code of conduct and could, if repeated or left unaddressed, indicate a risk to children.*

KCSIE 2025 emphasises that such concerns may appear minor in isolation, but patterns of behaviour may be significant.

**Examples of Low-Level Concerns** (*KCSIE-aligned, non-exhaustive*)

- Using language that is overly familiar, inappropriate or unprofessional
- Blurring professional boundaries with a child
- Showing favouritism or giving special attention to one pupil
- Failing to follow guidance on physical contact or one-to-one working
- Sharing personal information with pupils
- Dismissing children's worries or minimising behaviour
- Frustration, impatience or tone that may impact pupils, particularly those with SEND or EAL
- Failure to follow safeguarding or behaviour procedures consistently

## **5. What a Low-Level Concern Is Not**

A low-level concern is not:

- An allegation of abuse
- A concern that a child is at risk of significant harm
- A concern that meets the threshold for referral to the LADO

Where there is any doubt, staff should always report – the DSL will determine the appropriate response, as advised by KCSIE 2025.

## **6. Our School Context**

KCSIE 2025 highlights that some children with additional vulnerabilities may be less able to recognise or report concerns.

At our school, high levels of:

- SEND
- EAL
- Social disadvantage
- Pupil mobility

mean that professional curiosity and early reporting are essential to safeguarding.

## **7. Step-by-Step Guide for Staff, Volunteers and other adults**

### **Step 1: Recognise**

Staff and volunteers should be alert to behaviour that:

- Falls outside the Staff Code of Conduct
- Feels uncomfortable or concerning
- Could be misinterpreted
- Would be inappropriate if repeated
- Raises a "nagging doubt"

KCSIE 2025 is clear: staff should not wait for proof or certainty.

## Step 2: Record

As soon as possible:

- Make a clear, factual record
- Include:
  - Date, time and location
  - Who was involved?
  - What was observed or reported (using exact words where possible)
  - Your role and how the concern came to your attention
- Avoid opinion, assumption or investigation

Records should be made using the school's Low-Level Concern Form or safeguarding system.  
(Available on the central StaffShare drive – Safeguarding – In-house Forms)

## Step 3: Report

- Share the concern with the Designated Safeguarding Lead (DSL) or Headteacher
- If the concern involves the Headteacher, report directly to the Chair of Governors
- Verbal reporting may happen initially, but written recording is required

KCSIE 2025 stresses that concerns should be shared without delay.

## Step 4: DSL Consideration

In line with KCSIE 2025, the DSL/Headteacher will:

- Consider the concern in context
- Review any previous low-level concerns
- Look for patterns or cumulative issues
- Decide on appropriate action, which may include:
  - Advice or clarification of expectations
  - Support or training
  - Increased supervision or monitoring
  - Recording for future reference
  - Escalation to LADO if thresholds are met

## Step 5: Outcome and Follow-Up

- Any action taken will be proportionate, fair and supportive
- The adult involved will be treated with respect and confidentiality
- Records will be kept securely and reviewed regularly
- Low-level concerns may be used to inform:
  - Professional development
  - Safeguarding learning
  - Risk management

## 8. Recording, Storage and Confidentiality

In line with KCSIE 2025:

- Low-level concerns are recorded and stored securely
- Records are confidential and shared on a need-to-know basis
- Information may be reviewed to identify patterns of behaviour
- Records do not automatically form part of disciplinary or personnel files unless escalation occurs

## 9. Raising Concerns and Professional Confidence

KCSIE 2025 is explicit that schools must ensure staff:

- Feel confident and safe to report concerns
- Understand that reporting is a professional responsibility
- Are protected from detriment for raising concerns in good faith

Raising a low-level concern is not a judgement and is consistent with our Catholic values of honesty, care and accountability.

## 10. Whistleblowing

If a member of staff feels unable to raise a concern internally, they should follow the school's Whistleblowing Policy, as referenced in KCSIE 2025.

## 11. Monitoring and review

This policy will be reviewed by the headteacher and Full Governing Body on an annual basis. Any changes to this policy will be communicated to all staff and other relevant parties.

**Reviewed and ratified by:** Full Governing Body

**Date of review:** 22<sup>nd</sup> January, 2026

**Date of next review:** January 2027

**Policy Status:** Statutory

**Policy cycle:** Annual

NB. This policy may be subject to review subject to changes in KCSIE and/ or after any safeguarding learning, audit or inspection

Date concern recorded:

Time recorded:

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### 1. Details of Person Completing This Form

Name:

Role:

Relationship to school:

☐ Staff    ☐ Volunteer    ☐ Governor    ☐ Supply    ☐ Other: \_\_\_\_\_

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### 2. Details of the Adult the Concern Relates To

Name:

Role:

Employment status:

☐ Staff    ☐ Volunteer    ☐ Supply    ☐ Other: \_\_\_\_\_

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### 3. Nature of the Concern

*(KCSIE 2025: behaviour that does not meet the threshold for an allegation but is inconsistent with the staff code of conduct)*

Date of incident / observation:

Time:

Location:

Please provide a **clear, factual account** of what was observed, heard or reported.

Include **what happened, what was said** (use exact words if possible), and **who was present**.

Do not include opinion, interpretation or investigation.

Description of concern:



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#### 4. How Did This Concern Come to Your Attention?

- ☐ Observed directly
  - ☐ Reported by another adult
  - ☐ Reported by a child
  - ☐ Other (please specify):
- 

#### 5. Context and Vulnerability (if relevant)

Please note any relevant context, for example:

- Child/children with SEND, EAL or additional vulnerabilities
- One-to-one situations
- Repeated or similar behaviour
- Any professional boundary issues

*(KCSIE 2025 highlights the importance of professional curiosity and recognising patterns.)*

**6. Immediate Actions Taken (if any)**

- ☐ No immediate action required
  - ☐ Advice given
  - ☐ Safeguarding guidance followed
  - ☐ Other (please specify):
- 

**7. Reporter Declaration**

I confirm that this record is **true, accurate and made in good faith**, in line with the school's safeguarding responsibilities and KCSIE 2025.

**Name:**

**Signature:**

**Date:**

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## Appendix 2 – DSL/ Headteacher Consideration and Review Form

For DSL/ HT use only

**Reviewed by:**

**Role:**

**Date reviewed:**

### 1. Decision made

- ☐ Low-level concern confirmed
- ☐ No further action required
- ☐ Advice / clarification provided
- ☐ Monitoring required
- ☐ Support / training identified
- ☐ Escalated to safeguarding concern
- ☐ Escalated to LADO (date): \_\_\_\_\_

### 2. Rationale for Decision

Please record the **reasoning**, including consideration of previous concerns or patterns of behaviour.

### 3. Follow-Up and Review

**Actions agreed:**

**Timescale:**

**Review date (if applicable):**

### 4. Record Storage

- ☐ Stored securely within safeguarding records
- ☐ Linked to existing low-level concerns (if applicable)
- ☐ Stored securely within individual's personnel records

#### **Important Notes (KCSIE 2025)**

- Low-level concerns are not allegations
- Records are kept confidentially and securely
- Information may be reviewed to identify patterns of behaviour over time
- Recording a concern is a professional responsibility and supports a culture of openness and transparency