

OWSLEBURY PRIMARY SCHOOL POLICY DOCUMENT



NO. E 190 Lower Level Concerns Policy

Review History

Date of Update	Reason for Update	Next Update
Sept. 2021	New Policy	Sept 2022
Sept 2022	Annual Update	Sept 2023
Nov 2023	Annual Update	Sept 2024
Sep 2024	Annual Update	Sept 2025
Sept 2025	Annual Update	Sept 2026

1. Introduction

At Owslebury Primary School, safeguarding is our highest priority. All staff are expected to work with children in accordance with the ethos, values, and policies of the school, including the Staff Code of Conduct. This policy provides clear guidance on the handling of lower-level concerns (LLCs) and reflects the requirements of Keeping Children Safe in Education (KCSIE) 2025.

2. Aim

The purpose of this policy is to:

- Encourage an open and transparent culture where staff feel able to share concerns.
- Enable early identification of concerning, problematic, or inappropriate behaviour.
- Protect children by ensuring concerns are addressed proportionately.

Any member of staff who has a concern—no matter how small—about a colleague's behaviour must report it to the Headteacher. If the concern relates to the Headteacher, it should be reported to the Chair of Governors.

3. Keeping Children Safe in Education

KCSIE (2025) defines a low-level concern as:

Any concern—no matter how small, and even if no more than 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 of work, and which does not meet the harm threshold for referral to the LADO.

Examples include, but are not limited to:

- Being over-friendly with children.
- Having favourites.
- Taking photographs of children contrary to school policy.
- Spending excessive time one-to-one in secluded areas.
- Humiliating children.

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Updates from KCSIE 2025 to note:

- Safeguarding harms now explicitly include misinformation, disinformation, and conspiracy theories.
- Staff should be aware of new guidance on generative AI in education (DfE, 2025).
- Cybersecurity standards are highlighted to strengthen cyber resilience.
- Working Together to Safeguard Attendance is now statutory guidance.
- The Virtual School Head is also responsible for children in kinship care.
- Inclusive terminology is to be used (e.g., referring to “autism” rather than “spectrum disorder”).

4. Clarity around Allegation vs Lower 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

Lower 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 our school 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 our Code of Conduct, and the law.

5. Dealing with an allegation of a Lower level Concern

LLCs are reported to the Headteacher (or Chair of Governors if the concern relates to the Headteacher).

The Headteacher will meet with the named adult and, if necessary, seek advice from Educational Personnel Services.

Records of meetings will be kept securely.

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Support and monitoring will be provided to address unprofessional behaviour at an early stage.

Where behaviour escalates or if there is uncertainty, the LADO will be consulted.

6. Storing and use of Lower level Concerns and follow-up information

LLC forms and follow-up information will be stored securely within the schools safeguarding systems, with access only by the 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 Head Teacher or those aware in the senior leadership team.

Lower level Concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

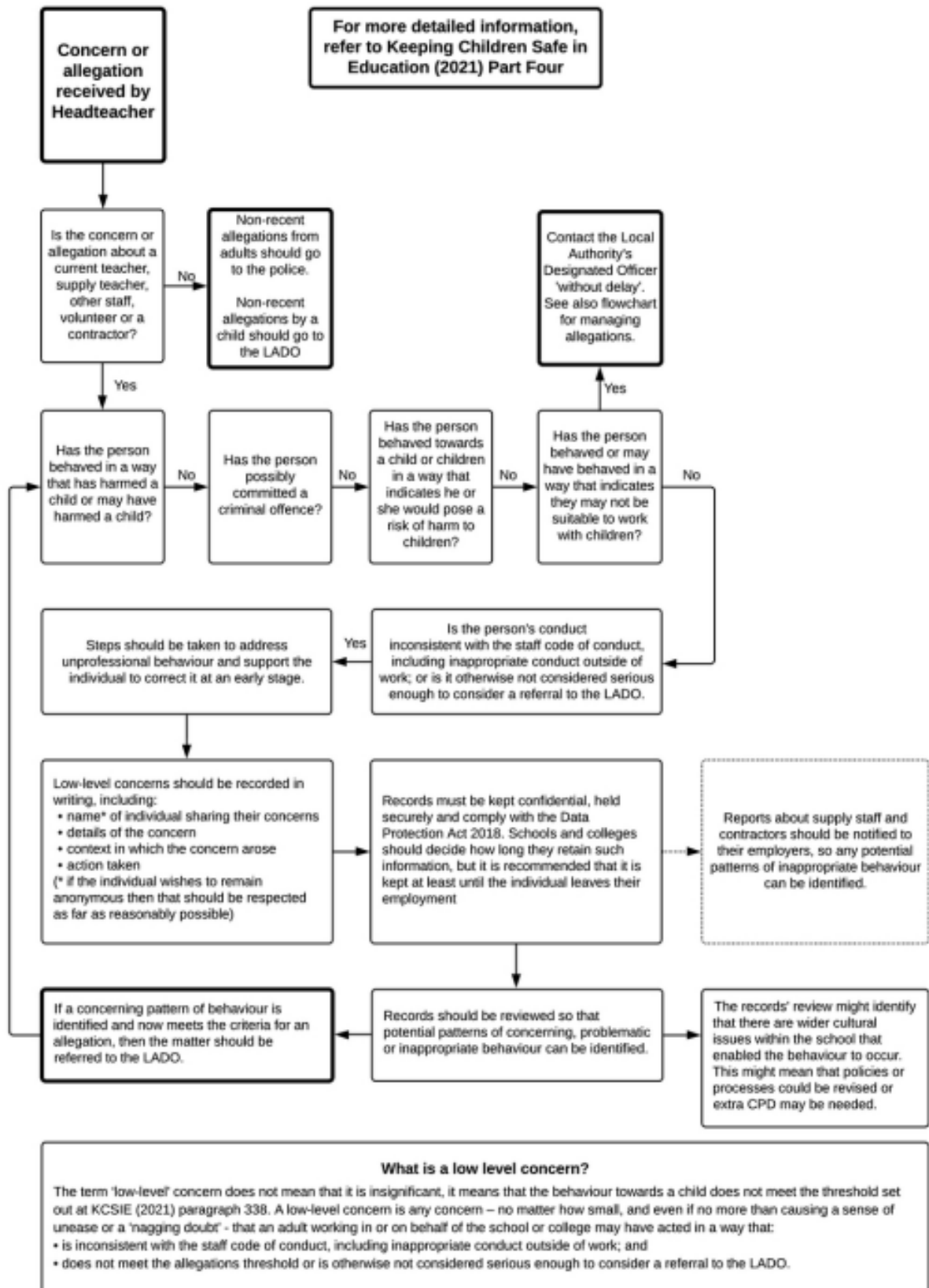
Whenever staff leave Owslebury Primary School, any record of lower level concerns which are stored about them will be reviewed as to whether or not that information needs to be kept. Consideration will be given to:

- (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.

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7. Process to follow when a Lower level Concern is raised



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7. Key Reference Document

- Keeping Children Safe in Education (DfE, September 2025).
- Working Together to Safeguard Attendance (DfE, 2025).
- DfE Generative AI Guidance for Schools (2025).
- Cybersecurity standards for schools and colleges (DfE, 2025).

8. Lower Level Concern Form

This form (at the end of this policy) will be available to staff via:

- The Office
- DSLs
- The Senior Leadership Team

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 Owslebury Primary School’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.

You should provide a concise record – including brief context in which the lower 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). The record should be signed, timed and dated.

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Lower level Concern Form

Details of concern (with context, chronological order, and precision):

Name of staff member:	Role:
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Signed:	Time and Date:
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Received by	At: (Time)	On: (Date)
Action Taken: (Specify)		

Signed:	Time and Date:
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