



POLICY	Low Level Concerns Policy 2025/26
STATUS/DATE OF THIS VERSION	Autumn 2025 Update
APPROVED BY	Trustees Standards Committee Sept 2025
RATIFIED BY	Trustees Standards Committee Sept 2025
REVIEW	September 2026

This policy is operated by all the schools in Unity Education Trust (as listed below).

There may be sections that are specific to one school and these will be added by the school either as an annex or in place of yellow highlighted sections below.

Any queries about the policy should be directed, in the first instance, to the Headteacher/Head of School:

- **Beeston Primary School**
- **Garvestone Primary School**
- **Grove House Infant and Nursery School**
- **King's Park Infant School**
- **Northgate High School and Dereham Sixth Form College**
- **The Pinetree School**
- **UET Pathfinder Douglas Bader Academy**
- **UET Compass Belton Academy**
- **Churchill Park Academy**
- **Greyfriars Academy**
- **Highgate Infant School**
- **King's Oak Infant School**
- **Wimbotsham and Stow Academy**
- **Magdalen Academy**
- **St German's Academy**

Contents

1. Rationale
2. Definitions (from Keeping Children Safe in Education September 2025)
3. Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct
4. Storing and use of Low-Level Concerns and follow-up information
5. Process to follow when a Low-Level Concern is raised
6. Unity Education Trust **Concern about an Adult Recording Form**

1. Rationale

Unity Education Trust schools aim to create an open and transparent culture where all concerns about all adults involved within our schools are dealt with promptly and appropriately.

We aim to identify any concerning, problematic or inappropriate behaviour early; to minimise the risk of abuse and to ensure that adults working in or on behalf of our school are clear about expectations and professional boundaries, and act within these boundaries, and in accordance with our Trust and school's ethos.

This policy should be read alongside our Safeguarding and Child Protection and Staff Code of Conduct Policies available on our Statutory Policy Table and available on all UET School websites.

2. Definitions

With reference to the Department for Education's Keeping Children Safe in Education (September 2025) and the NSPCC, we define a low-level concern as **any concern that an adult has 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.

Keeping Children Safe in Education (September 2025 references in italics)

What a low-level concern is

430. 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 children.*

431. 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.

432. 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.

433. 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.

It may be possible that a member of staff acts in a way that does not cause risk to children, but is however inappropriate. A member of staff who has a concern about another member of staff, volunteer, contractor or who, on reflection, recognises that their actions could have been viewed as a risk should inform the Headteacher/DSL about their concern **using the Concern about an Adult Record Form (Section 6)**. If the Headteacher cannot be contacted or the concern is regarding the Headteacher, the CEO should be contacted instead. If the concern is regarding the CEO, the Chair of Trustees should be contacted.

The NSPCC identify that having clear procedures for responding to low-level concerns is part of creating a school culture of openness and trust. It helps ensure that adults consistently model the school's values and helps keep children safe. It will also protect adults working in school from potential false allegations or misunderstandings.

3. Allegation vs Low-Level Concern vs Appropriate Conduct

Allegation:

Any adult linked to our school who has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Low Level Concern:

Any adult linked to our school who has behaved in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Appropriate:

- Behaviour which is entirely consistent with our school's Code of Conduct, and the Law.

4. 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 Unity Education Trust schools safeguarding systems, with access only by the school 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 of School/Headteacher/Principal/Executive Headteacher or those aware in the Senior Leadership Team (school specific).

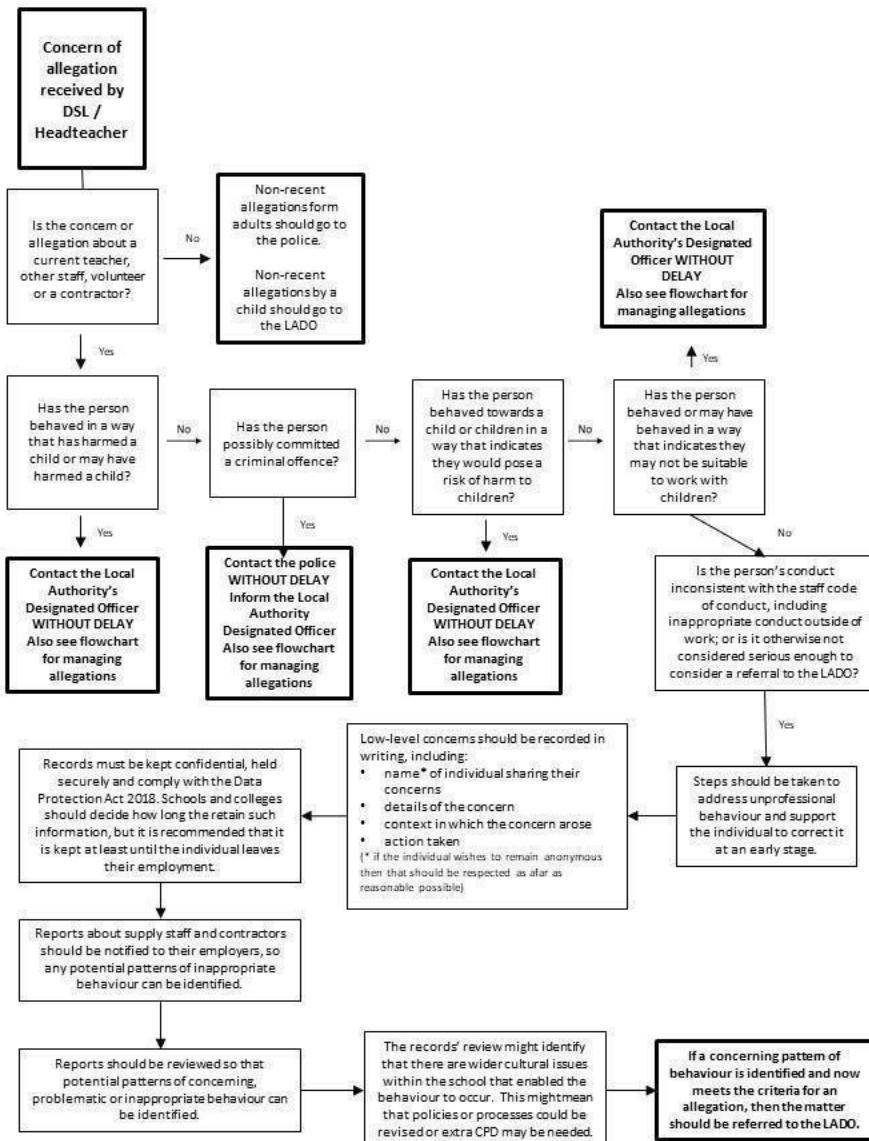
Low-Level Concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

Whenever staff leave Unity Education Trust, any record of low-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

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



*NB – if the concern is about the Headteacher, the CEO should be informed and if the concern is about the CEO, the Chair of Trustees should be informed.

Norfolk County Council Education Duty Desk

The first point of contact for our schools regarding concerns and/or allegation issues (including for supply teachers) is via the Local Authority Education Duty Desk on 01603 307797. A Duty Advisor (not a LADO) will give advice and guidance on next steps. If the advice is to make a referral to the LADO service then the [LADO referral form](#) should be completed. The completed LADO referral form is sent via email to:

LADO@norfolk.gov.uk



6. Unity Education Trust Concern about an Adult Recording Form

Your details	
Name:	
Role:	
Date and Time of completing this form:	
Details of Individual (including yourself for self-reporting) whom the concern is about	
Name:	
Role:	
Base/School:	
IS THIS A SELF-DISCLOSURE?	YES/NO
Relationship to the individual reporting eg line manager, colleague etc:	
Details of concern Please include as much detail as possible. Think about the following: What behaviour and/or incident are your reporting? What exactly happened?	
Date and time of the incident:	Location:
What happened:	
Why does the behaviour and/or incident worry you?	
Adult Witnesses (please use full names): Pupil	Witnesses (please use full names)
Additional Information (your opinion, context of concern/allegation)	

Please state any other information which you feel is relevant to the processing of this concern:

Signature:

Date and time of recording:

Please note that you may be asked to discuss this matter further with the Headteacher and/or DSL

Next Steps- to be completed by Headteacher/DSL

Headteacher/DSL Action(s):

Does this behaviour/incident meet the criteria for processing as an allegation?

Low Level Concern

Any adult linked to our school who has behaved in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Allegation

Any adult linked to our school who has:

- Behaved in a way that has harmed a child, or may have harmed a child and/or;
- Possibly committed a criminal offence against or related to a child and/or;
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

If allegation threshold has been met- date/time reported to LADO:

Outcome:

Signature (Head/DSL):

Date: