

# **Low-level Concerns Policy**

2025-2026

**This policy outlines the guidance for allegations or concerns about an adult working in the school, whether as a teacher, supply teacher, other staff, volunteers or contractors**

**We recognise the possibility that adults working in the school may harm children, including governors, volunteers, supply teachers and agency staff.**

Any concerns about the conduct of other adults in the school should be taken to the headteacher without delay; any concerns about the headteacher should go to the relevant Chair of the Academy Committee or CEO who can be contacted by email:

[k.mcgrane@peletrust.org.uk](mailto:k.mcgrane@peletrust.org.uk)

Any concerns about the conduct of a member of staff, supply teachers, volunteers or contractors should be reported to the headteacher (not the DSL).

Concerns may come from various sources, for example, a 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.

The headteacher has to decide whether the concern is an allegation that meets the harm threshold or should be treated as a low-level concern.

The term 'low-level' concern does not mean that it is insignificant; it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO) (see below).

### **Allegations**

It is an allegation if the person\* 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 (also includes behaviour outside the school).

(\*Person could be anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors.)

Allegations should be reported to the LADO 'without delay'.

Before contacting the LADO, schools should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school or college, or a combination of these.

### **Low-level Concerns**

Concerns may be graded 'low-level' if the concern does not meet the criteria for an allegation but the person has acted in a way that is inconsistent with the Pele Trust staff code of conduct, including inappropriate conduct outside of work. Low-level concerns can be shared with the DSL, however, the headteacher must be made aware of the concern at the earliest opportunity.

Example behaviours include, but are not limited to:

- being overly friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,

If the concern has been raised via a third party, the DSL or headteacher should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Staff should be encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or, on reflection, they believe they have behaved in such a way that they consider falls below the expected professional standards.

Low-level concerns should be recorded in writing, including:

- name\* of individual sharing their concerns
- details of the concern
- context in which the concern arose
- action taken

(\* if the individual wishes to remain anonymous, then that should be respected as far as is reasonably possible.)

Records must be kept confidential, held securely and comply with the Data Protection Act 2018. Schools should decide how long they retain such information, but it is recommended that it is kept at least until the individual leaves their employment.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO.

The records' review might identify that there are wider cultural issues within the school that enabled the behaviour to occur. This might mean that policies or processes could be revised or extra training delivered to minimise the risk of it happening again.

### **What is a Designated Officer or LADO?**

The role of the LADO was initially set out in the HM Government guidance Working Together to Safeguard Children 2010 and continues in Working Together 2018.

The LADO works within Children's Services and should be alerted to all cases in which it is alleged that a person who works with children has:

- behaved in a way that has harmed, or may have harmed, a child
- possibly committed a criminal offence against children, or related to a child
- behaved towards a child or children in a way that indicates s/he is unsuitable to work with children.

This role applies to paid, unpaid, volunteer, casual, agency and self-employed workers and all adults outside the school workforce. They capture concerns, allegations or offences; this can include concerns about their personal life, e.g. incidents of domestic violence or child protection concerns relating to their own family.

If there is an allegation against the headteacher, then concerns should be reported directly to the Chair of the Academy Committee or the CEO and then to the LADO.

The LADO is involved from the initial phase of the allegation through to the conclusion of the case. They will provide advice, and guidance and help to determine whether the allegation sits within the scope of the procedures. **Schools should seek advice from the LADO as soon as an allegation is made.**

The LADO coordinates information-sharing with the right people and will also monitor and track any investigation, with the aim of resolving it as quickly as possible. The LADO for Northumberland is **Louise Prudhoe**.

1. [LADO@northumberland.gov.uk](mailto:LADO@northumberland.gov.uk)
2. **Call:** 07500 606174 (Monday to Thursday 08:30-17:00, Friday 08:30-16:30) or 01670 536400 (Out of hours)
3. Online referral form - [here](#)
4. Allegation referral process - [here](#)