



Education Trust

Inspiring the individuals of today, for a better society tomorrow,
“Aspire, Belong, Collaborate”

LOW LEVEL CONCERNS POLICY & GUIDANCE

Review Frequency	Annual
Reviewed	September 2025
Next Review	September 2026
Agreed by Trustees	13 th October 2025



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Introduction

At Riviera Education Trust, we aim to create an open and transparent culture where all concerns about all adults involved with our schools are dealt with promptly and appropriately. We aim to identify any concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of our school are clear about professional boundaries and act within these boundaries, and in accordance with our school ethos. This policy should be read alongside our Safeguarding and Child Protection and Staff Code of Conduct Policies.

Summary

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 Head of School about their concern using a Low-Level Record of Concern Form. If the Head of School cannot be contacted, the CEO should be contacted instead. If the concern is about the Head of School, the CEO should be informed. If the concern is about the CEO, the Chair of Trustees should be informed.

Keeping Children Safe in Education September 2025

The following is taken from [Keeping Children Safe in Education](#) and identifies what may be considered behaviour relating to low level concern:

427. Governing bodies and proprietors should have policies and processes to deal with any concerns or allegations which do not meet the harm threshold, referred to in this guidance as ‘low-level’ concerns. It is important that schools and colleges have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

428. 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.

429. 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.



What is a low-level concern?

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.



Clarity around Allegation vs Low Level Concern vs Appropriate Conduct

Allegation:

Any adult linked to our Trust 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.



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

LLC forms and follow-up information will be stored securely within the Trust's safeguarding systems, with access only by HR, Heads of School (only for staff within their own school) and the CEO. 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 or those aware in the senior leadership team.

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.

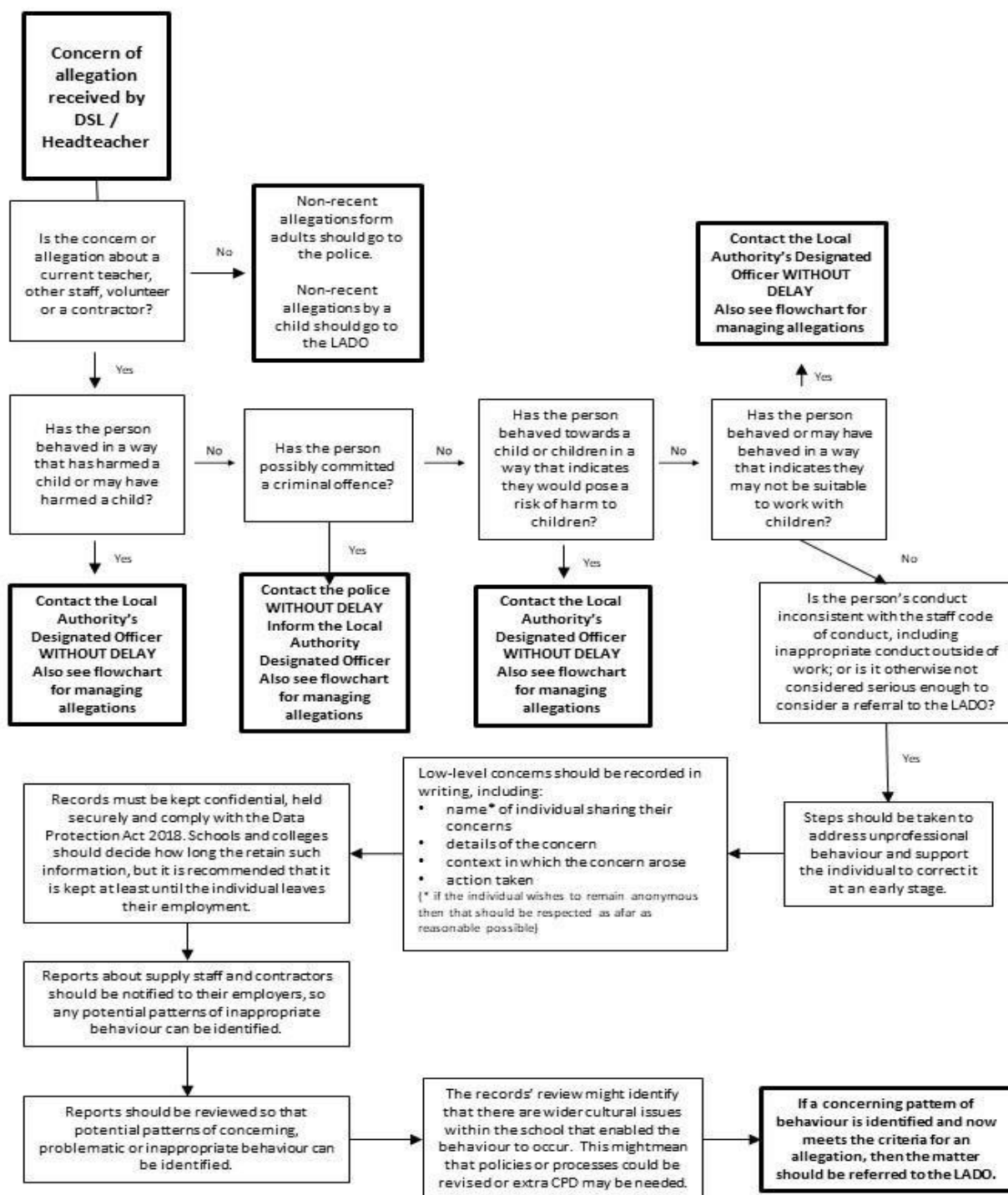
Whenever staff leave Riviera Education Trust, any record of low-level concerns which are stored about them will be reviewed as to whether or not that information needs to be kept.

Consideration will be given to:

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



PROCESS TO FOLLOW WHEN A LOW-LEVEL CONCERN IS RAISED



*NB – if the concern is about the Head of School, then the CEO should be informed. Concerns about the CEO should be reported to the Chair of Trustees

<p>Please state any other information that you feel is relevant to the processing of this concern.</p>	
<p>Signature</p>	
<p>For use by Head of School upon receipt of the LLC form</p>	
<p>Date and time concern received</p>	
<p>Signature</p>	
<p>Role</p>	
<p>Actions to be taken and follow-up.</p>	



DETAILS OF AMENDMENTS

October 2021

- Policy adopted.

June 2023

- Important KCSiE updates added.

September 2024

- KCSiE references updated

September 2025

- No changes

December 2025

- Formatting changes
- KCSiE references updated to reflect September 2025 guidance

