

OAKFIELD

SHORT STAY SCHOOL

Low-Level Concerns Policy

2026-2027

ALL LOW-LEVEL CONCERNS MUST BE EMAILED TO

Victoria Edwards

victoria.edwards@leics.gov.uk

Email title: low level concern

Based on Keeping Children Safe in Education 2026, Part Four

Policy owner	Executive Headteacher
Approval	Management Committee
Review date	September 2027

1. Policy statement

Oakfield Short Stay School is committed to creating and maintaining a culture of openness, transparency, accountability and safeguarding. All adults working in or on behalf of the school have a responsibility to share concerns about the behaviour of another adult where that behaviour may be inconsistent with the school's Code of Conduct, professional standards or safeguarding expectations.

Oakfield recognises that low-level concerns are an important part of safeguarding and safer culture. Reporting concerns early helps protect children, staff and the wider school community. A low-level concern does not mean that it is insignificant. All concerns must be recorded, considered and addressed appropriately.

This policy should be read alongside:

- Oakfield Child Protection Policy 2026-2027
- Staff Code of Conduct
- Whistleblowing Policy
- Safer Recruitment Policy
- Keeping Children Safe in Education 2026, Part Four

2. Scope

This policy applies to all adults working in or on behalf of Oakfield, including:

- Employees
- Agency and supply staff
- Volunteers
- Management Committee members
- Contractors
- Trainees and students on placement
- Any other adult working on behalf of Oakfield

3. Definition of a low-level concern

A low-level concern is any concern, however small, including a sense of unease or a nagging doubt, that an adult working in or on behalf of Oakfield may have acted in a way that:

- Is inconsistent with the Staff Code of Conduct.
- Is inconsistent with expected professional boundaries.
- Does not meet the harm threshold or is otherwise not serious enough to consider a referral to the Local Authority Designated Officer (LADO).
- Could indicate a pattern of unsafe behaviour when considered alongside other information.

This can include conduct inside or outside work. Such behaviour may range from inadvertent or thoughtless conduct, or conduct that appears inappropriate in particular circumstances, through to behaviour intended to enable abuse.

4. Examples

Examples may include, but are not limited to:

- Being overly familiar with pupils or showing favouritism.
- Using inappropriate language or humiliating, intimidating or belittling a pupil.
- Inappropriate social media contact or contact outside agreed professional arrangements.

- Engaging with a pupil one-to-one in a secluded area or behind a closed door without appropriate safeguards.
- Taking photographs of pupils on a personal device.
- Sharing inappropriate personal information with pupils.
- Inappropriate touch.
- Failing to follow safeguarding procedures or breaching the Staff Code of Conduct.
- Any behaviour that causes concern but may not meet the LADO harm threshold.

5. Reporting procedure

Report every low-level concern promptly by email to Victoria Edwards at victoria.edwards@leics.gov.uk using the exact email title: low level concern

The report should be made as soon as reasonably possible and no later than the end of the working day. If it cannot be emailed immediately, staff must ensure the concern is communicated without delay and followed by the required email record.

The email should include:

- Date and time of the incident or concern.
- Name and role of the adult involved.
- Location and context.
- A clear, factual description of what was seen, heard or disclosed.
- Names of witnesses, where applicable.
- Any immediate action taken.
- Whether anyone else has been informed.

Staff must report facts, avoid assumptions or speculation, not investigate the matter themselves, and maintain confidentiality.

6. Immediate safeguarding risk or harm threshold

If there is any indication that a child is at immediate risk of harm, an allegation may meet the harm threshold, or a criminal offence may have occurred, staff must report the matter immediately to the Executive Headteacher and a Designated Safeguarding Lead. Emergency services must be contacted where there is an immediate danger.

Oakfield will follow KCSIE 2026 Part Four and local safeguarding procedures, including consultation or referral to the LADO, Children's Social Care or the police where appropriate. Staff must not delay reporting while deciding whether a concern is low-level or meets the harm threshold.

7. Responding to a concern

On receipt of a low-level concern, the Executive Headteacher, or the appropriate alternative where the concern relates to the Executive Headteacher, will:

- Review the information promptly and speak to the person who raised the concern where necessary.
- Consider the context, the Staff Code of Conduct and any risk to children.
- Determine whether the matter remains a low-level concern or should be managed under the allegations procedure and referred to or discussed with the LADO.
- Gather proportionate information without compromising any formal investigation.
- Check whether other low-level concerns or safeguarding information indicate a pattern of behaviour.

- Record the decision, rationale, actions and outcome.
- Consider whether policies, training, supervision or working practices need to change.

8. Concerns about the Executive Headteacher

A concern or allegation about the Executive Headteacher must not be sent to the Executive Headteacher. It must be reported without delay to the Chair of the Management Committee, in line with the school's Child Protection Policy and KCSIE 2026. If there is a conflict of interest in reporting to the Executive Headteacher, staff should use the same alternative reporting route or the school's whistleblowing procedure.

9. Self-referral

Adults are encouraged to self-refer where they believe they may have acted in a way that could be misinterpreted, may fall below expected professional standards, or may have compromised the Staff Code of Conduct. A self-referral should be made using the same email address and title.

10. Recording, confidentiality and retention

The school will maintain a secure and confidential central record of low-level concerns. The record will include the concern, context, actions taken, outcome and rationale for decisions. Access will be limited to those who need the information for safeguarding or management purposes.

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Records will be retained and handled in accordance with KCSIE, the school's retention arrangements and applicable data protection requirements.

11. References

When a staff member leaves Oakfield, the school will consider whether information arising from substantiated low-level concerns should be included in a reference. References will be handled in line with KCSIE 2026 and the school's safer recruitment procedures. Low-level concerns that relate exclusively to safeguarding and have not met the harm threshold should not normally be included unless they form part of a pattern that meets the harm threshold or are otherwise relevant to the safeguarding information required in a reference.

12. Possible outcomes

Depending on the circumstances, outcomes may include:

- No further action, with rationale recorded.
- Advice, guidance or a reflective professional discussion.
- Additional supervision, training or changes to working practice.
- Monitoring or review of professional boundaries.
- Management action under relevant employment procedures.
- Escalation under the allegations procedure and consultation or referral to the LADO.

13. False or malicious reports

Staff who raise concerns honestly and in good faith will be supported, regardless of the outcome. If an allegation is shown to be deliberately false or malicious, the school may consider action under the relevant disciplinary procedure. An unsubstantiated, unfounded or mistaken concern is not, by itself, evidence of malicious intent.

14. Whistleblowing

Staff who feel unable to raise a concern through this procedure, believe a concern has not been addressed, or identify a conflict of interest should use Oakfield's or Leicestershire County Council's whistleblowing arrangements. Staff may also seek independent safeguarding advice through the NSPCC whistleblowing route.

15. Training, review and monitoring

All staff will be made aware of this policy, the reporting route and the importance of sharing low-level concerns. The school will review this policy at least annually and sooner where statutory guidance, local procedures or school arrangements change. The Management Committee will receive appropriate assurance that procedures are operating effectively, while preserving confidentiality.

LOW-LEVEL CONCERNS: QUICK REFERENCE

1. NOTICE

Any concern, doubt or unease about an adult's conduct, however small.

2. EMAIL

Send promptly to victoria.edwards@leics.gov.uk

3. TITLE

Use the exact email title: low level concern

4. RECORD FACTS

State what happened, when, where, who was present and any immediate action. Do not investigate.

If a child may be at risk, report immediately to the Executive Headteacher and a DSL. If in doubt, report.

Staff acknowledgement

I confirm that I have read and understood the Oakfield Short Stay School Low-Level Concerns Policy and understand my responsibility to report concerns promptly.

Name: _____

Signature: _____

Date: _____