MacIntyre Academies

Low Level Concern Policy

To be read alongside the Academy Safeguarding Policy

Version:	Changes/Updates	Responsibility:	Date:
5	- Removal of 'Head of Care' - Change from Group Director to CEO role, change from Executive Leader for Education and Care to Executive Leader for Education	Group Director	Feb 2026

Person Responsible:	CEO (or equivalent)
Type of policy	Non-statutory
Date of first draft:	Dec 2021
Date of staff consultation:	Dec 2021 via MAT Safeguarding Forum
Date adopted by the Trust Board:	Mar 2022
Date reviewed:	Feb 2026
Date of next review:	Mar 2027

This policy should be read alongside:

- The Academy Safeguarding Policy
- MAT Staff Code of Conduct
- MAT Whistleblowing Policy

1. Introduction

At Macintyre Academies Trust we take safeguarding very seriously. This includes ensuring that adults who work with children do so in a way that is in accordance with the ethos and policies set out by the Trust, including the Staff Code of Conduct. This policy sets out the detail and processes for staff regarding low-level concerns they may have.

2. Summary

It may be possible that an individual (be that a member of staff, a volunteer or a visitor) acts in a way that does not cause risk to children, but is however inappropriate. An individual who has such a concern about another individual should report this using the low-level Record of Concern Form. The form can be accessed electronically via a QR code featured on posters around the Academy (see example). Alternatively, staff can download a form from the shared folder MAT Common/ Safeguarding.

Where a low-level concern relates to the conduct of a Principal, Head of School, or Deputy Principal, or a member of the MAT Central Team this should be reported to the CEO (or equivalent). This can be done via the alternative QR code on the low-level concern poster.

An individual may also wish to report a low-level concern to the CEO (or equivalent) where they perceive a lack of action following having raised a low-level concern to the Academy Principal (e.g. not taking Low Level Concerns seriously enough in your view).

Where Low Level Concerns are raised with the CEO (or equivalent), these may also be accessed and actioned by the Executive Leader of Education and the Head of Operations, as indicated on the posters.

Any low-level concern in relation to the CEO (or equivalent), the Executive Leader of Education, or the Head of Operations can be raised with the Chair of MacIntyre Academies – Denise Cockrem, or the Safeguarding Board Director. Details of which are on the Trust website macintyreacademies.org.

3. Low-level concerns and Keeping Children Safe in Education September 2025

The following text is taken from Keeping Children Safe in Education September 2025:

Low-level concerns

Low-level concerns

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 108 (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 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.
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
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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.
Staff code of conduct and safeguarding policies
435. As set out in Part two of this guidance, the governing body or proprietor should ensure their staff code of conduct, behaviour policies and safeguarding policies and procedures are implemented effectively and ensure that appropriate action is taken in a timely manner to safeguard children and facilitate a whole school or college approach to dealing with any concerns.
436. Schools and colleges can achieve the purpose of their low-level concerns policy by:
• ensuring their staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from inappropriate, problematic or concerning behaviour, in themselves and others
• empowering staff to share any low-level safeguarding concerns (see below)
• addressing unprofessional behaviour and supporting the individual to correct it at an early stage
• handling and responding to such concerns sensitively and proportionately when they are raised, and
• helping identify any weakness in the school or colleges safeguarding system.
Sharing low-level concerns
437. Schools and colleges should ensure that their low-level concerns policy contains a procedure for sharing confidentially such concerns which is clear, easy
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to understand and implement. Whether all low-level concerns are shared initially with the DSL (or a nominated person (such as a values champion)), or with the headteacher/principal is a matter for the school or college to decide. If the former, then the DSL should inform the headteacher/principal of all the low-level concerns and in a timely fashion according to the nature of each particular low-level concern.

The headteacher/principal should be the ultimate decision maker in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns and/or the role of the DSL in some schools/colleges, the headteacher/principal may wish to consult with the DSL and take a more collaborative decision making approach.

438. Low-level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

439. If schools and colleges are in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they should consult with their LADO.

440. Schools and colleges should ensure they create an environment where staff are 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.

Recording low-level concerns

444. It is for schools and colleges to decide how long they retain such information, but it is recommended that it is retained at least until the individual leaves their employment.

References

445. Part three of this guidance is clear that schools and colleges should only provide substantiated safeguarding concerns/allegations (including a group of lowlevel concerns about the same individual) that meet the harm threshold in references. Low-level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference.

Responding to low-level concerns

446. The school or college low-level concerns policy should set out the procedure for responding to reports of low-level concerns. If the concern has been raised via a third party, the headteacher/principal (or a nominated deputy) should collect as much evidence as possible by speaking:

• directly to the person who raised the concern, unless it has been raised anonymously, and

• to the individual involved and any witnesses.

447. The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. This information needs to be recorded in writing along with the rationale for their decisions and action taken.

4. Clarity around Allegation vs Low-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 in a way that indicates they may pose a risk of harm to children.**

(Note: If this is the case staff should act without delay: refer to the Academy Safeguarding Policy Section 13, or use the MAT Whistleblowing Policy)

A low-level concern
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 allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.**

Appropriate Conduct
Behaviour which is entirely consistent with the Trust Code of Conduct, and the Law.

5. Access to the Low-Level Concerns forms

Low Level Concerns will be held confidentially and those who have access to the submissions is indicated on the poster.
In addition to this, the Executive Leader for Education will have access to the data and may from time to time review the concerns raised for any Academy at any given time for the purpose of quality assurance and reviewing any actions taken.

6. Storing and use of Low-Level Concerns and follow-up information

Records of low-level concerns will be stored confidentially in accordance with the MAT Data Protection Policy and MAT Data Retention Schedule.

It is at the discretion of the Academy Principal as to whether the low-level concerns are accessible only to them as Principal, or whether access is shared with one other nominated Deputy Designated Safeguarding Lead, usually the Head of School or Deputy Principal. Details of who has access to the concerns raised are always clearly shown on the academy low-level concern Poster.

Where low-level Concerns relate to the Principal (and/or the Deputy Designated Safeguarding Lead) they will be reported to the CEO (or equivalent). Only the CEO (or equivalent) and Head of Operations, as their Deputy, will have access to these.

The staff member reporting the concern must keep the information confidential and not share the concern with others as this could prejudice future action or process.

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.

When staff leave Macintyre Academies, any record of Low-Level concerns which are stored about them will be reviewed as to whether 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, it should be deleted accordingly in line with the MAT Retention Schedule.

7. Low level concern form

The form is available to all via:

- Posters which are found around the academy premises in places they can be used with discretion. The posters include a QR code linking to the electronic form. The form can be used anonymously, but offers the user a space to add their name.
- In document form via the shared drive in the directory MAT Common / Safeguarding

Importantly, Principals and the CEO (or equivalent) operate with an open-door policy and if a staff member feels more comfortable to have a face to face or telephone conversation, they are encouraged to do so.

8. Review

This policy will be reviewed on an annual basis, or earlier when required.

Changes at previous reviews

Version:	Changes/Updates	Responsibility:	Date:
V2	Updated to refer to KCSIE 2022 Clarification throughout that: - the policy relates to any individual, rather than only members of staff. - where a low-level concern is raised to the Group Director, this may be shared and followed up by the Head of Operations, as his Deputy. Removed the link to Farrer & Co 2020 guidance which was obsolete. Inserted example of LLC poster for clarity in section 6.	Group Director	Feb 23
V3	Updated to refer to KCSIE 2023 Quoted text from KCSIE update to reflect new version	Group Director	Feb 24
V4	- New version of poster updated. - Updated with KCSIE 2024 text regarding LLCs Addition to section 2 in relation to Low Level Concerns about the Group Director, Executive Leader of Education and Care or Head of Operations	Group Director	Mar 2025

Appendix - **Process to follow when a Low-Level Concern is raised**

