



## Low-level Concerns Policy

<b>Person responsible</b>	<b>DSL &amp; Safeguarding Governor</b>
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## 1. Introduction and Aims

This Policy sets out a framework whereby staff are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working in Bute House Preparatory School (the School).

The School aims to encourage a culture of openness, trust and transparency, where key values and expectations, as set out in the Safeguarding Policy, are embedded, monitored and reinforced. This enables the School to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the School are clear about professional boundaries and act within them.

Everyone is required to share low-level concerns as set out in this Policy:

- To ensure there is a formalised mechanism for reporting low-level concerns
- To allow staff to self-refer to the School to protect themselves in situations where they may have found themselves compromised
- To identify patterns of behaviour that are concerning
- To ensure the School continues to have a culture of safeguarding in which all staff understand their responsibility to raise concerns

Staff should therefore:

- Report any behaviour by another adult towards a pupil, another child or another adult that may have concerned them
- Self-refer in any situation where they feel their behaviour towards a pupil, another child or another adult could be misinterpreted or misconstrued to leave them vulnerable

## 2. Scope and Responsibilities

This Policy relates to the whole school including the Early Years Foundation Stage and is reviewed annually to ensure compliance with current regulations and law. It must be read alongside the following Policies: Safeguarding (Child Protection), Safer Recruitment, Staff Behaviour (Staff Conduct), Whistleblowing, Keeping Children Safe in Education (KCSIE) 2025, Part 4 and Working Together to Safeguard Children (2018, updated 2023).

This Policy applies to all staff; those who work for, or on behalf of the School, regardless of their employment status, including contractors, supply staff, volunteers and Governors.

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

*428. As part of their whole school 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 concerning, problematic or inappropriate 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.*

### **3. Definition of a Low-level Concern**

A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a 'nagging doubt', that a person working in or on behalf of the School may have acted in a way that:

- is inconsistent with the School's Staff Behaviour Policy (Code of Conduct), including inappropriate conduct outside of work and
- does not meet the allegations threshold for the Local Safeguarding Children's Partnership or is otherwise not considered serious enough to make a referral to the Local Authority Designated Officer (LADO)

Examples of low-level concerns may include:

- being over friendly with pupils
- having favourites
- taking photographs of pupils on personal mobile devices
- engaging with a pupil on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate, sexualised, intimidating or offensive language

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.

It is crucial that any such concerns, including those which do not meet the harm threshold - please refer to the School's Staff Behaviour Policy (Code of Conduct) - are shared responsibly and 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 the School from potential false allegations or misunderstandings.

Please refer to the 'Spectrum of Behaviour' in Appendix 1

If at any point a concern is identified that meets the threshold for harm or constitutes an allegation of abuse, it must not be dealt with through this Low-level Concerns Policy. Staff should immediately follow the appropriate safeguarding procedures as set out in the Safeguarding (Child Protection) Policy and report the matter accordingly without delay. Similarly, if a concern relates to serious misconduct, illegal activity, or matters in the public interest, staff should refer to the Whistleblowing Policy for guidance on how to raise such matters formally and confidentially.

Staff should not allow uncertainty about which Policy applies to delay reporting. When in doubt, it is always safer to escalate concerns through safeguarding or whistleblowing channels. The safety and wellbeing of pupils must always take priority, and all staff have a duty to act immediately when harm is suspected or alleged.

## 4. Reporting Low-level Concerns

Where a low-level concern has been identified, this will be reported as soon as possible to the Head, who will inform the DSL, as necessary. It is never too late to share a low-level concern.

Low-level concerns about the Designated Safeguarding Lead will be reported to the Head and those about the Head will be reported to the Chair of Governors.

Where the low-level concern has been reported to the Designated Safeguarding Lead, they will inform the Head of the details as soon as possible.

## 5. Recording Low-level Concerns

All low-level concerns must be appropriately documented to ensure transparency, accountability, and the protection of both pupils and staff members. A summary must be logged onto the StaffSafe portal within CPOMS as soon as reasonably practicable after the concern is raised. The record should include:

- Name(s) of the individual(s) involved
- Brief factual summary of the concern
- Any immediate actions taken

Records must be factual, objective, and free from opinion or speculation.

## 6. Responding to Low-level Concerns

Access to low-level concerns records on CPOMS StaffSafe is restricted to the Head, DSL and Director of People & Development (DPD). Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The Head will:

- Speak to the person reporting the concern to gather all the relevant information
- Speak to the individual about the concern raised to ascertain their response, unless advised not to do so by the LADO or police (advice from the DSL and DPD may also need to be taken)
- Where necessary, further investigation will be carried out to gather all relevant information. This may involve speaking to any potential witnesses

The information reported and gathered will then be reviewed to determine next steps. If the concern:

- Is consistent with the School's Staff Behaviour Policy (Code of Conduct): no further action will be required
- Constitutes a low-level concern: additional training/guidance/support may be required to rectify the behaviour via normal day to day management processes. The staff member should understand that failure to improve or repetition of the behaviour may lead to further action being taken, according to the Staff Behaviour Policy (Code of Conduct).
- Is serious enough to consult with or refer to the LADO: a referral should be made to the LADO and HR advice will be taken from the DPD.

When allegations raise a safeguarding concern, procedures within the School's Safeguarding and Staff Behaviour (Code of Conduct) Policies will be followed.

Allegations will be considered alongside any other low-level concerns that have previously been raised about the same individual. They will then be referred to the LADO or police if deemed necessary by the Head and DSL. If the concern is referred to the LADO or police, the School's safeguarding procedures will be followed.

When considered with any other low-level concerns that have previously been made, records will be made of:

- All internal conversations including any relevant witnesses
- All external conversations, e.g. with the LADO
- The decision, and the rationale used to make that decision
- Any action taken

Low-level concerns will not be included in references unless a low-level concern, or group of concerns, has met the threshold for referral to the LADO and found to be substantiated.

## **7. Privacy of Staff and Confidentiality**

The person bringing forward the concern will be named in the written record. Where they request to remain anonymous this will be respected as far as possible. However, there may be circumstances where this is not possible, e.g. where a fair disciplinary investigation is needed or where a later criminal investigation is required.

## **8. Self-reporting**

It may be the case that a person finds themselves in a situation which could be misinterpreted or might appear compromising to others; or they may have behaved in a manner which on reflection they consider falls below the standard set out in the Staff Behaviour Policy (Code of Conduct). In

these circumstances, they should self-report via CPOMS StaffSafe. This will enable a potentially difficult situation to be addressed at an early opportunity, if necessary.

## **9. Role of the Governors**

The Head will regularly inform the Governors about the implementation of the Low-level Concerns Policy including any evidence of its effectiveness, e.g. with relevant data. The Safeguarding Governor may also review an anonymised sample to ensure that these concerns have been handled appropriately.

## **10. Monitoring and Review**

The records will be reviewed periodically by the Head, as well as when a new low-level concern is added, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and referred to the LADO if required. A record of these reviews will be retained.

This Policy will be subject to review at least annually by the Senior Deputy Head and the Governing Body.

The date of the next review is shown on the front page.

## APPENDIX 1: Spectrum of Behaviour Overview

### Concern or allegation that may meet harm threshold

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; 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 they 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

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 with children may have acted in a way that:

- is inconsistent with an organisation's staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the harm threshold, or is otherwise not serious enough to merit a referral to the LADO.

### Appropriate conduct

Behaviour which is entirely consistent with the organisation's staff code of conduct, and the law.