



Low Level Concerns Policy

To be read in conjunction with the 'Safeguarding Policy' and the 'Staff Code of Conduct with specific regard to Safeguarding'

Including all of the Pre-Prep Department and Early Years Foundation Stage

DJCF

Updated September 2024

Review and Amendment Record

Date	Person Conducting the Review	Changes Made
1/9/21	DJCF	New policy, according to KCSIE 2021
5/9/22	DJCF	Updated according to KCSIE 2022 and Farrer & Co guidance 2022. Schools may decide to whom low level concerns are reported, so long as it is clear in this policy (which can also be found in the Safeguarding Policy and the Staff Code of Conduct).
1/9/23	DJCF	Updated for KCSIE 2023
1/9/24	DJCF	Updated for KCSIE 2024 and reviewed Farrer guidance

Introduction

Concerns may arise in several different 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.

Summer Fields adopts a whole-school approach to safeguarding and actively promotes, and seeks to ensure, an open and transparent culture in which all concerns about any adult working in any capacity (employed or voluntary) on behalf of the school are dealt with promptly and appropriately.

Creating a culture in which **all** concerns about adults (including those concerns which do not meet the 'harms threshold' or 'harms test', as laid out in *Keeping Children Safe in Education 2024*, Part 4, Section 1) are shared responsibly with the correct person, recorded and dealt with appropriately, is critical.

This should encourage an open and transparent culture and enable the school to identify concerning, problematic or inappropriate behaviour early, thus minimising the risk of abuse and ensuring that adults working in or on behalf of the school are clear about professional boundaries and the ethos and values of the school. It should also protect those working in or on behalf of the school from potential false allegations or misunderstandings.

What is a Low Level Concern?

The term 'low level concern' does not mean that it is insignificant, rather that the behaviour towards a child does not meet the 'harms threshold' or 'harms test' as set out in *KCSIE 2024*, Part 4, Sections 1 and 2. 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 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.

Examples of low level concerns could include, but are not limited to:

- being over-friendly with children;
- having favourites;
- taking photographs of children on their own mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- 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. Any such concern (including those that do not meet the 'harm threshold' in *KCSIE 2024*, Part 4, Section 1) should be shared with the headmaster (see below).

Summer Fields aims to:

- ensure that all staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, both in themselves and in others;
- empower staff to share any low level safeguarding concerns with the headmaster;
- address unprofessional behaviour and support the individual to correct it at an early stage;
- provide a responsive, sensitive and proportionate handling of such concerns when they are raised; and
- help identify any weakness in the school's safeguarding procedures.

Sharing Low Level Concerns

Low level concerns about any member of staff should be reported to the headmaster.

Summer Fields seeks to create an environment in which staff are encouraged and feel confident to self-refer where, for example, they may have found themselves in a situation which could be misinterpreted, might appear compromising to others, or in which their own behaviour might have fallen below expected professional standards.

Where a low level concern relates to a person employed by an agency or contractor, that concern should still be shared with the headmaster and recorded in accordance with the school's low level concerns policy. The headmaster should also inform the employer about the concern, so that any potential patterns of inappropriate behaviour can be identified.

Recording Low Level Concerns

All low level concerns should be recorded in writing by the headmaster. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted; if the individual wishes to remain anonymous, then that should be respected as far as reasonably possible.

The school must keep these records confidential, and held securely in compliance with the [Data Protection Act 2018](#) and the [UK General Data Protection Regulation \(UK GDPR\)](#).

Records should be reviewed periodically so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the 'harms threshold', in which case it will be referred to the LADO.

Consideration will also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and, where appropriate, policies could be revised or extra training delivered to minimise the risk of it happening again. The school will retain information on low level concerns at least until the individual leaves its employment.

References

Only substantiated safeguarding allegations will be included in staff references. Low level concerns will not be included unless they relate to issues which would normally be included in a reference, such as misconduct or poor performance. Low level concerns relating exclusively to safeguarding (and not to misconduct or poor performance) will therefore not be referred to in a reference. However, where a low level concern (or group of concerns) has met the threshold for referral to the LADO and is found to be substantiated, it will be referred to in a reference.

Responding to Low Level Concerns

Concerns about safeguarding should be reported to the headmaster. If the concern has been raised by a third party, the headmaster should collect as much information 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.

The information collected will help the headmaster to categorise the type of behaviour and determine what further action may need to be taken. All of this will be recorded along with the rationale for any decisions and action taken.

Further information on the management of low level concerns may be found in the updated document:

[Developing and implementing a low-level concerns policy: a guide for organisations which work with children \(Farrer & Co. 2024\)](#)