Kew Green Preparatory School

Low Level Concerns Policy

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1. Introduction

At Kew Green Preparatory School, we aim to create an open and transparent culture where all concerns about all adults involved with our school 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 Child Protection and Safeguarding policy and Staff Code of Conduct.

2. 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 Headteacher or DSL about their concern

3. Keeping Children Safe in Education: what is a low-level concern?

The following is taken from KCSIE 2025:

433. 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,
• humiliating children.

434. 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.

435. 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.

436. 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.

4. Clarity around Allegation vs. Low-Level Concern vs. Appropriate Conduct

Allegation:

Any adult linked to our school 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.**

5. Reporting Low Level Concerns

Where a low-level concern has been identified, this will be reported as soon as possible to the Headteacher. However, it is never too late to share a low-level concern if this has not already happened.

Low-level concerns about the Designated Safeguarding Lead will be reported to the Headteacher and those about the Headteacher will be reported to the Director with Responsibility for Safeguarding.

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

6. Recording Low Level Concerns

All staff have access to a secure online KGPS Microsoft Form to record low-level concerns: https://forms.office.com/e/W9403N47HV All records can be accessed by the Headteacher only.

Where concerns are reported verbally to the Headteacher, the Headteacher will log a record of the conversation using the secure KGPS Microsoft Form.

7. Responding to Low Level Concerns

Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The Headteacher 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

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 whether the behaviour:

- is consistent with the school's Staff Behaviour and Code of Conduct and therefore no further action will be required.
- constitutes a low-level concern and no further action is required, or additional training/guidance/support may be required to rectify the behaviour via normal day to day management processes. The employee should understand that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g. via disciplinary procedures.
- is serious enough to consult with or refer to the LADO and a referral should be made to the LADO, having advice sought from the Directors.

Allegations procedure within the Safeguarding Policy and Disciplinary Policy will be followed:

- when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the LADO or Police: a referral should be made to the LADO. In this case the school's Staff Behaviour and Code of Conduct within the Safeguarding Policy and Disciplinary Policy will be followed

When considered with any other low-level concerns that have previously be 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 for it
- any action taken.

Can the reporting person remain anonymous?

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.

Should staff report concerns about themselves (ie self-report)?

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 behavedin a manner which on reflection they consider falls below the standard set out in the Staff Behaviour and Code of Conduct. In these circumstances they should self- report. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary.

Where behaviour is consistent with the Staff Behaviour and Code of Conduct

Feedback will be given to both parties to explain why the behaviour was consistent with the Staff Behaviour and Code of Conduct.

Should the low-level concerns file be reviewed?

The records will be reviewed periodically and whenever 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 by the Headteacher.

References

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.

What is the role of the Directors?

The Headteacher will regularly inform the Directors about the implementation of the low-level concerns policy including any evidence of its effectiveness, e.g. with relevant data. The Director with Responsibility for Safeguarding may also review an anonymous sample to ensure any concerns have been handled appropriately.