

Low Level Concerns Policy

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1. Principles

Guildhouse School London is committed to ensuring Low-Level Concerns (LLCs) are monitored, recorded, and dealt with appropriately to create a safer culture for all staff, students, and visitors. Guildhouse School London has a moral, legal, and social responsibility to provide a safe environment for students studying and residing with us.

2. Scope and References

This policy sets out good practice and provides guidance on how to deal with situations and put in safeguards where a low-level concern may be encountered to ensure the promotion of a safe culture and the prevention of possible harm. It will work in conjunction with all school policies and procedures, including, but not limited to, the following UK-GDPR, Health and Safety, Prevent Strategy, and Safer Recruitment Policy. This policy has regard to:

- Keeping Children Safe in Education 2026;
- Working Together to Safeguard Children (latest version);
- Staff Code of Conduct;
- Safeguarding and Child Protection Policy;
- CGS Whistleblowing Policy.

3. Distinction between an allegation and a Low-Level concern

A culture encouraging the reporting of LLCs enables staff to share any concerns they may have, no matter how small, about the behaviour of any adult in the school. Concerns should not be limited to safeguarding but could relate to behaviour that does not meet the professional standards expected within CATS Global Schools.

The term 'allegation' means that it is alleged that a person 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 or children in a way that indicates they may pose a risk of harm to children. An allegation can also relate to an adult's behaviour outside of work and their relationships with others if they:
- have behaved in a way in their personal life that raises safeguarding concerns. These concerns do not have to directly relate to a child but could, for example, include an arrest for the possession of a weapon;
- have, as a parent or carer, become subject to child protection procedures;
- are closely associated with someone in their personal lives (e.g., partner, family member, or other household member) who may present a risk of harm to children for whom the adult is responsible in their employment/volunteering.

A Low-Level Concern is any concern about an adult's behaviour towards a child that does not meet the allegation threshold set out above or is not otherwise serious enough to consider a referral to the LADO.

A Low-Level Concern is any concern – no matter how small, and even if no more than a 'nagging doubt' – that an adult may have acted in a manner which:

- is not consistent with an organisation's Code of Conduct, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children. Examples of such behaviour could include, but are not limited to:
 - being overly 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; or
 - humiliating children.

Self-reporting

Staff are encouraged to report any incident in which they believe their own behaviour may have fallen below the expectations of the Staff Code of Conduct, even where there was no intention to cause harm. Self-reporting will normally be regarded as evidence of professional responsibility and reflective practice.

Anonymous reporting

Concerns may be raised anonymously. However, staff are encouraged to provide their identity wherever possible to enable appropriate enquiries to be undertaken and support to be offered.

All staff, including volunteers and contractors, will receive training on the Low-Level Concerns Policy during induction and through regular updates. Staff do not need to be able to determine in each case whether their concern is a Low-Level Concern or if it is serious enough to consider a referral to the LADO or meets the threshold of an allegation. Once staff share what they believe to be a Low-Level Concern, that determination should be made by the Headteacher.

4. Importance of sharing Low-Level concerns

It is necessary to ensure a culture of openness and trust is fostered within an organisation in which staff can share any concerns about the conduct of colleagues and be assured that these will be received in a sensitive manner. It is well documented that organisational child sexual abuse is often preceded by grooming, and that such conduct was observed and considered questionable. This could be targeted at children or vulnerable adults. This behaviour was rarely reported to the relevant individual in the organisation, was not recorded, and not available later for evaluation of patterns emerging. It is not possible for individuals to accurately judge people, as there is no one profile to describe everyone who abuses a child, so focus should be placed upon specific behaviours.

To minimise the risk of situational offending, there needs to be a culture of allowing the confidence to speak out. This requires a robust framework, policy, training, support, and leadership to facilitate this and a willingness to accept that abuse could happen in any organisation.

5. Implementation

To be effective, this policy must have 'buy-in' from all staff, and leaders must be seen to adhere to and model the expected values and behaviours as written in the policy.

Training on this policy will be incorporated in both the Safeguarding Induction Training for new staff and the Annual Safeguarding Training for all staff. Staff should complete the 'Low-Level Concern Form' in **Appendix 1** as fully as possible and pass it directly to the Headteacher, or in their absence the Chair of Governors, without informing the adult who is the subject of the form. If the concern is about the Headteacher, it should be passed to the Chair of Governors without informing the Headteacher.

Upon receipt of a Low-Level Concern, the Headteacher (or Chair of Governors where appropriate) will:

- review the information provided;
- gather any additional information as necessary;
- speak with the individual concerned where appropriate;
- consider the context in which the behaviour occurred;
- review previous records relating to the individual;
- determine whether the concern remains a Low-Level Concern or meets the harm threshold for referral to the LADO;
- record the decision-making process, outcome and rationale;
- identify any actions, support, training or management guidance required.

The Headteacher will undertake proportionate enquiries necessary to establish the facts and determine an appropriate response. The member of staff who is the subject of the concern will normally be informed and given an opportunity to respond unless doing so would compromise safeguarding enquiries or place a child at risk.

Any concerns or issues relating to the Low-Level Concern Policy will be included in the annual safeguarding report to governors. Any person who feels unable to raise a concern through this procedure may use the CGS Whistleblowing Policy.

6. Data Protection

The Data Protection Act 2018 makes specific provision for the processing of personal data necessary for safeguarding children from harm. The Information Sharing Code of Practice (Information Commissioner's Office 2019) specifically cites safeguarding of children as a 'clear example of a compelling reason' to share personal data. Where a concern is low-level, rather than an allegation,

the balance between safeguarding interests and personal data rights will be considered carefully to ensure it is a reasonably necessary measure that the data should be shared.

7. How Low-Level concerns will be recorded

Low-Level Concern Forms and records will be retained (including those subsequently deemed to relate to behaviour that is entirely consistent with the Code of Conduct) in the school folder and logged in the central People & Engagement (P&E) area on SharePoint. Where there are multiple low-level concerns relating to the same individual, these will be kept in chronological order as a running record. These records will be kept confidential and held securely, access being restricted to those with a legitimate safeguarding or management need to know, which may include the Headteacher, DSL and relevant HR/People team personnel. The log will contain details of the concern, the context in which it arose, and action taken. Records will include the rationale for decisions made and any follow-up actions undertaken. The name of the person reporting should be noted while respecting wishes to remain anonymous as far as reasonably possible.

Where concerns also involve issues of misconduct or where such issues have caused poor performance, disciplinary, grievance, or whistleblowing procedures will be triggered, the normal records required will still be made and kept according to procedure in addition to the low-level concerns records.

Where the low-level concern is serious enough to be referred to the LADO (or in the case of local arrangements requiring all concerns to be reported to the LADO), the related records will be placed and retained on the staff member's employee file. If a low-level concern is reclassified as an allegation, then the records relating to it will be treated accordingly. The Headteacher will determine whether consultation with the Local Authority Designated Officer (LADO) is required. Advice will be sought where there is uncertainty regarding the classification of a concern or where the concern may meet the harm threshold. Where the threshold is met, allegations will be managed in accordance with the School's Safeguarding and Child Protection Policy and relevant statutory guidance.

8. Review of the central Low-Level concerns file

The Safeguarding Governor will review the school Low-Level Concerns register termly. A record of these reviews will be made. The review will consider patterns, recurring themes, locations, staff groups and any wider cultural issues that may require action. This is to ensure such concerns are being dealt with promptly and appropriately and that any potential patterns of concerning, problematic, or inappropriate behaviour are identified, a course of action can be decided and carried out. This might involve internal disciplinary procedures or referral to the LADO if the harms threshold is met. It will also be considered whether there are any wider cultural issues in school that enabled the behaviour to occur. If appropriate, policies would be revised or additional training delivered to minimize the risk of recurrence. The rationale for all decisions and actions taken will be recorded.

9. Retention of Low-Level concern records

Low-Level Concern records will be retained securely and separately from personnel records whilst the individual remains employed by the school. When employment ceases, a review will be undertaken to determine whether continued retention is necessary and proportionate in accordance

with safeguarding requirements, safer recruitment considerations and the CGS Data Retention Policy.

Should Low-Level Concerns be referred to in a reference?

The school will provide references that are factual, accurate and fair. Safeguarding information will be included where required by law, statutory guidance or where it is necessary to ensure safeguarding and promote the welfare of children. Unsubstantiated, false or malicious allegations and unsubstantiated Low-Level Concerns will not be included in references. Decisions regarding safeguarding-related reference disclosures will be made by the Headteacher in consultation with HR and, where appropriate, legal advice.

Role of the board

The Board will receive regular safeguarding reports which include information regarding the implementation and effectiveness of the Low-Level Concerns Policy.

Reports will be sufficiently anonymised and will include:

- numbers of concerns raised;
- themes and trends identified;
- actions taken;
- training implications;
- evidence of safeguarding culture and reporting confidence.

The Board will seek assurance that low-level concerns are identified, recorded, reviewed appropriately and contribute to continuous safeguarding improvement.

Appendix 1

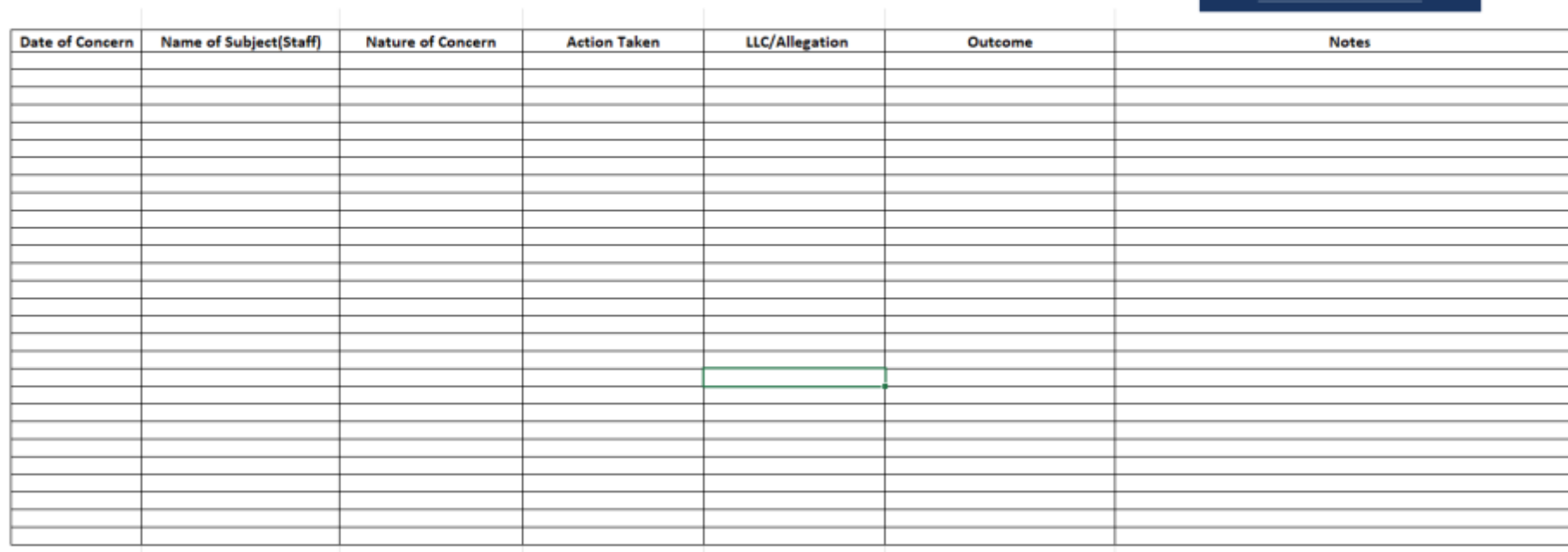
LOW LEVEL CONCERN FORM

☐ Accident	☐ Incident	☐ Safeguarding Concern
Date of incident:		
Name, date of birth and details of the person(s) (position/role) the report is being made about:		
Account of incident or concern: (give clear details relating to what happened, where, when(time), who was involved, what was said, nature of injury or behaviour, any witnesses etc (keep it factual)).		
Action taken:		
Name of person making the report:		
Signed:		
Date:		
ADMIN USE ONLY		
Headteacher:		
Signed:		
Date:		
Further action taken:		

Outcome (select): Low Level Concern Allegation Threshold Met Unsubstantiated False Malicious	
Review completed by: Date: Follow up required: Training/support required: Date closed:	



Low-Level Concerns Log





GUILDHOUSE SCHOOL
LONDON



Creating tomorrow's change makers.