RADLEY SCHOOLS GROUP

Low Level Concerns Policy
about the conduct of an adult towards a young person

Owner:	Director of Education	Date Reviewed:	August 2026
Review Period	Annual	Next Review Date:	August 2027

Low-Level Concerns Policy

The statutory guidance Keeping Children Safe in Education (KCSIE 2026) includes guidance for schools and colleges in England on dealing with low-level concerns about the behaviour of teachers, other staff, volunteers and contractors. The purpose of this policy is to assist in building and embedding a culture of openness, trust and transparency in which each School's values and expected behaviour which are set out in the staff code of conduct are constantly lived, monitored and reinforced by **all staff.**

Behaviour which is not consistent with our standards and values, and which does not meet the School's expectations encapsulated in our staff Code of Conduct, needs to be addressed.

This policy applies to concerns about **all adults working in or on behalf of the School**, including:

- employees;
- supply staff;
- trainee teachers;
- volunteers;
- contractors;
- peripatetic and visiting staff;
- governors or members of Radley Schools Group office.

What is a low-level concern?

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, or
- humiliating children.

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.

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.

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.

The Head is the ultimate decision-maker in respect of all low-level concerns, working collaboratively with the DSL where appropriate.

Why do we need to respond to low-level concerns?

Having clear procedures for responding to low-level concerns is part of creating a culture of openness and trust. It helps ensure that we, as adults, consistently model the School's values and helps keep children safe. It will also protect adults working at the School from potential false allegations or misunderstandings.

How to report a low-level concern

Low level concerns should be raised directly with the Head, but in the Head's absence they can be reported through the DSL. Staff are encouraged to speak to the Head if you have a low-level concern (LLC). If the LLC relates to the behaviour of the DSL or deputy DSL, then the concern should be raised directly with the Head. If the LLC relates to the behaviour of the Head, then the concern should be raised directly with the CEO of Radley Schools Group.

Staff are also encouraged to self-refer to the DSL, 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.

Reports about supply staff and contractors should be notified to their employers so any potential patterns of inappropriate behaviour can be identified.

If the Head or DSL 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.

Recording

All low-level concerns will be recorded in writing and 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, however if the individual wishes to remain anonymous then that will be respected, as far as reasonably possible.

Records will be kept confidential, held securely, and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), and in accordance with KCSIE, Part Four, Section Two. Access will normally be restricted to the Head and DSL, with information shared with others only where necessary for safeguarding, employment, regulatory or legal purposes.

Records will be reviewed periodically so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of behaviour starts to meet the harm threshold, it will be referred to the LADO. The rationale for all decisions and actions taken must be recorded. The Prep School Committee monitors anonymised LLCs at their termly meetings.

The record of a low-level concern will be retained for seven years after the individual leaves employment with the relevant School or the Radley Schools Group. Low-level concerns will not form part of a reference, unless they

relate to issues which would normally be included in a reference, for example, misconduct or poor performance, or a pattern of behaviour has been identified that meets the harm threshold and will therefore have been brought to the attention of the LADO, and substantiated.

Responding to concerns

The Head, or a suitably nominated deputy, will make proportionate enquiries and collect sufficient information to determine how the concern should be categorised and addressed.

This may include the person raising the concern, the individual concerned and any witnesses, where appropriate.

The LADO will be consulted whenever there is doubt about whether the harm threshold has been met.

There will be a review of the information to determine whether the behaviour:

1. is entirely consistent with the staff code of conduct and the law,
2. constitutes a low-level concern,
3. is not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO, and on a no-names basis, if necessary,
4. when considered with any other low-level concerns that have previously been raised about the same individual, could now meet the threshold of an allegation, and should be referred to the LADO/ other relevant external agencies,
5. in and of itself meets the threshold of an allegation and should be referred to the LADO/other relevant external agencies.

The primary purpose of sharing LLCs is to support colleagues in correcting inappropriate behaviour. In most cases, a constructive conversation with the subject of the concern will be all that is required. Consideration will be given as to who is best placed to have the conversation, but in most cases, this will be the appropriate line manager. Where appropriate, the matter may be addressed through a supportive management conversation. Depending on its nature and seriousness, action may also be taken under the School's disciplinary, capability or other employment procedures.

If there were to be a repetition of the behaviour, leading to further concerns being raised, The Head will determine who should be involved in any further management response. A repetition might be seen as the start of a pattern of behaviour, requiring careful review against the harm threshold. Where a pattern of behaviour meets, or may meet, the harm threshold, the Head will consult the LADO and make a referral where appropriate.

Reviewing

Low level concerns will be reviewed by the DSL and the Head on a termly basis, to identify patterns and review the actions that have been taken. Cultural issues within the School might be a factor in enabling the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again.