

Low Level Concern Policy

Date Reviewed:	01.09.2025
Next Review Date:	01.09.2026
Policy Owner:	Roxann Dowling
Ratified @ FGB/Committee Name & Date:	N/A as previously incorporated in the Safeguarding Policy.

Mission Statement

We are committed to providing a supportive, enjoyable and family style environment in which every child is nurtured and encouraged to achieve their potential through a broad-based curriculum and opportunities for developing sporting, dramatic, artistic and musical talents.

Statement of Aims & Objectives

- To enable each child to fulfil their own academic and personal potential.
- To instil in every child the importance of developing personal initiative and to foster in them a belief that they can fulfil their potential in any area of school life.
- To provide a broad based academic and extra-curricular education that is delivered in such a way as to satisfy the learning needs of each and every pupil.
- To help each pupil to develop both a set of Christian values and an understanding and appreciation of other religious beliefs.
- To learn the difference between right and wrong and to appreciate that rights and responsibilities are equally balanced.
- To develop and promote a sense of caring and community between the pupils within the school and the wider community as a whole.
- To instil in each pupil a high degree of self-respect and respect for their fellow pupils, teachers and other adults.
- To prepare each child for the transition to the next stage of their education and to be able to take advantage of any opportunities as they present themselves.



Safeguarding

Oakhyrst Grange School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. At this school we respect and value all children and are committed to providing a caring, friendly and safe environment for our pupils so that they can learn in a relaxed and secure atmosphere. We believe that every pupil should be able to participate in all school activities in an enjoyable and safe environment and be protected from harm. This is the responsibility of every adult employed by, or invited to deliver services at Oakhyrst Grange School. We recognise our responsibility to safeguard all who access school and promote the welfare of all of our pupils by protecting them from physical, sexual and emotional abuse, neglect and bullying. This should be read in conjunction with the Safeguarding Policy.

All staff will be asked to complete training annually following KCSIE updates. Further safeguard training will take place throughout the year. All staff must wear their lanyards at all times.

The Safeguarding governor is: Pauline Clark Pauline.clark@oakhyrstgrangeschool.co.uk

DSL: Roxann Dowling (Head of EYFS) 07746135233 DDSL: Gemma Mitchell (Headteacher) 07786 393228 DDSL: Faye Dance (Deputy Headteacher) 07415 359114

dsl@oakhyrstgrangeschool.co.uk



Introduction

Oakhyrst Grange school is an independent day school for girls and boys aged between 3 and 11 years old. It is a mixed ability and a family ethos that welcomes children from all backgrounds. We actively promote democracy, the rule of the law, individual liberty and respect those with different faiths and beliefs. These are fundamental British Values which underpin all that we offer.

At Oakhyrst Grange school, we take safeguarding very seriously. This includes ensuring that adults who work with children do so in a way that is in accordance with the ethos and policies set out by the school, including the Staff Handbook. This policy sets out the detail and processes for staff regarding low-level concerns they may have.

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 should inform the Headteacher about their concern using a Low-Level Record of Concern Form. If the Headteacher cannot be contacted, the Chair of Governors should be contacted instead. The Headteacher will consult with the DSL, if the concern is deemed a possible risk to children. If the Low-Level Concern relates to the DSL, the Headteacher will refer directly to the Safeguarding Governor.

If the Headteacher cannot be contacted; the Chair of Governors should be contacted instead, via the Clerk to the Governors.

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

'As part of their whole school or college 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 108 (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. 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 inappropriate, problematic or concerning behaviour early. It should 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.'

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out at paragraph 359.

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 allegations threshold or is otherwise not considered 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, 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.

It is crucial that any such concerns, including those which do not meet the harm threshold (see Part Four - Section one), 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 schools and colleges from potential false allegations or misunderstandings.

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

Allegation

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;
- 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.

Low-Level Concern

Any concern – no matter how small, 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.

Appropriate Conduct

Behaviour which is entirely consistent with the organisation's Code of Conduct, and the law.

Storing and use of Low-Level Concerns and follow-up information

LLC forms and follow-up information will be stored securely within the schools safeguarding systems, with access only by the Headteacher in the first instance. This will be stored in accordance with the school's GDPR and data protection policies.

The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Headteacher or those aware in the senior leadership team (should they have needed to be informed).

Low-Level Concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.



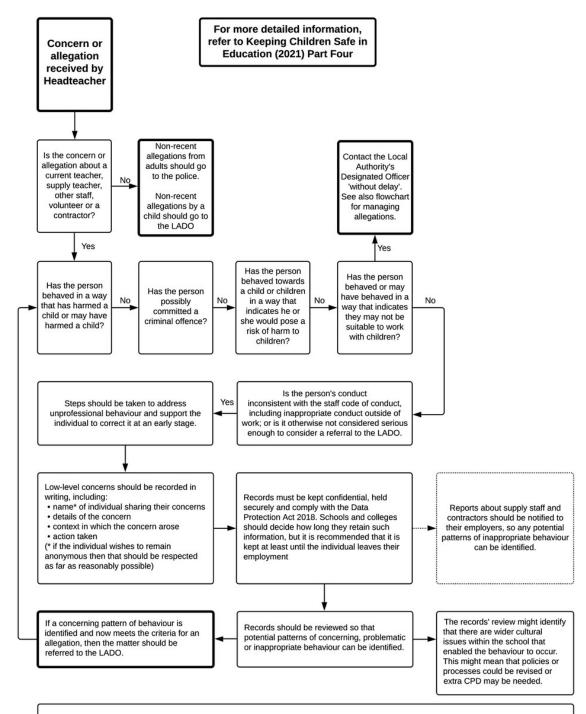
Whenever staff leave Oakhyrst Grange School, any record of low-level concerns which are stored about them will be reviewed as to whether or not that information needs to be kept.

Consideration will be given to:

whether some or all of the information contained within any record may have any reasonably likely value in terms of any potential historic employment or abuse claim so as to justify keeping it, in line with normal safeguarding records practice; or

if, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted accordingly.

Process to follow when a Low-Level Concern is raised-



What is a low level concern?

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out at KCSIE (2021) paragraph 338. 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 allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.



Read this document for further information about Low-Level Concerns, which is referenced in KCSIE 2025. https://assets.publishing.service.gov.uk/media/68add931969253904d155860/Keeping children safe in education from 1 September 2025.pdf

This Policy is subject to regular review.



Low Level Concern Form (Appendix 1)

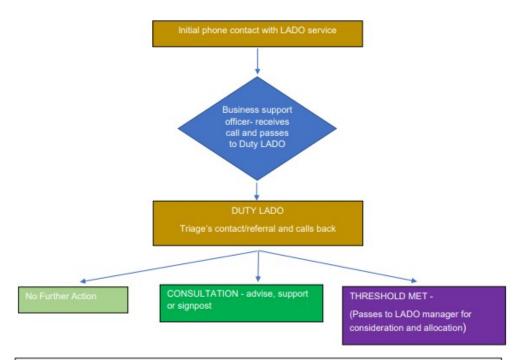
NB: This is for reporting concerns about staff and not for reporting concerns about students. Thank you for reporting your concerns. We are grateful to you for taking the safety and welfare of our students seriously. Please fill in the below form, including as much detail as you can, and return it directly to the Headteacher or Chair of Governors. Please refrain from discussing this concern with anyone other than the Headteacher or the DSL until the matter has been dealt with. We ask that you keep all details, including the name of the staff member to whom the concern pertains, confidential.

the concern pertains, confidential.				
Your details				
Name (optional)				
Role				
Date and time of completing this form				
Details of individual whom the concern is about				
Name				
Role				
ationship to the individual who is reporting th concern, eg manager, colleague				
D	etails of concern			
	wink about the following: What behaviour and/or incident are y does the behaviour and/or incident worry you? Why do you consistent with our Staff Code of Conduct?			

	Details (of any students involved
Name(s)		
Do you believe there is a risk of students, either now or in the following result of the individual's behotens. Explain your answer.	uture, as a aviour?	
		Next steps
What would you like to see h response to your conce		
Signature		
For use	e by safeguar	rding team upon receipt of concern
Date and time concern received		

Signature of Head Teacher or Chair of Governors
Actions to be taken, eg no
action, investigation,
reclassification as allegation
meeting the harms
threshold.

LADO SERVICE CONTACT AND PATHWAY



Please note:

- The initial phone contact with the LADO service goes directly to the LADO business support officer whose responsibility it is to pass the callers details to the DUTY LADO who will then call back where required.
- The business support officer will not advise on threshold or safeguarding matters. Where the caller states that the reason for their contact is to discuss/ make a LADO referral, the business support officer will advise them to complete a referral form which will then be passed to the DUTY LADO to triage/assess.
- Completing a referral form does not determine threshold for LADO involvement. However, completing
 a referral form will provide the DUTY LADO with the relevant safeguarding concern/allegation detail which
 they need to read, review and respond to via the referral form. Responding on the referral form is beneficial
 for the referrers record keeping and allows the LADO to be accountable for advice given.
- Following the triage process, the DUTY LADO will inform the referrer of the outcome of the LADO contact
 which could be NFA, advise/support and or threshold met. Where threshold is met, the case will be passed
 to the LADO manager for allocation consideration after which a named LADO will be allocated
 manage/monitor the case.

You can contact the LADO service via phone/email:

Phone: 0300 123 1650 (option 3) Email: LADO@surreycc.gov.uk

03/02/2022