



Radnor House

— TWICKENHAM —

Low-Level Concerns Policy Radnor House Prep School

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Data Protection Policy

Introduction

This policy should be read alongside our Child Protection and Safeguarding policy and Staff Code of Conduct.

At Radnor House Prep School, we aim to create an open and transparent culture where all concerns about all adults involved with Radnor House Prep School are dealt with promptly and appropriately. This applies to all concerns (including allegations) about members of staff at our school, including supply teachers, volunteers, contractors and governors.

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 expectations.

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

Definition of Low-Level Concerns

Reflective of with KCSIE, September 2025

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

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.

Sharing Low-Level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.
- Have clear policies and procedures.
- Empowering staff to share any low-level concerns.
- Empowering staff to self-refer.
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage.
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised.
- Helping to identify any weakness in the school's safeguarding system.

Reporting a low-level concern

Low level concerns about a member of staff should be reported to the Headteacher as per the school's Child Protection procedures.

If the concern is about the Headteacher this should be reported to the Chair of Governors.

Low level concerns about supply staff, contractors and local authority visiting staff will also be reported to their employers.

Staff should use **Staff Safe** the school's database for recording concerns with regards staff.

Responding to low-level concerns

If the concern is raised via a third party, the Headteacher will collect evidence by

- Speaking directly to the person who raised the concern, unless it has been raised anonymously
- Speaking directly to the individual involved and any witnesses

The Head Teacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff Code of Conduct.

Allegations and low-level concerns that meet the harm threshold will be referred to the LADO for advice. The Head Teacher will consult with the Safeguarding Governor – Rachael Friend.

Low level concerns that the school feel they can deal with internally will be dealt with via the school's usual child protection investigation process.

The school will engage with its HR provider where it is necessary to undertake further investigation and/or deal with the concern under relevant processes.

Record keeping

All low-level concerns will be recorded on **Staff Safe**. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR.
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Where a pattern of such behaviour is identified, the Head Teacher will decide on a course of action, following consultation with the Safeguarding Governor (David Goodhew).

- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, the Head Teacher will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

Reviewing a low-level concern

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Where a pattern of such behaviour is identified, the Head Teacher will decide on a course of action, which may include:

- Disciplinary investigation and/or proceedings
- Management Advice, including recommendations for training
- Referral to the LADO (where a pattern of behaviour moves from a concern to meeting the harm threshold).

If the concern relates volunteers, or any other concerns arise, school can contact the LADO for further advice.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the LADO and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.