St Hilary's Prep School Policy

Low-Level Concerns Policy

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1. Introduction

St Hilary's is an independent day school for girls and boys aged between 2 and 11 years old. It is a mixed ability, non-denominational school with 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, as does our School Motto 'Not for oneself but for all.'

At St. Hilary's, 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 (Staff Code of Conduct). This policy sets out the detail and processes for staff regarding low-level concerns they mayhave.

2. Summary

Staff must report any low-level concern about an adult working in or on behalf of the school promptly to the DSL, verbally and using the Low-Level Record of Concern Form. If the DSL is unavailable, report to the Headmaster or, if neither is available, the Chair of Governors. Concerns about the DSL must go directly to the Headmaster. Concerns about the Headmaster must go directly to the Chair of Governors. The DSL must inform the Headmaster of every low-level concern in a timely manner; the Headmaster remains the ultimate decision maker.

Any allegation that may meet the harm threshold must be referred immediately to the Headmaster (or the Chair of Governors where it concerns the Headmaster), following the school's managing allegations procedure. Consult the LADO if the threshold is unclear. A conflict of interest must not prevent a direct referral to the LADO. If a child is in immediate danger, call 999.

3. Keeping Children Safe in Education September 2026

The following summarises Keeping Children Safe in Education September 2026, Part Four, Section Two. Please read it alongside the full statutory guidance.

407. As part of their whole school 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(including supply teachers, volunteers and contractors) are dealt with

promptly and appropriately.

408. Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold(see Part Four - Section one) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage an open and transparent culture; enable schools and colleges to identify concerning, problematic or inappropriate behaviour early; 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.

What is a low-level concern?

"Low-level" does not mean unimportant. It describes conduct below the harm threshold in KCSIE Part Four, Section One; uncertainty about that threshold must be discussed with the LADO by the DSL.

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:

a. is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
b. does not meet the allegations threshold or is otherwise not considered serious enough to consider a referralto the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- 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 potentialfalse 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.

The harm threshold also includes behaviour indicating that an adult may not be suitable to work with children, including conduct outside school. Consider all four criteria in KCSIE Part Four, Section One; the illustration above must be read with this additional criterion.

5. 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 DSL in the first instance. This will be stored in accordance with the school's GDPR and data protection policies.

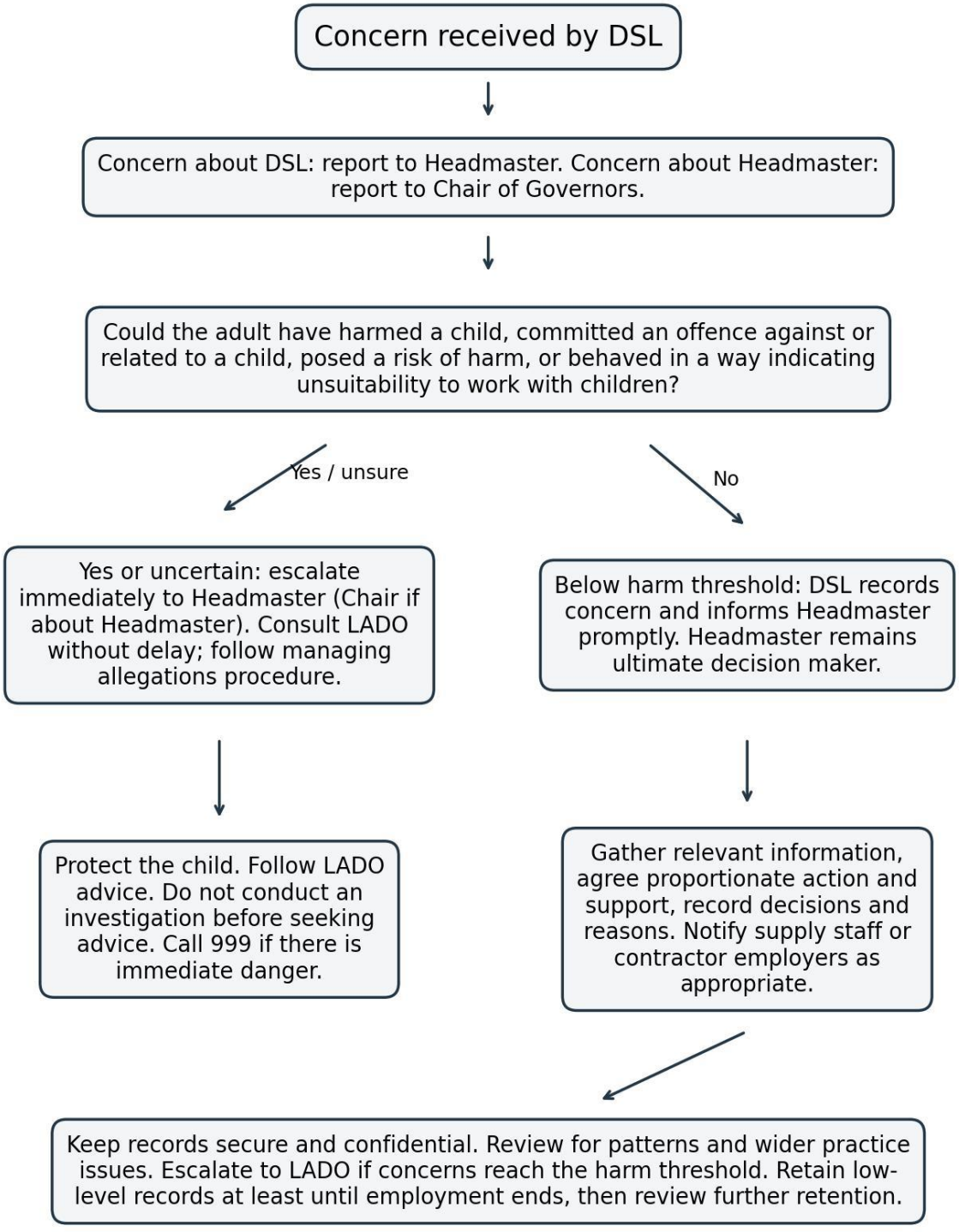
The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the DSL (or Safeguarding Governor/Headmaster as per protocol above) or those aware in the senior leadership team (should they have needed to be informed).

References must follow KCSIE Part Four: do not include concerns relating only to safeguarding below the harm threshold. Include misconduct or poor performance only where ordinarily appropriate; safeguarding concerns meeting the harm threshold must be substantiated before inclusion.

Keep low-level concern records at least until the individual leaves employment. Review records regularly for patterns, record decisions and reasons, and consider support, disciplinary action or LADO referral as appropriate. On departure, review continued retention under the school's retention schedule, considering:

(a) whether some or all of the information contained within any record may have any reasonably likely value interms of any potential historic employment or abuse claim so as to justify keeping it, in line with normal safeguarding records practice; or
(b) if, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, andought to be deleted accordingly.

6. Process and reporting flowchart



KCSIE September 2026 • Part Four • Read alongside the school safeguarding policy

KCSIE September 2026, Part Four, Sections One and Two:
https://www.gov.uk/government/publications/keeping-children-safe-in-education--2
Supporting guidance: Farrer & Co, Developing and implementing a low-level concerns policy (2024). This is supplementary guidance; current KCSIE takes precedence.
Farrer & Co low-level concerns guidance (2024) – open guidance

https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/developing-and-implementing-a-low-level-concerns-policy.pdf

7. Low Level Concern Form (Appendix 1)

This form will be available to staff via:

a. On the shared Drive
b. 'It Could Happen Here' Staff Display Board
c. DSL
d. The Senior Leadership Team

8. Surrey LADO contact and procedure

Surrey LADO: 0300 123 1650 (option 3); LADO@surreycc.gov.uk. Current local procedure and referral information: https://surreyscp.trixonline.co.uk/chapter/allegations-against-staff-or-volunteers

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Reviewed: June 2021, May 2022, June 2022, July2022, September 2022, July 2023, June 2024, July 2025, July 2026, November 2026
Next review date: June 2027
Person Responsible: Mr Mark Parton (DSL)

APPENDIX 1

Low-Level Record of Concern Regarding a Staff Member

Please use this form to share any concern – no matter how small, and even if no more than a 'nagging doubt' – that an adult may have acted ina manner which:

- is not consistent with St Hilary'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 thatadult's suitability to work with children.

Speak to the DSL promptly and pass this completed form to the DSL.

Do not delay reporting while completing the form. If the concern is about the DSL, report directly to the Headmaster; if about the Headmaster, report directly to the Chair of Governors at J.alliss@saintedmunds.co.uk

If the DSL is unavailable, contact the Headmaster or Chair of Governors. Allegations that may meet the harm threshold must be escalated immediately under the managing allegations procedure.
Remember, a low-level concern is different to an allegation (which uses a different form). See the table below for a definition:

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.

Name of adult writing this concern:
Name of adult whom this concern is about:
Date written:
Signature:
Please write your concerns below (continue on a separate sheet if necessary)

You should provide a concise record – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurateas possible – of any such concern and relevant incident(s). Consider any contextual information that may be appropriate to know.