



Vita et Pax
PREPARATORY SCHOOL

Vita et Pax Preparatory School
Established 1936

Low-Level Concerns Policy

Policy Originator	Head Teacher
Approved by	Governing Body
Governor Responsible	Chair
Date Approved	1 March 2026
Status	Statutory
Review Period	Annually (next: March 2027)

This policy is reviewed annually and ratified by the Governing Body. Families are encouraged to be familiar with this policy via the school website. Copies of this policy and its associated documents are available from the school office.

1. Policy Statement

Vita et Pax Preparatory School understands the importance of a positive culture where concerns can be identified and spoken about openly and acknowledges that this is a key element of a strong safeguarding system. This Low-Level Concerns Policy seeks to ensure that all staff who work with children behave appropriately and to enable the early identification and prompt and appropriate management of concerns.

As part of its whole-school approach to safeguarding, the school will ensure that it promotes an open and transparent culture in which all safeguarding concerns and allegations about all adults working with children are dealt with promptly and appropriately.

Creating a culture in which all safeguarding concerns and allegations about adults (including those that do not meet the harm threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is crucial. If implemented correctly, this should encourage an open and transparent culture; enable the school to identify inappropriate, problematic or concerning behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the school.

This policy operates in conjunction with:

- Safeguarding and Child Protection Policy
- Staff Code of Conduct

- Disciplinary Procedure
- Capability Procedure
- Grievance Procedure
- Whistleblowing Policy
- Data Protection Policy

2. Legislation and Guidance

This policy has regard to the following legislation and statutory guidance:

- Keeping Children Safe in Education (KCSIE) 2025, Part 4
- Working Together to Safeguard Children 2023
- Education (Independent School Standards) Regulations 2014
- Data Protection Act 2018 / UK GDPR
- Equality Act 2010

3. Introduction

Behaviour which is not consistent with the standards and values of the school and which does not meet the organisational expectations encapsulated in the school's Staff Code of Conduct needs to be addressed. Such behaviour can exist on a wide spectrum — from the inadvertent or thoughtless, through to that which is ultimately intended to enable abuse.

All staff need to be informed about and be able to identify inappropriate, problematic or concerning behaviour and understand the importance of sharing concerns when they observe behaviour which violates the school's Staff Code of Conduct.

4. Definitions

4.1 Who Does This Policy Apply To?

This policy applies to all staff whether working in or on behalf of the school, engaged as a paid employee, worker or contractor, or unpaid member of staff or volunteer. It also includes anyone who is part of the Governing Body.

4.2 Concern That May Meet the Harm Threshold

This means the behaviour in question might indicate that a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children — i.e. a concern is raised/it is alleged that they have:

- 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

- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

4.3 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 with children may have acted in a way that:

- Is inconsistent with the school's Staff Code of Conduct, including inappropriate conduct outside of work
- Does not meet the harm threshold; or is otherwise not serious enough to merit a referral to the LADO

Staff do not need to be able to determine in each case whether the behaviour constitutes a low-level concern or if it may meet the harm threshold. Once staff share what they believe to be a low-level concern, that determination should be made by the Head Teacher and in consultation with the DSL if/as appropriate.

5. Purpose and Aims

The purpose of this policy is to create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour set out in the school's Staff Code of Conduct are constantly lived, monitored and reinforced by all staff.

The aims are to:

- Ensure that staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from inappropriate, problematic or concerning behaviour — in themselves and others
- Empower staff to share any low-level concerns with the Head Teacher, and to help all staff interpret the sharing of such concerns as a neutral act
- Address unprofessional behaviour and support the individual to correct it at an early stage
- Identify inappropriate, problematic or concerning behaviour — including any patterns — that may need to be consulted upon with, or referred to, the Local Authority Designated Officer (LADO)
- Provide for responsive, sensitive and proportionate handling of such concerns when they are raised
- Help identify any weaknesses in the school's safeguarding system

6. School Culture

The school promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the school are dealt with promptly and appropriately.

7. Data Protection and Confidentiality

The school will always respect the personal data of staff (and others, where they may be identifiable) in implementing this policy and in keeping records of low-level concerns secure.

The Data Protection Act 2018 (UK GDPR) includes a specific provision which permits organisations to process even the most sensitive personal data where necessary for the purposes of protecting children from harm. Although sharing of low-level concerns will not always involve legally sensitive categories of data, the safeguarding purpose is the same as that under the school's Safeguarding Policy.

A proportionate approach must be taken to considering what personal data is necessary to share and record in each case. Information should be accurate, fair and as far as possible recorded in neutral terms.

If a member of staff who raises a low-level concern does not wish to be named, the school will respect their wishes as far as possible. However, staff should be aware that in certain circumstances this anonymity may need to be waived.

All personal data processed in connection with this policy will be processed in accordance with the school's Privacy Notices and Data Protection Policy.

8. Sharing Low-Level Concerns

Low-level concerns should be shared initially with the Head Teacher as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it (where the concern relates to a particular incident) — although it is never too late to share a low-level concern.

If the Head Teacher is absent, low-level concerns should be shared with the Deputy DSL, who will ensure they inform the Head Teacher immediately on their return.

If any low-level concern relates to the behaviour of the Head Teacher, it should be referred to the Chair of Governors. If there is a conflict of interest in sharing a low-level concern with the Head Teacher, the concern should be shared with the Chair of Governors, unless there is a conflict of interest in doing so, in which case it should be reported directly to the LADO.

9. Anonymity

Staff are encouraged to consent to be named when sharing low-level concerns, as this will help to create a culture of openness and transparency. If the staff member who raises a low-level concern does not wish to be named, the school will respect that person's wishes as far as possible. However, there may be circumstances where the staff member will need to be named (for example, where disclosure is required by a court or local authority, or under a fair disciplinary process) and, for this reason, the school will not promise anonymity.

10. Self-Reporting

Occasionally a member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Staff should, wherever possible, proactively self-report. Examples include where a member of staff:

- Has a child who is a student in the school and may have the mobile phone number of their child's friend
- Plays in an external sports team with a current student and may be on a group chat with them
- Is having to drive a student somewhere, for example for an urgent medical appointment

Equally, a member of staff may have behaved in a manner which, on reflection, they consider falls below the standard set out in the Staff Code of Conduct. Self-reporting in these circumstances is encouraged because:

- It is self-protective, enabling a potentially difficult issue to be addressed at the earliest opportunity
- It demonstrates awareness of expected behavioural standards and self-awareness
- It is an important means of maintaining a culture where everyone aspires to the highest standards of conduct

11. Recording Low-Level Concerns

The concern can be shared verbally with the Head Teacher in the first instance, or a written summary can be provided. Where the concern is provided verbally, the Head Teacher will make an appropriate record of the conversation, either contemporaneously or immediately following the discussion.

Where a low-level concern relates to a person employed by a supply agency or a contractor, the school will notify that person's employer so that any potential patterns of inappropriate behaviour can be identified.

12. Responding to Low-Level Concerns

Once the Head Teacher has received what is believed to be a low-level concern, they will (in an appropriate sequence according to the nature of the concern):

1. Speak to the person who raised the concern (unless raised anonymously)
2. Speak to any potential witnesses (unless advised not to do so by the LADO or other relevant external agencies)
3. Speak to the individual about whom the concern has been raised (unless advised not to do so by the LADO)
4. Review the information and determine whether the behaviour: (a) is entirely consistent with the Staff Code of Conduct and the law; (b) constitutes a low-level concern; (c) may meet the harm threshold and should be referred to the LADO; or (d) when considered with previous concerns about the same individual, may meet the harm threshold
5. Ensure appropriate and detailed records are kept of all conversations, their determination, the rationale for the decision and any actions taken
6. Consider whether the concern also raises misconduct or capability issues and, if so, refer accordingly

12.1 If Behaviour Is Consistent with the Staff Code of Conduct

The Head Teacher will update the individual in question and inform the person who shared the concern, providing feedback about how and why the behaviour is consistent with the Staff Code of Conduct.

12.2 If Behaviour Constitutes a Low-Level Concern

Most low-level concerns by their nature are likely to be minor. Some will not give rise to any ongoing concern and will not require further action. Others may be most appropriately dealt with by means of

management guidance and/or training. In many cases, a low-level concern will simply require a conversation with the individual.

Any such conversation will include being clear about why the behaviour is inappropriate, what change is required, what support may be needed, and the consequences if the required standard is not reached. Ongoing and transparent monitoring may be appropriate. An action plan or risk assessment agreed with the individual may also be appropriate.

12.3 If Behaviour May Meet the Harm Threshold

If the behaviour, in and of itself or when considered with any other low-level concerns previously shared about the same individual, may meet the harm threshold, it will be referred to the LADO and other relevant external agencies, in accordance with the school's Safeguarding Policy, Part 4 of KCSIE 2025 and the relevant procedures and practice guidance stipulated by the Local Safeguarding Partnership.

13. Record Keeping

The school will retain all records of low-level concerns (including those subsequently deemed to relate to behaviour entirely consistent with the Staff Code of Conduct) in a central low-level concerns file.

Where multiple concerns have been shared regarding the same individual, these will be kept in chronological order as a running record with a timeline. These records will be kept confidential and held securely, with access afforded only to a limited number of individuals such as the Head Teacher, DSL and the Chair of Governors.

14. Review of Central File

The Head Teacher will review the central low-level concerns file periodically to ensure that all concerns are being dealt with promptly and appropriately, and that any potential patterns of inappropriate, problematic or concerning behaviour are identified. A record of these reviews will be made.

Where a pattern of behaviour is identified, the Head Teacher will also consider whether any wider cultural issues are at play and whether additional training or a review of policies is needed.

15. Retention of Records

Low-level concerns will be retained securely for as long as deemed relevant and necessary for a safeguarding purpose, unless the school is required to disclose by law. In most cases, once a staff member leaves the school, low-level concerns held relating to them:

- Will be retained at least until the individual leaves the school
- Will not be included in any onward reference, except as set out below

16. References

Low-level concerns will not be included in references unless they relate to issues which would normally be included, for example misconduct or poor performance. A low-level concern which relates exclusively

to safeguarding (and not to misconduct or poor performance) will not be referred to in a reference.

17. Role of the Governing Body

The Head Teacher will regularly inform the Governing Body about the implementation of this policy and any evidence of its effectiveness, for example by including reference to it in safeguarding reports and providing relevant data.

The Governing Body will also review an anonymised sample of low-level concerns at regular intervals, in order to ensure that concerns have been responded to promptly and appropriately.

18. Monitoring and Review

This policy will be monitored to ensure effective implementation and will be reviewed annually by the Head Teacher and in response to any relevant legislative, statutory or regulatory changes and/or changes in relevant guidance and/or safeguarding best practice.

19. Key Contacts

- Head Teacher: As listed on the school website
- Designated Safeguarding Lead (DSL): As listed on the school website
- Chair of Governors: Mr P. Acharya
- LADO: Contact via the Local Authority

20. Associated Policies

- Safeguarding and Child Protection Policy
- Staff Code of Conduct
- Behaviour and Discipline Policy
- Whistleblowing Policy
- Data Protection Policy
- Safer Recruitment Policy

Approved by: Governing Body of Vita et Pax Preparatory School

Date: 1 March 2026