



APPLEFORD SCHOOL

Low level Concerns Policy

This policy, which applies to all staff, volunteers, contractors and visitors working with pupils in education or the boarding provision publicly available on the school website, on the staff share and upon request a copy (which can be made available in large print or other accessible format if required) may be obtained from the School Office. This policy reflects current legislation, the new recording/parent-notification duties and emerging DfE/Ofsted/ISI expectations for residential special schools

We have a whole school approach to safeguarding, which is the golden thread that runs throughout every aspect of the school. All our school policies support our approach to safeguarding (child protection). Our fundamental priority is our children and their wellbeing; this is first and foremost.

All who work, volunteer or supply services to our school have an equal responsibility to understand and implement this policy and its procedures both within and outside of normal school hours, including activities away from school. All employees and volunteers are required to state that they have read, understood and will abide by this policy and its procedural documents.

Monitoring, Review and Adaptation: The text of this policy is **necessary** and proportionate to meet the needs of Appleford School, supporting those who work with our pupils, **making clearer** the responsibilities of school staff, volunteers, proprietor and the Advisory Board. This policy is reviewed at least annually, and sooner if: there is a filtering or monitoring incident; new technology, systems or a new provider is introduced; relevant statutory guidance changes (for example, Keeping Children Safe in Education); or an external safeguarding or IT audit recommending changes.

These arrangements are therefore subject to continuous monitoring, refinement, and audit by the Headmaster, the DSL the IT team inclusive of the school administrator who was previously seconded to the DfE. In monitoring the effectiveness of this policy through the timetable of checks detailed in this policy. There will be analysis of monitoring alert data, feedback from staff, pupils and parents, and outcomes of any incidents. Findings will inform the annual policy review and be reported to the Proprietor.

The Proprietor is committed to regularly reviewing and updating our policies to ensure they remain relevant and effective in supporting our school's mission and values, inclusive of its implementation and the efficiency with which the related duties have been implemented. This review will be formally documented in writing. Any deficiencies or weaknesses recognised in arrangements or procedures will be remedied immediately and without delay. All staff will be informed of the updated/reviewed arrangements, and it will be made available to them in writing or electronically.

Reviewed: September 2026

Next Review: September 2027 (or sooner, to reflect any material change in statutory or best practice requirements:

Signed:

Dr. Peter Gardner
Proprietor and Managing Director

Mr. James Langan
Headmaster

Policy statement and purpose Appleford School is a residential special school providing education and care for children and young people with special educational needs and disabilities (SEND) for ages 7-16, on termly boarding basis. Many of our pupils specific learning needs such as dyslexia and dyspraxia and other complex needs. We recognise that children with additional needs who live away from home are at greater risk of abuse and are less likely to be able to tell someone about it. A strong low-level concerns culture is one of the most important protections against this. The purpose of this policy is to:

- create and embed an **open and transparent culture** in which all concerns about all adults working in or on behalf of the school (including supply staff, trainee teachers, volunteers and contractors) are dealt with promptly and appropriately;
- enable the school to **identify inappropriate, problematic or concerning behaviour early**, including in the residential setting, at night, at weekends and during school holidays;
- **minimise the risk of abuse** by ensuring that adults are clear about, and act within, the expected professional boundaries set out in the Staff Code of Conduct;
- ensure that **patterns** of concerning behaviour are identified, reviewed and acted upon, and that concerns are escalated to the Local Authority Designated Officer (LADO) where appropriate;
- **support staff** to reflect on and improve their own practice, to self-report, and to raise concerns without fear of reprisal; and
- meet the requirements of Keeping Children Safe in Education 2026 (KCSIE), the National Minimum Standards for Residential Special Schools and all other relevant legislation and guidance.

Our commitment: The term “low-level” does **not** mean that a concern is insignificant. Every concern – however small, and even if it is no more than a sense of unease or a “nagging doubt” – matters, and every concern will be listened to, recorded and responded to. No member of staff will ever be criticised for raising a concern in good faith that turns out to be unfounded.

Scope: This policy applies to concerns about the conduct of **any adult** working in or on behalf of the school, whether paid or unpaid, in any setting (education, residential houses, transport, off-site visits, online and outside work), including:

- all teaching, residential/care, support, therapy, nursing/medical, administrative, catering, domestic, estates, transport and waking-night / sleeping-in staff;
- members of the senior leadership team, the Headmaster, Head of Boarding and the Proprietor and Advisory Board;
- supply, agency and bank staff;
- **trainee teachers** and other students on placement (including apprentices and social care, nursing or therapy students);
- volunteers (including those now in regulated activity following removal of the supervision exemption by the Crime and Policing Act 2026);
- contractors, peripatetic and visiting professionals (e.g. NHS therapists, CAMHS, advocates, independent visitors) working on site or with pupils;
- individuals or organisations using the school premises for non-school activities (lettings), in line with KCSIE Part two;
- escorts and drivers (including those contracted by a local authority) while pupils are in their care.

The policy covers concerns about conduct towards **all pupils** on roll. It also covers conduct outside work, including online, that may be relevant to a person’s suitability to work with children (“transferable risk”).

What this policy does not cover

- **Concerns or allegations that meet the harm threshold** – these are managed under the school’s Managing Allegations Against Staff procedure (KCSIE Part four, Section one) and referred to the LADO without delay.
- **Concerns about a child’s welfare** – these are managed under the Child Protection and Safeguarding Policy and reported to the DSL.

Appleford School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. It is our aim that all children fulfil their potential

- **Child-on-child abuse** – managed under the Child Protection and Safeguarding Policy and KCSIE Part five.
- **General performance or conduct matters with no safeguarding dimension** (e.g. lateness, attendance) – managed under the relevant HR policies. If in doubt, share it as a low-level concern.
- **Concerns about organisational safeguarding practice** – these are raised under the Whistleblowing Policy (though the same concern may also be shared as a low-level concern where it relates to an individual).

Legislative, statutory and good practice framework: This policy has been written to comply with, and should be read in the context of, the following. Advisory Board Members and senior leaders must satisfy themselves that the school complies with the law at all times.

Statutory guidance

- Keeping Children Safe in Education 2026 (DfE, in force 1 September 2026)
- Working Together to Safeguard Children 2026 (as updated)
- National Minimum Standards for Residential Special Schools (DfE, 2022)
- Children’s Homes (England) Regulations 2015 and Guide to the Quality Standards [delete if not applicable]
- Early Years Foundation Stage Statutory Framework (Section 3)
- SEND Code of Practice: 0 to 25 years (2015)
- Guidance for safer working practice for those working with children and young people in education settings (Safer Recruitment Consortium, current edition)
- Restrictive interventions, including use of reasonable force, in schools (DfE, 2026)
- Information sharing: advice for practitioners (DfE, 2024) and ICO guidance for the education sector

Related school policies: Child Protection and Safeguarding Policy; Managing Allegations Against Staff (including supply staff, trainee teachers, volunteers and contractors); Staff Code of Conduct / Staff Behaviour Policy; Whistleblowing Policy; Safer Recruitment Policy; Intimate and Personal Care Policy; Positive Behaviour Support and Physical Intervention Policy; Residential/Boarding Policy and Night-Time Procedures; Online Safety and Acceptable Use Policy (including mobile devices and social media); Photography and Images Policy; Lettings Policy; Disciplinary and Capability Policies; Data Protection and Records Retention Policy; Complaints Policy; Grievance Policy; Staff Wellbeing Policy.

Definitions

Low-level concern

- In line with KCSIE 2026, 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 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.

A low-level concern can arise in several ways and from a number of sources: for example, suspicion, complaint, or disclosure made by a child, parent/carers or other adult within or outside of the organisation; or as a result of vetting checks. It may be about something that has been seen, heard, or pieced together over time.

The harm threshold: A concern or allegation meets the **harm threshold** (and must be managed under the Managing Allegations Against Staff procedure and referred to the LADO) where it is alleged that an adult has:

- behaved in a way that has harmed a child, or may have harmed a child; and/or
- possibly committed a criminal offence against or related to a child; and/or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (including behaviour outside work – “transferable risk”).

Other key terms

Term	Meaning in this policy
Staff / adult	Anyone within the scope set out in section 2, including supply staff, trainee teachers, volunteers and contractors.
Low-Level Concerns Lead (LLC Lead)	The Headmaster, who receives and makes decisions on low-level concerns. The DSL (or a deputy DSL) acts for the Headmaster where the Headmaster is unavailable or conflicted.
LADO	Local Authority Designated Officer – the person(s) in the local authority who must be informed of allegations that meet the harm threshold, and who can be consulted where there is doubt about whether a concern meets that threshold.
Pattern	Two or more low-level concerns about the same individual (whether or not similar in nature), or about several individuals in the same team, house, shift or activity, that together may indicate a cultural or systemic issue or a heightened risk.
Self-report / self-referral	Where an adult raises a concern about their own conduct, or about a situation that could be misinterpreted.
Closed culture	A culture, often in residential settings, where people are isolated from outside scrutiny, poor practice becomes normalised and staff do not feel able to speak up.
Pupil / child	Any pupil on roll. “Child” means anyone under 18. Section 13 sets out how this policy applies to learners aged 18 and over.

Principles and culture: Our approach is grounded in the following principles, which the proprietor/governing body expect to be visible in daily practice across the school day, the residential day and the night:

1. The welfare of the child is paramount. Where there is any doubt, we act in the best interests of the child.
2. “It could happen here.” All adults maintain professional curiosity about the conduct of colleagues as well as the welfare of pupils.
3. Everyone shares concerns; no one investigates alone. Staff are expected to share concerns, not to decide for themselves whether a concern is serious enough or to gather evidence.
4. Openness is the norm. Sharing low-level concerns and self-reporting are part of good professional practice, and are recognised as such in supervision and appraisal.
5. Proportionate and fair. Concerns are handled promptly, sensitively, confidentially and fairly; the individual is treated with respect and supported, and the purpose is to identify and correct behaviour at an early stage – not to punish.
6. Patterns matter. Individually minor concerns can, taken together, indicate grooming, a closed culture or an unsafe environment. We keep records so that patterns can be seen.
7. Children’s voices are sought. Changes in behaviour, distress, avoidance of a particular adult, or reluctance to go to a particular house or activity are treated as communication and may be the source of a low-level concern.
8. No retaliation. Victimisation of anyone who raises a concern in good faith is a disciplinary matter.

Heightened risk factors in our setting: Leaders and all staff should be aware of features of residential special provision that can increase risk and make low-level concerns especially important:

- pupils’ communication needs and dependence on adults for intimate care, feeding, medication and moving and handling;
- lone working, night-time and weekend working with fewer senior staff and external professionals on site;
- the domestic, “family-like” atmosphere of residential houses, which can blur professional boundaries;

- long-standing, stable staff teams where colleagues may be friends or family members, which can make challenge harder;
- use of physical intervention and restrictive practices;
- pupils living far from home, with limited family contact, or who are looked-after children placed by local authorities;

6. Roles and responsibilities

Role	Responsibilities
Proprietor	• Ensure this policy is in place, is part of (or cross-referenced in) the Staff Code of Conduct, is compliant with KCSIE 2026 and is reviewed at least annually. • Ensure the school has a senior board-level safeguarding lead. • Receive at least termly anonymised reports on the number, type and outcome of low-level concerns and any patterns or themes, and use them to provide strategic challenge. • Ensure they know how to receive a low-level concern about the Headmaster and is trained to do so. • Ensure all Advisory Board Members receive safeguarding training at induction, including on this policy.
Headmaster	• Receives and make decisions about all low-level concerns (unless conflicted). • Consult the DSL on every concern, and consult the LADO where in doubt. • Review the low-level concerns record and regularly check it for patterns. • Ensure all staff are trained on this policy and on the Staff Code of Conduct at induction and at least annually. • Ensure supply agencies, ITT providers and contractors are informed where required. • Promote a culture of openness and model self-reporting.
Designated Safeguarding Lead (DSL) and deputies	• Advise the Headmaster on every concern; act as LLC Lead where the Headmaster is unavailable or conflicted. • Consider whether any child requires support or protection, and whether the concern links to any child protection record. • Liaise with the LADO and other agencies. • Contribute to pattern analysis and to training.
Head of Boarding	• Ensure residential and night staff know how to raise concerns out of hours, and that the on-call rota always includes a DSL-trained senior manager. • Pass all concerns raised in the residential setting to the LLC Lead the same day (or first thing the next morning where out of hours and not urgent). • Contribute residential oversight (e.g. house logs, night records, restraint records, pupil voice) to pattern analysis.
HR / Business Manager	• Support the LLC Lead with the secure central record, retention, data protection and references. • Ensure the single central record and personnel files are maintained, and that concerns are not placed on personnel files unless section 12.2 applies.
Line managers and supervisors	• Pass any concern received immediately to the LLC Lead; do not investigate or resolve it themselves. • Use supervision to reinforce professional boundaries and encourage self-reporting.
All staff, volunteers and contractors	• Read and follow the Staff Code of Conduct and this policy; read KCSIE Part one in full. • Share every low-level concern about any adult, and self-report where appropriate. • Co-operate with any follow-up and maintain confidentiality.

Recognising low-level concerns: Low-level concerns may range from inadvertent or thoughtless behaviour, to behaviour that looks inappropriate but might not be in specific circumstances, through to behaviour which is intended to enable abuse. KCSIE gives the following examples:

- 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 pupils.

The table below gives further examples that are specific to our all-age residential special school. These are illustrations, not an exhaustive list, and the circumstances will always matter. Any of these could meet the harm threshold depending on context, severity, intent or frequency.

Area	Examples that may be low-level concerns
Professional boundaries and relationships	Over-familiar language or nicknames; giving or receiving personal gifts outside agreed procedures; sharing personal details, problems or personal phone numbers/social media with pupils or families; spending disproportionate time with one pupil; singling out a pupil for privileges; inappropriate jokes, innuendo, swearing or sarcasm; discussing a pupil's needs in a demeaning way.
Residential and overnight care	Entering bedrooms or bathrooms without knocking or outside the agreed care plan; deviating from agreed night-check routines or failing to record them; sitting on beds or lying next to pupils to settle them contrary to their plan; being in a residential house when not on shift, or arriving early/leaving late without reason; inviting pupils to staff areas or sleeping-in rooms; undocumented changes to bedtimes or routines to suit staff.
Intimate and personal care	Carrying out intimate care outside the pupil's intimate care plan (e.g. without the agreed number of staff, or of a different sex to that agreed); not respecting dignity or privacy; failing to record intimate care; unnecessary nudity; comments about a pupil's body.
Physical contact and physical intervention	Unnecessary or prolonged physical contact; tickling or play-fighting; using a hold not in the pupil's positive behaviour support plan or not taught in accredited training; late or incomplete recording of restrictive interventions; use of seclusion, withdrawal or removal of items/aids not sanctioned in the plan; handling that is rough but causes no injury.
Communication and online conduct	Using personal devices to contact, photograph or film pupils; contacting pupils or former pupils via personal social media, gaming or messaging apps; ignoring a pupil's communication of distress; online content, posts or "likes" that are inconsistent with the Code of Conduct.
Care, dignity and wellbeing	Withholding food, drink, activities, comfort items or communication aids as a sanction; mocking a pupil's disability or communication; ignoring medical or dietary protocols without harm resulting; leaving pupils unsupervised contrary to risk assessments; delayed response to a pupil's care needs.
Transport and off-site activity	Taking a pupil off site or in a private vehicle without authorisation; changing routes or stops without authorisation; lone transport not agreed in the risk assessment.
Conduct outside work	Behaviour outside work that is inconsistent with the Code of Conduct and could affect suitability to work with children – for example, inappropriate online content, arrests or cautions not disclosed, or associations that raise concern – where it does not reach the harm threshold.

7.1 Distinguishing low-level concerns from allegations

General conduct matter	Low-level concern	Allegation (harm threshold met)
Performance or conduct with no safeguarding dimension (e.g. lateness, not completing admin tasks).	Behaviour inconsistent with the Code of Conduct that could affect a pupil or indicates weak boundaries, but has not harmed a child and does not suggest risk of harm or unsuitability.	Behaviour that has or may have harmed a child, may be a criminal offence, suggests risk of harm, or indicates the adult may be unsuitable to work with children.
Managed by line manager under HR procedures.	Shared with the Headmaster under this policy.	Reported to the Headmaster immediately ; LADO informed within one working day; managed under the Allegations procedure.

If in doubt: Staff must never decide for themselves whether something is “serious enough”. Share it with the LLC Lead. The LLC Lead will decide, with the DSL and, where there is any doubt, after consulting the LADO. If a concern is escalated to the LADO and found not to meet the harm threshold, it will be managed as a low-level concern.

How to share a low-level concern

If the concern is about...	Share it with...
Any member of staff, supply staff, trainee teacher, volunteer or contractor	The DSL or Headmaster . If they are unavailable, the deputy DSL.
The DSL or a deputy DSL	The Headmaster
The Headmaster	The Proprietor . Do not inform the Headmaster.
The Proprietor,	The Headmaster, who will seek LADO advice as needed. Do not inform the Proprietor.
A member of the Advisory Board	The Headmaster, who will seek LADO advice as needed.

How and when

1. Share the concern **as soon as reasonably possible and in any event within 24 hours**. If a child may be at immediate risk, act at once and follow the Child Protection Policy.
2. You may share the concern in person, by phone or via CPOMS. Then complete the **Low-Level Concern Reporting Form (Appendix A)**,
3. Record facts: what you saw or heard, when, where, who was present, the context, and any words used by a child verbatim. Distinguish fact from opinion. Sign and date your note.
4. **Do not** investigate, question the child in detail, discuss it with the adult concerned or with colleagues, or wait until you have “more evidence”.
5. If a child makes a disclosure about an adult, listen, reassure, do not promise confidentiality, and report immediately to the Headmaster/DSL – this may be an allegation, not a low-level concern.

Residential, night-time, weekend and holiday arrangements

- A senior member of staff who is DSL-trained is on call at all times the residential provision is open. The rota and contact numbers are displayed in every house office and staff room and included in night staff induction.

- Where the concern could indicate risk to a child that night (for example, where it may meet the harm threshold), the Head of Boarding will act immediately, including rearranging staffing so the adult is not working alone with pupils, and will contact the Headmaster and, where required, the LADO/out-of-hours service or police.

Anonymity and confidentiality: Staff are encouraged to put their name to a concern so that it can be properly followed up. Where a member of staff asks for their identity not to be shared with the individual concerned, the Headmaster will respect this as far as reasonably possible, but cannot guarantee it (for example, where the matter later meets the harm threshold, or where the context would make the source apparent). The Headmaster will explain this at the outset. Anonymous concerns will still be recorded and considered.

Whistleblowing and external routes: If you feel unable to raise a concern internally, or feel your concern has not been addressed, you should use the Whistleblowing Policy or contact the NSPCC Whistleblowing Advice Line (0800 028 0285; help@nspcc.org.uk; 08:00–20:00 Monday–Friday and 09:00–18:00 at weekends). You may also contact the LADO directly, or Ofsted (Whistleblowing hotline 0300 123 3155; whistleblowing@ofsted.gov.uk) regarding the residential provision.

Self-reporting: Occasionally an adult may find themselves in a situation which could be misinterpreted or might appear compromising to others, or may realise that their own behaviour may have fallen below expected standards. We actively encourage staff to self-report, and this will be viewed positively as a sign of professionalism and openness.

Examples include: a pupil developing an attachment to the adult or making an allegation-like comment; a pupil sending the adult a friend request; accidental contact during intimate care or physical intervention; having to be alone with a pupil in an emergency; a relationship between the adult and a parent/carer or a pupil's family; being contacted by a former pupil; or an incident outside work (including online) that may be relevant.

Self-reports are made to the Headmaster also using the Low Level Concerns Form (**Appendix A**) and are recorded and handled in the same way as other low-level concerns. Self-reporting does not mean the matter will be treated as less serious if it meets the harm threshold, but it will be taken into account.

Responding to a low-level concern: The following procedure will be followed for every low-level concern. The Headmaster will act promptly and proportionately. The expected timescales below are good practice and may be adjusted where there is a documented reason.

Step	Action	Timescale
1. Receive and acknowledge	The DSL receives the concern, acknowledges it to the person who raised it, and ensures that a written record is made (Appendix A) and informs the Headmaster.	On receipt; written record within 24 hours
2. Immediate safety check	Consider whether any child is at risk now. If so, take immediate protective action under the Child Protection Policy and/or the Allegations procedure.	Immediately
3. Consult the DSL	The DSL, checks the central LLC record, any linked child protection records and (where relevant) HR and residential records, to establish whether there is a previous concern or pattern.	Within 1 working day
4. Categorise the concern	Decide whether the concern is (a) an allegation meeting the harm threshold; (b) a low-level concern; or (c) a general conduct/performance matter with no safeguarding dimension. Where there is any doubt, consult the LADO. Record the reasons for the decision.	Within 1 working day

Step	Action	Timescale
5. Find out more (proportionate fact-finding)	If a low-level concern, the LLC Lead (or a delegated senior leader who is not the subject's friend/relative) collects information, usually starting with the person who raised it and then speaking to the individual concerned. Where needed, speak to witnesses. This is not a formal investigation.	Normally within 5 working days
6. Speak with the individual	The individual is told about the concern (unless this would prejudice a LADO/police process), given the opportunity to respond, and reminded of the expected standards. The source is protected as far as possible (see 8.4). The individual may be accompanied by a colleague or union representative if they wish.	As part of step 5
7. Decide on outcome	Record the decision and rationale. Possible outcomes are set out below.	Normally within 10 working days
8. Feed back	Where appropriate, confirm to the person who raised the concern that it has been dealt with (without sharing confidential details). Confirm the outcome to the individual in writing.	On conclusion
9. Record and review	Complete the central LLC record and review for patterns	On conclusion; reviewed at least termly

Possible outcomes

- No further action – the behaviour was found to be appropriate in context or the concern was unfounded. The record is still kept.
- Advice and guidance – a supportive conversation reminding the individual of expected standards, with clear expectations for future conduct.
- Additional training, supervision or mentoring – e.g. refresher training in intimate care, physical intervention, online safety, or professional boundaries.
- Changes to practice or deployment – e.g. adjusting rotas to avoid lone working, changes to a pupil's care plan, environmental changes.
- Action plan and monitoring – with a defined review date.
- Referral into HR procedures – where the conduct amounts to misconduct or poor performance, it will be managed under the Disciplinary or Capability Policy.
- Escalation to the LADO – where the concern (individually or as part of a pattern) meets, or may meet, the harm threshold.
- Wider organisational learning – where the concern reveals weakness in systems, training, staffing or culture, which will be addressed by the senior leadership team and reported to Proprietor.

Children, parents and placing authorities: The DSL will consider whether any child needs support as a result of the concern, and record this on the child's safeguarding record where appropriate. Low-level concerns about staff are not ordinarily shared with parents/carers or placing authorities. However, the DSL will consider on a case-by-case basis whether parents, carers, a child's social worker or placing authority should be informed – for example, where the matter involves their child's care plan or wellbeing – taking into account data protection laws and the rights of the individual. Decisions and reasons will be recorded.

Where a concern later meets the harm threshold: If new information comes to light, or a pattern of concerns emerges, that means the harm threshold may be met, the matter will immediately be referred to the LADO and managed under the

Allegations procedure. The school will also consider its legal duty to refer to the DBS and whether a referral to the Teaching Regulation Agency is appropriate.

Concerns about supply staff, trainee teachers, volunteers, contractors and others: KCSIE 2026 makes clear that the school's processes apply to supply staff, trainee teachers, volunteers and contractors in the same way as to employed staff.

- **Supply and agency staff:** low-level concerns will be shared with the employing agency so that it can take any action and identify any wider pattern. The school will not decide to cease using a supply worker because of a safeguarding concern without first finding out the facts and liaising with the agency and, where appropriate, the LADO.
- **Trainee teachers and students on placement:** the school will inform the initial teacher training (ITT) or education provider and work with them. Where concerns relate to a trainee, the same expectations that apply to supply teachers and contracted staff apply.
- **Contractors and visiting professionals (including NHS therapists and escorts):** concerns will be shared with their employer or commissioning body, and with the relevant professional lead where appropriate.
- **Volunteers:** managed by the LLC Lead in the same way as staff. Following the Crime and Policing Act 2026, the school has re-assessed which volunteers are in regulated activity.
- **Lettings:** concerns about individuals or organisations using the premises will be managed in line with KCSIE Part two and the Lettings Policy; the organisation and, where relevant, the LADO will be informed.

Recording low-level concerns

All low-level concerns will be recorded in writing, including self-reports and concerns that are found to be unfounded. The record will include:

- the name of the individual sharing the concern (or a note that it was anonymous, or that the reporter requested not to be named);
- the name of the individual about whom the concern is raised, and their role;
- the date, time and location of the behaviour, and the date the concern was shared;
- details of the concern (factual, and including any child's words or communication verbatim);
- the context in which the concern arose;
- action taken, including any advice sought from the DSL or LADO;
- the decision reached, the rationale for it, and the outcome.

Records are kept **confidentially and securely electronically** in a central low-level concerns record held by the DSL, with access restricted to the Headmaster, DSL/deputies and HR lead on a need-to-know basis. They are kept separately from personnel files and from pupils' child protection files, although cross-references will be made where relevant. Records are not placed on the individual's personnel file unless it is dealt with under the Disciplinary or Capability Policy or managed by the LADO.

Identifying patterns: Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. The Headmaster and DSL will review the central record:

- every time a new concern is received (checking for previous concerns about the same individual);
- at least **half-termly** for themes across individuals, houses, shifts, teams, times of day, pupils or activities, alongside residential logs, physical intervention records, complaints, missing-from-care records and pupil voice; and
- annually, as part of the school's safeguarding audit and self-evaluation.

Where a pattern of behaviour is identified, the school will decide on a course of action – either through its disciplinary procedures or, where the pattern moves from a concern to meeting the harm threshold, by referring the matter to the LADO. Consideration will also be given to whether there are wider cultural issues that enabled the behaviour and what changes to policy, training or practice are needed to reduce the risk of recurrence.

Retention, data protection and subject access

- Low-level concern records are processed lawfully under the data protection laws (Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025). The school's privacy notice for staff explains how this information is used.
- Records will be retained **at least until the individual leaves the school's employment** (or ceases to work/volunteer at the school). The school will then retain for a further period if appropriate, documenting the reasons, in line with the school's Records Retention Policy and with regard to the need to identify patterns and to respond to any future inquiry, civil claim or statutory inquiry.
- Records of concerns that were referred to the LADO are retained in accordance with the Allegations procedure (normally on the personnel file until normal retirement age or 10 years from the date of the allegation, whichever is longer).
- Individuals are entitled to make a subject access request. Where information identifies a third party (e.g. the person who raised the concern or a child), the school will consider carefully whether it can be disclosed, redacted or withheld under the data protection laws, taking advice from the Data Protection Officer.
- Data protection laws do not prevent the sharing of information for the purposes of keeping children safe.

References: In line with KCSIE, low-level concerns will **not** be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and has been found to be substantiated, it will be referred to in a reference. References are provided only by the Headmaster or HR lead, never by colleagues informally, and are factually accurate.

Support, fairness and protection

- Staff who raise concerns in good faith will be supported and protected from detriment or victimisation (Public Interest Disclosure Act 1998). Any victimisation will be treated as a disciplinary matter.
- Staff who are the subject of a low-level concern will be treated fairly and with respect, kept informed, and offered support (e.g. through the Employee Assistance Programme, supervision, union representation, occupational health).
- Concerns raised maliciously will be dealt with under the Disciplinary Policy; however, a concern that turns out to be unfounded is not in itself malicious.
- All decisions will be made without unlawful discrimination and with reasonable adjustments for staff with disabilities (Equality Act 2010).

Training, induction and awareness

- All staff, volunteers and Advisory Board Members receive training on this policy and the Staff Code of Conduct at **induction** (before working unsupervised, or before starting a night/sleep-in shift), and as part of annual safeguarding refresher training, with regular updates at least annually.
- All staff read **KCSIE Part one in full** (as required from September 2026) and confirm this in writing.
- Supply staff, trainees, contractors and visitors receive a proportionate briefing on how to raise concerns, including a summary leaflet.
- Training includes scenario-based discussion of professional boundaries in residential and intimate care contexts, closed cultures, how pupils with communication needs may indicate concerns, and self-reporting.
- The Headmaster, DSL/deputies, Head of Boarding and Residential Staff receive additional training on handling concerns, record-keeping and the LADO process. Advisory Board Members receive safeguarding training at induction, updated regularly.
- Low-level concerns and self-reporting are routinely discussed in supervision, team meetings and residential handovers so that sharing concerns becomes an everyday part of practice.

Monitoring, quality assurance and review

- The DSL reports at least **termly** to the proprietor with anonymised data: number of concerns, categories, source (including self-reports), outcomes, escalations to the LADO, patterns identified and actions taken.
- The Proprietor samples records (anonymised where appropriate) at least annually to test the quality of decision-making and recording.
- Low-level concerns data is considered alongside the monitoring and independent visiting arrangements required under the National Minimum Standards [and Regulation 44/45 reports if registered as a children's home], staff and pupil surveys, and exit interviews.
- A low number of concerns is not in itself evidence of a safe culture; leaders will triangulate data to test whether staff feel confident to speak up.
- This policy is reviewed **at least annually** and whenever statutory guidance, legislation or local safeguarding arrangements change, or learning from a case or review indicates a change is needed. Staff views are sought as part of the review.

Appendix A: Low-Level Concern Reporting Form

CONFIDENTIAL. Complete as soon as possible and in any event within 24 hours. Hand directly to the Headmaster, or the DSL if unavailable, or upload to [system]. Do not keep copies.

Appleford Low-Level Concern Form 2026 / 2027

Purpose

This form should be used to record any concern, however small, including behaviour that gives rise to a sense of unease or a "nagging doubt", that an adult working in or on behalf of the organisation may have acted in a way that:

- Is inconsistent with the organisation's Staff Code of Conduct, including behaviour outside of work.
- Does not meet the harm threshold.
- Is not serious enough to require immediate consideration of referral to the Local Authority Designated Officer (LADO).

Low-level concerns should be reported and recorded promptly to help maintain a strong safeguarding culture and identify concerning patterns of behaviour at an early stage.

If at any point you believe a child may have suffered, is suffering, or may be at risk of harm, follow the organisation's safeguarding procedures immediately and seek advice from the Designated Safeguarding Lead (DSL) Julia Hendrickse or DDSL's Iona Gray and Dudley Manning

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 accurate as possible – of any such concern and relevant incident(s) (and please use a separate sheet if necessary).
The record should be signed, timed, and dated.

Name of person raising the concern:

Department/Role/Position:

Date concern reported:

Time concern reported:

Name of person who is the subject of the concern:

Department/Role/Position:

Employment status (employee/volunteer/agency/contractor/governor/trustee/other):

Nature and details of concern (please state any specific dates).

Appleford School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. It is our aim that all children fulfil their potential

Include how the concern arose (observation/disclosure from child or parent/carer or staff member/complaint/info from another agency/social media and/or online activity).

Provide a factual account only to include

- What was seen, heard, disclosed, or reported.
- Dates, times and locations.
- Names of those present.
- Relevant context.
- Any direct quotes where possible.
- A clear chronological account of events.
- Details of any witnesses

Avoid opinion, assumption, interpretation, or speculation.

Children involved or potentially affected

Provide details of any specific children involved in the concern

Supporting evidence

If relevant attach any supporting evidence and indicate below:

Evidence attached:

- ☐ Email(s)
- ☐ Screenshot(s)
- ☐ Social media content
- ☐ Photographs
- ☐ Written statement
- ☐ Other _____

Details:

Reporter declaration

I confirm that this record is accurate and factual to the best of my knowledge and reflects what was observed, disclosed, or reported.

Signature: _____

Name: _____

Date: _____

Time: _____

Headteacher / DSL review only

Received By: _____

Role: _____

Date Received: _____

Time Received: _____

Initial Assessment

Following review, this concern is assessed as:

- ☐ Low-level concern
- ☐ Concern requires further enquiries
- ☐ Concern appears to meet harm threshold

☐ LADO referral required

☐ Referred to Children's Social Care

☐ Referred to Police

Rationale for Decision

Previous concerns check: (include any historical information, for example, any previous low-level concerns, any LADO consultation, and or referrals).

Action Agreed: (please specify, including rationale for action and outcome).

☐ Discussion with individual

☐ Supervision/support

☐ Additional training

☐ Management advice

☐ Formal investigation

☐ Referral to HR

☐ Referral to DSL

☐ No further action

☐ Other _____

If other provide further details

Outcome

Review date (if applicable):

Completed By

Name: _____

Role: _____

Signature: _____

Date: _____

Time: _____

Confidentiality Notice

This record contains safeguarding information and must be stored securely in accordance with the organisation's safeguarding, data protection, information-sharing and records-retention procedures. Access should be restricted to those with safeguarding responsibilities and a legitimate need to know

This record will be held securely in accordance with Appleford Schools low-level concerns policy. Please note that low-level concerns will be treated in confidence as far as possible, but Appleford School may in certain circumstances be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.

Appendix B: Low-level concerns procedure flowchart

An adult has a concern about the conduct of another adult (or themselves) – no matter how small



Is a child at immediate risk? YES → act immediately under the Child Protection Policy; inform the Headmaster/DSL (out of hours: on-call duty staff); call 999 if needed



Share the concern within 24 hours with the Headmaster – or DSL if unavailable; Proprietor if about the Headmaster; LADO if about the Proprietor. Complete Appendix A.



Headmaster consults the DSL (within 1 working day), checks the central record for previous concerns and patterns



Does the concern meet the harm threshold? • YES → Allegations procedure; LADO within 1 working day
• UNSURE → consult the LADO • NO → continue below • No safeguarding dimension → HR procedures



Proportionate fact-finding; speak with the person who raised the concern and the individual; record responses



Decide outcome – no further action / advice / training / supervision / action plan / HR procedures / escalate to LADO. Inform agency or ITT provider where relevant.



Record on the central LLC record; **review for patterns** at each new concern and at least half-termly; report anonymised data to the Proprietor termly

Appendix C: Quick guide for all staff, supply staff, trainees, volunteers and contractors

Low-level concerns – what you need to know

What is it? Any concern – even just a “nagging doubt” – that an adult has acted in a way that is inconsistent with our Staff Code of Conduct, including outside work, but that does not meet the harm threshold.

What do I do? Share it with the Headmaster [Mr James Langan within 24 hours 01980 621020. Out of hours in the houses, inform the Headmaster. If it is about the Headmaster, inform the Proprietor.

What don't I do? Don't investigate, don't confront the person, don't discuss it with colleagues, and don't wait for more evidence.

What if a child is at risk now? Act immediately and follow the Child Protection Policy.

Can I report myself? Yes – self-reporting is encouraged and seen as professional.

Will I get into trouble for reporting? No. Concerns raised in good faith are always welcomed, even if they turn out to be unfounded.

Still worried? Use the Whistleblowing Policy, contact the LADO **0300 456 0108**, LADO@wiltshire.gov.uk or the NSPCC Whistleblowing Advice Line on 0800 028 0285.

Appendix D: Glossary of abbreviations

Abbreviation	Meaning
AAC	Augmentative and alternative communication
DBS	Disclosure and Barring Service
DSL	Designated Safeguarding Lead
EYFS	Early Years Foundation Stage
ITT	Initial teacher training
KCSIE	Keeping Children Safe in Education
LADO	Local Authority Designated Officer
LLC	Low-level concern
NMS	National Minimum Standards
SCCIF	Social Care Common Inspection Framework
SEND	Special educational needs and disabilities
TRA	Teaching Regulation Agency