



Halliford
School
SHEPPERTON

Staff Low-Level Concerns Policy

*To be read in conjunction with the
Safeguarding and Child Protection Policy*

September 2025

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Mission Statement

Halliford is a school based on strong family values where we know and respect every student as an individual. We encourage and support Hallifordians to flourish and become the best version of themselves that they can possibly be.

We aim for excellence by being academically ambitious but at the same time academically sensitive.

We inspire Hallifordians within a community that is founded on high quality teaching and learning, outstanding pastoral care and first-class sporting, cultural and co-curricular opportunities.

Introduction

This Policy must be read in conjunction with the Safeguarding and Child Protection Policy.

As part of our whole school approach to safeguarding, Halliford School ensures that it promotes an open and transparent culture, in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors), are dealt with promptly and appropriately. Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. This encourages an open and transparent culture; enabling Halliford 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 are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the school.

At Halliford School, we take safeguarding incredibly seriously. This includes ensuring that all 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 Safe Students Safe Staff Policy (Staff Code of Conduct). We set out to create and embed a culture of honesty and transparency in which the school's values and expected behaviour, which is set out in the Safe Students Safe Staff Policy, are constantly lived, monitored and reinforced by all staff. Being able to report low level concerns, or indeed to self-report if a mistake has been made is an important part of that culture. Staff should feel able to discuss with senior members of staff any difficulties or problems that they experience in their relationships with students or colleagues, so that appropriate advice can be provided, or action taken.

Adults must model safe relationships and must adhere to the school's safer working practices. These make sure that everyone in our community is safe and valued.

This policy builds on learning from best practice across the world and sets out the detail and processes for staff regarding low-level concerns they may have. We are a community where we constantly reinforce the importance of being a community based on our school values. Our culture embeds feedback from a variety of sources, like the Staff Wellbeing Committee, to show that we are an open and listening school and all members of the SMT have an open-door policy.

Summary

It may be possible that a member of staff acts in a way that does not cause a risk to students, but which nevertheless is concerning. A member of staff who has a concern about another member of staff should inform the Headmaster about their concern, using a Low-Level Record of Concern Form. If the Headmaster cannot be contacted, the Chair of Governors should be contacted instead. Members of staff have the right to remain anonymous as far as reasonably possible.

*Approved by the Governing Body September 2025
To be reviewed September 2026*

Keeping Children Safe in Education – September 2025

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

428. 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 (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

429. 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
- 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?

430. 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, or
- humiliating children.

431. 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.

432. 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.

433. 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.

Key Staff duties

Staff behaviour

All Staff must comply with the School's Code of Conduct and Safe Students Safe Staff Policy which sets out appropriate and expected standards of behaviour.

Duty to report

As a member of Staff, you must immediately follow this policy to report any concerns you have about the conduct of a member of Staff or any other adult (which could include adults not employed by the School). This includes any concern however it arises, for example, behaviour you have witnessed, a concern raised with you by a colleague, student, parent or another adult, or as a result of checks or information brought to your attention.

Duty to self-refer

You must refer yourself to the Headmaster where, for example, you have found yourself in a situation which could be misinterpreted, which might appear compromising to others, and / or on reflection if you believe you have behaved in such a way that may fall below the standards expected of you.

A culture of sharing

All Staff have a positive obligation to support the School's culture of openness and sharing without fear of reprisal.

What needs to be reported?

Reporting all concerns

All concerns must be raised whether they are considered to be "low level" concerns or conduct which may meet the harm threshold.

Low level concerns

A low level concern is any concern, no matter how small, and even if no more than a sense of unease or a "nagging doubt", that a member of Staff may have acted in a way that is inconsistent with expected professional standards and / or the staff Code of Conduct, whether inside or outside of work. No concern is too small or minor to raise under this policy.

Concerns that meet the harm threshold

Allegations that may meet the harm threshold are those that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children, for example where the individual 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 he or she would 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. This includes behaviour that may have happened outside the School which creates a transferable risk.

Definition of Harm

It is important to understand the types of conduct that may be harmful to children, and to recognise that harm may not be limited to the most obvious types of physical abuse. There is no single legal definition of harm but to assist your understanding of what may amount to "harm" you should consider the following:

- the Safeguarding Vulnerable Groups Act 2006 which does not give a definition of harm, encouraging people to apply a "normal, everyday meaning";
- the Children Act 1989 defines:
 - "harm" as "ill-treatment or the impairment of health or development [including, for example, impairment suffered from seeing or hearing the ill treatment of another]";
 - "ill-treatment" as including "sexual abuse and forms of ill treatment which are not physical";
 - "health" as "physical or mental health".

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.

Process to follow when a Low-Level Concern is raised

Do not discuss with another colleague. Complete the LLC form and return it to the Headmaster without delay. If he is not available, then you should contact the Chair of Governors. You may also want to discuss the concern in the first instance with the Headmaster without completing a LLC. The Headmaster will collect as much evidence as possible by speaking, where possible, with the person who raised the concern, to the individual involved and any witnesses.

Duty of the DSL to refer concerns to the Headmaster

The Headmaster remains the ultimate decision-maker in respect of all low level concerns. Save for in cases involving the Headmaster, the DSL must therefore promptly report any concern raised with them to the Headmaster. Wherever possible the DSL must speak to the Headmaster in person about the concern as soon as possible after the concern is raised, and always on the same day the concern is raised. If it is not possible to speak to the Headmaster in person about the concern, the DSL must email the Headmaster with a summary of the concern on the same day the concern is raised.

Concerns involving the Headmaster and conflicts of interest

Where you identify a concern about the Headmaster, you must report the matter immediately to the Chair of Governors without first notifying the Headmaster. Where there is a conflict of interest in raising the concern with the Headmaster you must report the concern directly to the Local Authority Designated Officer (LADO), without first notifying the Headmaster. Details of the LADO can be found at the start of this policy.

Concerns involving Governors

Where you identify a concern about a Governor, you must report the matter immediately to the Chair of Governors or the Nominated Safeguarding Governor. If either the Chair of Governors or the Nominated Safeguarding Governor is the subject of an allegation, you must report the matter to the other.

Concerns involving individuals / organisations using School premises

Where the School receives an allegation relating to an incident that happened when an individual or organisation was using the premises for the purposes of running activities for children (e.g. community groups, sports associations, or service providers that run co-curricular activities) it will follow its own safeguarding policies and procedures, including informing the LADO.

The School's response to concerns and allegations

Appropriate action

The School will ensure that appropriate action is taken to address concerns that are raised under this policy

Assessing concerns

The Headmaster (or, if the concern relates to the Headmaster, the Chair of Governors or the Nominated Safeguarding Governor) will determine whether the concerns raised are low level or potentially meet the harm threshold.

Low level concerns

If the School determines the concern is a low level concern, then the School will address the concern as appropriate. This will usually involve making the individual aware of the concern against them, undertaking any investigation that may be required and may include giving management guidance and advice or invoking the School's capability or disciplinary procedures.

Borderline cases

The Headmaster (or, if the concern relates to the Headmaster, the Chair of Governors or the Nominated Safeguarding Governor) may take advice from the LADO in borderline cases in order to establish whether the concern is a low level concern or an allegation that potentially meets the harm threshold. This may include conducting an initial "no names" conversation with the LADO about whether the harm threshold is met.

Referral

Where the Headmaster (or, if the concern relates to the Headmaster, the Chair of Governors) considers the concerns raised potentially meet the harm threshold, the Head (or, if the concern relates to the Head, the Chair of Governors) will make a report to the LADO before further action is taken. The Headmaster (or, if the concern relates to the Headmaster, the Chair of Governors) may also seek advice from the LADO as appropriate. Where a LADO referral is appropriate, this will be made within one working day of the allegation being reported in accordance with this policy.

Responding to an allegation that may meet the harm threshold

Where an allegation is made that may meet the harm threshold, the School will take advice from and co-operate with the LADO, the police, and any other external body that may be involved in the response to the allegation. The School will follow its internal procedures in order to investigate and respond to the allegation when it is appropriate to do so, and will keep the LADO informed of the action it is taking.

Case Manager

Where an investigation is deemed necessary into an allegation of conduct that may meet the harm threshold, a "Case Manager" will be appointed by the School to lead the investigation. The Case Manager will be either the Headmaster or a person with appropriate authority appointed by the Headmaster. Where the Headmaster is the subject of an allegation, the Case Manager will usually be either the Chair of Governors or Nominated Safeguarding Governor.

Disclosure of information about concerns and allegations

Informing the individual of a concern

The School will in most cases inform the individual concerned about any low level concern that is raised about them.

Informing the individual of an allegation where appropriate

The Case Manager will consult with the LADO in order to agree if and when it is appropriate to inform the individual of the allegation.

Communication and support for the individual subject to an allegation

If and when it is appropriate to inform the individual of the allegation against them, the Case Manager will also offer appropriate pastoral support and will keep the individual informed of the timescales for the investigation under this procedure and the factors which may affect it. In all cases, the investigation will be concluded as soon as reasonably practicable.

Informing the child's parents / carers where appropriate

The Case Manager will agree with the LADO when and how the parents or carers of the child / children involved will be informed of the allegation if they do not already know of it. The Case Manager will also agree with the LADO what information shall be shared with the parents / carers of the child / children as the case progresses. The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.

Reporting restrictions

The School is mindful of and will comply with the reporting restrictions under section 141 Education Act 2002 which prevent the identification of a teacher who is the subject of such an allegation in certain circumstances.

Involvement of external agencies

Where the LADO(s) advises that a strategy discussion is needed, or the police or children's social care need to be involved, the Case Manager will not inform the individual subject to the allegation, or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.

Concerns about supply staff and contractors

Where a concern / allegation has been made in respect of a member of supply staff or a contractor, the concern / allegation may be notified to their employer. Where a Case Manager has been appointed to investigate an allegation, the Case Manager will consult with the LADO before sharing any information with the individual's employer.

Referrals to the Disclosure and Barring Service (DBS) and Teaching Regulation Agency (TRA)

Report to the DBS

The School is under a legal duty to make a referral to the DBS where:

- An individual has applied for a position at the School despite being banned from working with children and/or:
- an individual has been removed by the School from working in regulated activity (whether paid or unpaid), or has resigned prior to being removed, because they have:
 - satisfied the harm test (as defined in section 35 of the Safeguarding Vulnerable Groups Act 2006);
 - committed relevant conduct (as defined in Schedule 3 to the Safeguarding Vulnerable Groups Act 2006); or
 - been cautioned for, or convicted of, a relevant offence (as defined in paragraphs 1 and 2 of Schedule 1 to The Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Relevant Offences) Regulations 2009).

Report to the Teaching Regulation Agency

The School is under a duty to consider whether it is appropriate to make a referral to the TRA where it has ceased to use the services of a teacher because the teacher has been guilty of serious misconduct (or might have ceased to use the services of a teacher had the teacher not ceased to provide those services). The School may also, at its discretion, make a referral to the TRA where the duty to consider doing so has not yet arisen. The Teaching Regulation Agency will consider whether to impose a prohibition order on that person which prevents them from undertaking teaching work in future.

Key Reference Document

Read this document for further information about Low-Level Concerns, which is referenced in KCSIE 2024. It provides excellent case studies and the learning from Serious Case Reviews about opportunities for reporting low level concerns which were missed and which led to abuse occurring.

<https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/low-level-concerns-guidance-2020.pdf>

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

Low-Level Concern (LLC) forms and follow-up information will be stored securely within the school's safeguarding systems, with access only by the Headmaster and Chair of Governors. This will be done in accordance with the Data Protection Act 2018 and UKGDPR.

The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Headmaster / Chair of Governors or those aware of the incident on the SMT.

Reports about supply staff and contractors will be notified by the Headmaster to their employers so any potential patterns of inappropriate behaviour can be identified.

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 Halliford 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:

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

Low Level Concern Form

This form will be available to staff via:

- MS Teams – Safeguarding Advice and Resources
- DSL / DDSLs
- School Website

Monitoring and Review

The school will monitor records so that any potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms thresholds, in which case it will be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again.

The Headmaster has a strong and open relationship with the Surrey LADO Service and will consult the LADO if there is any doubt as to whether a concern meets the harm threshold. This also ensures that the school balances its duty of care to the child as well as to the member of staff.

The Headmaster will report on low level concerns (anonymised) to the Governing Body Safeguarding Committee at their termly meeting.

**Halliford School
Staff Low-Level Concern Form**

Please return this form to the Headmaster. If the concern is about the Headmaster, please return to the Chair of Governors.

Please use this form to share any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult may have acted in a way that:

- is inconsistent with Halliford School’s Safe Students Safe Staff Policy (staff code of conduct), including inappropriate conduct outside of work, and
- does not meet the allegation threshold or is otherwise not serious enough to consider a referral to the LADO.

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.

<div style="display: flex; justify-content: space-between; margin-bottom: 10px;"> <div style="width: 60%;">Name of staff member:</div> <div style="width: 35%;">Department & Role:</div> </div>	
Name of individual raising the concern: Signed:	Time & Date:
Received by	<div style="display: flex; justify-content: space-between;"> <div>At: (Time)</div> <div>On: (Date)</div> </div>

Action Taken: (Specify)

Name of person investigating the concern:

Signed:

Time & Date:

This record will be held securely in accordance with Halliford School's Low-Level concerns policy. Please note that low-level concerns will be treated in confidence as far as possible, but Halliford 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.

*Approved by the Governing Body September 2025
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