

## Low-level Safeguarding Concerns Policy

### Applies to:

- All staff (teaching and non-teaching), the directors and volunteers working in the School.
- Pupils, Parents, Guardians and Caregivers and Prospective Pupils
- Visitors and Contractors

### Availability:

This policy is made available in the following ways:

- The School's website [www.radnor-sevenoaks.org](http://www.radnor-sevenoaks.org);
- Via Teams, All Staff Shared Documents, Compliance, Policies;
- On request a copy may be obtained from the School's Office.

### Monitoring and Review:

- This policy will be subject to continuous monitoring, refinement and audit by the Head.
- The Board of Directors undertake a formal annual review of this policy.

Signed:



David Paton  
Head



Ian Davies  
Chairman of the Board of Directors

Reviewed: September 2025  
Next Review: September 2026

## **1. Aim of Policy**

Radnor House Sevenoaks (the 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 pupils achieve their very best.

Safeguarding and promoting the welfare of children is defined in the DfE's Keeping Children Safe in Education (2025) as protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

As part of the School's comprehensive approach to safeguarding, it ensures that an open and transparent culture is promoted, in which all concerns about adults working in or on behalf of the School (including supply teachers, volunteers, and contractors) are addressed promptly and appropriately. Creating a culture in which **all** concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately is critical.

The Directors have authorised this policy and applies to the entire School addressing all members of staff and volunteers. In our School, the term 'staff', in the context of safeguarding, is inclusive of all staff and is also inclusive of students on placement, contractors, agency staff, volunteers and directors. This policy applies wherever staff or volunteers are working with pupils, even where this is away from the School, for example at an activity centre or on an educational visit.

Other School policies and procedures are also directly relevant to safeguarding and the following in particular may be consulted in conjunction with this policy: Safeguarding; Online Safety; Educational Visits and Off-site Activities; First Aid; Health, Safety, Risk Assessment and Welfare; PSHEE; Safer Recruitment; Learning Differences incl SEND; Sex and Relationship Education; Staff Code of Conduct; Whistleblowing.

## **2. Introduction**

As part of their whole School approach to safeguarding, the School ensures that they promote 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 are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. (See Part Four of Keeping Children Safe in Education 2024 (KCSIE 2024) and the School's Safeguarding Policy for how to deal with allegations that might indicate a person will pose a risk of harm if they continue to work with children).

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. The term 'low-level' concern does not mean that it is insignificant. Early identification and prompt management of all concerns about the behaviour of adults who work or volunteer with children is critical to effective safeguarding. (KCSIE 2024) requires low-level concerns to be shared.

Staff are required to share low-level concerns in this way:

- To ensure there is a formalised mechanism for reporting low-level concerns;
- To allow staff to self-report to the School to protect themselves in situations where they may have found themselves compromised;
- To identify patterns of behaviour that are concerning;
- To ensure the School continues to have a culture of safeguarding in which all staff understand their

responsibility to raise concerns.

Staff should therefore

- a) **report any behaviour by another adult** towards a pupil or another child that may have concerned them
- b) **self-report** in any situation where they feel their behaviour towards a pupil or another young person could be misinterpreted or misconstrued or leave them vulnerable

### **3. Concerns regarding the behaviour of another adult towards a child**

A low-level concern report should be used when a member of staff is concerned about the behaviour of another adult towards a pupil or another child. This is not just where it is clear that a professional boundary has been broken: anything which causes staff to have a 'nagging doubt' about the way in which other adults behave or interact with pupils should be notified, in order to protect both pupils and the members of staff involved. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate.

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;
- 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.

### **4. Self-reporting**

From time to time an individual may find themselves in a situation which might appear compromising to others or which could be misconstrued. Equally, an individual may for whatever reason have behaved in a manner which on reflection he/she considers falls below the standard set out in the Staff Code of Conduct. Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how these might be perceived.

### **5. Reporting low-level concerns**

Almost always, there will be a perfectly innocent explanation for what has occurred, and staff should not feel awkward about making a report or being the subject of a report. Reporting these types of concerns is a neutral act and the Head will, on receiving a report, decide how to best approach the concern raised. A member of staff who makes a low-level concern, or a more serious allegation, in good faith will suffer no detriment as a result and will benefit from the protection set out in the School's Whistleblowing Policy.

Some of the circumstances in which staff must make a low-level concern report might be:

- any incident where s/he feels his/her actions or behaviour towards a pupil or that of another adult, may have been misinterpreted or may have given rise to a risk of misinterpretation
- any use by an adult of sexually inappropriate language, references or jokes to a pupil;
- any adult being over-friendly with pupils, allowing first names to be used, or encouraging the use of nicknames of staff or pupils;
- email, messaging, use of social media sites or other communication between adults and pupils outside agreed protocols;

- any incident of physical contact with a pupil when no one else is present, including when administering first aid or medical treatment (School medical staff are exempt from this requirement), and including physical demonstrations in one-to-one sports coaching, music lessons, etc;
- any incident where a staff member has been alone with a pupil or pupils in a vehicle where this has not been authorised in advance;
- any social contact with pupils outside of School (other than planned/authorised events, educational visits or trips, or insignificant incidents such as passing a pupil in the street or in a shop or noticing they are sitting, separately, in the same restaurant or cinema) particularly where the member of staff and/or pupil(s) is/are under the influence of alcohol;
- if a pupil becomes aware of and/or uses a staff members home address, mobile or home phone number, or non-School e-mail address other than in line with agreed protocols;
- the fact of, and explanation for, any one-to-one contact with a pupil on School trips, particularly if this takes place in a private space such as a bedroom;
- non-trivial illnesses or accidents of pupils on School trips;
- any incident where, for whatever reason, a member of staff has not complied with the Staff Code of Conduct.

This is not an exhaustive list. Staff who are unsure of whether to complete a neutral notification are at liberty to discuss the matter with a member of the safeguarding team on a no-names basis. However, following such a discussion, should it be felt that the matter reaches the threshold for notification the member of staff will be expected to refer it. If in doubt, a referral should always be made.

## **6. The Process**

### **Sharing a low-level concern – the process**

Low-level concerns should be reported to the Head. Low-level concerns can be made in person to the Head, but staff are encouraged to put their concerns in writing.

Where the low-level concern relates to The Head, or where there is a conflict of interest in reporting the matter to The Head, this should be reported directly to the Chairman of the Board of Directors, Ian Davies via [idavies@radnor-sevenoaks.org](mailto:idavies@radnor-sevenoaks.org).

### **Recording low-level concerns**

All low-level concerns will be recorded in writing. The record should set out the details of the concern, the context in which the concern arose and the action taken. The name of the individual sharing their concerns should also be noted but if the individual wishes to remain anonymous that should be respected as far as possible. Any hard copy records will be held securely on a password-protected file.

Low-level concerns will be shared with the Head unless there is a conflict of interests in doing so (see above). The Head and DSL will review the records so that potential patterns of concerning problematic or inappropriate behaviour can be identified. They will consider whether the reported matter is indeed a low-level concern and whether it should be reclassified as an allegation that meets the 'harms threshold' and dealt with as outlined in the Safeguarding Policy. Where there is any doubt whatsoever about the classification of a reported concern, the Head, or DSL (as appropriate) will seek advice from the Local Authority Designated Officer (LADO) on a no-names basis.

Having established that the concern is low-level, the Head or DSL (as appropriate) will discuss it with the individual who has raised it and will take any other steps to investigate it as necessary. If the low-level concern has been raised by a third party, in the investigation the Head or DSL will speak to the individual who raised the concern, to any witnesses and to the person involved. Most low-level concerns by their very nature are

likely to be minor and will be dealt with by means of management guidance, training etc. This might lead to internal disciplinary procedures, referral of an individual to the LADO or the consideration of amendments to other policies and procedures that could be revised to minimise further risks.

### **Creating a Culture of Openness and Learning Lessons**

It is very important that low-level concerns are shared by staff as they arise, as the School wishes to create and embed a culture of openness, trust and transparency in which the School's values and expected behaviour (which are set out in the Staff Code of Conduct) are constantly lived, monitored and reinforced by all staff.

All low-level concerns will be recorded in writing, including details of the concern, the context, and any action taken; and these records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour is identified and dealt with appropriately, either through the School's disciplinary procedures or (if a pattern of behaviour moves from a concern to meeting the harms threshold) in which case it will be referred to the LADO as above.