

PANGBOURNE

— A community where you can flourish —

LOW-LEVEL CONCERNS POLICY

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1. Policy Statement

Pangbourne College ('the School') is committed to a **whole-school approach to safeguarding**, fostering an open and transparent culture where all concerns about adults working in or on behalf of the School are dealt with promptly. This policy aims to identify concerning, problematic, or inappropriate behaviour early to minimise the risk of abuse and ensure all staff—including supply teachers, volunteers, and contractors—act within professional boundaries and the **Staff Code of Conduct**.

2. Statutory Context

This policy is drafted in accordance with **Keeping Children Safe in Education (KCSIE) 2025**, which replaces all previous versions. It operates alongside the School's **Safeguarding Policy**, **Whistleblowing Policy**, and the **Data Protection Policy**. This policy also reflects updated statutory guidance on "**Working together to improve school attendance**" (2025).

3. Defining a Low-Level Concern

A **low-level concern** is any concern—no matter how small, and even if it is no more than a "**nagging doubt**" or a sense of unease—that an adult working at the School may have acted in a way that is inconsistent with the **Staff Code of Conduct**, including inappropriate conduct outside of work.

Such behaviour may exist on a spectrum from inadvertent or thoughtless acts to behaviour intended to enable abuse. **KCSIE 2025** clarifies that safeguarding harms now include the spread of **misinformation, disinformation, and conspiracy theories**; such behaviours by adults should be considered under this policy.

Examples of low-level concerns include:

- Being **over-friendly** with children or having **favourites**.
- Taking photographs of children on a **personal mobile phone**.
- Engaging with a child one-to-one in a **secluded area or behind a closed door**.
- **Humiliating children** or using inappropriate language/jokes.
- Inappropriate use of **Generative AI** or circumventing school **filtering and monitoring** systems.

4. Reporting and Procedures

- **Timing:** All low-level concerns must be shared with the **Head** (Mr Oliver Knight) as soon as possible, and **strictly within 24 hours** of becoming aware of the incident. This is done through the Low-Level Concerns Form on My School Portal.
- **Anonymity:** While the School will respect a reporter's wish to remain anonymous as far as possible, **anonymity cannot be guaranteed** if the concern results in a fair disciplinary process or legal proceedings.
- **Self-Reporting:** Staff are encouraged to self-report situations that could be misinterpreted or where they feel their behaviour has fallen below the expected standard.
- **Supply Staff and Contractors:** If a low-level concern relates to a person employed by a **supply agency or a contractor**, the School **must notify the employer** of that individual so potential patterns of behaviour across different settings can be identified.

5. Management and Record Keeping

- **Central Record:** All low-level concerns will be recorded in writing, including the context, the names of those involved, and the action taken. These are held on a **secure, confidential central file managed by the Executive Assistant to the Head**.
- **Data Protection:** All records are processed in strict compliance with the **Data Protection Act 2018** and **UK GDPR**.

6. Online Safety and Technology

The School maintains strict **filtering and monitoring standards** to limit exposure to harmful content. Staff must follow DfE guidance (2025) regarding the safe use of **Generative AI** in education. Staff seeking further online safety resources should refer to **CEOP Education** (which has replaced Thinkuknow).

7. Outcomes and References

The Head will determine if the concern is entirely consistent with the Code of Conduct, constitutes a low-level concern, or meets the **harm threshold** requiring a referral to the **LADO**.

What action will be taken if it is determined that the behaviour is entirely consistent with the School's Staff Code of Conduct and the law?

- The Head will update the individual in question and inform them of any action taken (as above).

- The Head will speak to the person who shared the low-level concern – to provide them with feedback about how and why the behaviour is consistent with the School's Staff Code of Conduct and the law.

What action will be taken if it is determined that the behaviour constitutes a low-level concern?

- The Head will respond in a sensitive and proportionate way – on the one hand maintaining confidence that such concerns when raised will be handled promptly and effectively, whilst on the other hand protecting staff from any potential false allegations or misunderstandings. Any investigation of low-level concerns will be done discreetly and on a need-to-know basis.
- Most low-level concerns by their very nature are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any 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 about whom the concern has been raised.
- Any such conversation with individuals in these circumstances will include being clear with them as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual, and regularly reviewed with them, may also be appropriate.
- Some low-level concerns may also raise issues of misconduct or poor performance. The Head will also consider whether this is the case – by referring to the School's disciplinary and/or capability procedure and taking advice from the HR Department and/or taking specialist advice as necessary, on a named or no-names basis where necessary.
- If the Head considers that the School's disciplinary or capability procedure may be triggered, they will refer the matter to the HR department. If the HR department advises that the School's disciplinary or capability procedure is triggered, the individual will have a full opportunity to respond to any factual allegations which form the basis of capability concerns or a disciplinary case against them.
- Staff should be aware that when they share what they believe to be a low-level concern, the Head will speak to the adult who is the subject of that concern (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted) – no matter how 'low' level the concern may be perceived to be, to gain the subject's account – and to make appropriate records (as above), which may be referenced in any subsequent disciplinary proceedings.
- How the School responds to a low-level concern may be different depending on the employment status of the individual who is the subject of the concern - i.e. whether they are an employee or

worker to whom the School's disciplinary and/or capability procedure would apply; or a contractor, Governor, or volunteer. The School's response will be tailored accordingly.

What action will be taken if it is determined that the behaviour whilst not sufficiently serious to consider a referral to the LADO nonetheless merits consulting with and seeking advice from the LADO, and on a no-names basis if necessary?

- Then action (if/as necessary) will be taken in accordance with the LADO's advice; or
- When considered with any other low-level concerns that have previously been shared about the same individual, could now meet the threshold of an allegation, or in and of itself meets the threshold of an allegation? Then it will be referred to the LADO/other relevant external agencies

References: Low-level concerns that relate **exclusively to safeguarding** will not be included in employment references unless they are part of a pattern that meets the harm threshold or relate to broader misconduct/poor performance.

DBS Referrals: The School has a legal duty to refer individuals to the **Disclosure and Barring Service (DBS)** if they are removed from regulated activity due to safeguarding concerns.

8. Staff Training and Induction

All staff, including those who do not work directly with children, must read at least **Part One or Annex A of KCSIE 2025**. Training on the Low-Level Concerns Policy is a mandatory part of the **staff induction process** and will be updated at least annually.