

Collège Français Bilingue de Londres  
(the “School” or “CFBL” or “we”)

**Low-Level Concern Policy**

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| Authorised by:       | The Board of Governors of CFBL   |
| Date last updated:   | WR 08.12.25  |
| Frequency of review: | Annually and/or following any updates to national and local guidance and procedures, if sooner<br>This policy has been updated in line with the statutory guidance <b>Keeping Children Safe in Education (KCSIE 2025)</b> and reflects the expectations set out in Part 4 (Allegations and Low-Level Concerns) |
| Next review:         | November 2026  |
| Circulation:         | Governors/all staff/volunteers, automatically<br>Staff: Shared drive > Staff > HR > HR policies<br>Website   |

Safeguarding is of paramount importance at CFBL. This includes ensuring that adults who work with our students do so in a way which is in line with the school’s ethos and culture and matches what is outlined in our Staff Behaviour Policy. This policy outlines the systems CFBL has in place for managing low-level concerns related to staff in school.

This policy applies to the whole school, including Early Years. It must be read in conjunction with our Child Protection and Safeguarding Policy, Staff Behaviour Policy, Procedures for dealing with allegations of abuse against staff and other CFBL’s School policies.

This policy does not form part of any contract between staff and the School, but describes and informs staff about rules applicable at the School. It may be amended by the School at any time.

As part of its whole school approach to safeguarding, CFBL 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.

CFBL acknowledges that 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 the School to identify inappropriate, problematic or concerning behaviour early,
- minimise the risk of abuse, and
- ensure that adults working in or on behalf of the School are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

**What is a low-level concern?**

The term ‘low-level’ concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that:

- an adult working in or on behalf of the School may have acted in a way that is inconsistent with the staff Behaviour Policy, including inappropriate conduct outside of work, and/or their

conduct or communication online or outside the School environment questions their professional boundaries or suitability to work with children (for example, inappropriate social media contact, or online comments inconsistent with the School's ethos) **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.

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.

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.

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 the School from becoming the subject of potential false low-level concerns or misunderstandings.

#### **Clarity around allegation vs. low-level concern vs. appropriate conduct**

##### **Allegation**

Behaviour which indicates 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 it not consistent with the Staff Behaviour Policy, 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 School's Staff Behaviour Policy and the law.

#### **Reporting Low-Level Concerns**

CFBL recognises the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

All staff, volunteers, contractors and supply staff are encouraged to share concerns, including **self-reporting** where they recognise their own conduct may have fallen short of expected professional standards. Creating this culture of openness is essential to ensure concerns are addressed early and proportionately.

Where a low-level concern has been identified, this will be reported as soon as possible to the Designated Safeguarding Lead (DSL) or, in the DSL's absence, to the Deputy-DSLs, (email to : [safeguarding@cfbl.org.uk](mailto:safeguarding@cfbl.org.uk)) in accordance with the School's Safeguarding & Children Protection Policy. It is never too late to share a low-level concern, and staff are encouraged to share even if in doubt about the timeliness of their reporting.

The headteacher will be informed of the details as soon as possible.

Low-level concerns relating to the DSL will be reported to the Headteacher. Low-level concerns relating to the Headteacher will be reported to the Chair of the Governors (via the Clerk, [clerk@cfbl.org.uk](mailto:clerk@cfbl.org.uk) ).

The DSL and the Headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff handbook.

Where a low-level concern relates to a supply teacher or contractor, the School will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

### **Responding to a Low-Level Concern**

Once the DSL or Headteacher have received the low-level concern, they will (not necessarily in the order below but in an appropriate sequence according to the nature and detail of the particular concern shared with them):

- speak to the person who raised the concern (unless it has been raised anonymously), regardless of whether a written summary has been provided;
- speak to any potential witnesses (unless advised not to do so by the LADO);
- speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO);
- review the information and determine whether the behaviour:
  - (i) is entirely consistent with the CFBL's Staff Behaviour Policy and the law;
  - (ii) constitutes a low-level concern;
  - (iii) is not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO;
  - (iv) when considered with any other low-level concerns that have previously been raised about the same individual, could now meet the threshold of an allegation and should be referred to the LADO;
  - (v) in and of itself meets the threshold of an allegation and should be referred to the LADO.

The DSL or headteacher will always seek advice from the LADO where they are in any doubt whatsoever.

While responding to any incident, the DSL or Headteacher will make appropriate notes of:

- all internal conversations – including with the person who initially shared the low-level concern (where this has been possible), the adult about whom the concern has been shared (subject to the above), and any relevant witnesses (subject to the above);
- all external conversations – for example, with the LADO (where they have been contacted);

- the action taken and the rationale for the decision taken.

### **Storing and use of low-level concerns and follow-up information**

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

All reporting of low-level concerns and follow-up information will be stored securely within the School's safeguarding systems, with access restricted to the DSL, the Head Teacher and HR Manager. The safeguarding governors conduct regular reviews of the low-level concerns log (at least once per school term). This will be stored in accordance with the school's GDPR and data protection policies.

The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Head Teacher or the DSL. Staff who raise or are the subject of low-level concerns will be treated fairly, sensitively and with respect. The School will ensure appropriate support and welfare measures are in place for all parties involved, in line with KCSIE 2025 guidance.

Records will be:

- Kept confidential,
- Reviewed regularly so that 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 harm threshold as described in CFBL's Procedures for Dealing with Allegation of Abuse Made Against Staff, CFBL will refer it to the designated officer at the local authority (LADO),
- Retained at least until the individual leaves employment at the School.

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.

### **Relationship with HR procedures and Behaviour Policies**

The Low-Level Concern Policy supports the School's commitment to maintaining a safe, respectful and professional environment.

Reporting low-level concerns helps with the early identification and resolution of emerging issues, preventing escalation and supporting a culture of openness.

Where low-level concerns relate to professional conduct or behaviour matters covered by the Staff Behaviour Policy or HR procedures, the DSL and HR Manager will work together to ensure a proportionate, appropriate and consistent response.

### **Related policy**

This policy links with our policies on:

Keeping Children Safe in Education (KCSIE 2025) – statutory guidance

Child protection

Staff Behaviour Policy

Procedures for Dealing with Allegations of Abuse Made Against Staff

Staff disciplinary policy

Staff Capability policy

Complaints

E-safety (staff)

E-safety (pupils)

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Last review by management and safeguarding trustees November 2025

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Policy trail:

Version No 1 - 07.03.23

Version No: 2 – 18.12.23

Version No: 3 - 24.01.25

Version No 4 - 08.12.25

#### **Document Owner and Approval**

The Designated Safeguarding Lead is the owner of this document and is responsible for ensuring that it is reviewed in line with the School's policy review schedule.