POLICY · 2026–27

Low-Level Concerns Policy

Low level concerns

The safety and wellbeing of students in our care is dependent on the vigilance of all our staff and their prompt communication to the DSL, Iain Howell, or the DDSL, Jennifer Britton, of any concerns, no matter how small, about any conduct by an adult which causes you to doubt that adult's suitability to work with or have access to children. All references in this section to "adult" should be interpreted as meaning any adult, including staff, volunteers, homestays, visitors to homestay families, school staff and other adults who work with our organisation, unless otherwise stated. WBS Guardians is conscious of its duty of care to students and will always act, including if alerted to the possibility of abuse arising from situations or persons outside our care. The notification and prompt handling of all concerns about adults is fundamental to safeguarding students. It helps to identify and prevent abuse and to protect adults against misunderstandings or misinterpretations. It also encourages openness, trust and transparency and it clarifies expected behaviours.

Those raising concerns or reporting allegations in good faith will always be supported, and adults in respect of whom concerns or allegations have been raised will not suffer any detriment unless the concern or allegation is found to be substantiated. We are a 'telling' organisation. If you are concerned about the behaviour or actions of any adult who works for or with WBS Guardians you should speak to the DSL, Iain Howell, or the DDSL, Jennifer Britton. It is imperative that staff understand the importance of reporting any concerns that they may have.

What is a low level concern?

The term 'low level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harms threshold set out in our safeguarding policy. 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 WBS Guardians 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 allegations threshold or is otherwise not considered 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;
- 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.

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.

It is crucial that any such concerns, including those which do not meet the allegation/harm threshold (see Part Four, Section one of Keeping Children Safe in Education 2026), are shared responsibly and 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 WBS Guardians from potential false allegations or misunderstandings.

Code of Conduct

All staff and homestays must behave responsibly and professionally in all dealings with students and specifically with those for whom they have a duty of care. All staff and homestays must follow the procedures set out in our 'Staff and Homestay Code of Conduct'. Staff and homestays should always avoid behaviour which might be misinterpreted by others. As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people are in positions of trust in relation to the young people in their care. A relationship between a member of staff or homestay and a student cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff and Homestays have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Staff and Homestays should note that it is an offence for a person aged 18 or over and in a position of trust to touch a child in a sexual way or have a sexual relationship with a child, even if the relationship is consensual. Any person working for or with the WBS Guardians are deemed to have a position of trust, even if the member of staff does not directly work with the student.

Our low level Concern Policy

The overarching aim of the low level Concern Policy is to facilitate a culture in which the clear values and expected behaviours which are set out in our Code of Conduct are lived, constantly monitored and reinforced by all staff and homestays. In particular, the intention of this policy is to:

- maintain a culture of openness, trust and transparency in which staff and homestays are confident and clear about expected behaviours of themselves and their colleagues, the delineation of boundaries and reporting lines;
- ensure staff and homestays feel empowered to raise any low level concern, whether about their own or a colleague's behaviour, where that behaviour might be construed as falling short of the standards set out in our Code of Conduct; and Safeguarding and Child Protection Policy and Procedure;
- provide for responsive, sensitive and proportionate handling of such concerns when they are raised maintaining on the one hand confidence that concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff from false allegations or misunderstandings.

Low level Concerns about self (self-reporting) or others

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 they consider falls below the standard set out in the 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 they could be perceived. As such, the guardianship organisation sees self-reporting of low level concerns as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

Concerns about others

From time to time an individual may notice behaviour or actions in others which leave then concerned. These are behaviour or actions which fall short of a formal allegation of abuse. These tend to be behaviours which indicate that our Code of Conduct has not been met. Any such concerns can be dealt with as a low level Concern.

What should I do if I have a concern?

Where a low level concern exists it should be reported to the DSL (Iain Howell), or in their absence the DDSL (Jennifer Britton), as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it (where the concern relates to a particular incident).

How will my low level concern be handled?

The DSL (Iain Howell) or the DDSL (Jennifer Britton) will deal with all low level concerns they receive as soon as possible and in any event within 24 hours of becoming aware of it. The DSL or DDSL will, in the first instance, satisfy themselves that it is a low level concern and should not be reclassified as an allegation and dealt with under the appropriate procedure (outlined later in this document). The circumstances in which a low level concern might be reclassified as an allegation are where:

- the threshold is met for an allegation
- there is a pattern of low level concerns which collectively amount to an allegation or
- there is other information which when taken into account leads to an allegation.

If a low level concern relates to the DSL, it should be reported to the DDSL (Jennifer Britton). If it relates to the DDSL, it should be reported to the DSL (Iain Howell). If it relates to both, or you do not feel able to report it internally, seek advice from the LADO (contact details are in our Safeguarding and Child Protection Policy).

Where the DSL is in any doubt whatsoever, advice will be sought from the LADO, if necessary on a no-names basis. Having established that the concern is low level, the DSL as appropriate will discuss it with the individual who has raised it and will take any other steps to investigate it as necessary. 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.

If the concern has been raised via a third party, the designated safeguarding lead will collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses

Recording low level Concerns

All low level concerns should be recorded in writing. The record will include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns will also be noted, if the individual wishes to remain anonymous then that will be respected as far as reasonably possible. The record will include the rationale for the DSL's decisions and action taken.

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, WBS Guardians 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 threshold, in which case it should be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the guardianship organisation that enabled the behaviour to occur and where appropriate policies will be revised or extra training delivered to minimise the risk of it happening again.

What records will be kept?

WBS Guardians will store records of low level concerns in a central file which logs all concerns of this nature. These are kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Records are necessary to enable any patterns to be identified. However, no record will be made of the concern on the individual's personnel file unless either:

a) the concern (or group of concerns) has been reclassified as an allegation as above; or Safeguarding and Child Protection Policy and Procedure

b) the concern (or group of concerns) is sufficiently serious to result in formal action under the guardianship organisation's grievance, capability or disciplinary procedure.

WBS Guardians will retain such information until the individual leaves their employment.

References

In line with the guidance in Part three of Keeping Children Safe in Education 2026, we will only provide substantiated safeguarding allegations in references. 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 found to be substantiated, this will be referred to in a reference.

Contact Details

Name: Iain Howell, CEO and Designated Safeguarding Lead (DSL)

Phone/email: 07984 925526, iain@whichbritishschool.com

Deputy Designated Safeguarding Lead (DDSL)

Name: Jennifer Britton, Co-founder and Director

Phone/email: 07540 868974, jennifer@whichbritishschool.com

Review

We are committed to reviewing our policy and good practice annually.

This policy was last reviewed on: 28/09/2026. Next review: September 2027.

Signed: Iain Howell, CEO and DSL

Date: 28/09/2026

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