Low Level Concern Policy

APRIL WELL LIMITED — Company No. 11924473

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This policy is publicly available. It may be shared with parents, agents, partner schools and inspectors on request.

Document Control

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Approved by: Xiaoying Chi

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This document is reviewed at least annually in October and whenever statutory guidance or AEGIS Standards change. This revision reflects the AEGIS Quality Standards, September 2026, particularly Standards 6.5.1–6.5.4, and Keeping Children Safe in Education 2026, Part Four.

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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 or Director of any concerns, no matter how small, about any conduct by an adult which causes them 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 any homestay families, school staff and other adults who work with our organisation, unless otherwise stated.

April Well Limited 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 clarifies expected behaviours.

April Well Limited is a small guardianship organisation. Students supported by April Well normally live in boarding accommodation at their schools or with their parents. April Well Limited does not provide routine or long-term homestay accommodation. However, April Well may arrange or coordinate short-term emergency accommodation in clearly defined emergency or exceptional situations, in accordance with its Emergency Procedure and safeguarding policies. References in this policy to "homestays" include any host family, emergency accommodation adult or accommodation arrangement used or approved by April Well Limited.

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. This commitment does not prevent necessary and proportionate safeguarding measures during an investigation; such measures do not in themselves imply wrongdoing. We are a 'telling' organisation. If you are concerned about the behaviour or actions of any adult who works for or with April Well Limited you should speak to the DSL or **Director (who also acts as DSL)**. 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 the guardianship organisation 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. If there is doubt, seek LADO advice; staff must report rather than decide that a concern is too minor.

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. These examples are not automatically low level; context or a pattern may require immediate referral under the allegations procedure.

It is crucial that any such concerns, including those which do not meet the allegation/harm threshold (see Part Four - Section Two of *Keeping Children Safe in Education*), 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 April Well Limited 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 under 18 in a sexual way or have a sexual relationship with a child under 18, even if the relationship is consensual. For the purposes of our Code of Conduct, any person working for or with April Well Limited is treated as being in a position of trust, even if the member of staff does not directly work with the student. Whether the statutory definition applies depends on the role and the circumstances specified by law.

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 him/herself 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 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. April Well Limited must also self-report to AEGIS any significant safeguarding concern, any situation which could appear compromising or be misconstrued, or behaviour below expected standards (Standard 6.5.3). Notify AEGIS within one working day of complaints or investigations that may damage its reputation. This does not replace or delay statutory referrals.

Concerns about others

From time to time an individual may notice behaviour or actions in others which leave them 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. Report all such concerns; the DSL or conflict-free case manager will assess the threshold, seeking LADO advice if uncertain.

What should I do if I have a concern?

Report any concern immediately to the DSL/Director, including self-reports and emerging patterns. In immediate danger call 999; do not wait for internal approval. Submit the initial written record promptly and no later than 24 hours after becoming aware, adding dated updates. If the DSL cannot be reached, use the Emergency Procedure cover arrangements and contact children's social care, the LADO or police as appropriate. If the concern involves the DSL/Director, report directly to the LADO; do not send it only to the person concerned. External contacts are below.

How will my low level concern be handled?

The DSL/Director must promptly assess immediate safety and the reporting threshold; 24 hours is the written-record deadline, not a waiting period or an investigation-completion deadline. If the concern involves the DSL/Director, seek LADO advice on independent case management; the person concerned must not assess or investigate their own case. The DSL or conflict-free case manager will, in the first instance, satisfy him/herself that it is a low level concern and should not be reclassified as an allegation and dealt with under the appropriate procedure (as outlined in the Safeguarding and Child Protection Policy and Procedure). 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 the threshold is uncertain, the DSL or conflict-free case manager must seek LADO advice promptly. A concern suggesting harm, possible criminal conduct, risk to children or unsuitability to work with children must follow the allegations procedure. Where it may meet that threshold, consult the LADO and, as appropriate, police or children's social care before substantive internal enquiries. Preserve evidence and follow their directions. Confirmed low level concerns may require proportionate guidance, training or other management action.

If the concern has been raised via a third party, the DSL or conflict-free case manager will establish relevant facts, subject to the statutory advice above, by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;

- to the individual involved and any witnesses. Concerns about agency staff or contractors must also be shared with their employer so patterns can be identified, subject to statutory advice.

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 or conflict-free case manager's decisions and action taken. Record when the concern was received, risk assessment,

referrals, advice and follow-up. Share information only where necessary and lawful; anonymity cannot be guaranteed where safeguarding requires disclosure.

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, the DSL or conflict-free case manager 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 must be referred promptly 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?

April Well Limited will store records of low level concerns in a central log which records all concerns of this nature. These records 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 as outlined in the Safeguarding and Child Protection Policy and Procedure; or

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

Keep low level concern records at least until the person leaves their employment or involvement. Departure does not trigger automatic deletion: review retention under the approved retention schedule, documenting any continuing safeguarding or legal need. Apply the safeguarding allegations retention rules if a concern is reclassified.

References

In line with the guidance in Part three of *Keeping Children Safe in Education*, 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

Owner / Director

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Designated lead for safeguarding and child protection

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Phone/email: +44 (0)7930 416543 / info@aprilwell.co.uk External routes: Southwark LADO: 020 7525 0689 / 020 7525 3297; qau.safeguarding@southwark.gov.uk. Children's social care (MASH): 020 7525 1921 (Mon–Fri, 9am–5pm); out of hours: 020 7525 5000. Outside Southwark, use the relevant local authority. Immediate danger: 999. AEGIS: 01453 821293; info@aegisuk.net (office contact, not an emergency service).

Review

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

This policy was last reviewed on: 20/10/2026

Signed: 

Name: Xiaoying Chi

Role: Director and Designated Safeguarding Lead (DSL)

Date: 20/10/2026