

# Thames Hightech Ltd

## Low Level Concerns Policy 2025/26

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Thames Hightech Ltd is committed to creating a safeguarding culture in which concerns about adult behaviour are identified early, raised appropriately and handled fairly. Low level concerns are an important part of safeguarding because they can help prevent harm, reinforce professional boundaries and support a culture of openness and accountability.

This policy explains what a low level concern is, how it should be reported, how it will be considered and recorded, and how Thames Hightech Ltd will distinguish between a low level concern and an allegation that meets the harm threshold.

This policy should be read alongside the Safeguarding and Child Protection Policy, Staff and Homestay Code of Conduct, Whistleblowing Policy, Safer Recruitment Policy and relevant disciplinary or contractual procedures.

### 1. Key principles

- The welfare of the child is paramount.
- Even small concerns about adult behaviour may be important and should not be ignored.
- Reporting concerns protects children and may also protect adults from misunderstandings or false assumptions.
- Concerns will be handled fairly, proportionately and confidentially.
- A culture of openness, self-reflection and early reporting is encouraged.

### 2. Scope

This policy applies to concerns about any adult working for or with Thames Hightech Ltd, including staff, volunteers, contracted staff, local coordinators, homestays, relevant adult household members, visitors and other adults whose behaviour may affect the safety or welfare of a child in the organisation's care.

### 3. What is a low level concern?

A low level concern is any concern, no matter how small, that an adult may have acted in a way that:

- is inconsistent with the Staff and Homestay Code of Conduct, including inappropriate conduct outside work; and
- does not meet the threshold for an allegation that a person has harmed a child, may have harmed a child, committed a criminal offence against a child, or behaved in a way indicating they may pose a risk of harm to children.

The fact that a concern is described as 'low level' does not mean it is insignificant. It means that the known information, at that stage, does not appear to meet the harm threshold.

### 4. Examples

Examples of behaviour that may amount to a low level concern include, but are not limited to:

- being over-familiar with a child;
- showing favouritism;
- using inappropriate, offensive or sexualised language;

- taking or retaining images on a personal device contrary to policy;
- meeting a child in a way that lacks transparency or appropriate boundaries;
- engaging in one-to-one communication that is unnecessary, secretive or unprofessional;
- other conduct that creates a sense of unease or appears to fall short of expected standards.

## 5. Self-reporting and concerns about others

Thames Hightech Ltd encourages both self-reporting and reporting of concerns about others.

- An adult may self-report if they believe their behaviour could have been misinterpreted, was ill-judged or may have fallen below expected standards.
- Any person who notices concerning behaviour in another adult should report it promptly.
- Reports made in good faith will be taken seriously and handled appropriately.

## 6. How to report a low level concern

Low level concerns should be reported as soon as reasonably possible, and normally within 24 hours of the concern arising or becoming known.

- Report to Yuhong Li, Director / DSL, on 07538826068 or [Andrew.li@thameshightech.com](mailto:Andrew.li@thameshightech.com).
- If the concern relates to the Director / DSL, it should be raised with an appropriate independent person or external safeguarding adviser, and external advice should be sought where necessary.
- Where there is any possibility that the harm threshold may be met, the concern must be treated urgently and considered under safeguarding allegation procedures rather than delayed as a low level concern.

## 7. Initial consideration of the concern

On receiving a concern, the Director / DSL will consider the information available and decide whether:

- it is properly a low level concern;
- it should be reclassified as an allegation meeting the harm threshold;
- it forms part of a wider pattern of concern that raises the level of risk;
- further information is needed before a decision can be made.

If there is any doubt about threshold, Thames Hightech Ltd may seek external advice, including from the LADO or other appropriate safeguarding authority, where relevant.

## 8. Handling a low level concern

Most low level concerns are likely to be addressed through proportionate management action. Depending on the circumstances, this may include:

- a professional conversation or clarification;
- guidance or reminder about expected conduct;
- additional supervision, monitoring or support;
- training or policy re-reading;
- a written note of expectations or agreed action;
- consideration of whether wider cultural or procedural improvement is needed.

## 9. When a concern becomes an allegation

A low level concern must be reclassified and handled as an allegation if:

- the information indicates that a child has been harmed or may have been harmed;
- the adult may have committed a criminal offence against or related to a child;
- the adult has behaved in a way that indicates they may pose a risk of harm to children;
- a pattern of low level concerns collectively indicates a more serious safeguarding issue.

## 10. Recording

All low level concerns should be recorded in writing. The record should include:

- the nature of the concern;
- the context in which it arose;
- the adult involved;
- who raised the concern, where known;
- the decision on threshold;
- the action taken;
- the rationale for decisions made;
- any review or follow-up action.

Records will be kept securely and confidentially in accordance with data protection requirements. Low level concern records will be reviewed periodically to identify any patterns or repeated themes.

## 11. Personnel files and references

A low level concern will not normally be placed on an individual's personnel file unless:

- it has been reclassified as an allegation;
- it leads to formal management, disciplinary or contractual action; or
- it relates to a matter that would normally be included in employment records.

Thames Hightech Ltd will only include substantiated safeguarding allegations in references, unless other conduct matters separately justify inclusion under normal reference practice.

## 12. Support and fairness

Thames Hightech Ltd aims to handle low level concerns in a way that is fair to everyone involved. Those who raise concerns in good faith should be supported. Adults who are the subject of a concern should be treated fairly, and conclusions should be based on the information available rather than assumption.

## 13. Review

This policy will be reviewed at least annually and sooner if guidance, legislation, AEGIS standards or organisational practice changes.

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Approved by	Yuhong Li, Director / DSL
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Review date	1 September 2026
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