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LOW-LEVEL CONCERNS POLICY

Sunshine365 Limited

(Aligned with AEGIS Quality Standard 6.5 and KCSIE 2025, Part 4 – Safeguarding)

V1.0
Oct,2025

1. Purpose

The purpose of this policy is to ensure that all staff, homestays, and volunteers at Sunshine365 feel confident to report any *low-level concern* about an adult's behaviour that may not meet the threshold for an allegation, but nevertheless causes unease or questions professional conduct.

The aim is **to protect children, support staff reflection, and foster a transparent safeguarding culture** in which concerns are identified and addressed early.

2. Definition

A **low-level concern** is any behaviour by a member of staff, homestay, volunteer, or contractor that:

- Is inconsistent with the organisation's *Code of Conduct* or professional expectations, and
- Does not meet the threshold for referral to the Local Authority Designated Officer (LADO), but
- Causes doubt or unease about the adult's conduct or attitude towards students.

Examples include (but are not limited to):

- Overly personal comments or inappropriate familiarity
 - Excessive one-to-one communication outside of professional context
 - Unnecessary physical contact
 - Breach of professional boundaries on social media
 - Failing to maintain appropriate dress or language standards
 - Making jokes or remarks that could be perceived as inappropriate
 - Favouritism or giving special attention to a particular student
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3. Principles

- Sunshine365 promotes an **open and reflective culture** where concerns are raised promptly.
- Early reporting allows patterns of behaviour to be identified and mitigated before escalation.

- All concerns, no matter how small, will be recorded, reviewed, and acted upon.
 - Staff will never be penalised for raising a genuine concern in good faith.
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4. Responsibilities

| Role | Responsibility |
|--|---|
| All Staff, Volunteers & Homestays | To report any low-level concern about themselves or others as soon as possible. |
| Designated Safeguarding Lead (DSL) | To receive, record, and review all low-level concerns, and escalate to LADO if necessary. |
| Director | To oversee the policy's implementation and ensure annual review. |

5. Procedure for Reporting a Low-Level Concern

1) Self-Reporting:

- If an individual feels they may have acted inappropriately, they are encouraged to self-report immediately to the DSL.

2) Reporting About Others:

- Concerns about colleagues or homestays should be reported confidentially to the DSL.
- If the concern involves the DSL, report directly to the Director.

3) Recording:

- The DSL will record the concern using the *Low-Level Concern Form*, noting:
 - Date/time of incident or disclosure
 - Name of person raising concern
 - Factual description of what happened
 - Any witnesses or evidence
 - DSL's assessment and actions taken

4) Assessment:

- The DSL reviews each concern to determine whether it remains low-level, requires advice from LADO, or meets the threshold for a formal allegation.

5) Action:

- Low-level concerns are addressed through reflective supervision, training, or written reminders of conduct standards.
 - Where patterns emerge or risk increases, escalation to the LADO will occur immediately.
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6. Confidentiality

- All records are stored securely by the DSL and not shared beyond those who need to know.
 - The name of the person reporting will be kept confidential as far as reasonably possible.
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7. Record Keeping

- Low-level concerns are logged in a secure **Low-Level Concerns Register**, maintained separately from staff files.
 - Records include date, concern type, follow-up action, and resolution.
 - Retention follows the *Data Protection Act 2018* and *UK GDPR* requirements.
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8. Training and Communication

- All staff and homestays receive training on recognising and reporting low-level concerns during induction and annual refreshers.
 - The DSL ensures all coordinators understand the difference between a low-level concern, allegation, and whistleblowing issue.
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9. Escalation Criteria


A concern must be escalated to the LADO (and AEGIS notified if relevant) if:

- The adult behaved in a way that harmed or may have harmed a child;
 - The adult possibly committed a criminal offence against a child;
 - The adult's behaviour indicates they may pose a risk of harm to children; or
 - The concern, when combined with previous ones, suggests a pattern of inappropriate behaviour.
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10. Monitoring and Review

- The DSL reviews the register at least termly to identify trends or repeated behaviours.
 - This policy is reviewed annually or earlier if guidance changes.
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11. Approval

- **Date Published:** October 2025
- **Next Review Date:** October 2026
- **Approved by:** Director, Sunshine365 Limited
- **Designated Safeguarding Lead:** Dongmei Wang
- **Signature:**  _____
- **Date:** 30. Oct. 2025