

Policy – Low-level Safeguarding Concerns

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1. Introduction and Purpose

The Group is committed to ensuring that all staff and volunteers are suitable to work with children and vulnerable adults. The early identification and appropriate management of safeguarding concerns is an essential part of the Group’s safeguarding duties.

The Group has detailed procedures for dealing with safeguarding concerns that reach the point where a concern becomes a formal allegation. However, this guidance extends to those occasions when concerns are raised about the behaviour of a member of staff that appears to fall below the threshold of a formal allegation and do not meet the harm threshold. The purpose of this policy is to provide guidance to managers and staff with designated safeguarding and HR responsibilities on how they should utilise existing processes in these circumstances. This is intended to facilitate a culture in which the clear values and expected behaviours are adhered to by all staff.

This procedure is based on the statutory guidance document issued by the Department for Education “Keeping Children Safe in Education September 2025”.

2. Scope of the Procedure

This operating procedure applies to the management of all low-level safeguarding concerns. This includes concerns in respect of children, as defined in this document, and vulnerable adults.

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Although this policy is intended to provide a framework to manage a low-level safeguarding concern, the individual receiving details of the concern will liaise with the Designated Safeguarding Lead (DSL), Centre Safeguarding Lead (CSL), Executive Principal, Executive Director or Deputy Chief Executive Officer (DCEO) to consider whether it meets the threshold for reporting a concern to the local authority designated officer (LADO) as an allegation. A series of low-level safeguarding concerns may cumulatively meet the threshold and need to be treated as such.

3. Who should be aware of this procedure?

The information contained within this document is addressed to all staff within the first 4 tiers of the Group’s management structure as it is these managers that such concerns will be reported to directly or indirectly.

4. Definitions and Designated Contacts

What is a low-level safeguarding concern?

The term ‘low-level’ concern does not mean that it is insignificant. A low-level safeguarding concern is a concern raised, no matter how small, that an adult may have acted in a manner that appears to be below the threshold that would lead to a formal safeguarding allegation but is inconsistent with the expected standards of behaviour, even if not linked to a particular act or omission, to create an unease as to the adult’s behaviour particularly towards or around children.

A ‘low-level’ concern is any concern that an adult working in or on behalf of the Group 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 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

There may also be occasions when the behaviour of a student prompts a member of staff to seek advice and report a potential concern. For example, a member of staff may self-refer if they are concerned that a student has become infatuated with them.

The definition of a child for the purpose of this procedure is an individual under 18 years of age.

The local authority designated officer (LADO) is the relevant contact(s) at the local authority. Designated Safeguarding Lead (DSL) is the Director of Student Services.

The Centre Safeguarding Lead (CSL) is the Head of Student Services at each College site.

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5. Procedure

5.1 Responding to a low-level safeguarding concern

If an individual receives a report of a low-level safeguarding concern, it should be discussed with the following staff as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it if the concern relates to a particular incident:

- Relevant member of the Senior Leadership Team:
 - Executive Principal Skills and Inclusion
 - Executive Principal Quality and Improvement
 - Deputy Chief Executive (DCE)
 - Executive Director Business Partnerships
- Group Designated Safeguarding Lead (DSL) – Director Student Services
- Centre Safeguarding Lead (CSL) -- Head(s) of Student Services

5.2 Dealing with a low-level safeguarding concern

If the low-level safeguarding concern has not been reported directly to the relevant SLT member, DSL, or CSL the recipient of the concern will discuss the content with one of the aforementioned post holders as soon as possible and in any event within 24 hours of becoming aware of it. The member of SLT, as the case manager, will determine, in the first instance, in consultation with the DSL and Director of HR, that it is a low-level safeguarding concern and should not be reclassified as an allegation and dealt with under the appropriate procedure. The circumstances in which a low-level safeguarding 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
- there is other information which when considered leads to an allegation
- it is a concern that involves a member of staff and a student or students

Where necessary, advice will be sought from the LADO, on a no-names basis. HR will normally be responsible for discussing a matter with the LADO.

Having established that the safeguarding concern is low-level, the case manager will identify an appropriate member of staff to collect as much evidence as possible by speaking:

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

Most low-level safeguarding concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training or any other relevant intervention.

Low-level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

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5.3 Anxieties about reporting a low-level safeguarding concern

The intention of this procedure is to ensure that managers feel able to respond effectively to the report of a low-level safeguarding concern.

A low-level safeguarding concern could be an indication that a member of staff requires additional training and support or that they are not aware that their conduct could result in allegations. Staff deciding to report a concern could therefore be assisting another colleague to develop their practice and modify their behaviour to prevent safeguarding allegations in the future.

5.4 Retention of records of low-level safeguarding concerns

Where a low-level safeguarding concern has been communicated, a confidential record will be kept in a central file which logs all low-level safeguarding concerns. 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 should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. This is necessary to enable any patterns to be identified. However, no record will be made of the safeguarding concern on the individual's HR file (and no mention made in job references) unless either:

- the concern (or group of concerns) has been reclassified as an allegation as above; or
- the concern (or group of concerns) is sufficiently serious to result in formal action under the Group's grievance, capability or disciplinary procedure.

5.5 References

References should only include substantiated safeguarding concerns/allegations (including a group of low-level concerns about the same individual) that meet the harm threshold. Low-level concerns should 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) should not be referred to in a reference.

6. How will we evaluate and review this procedure?

The Director of Human Resources will ensure that this procedure is reviewed and evaluated on an annual basis.

7. Responsibilities

Management colleagues across the Group are responsible for responding to reports of a low-level safeguarding concern by seeking advice and guidance as per the instructions defined in this procedure.

The DSL, CSL, Executive Principal, DCEO or Director of HR are responsible for completing the actions described within the policy.

8. Policy Distribution

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A copy of this policy will be posted on the HR section of the staff intranet, published on the Group website and issued to all staff.

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