



SAFE START SCHOOL

WILLPOWER-INITIATIVE-SUCCESS-EMPATHY-RESPECT

Low-level Safeguarding Concerns Policy

Reviewed: October 2026

Review Due: October 2027

Reviewed by: Grace Speakman

Verified by: Rachel Pilling

Statement of intent

Safe Start School is committed to a culture of openness, professional curiosity and safeguarding in which concerns about adults working with children are shared promptly, however small they may initially appear. Reporting a concern is not an allegation of wrongdoing: it allows appropriate, proportionate assessment, support and early intervention. Children's welfare and safety remain paramount.

This policy applies to all adults working in or on behalf of the school, including employees, leaders, directors, agency and supply workers, contractors, volunteers and trainees. It covers conduct in school, off-site and outside work where relevant to suitability to work with children. It does not replace procedures for concerns about a child, whistleblowing, or allegations meeting the harm threshold.

Legal framework and related policies

This policy is informed by the current Department for Education Keeping Children Safe in Education (KCSIE) guidance, Working Together to Safeguard Children, the Education (Independent School Standards) Regulations 2014 (as amended), the Data Protection Act 2018 and UK GDPR. Where guidance is updated, statutory requirements and current local safeguarding partnership/LADO procedures take precedence.

Read alongside: Safeguarding and Child Protection Policy; Staff Code of Conduct; Allegations of Abuse Against Staff Policy; Whistleblowing Policy; Safer Recruitment Policy; Data Protection and Records Retention policies; Staff Mobile Phone Policy; and Physical Intervention Policy.

Definitions and thresholds

A low-level concern is any concern, however small and even if no more than a sense of unease, that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside work, but which does not meet the harm threshold or is otherwise not considered sufficiently serious to refer to the LADO at that point. "Low-level" does not mean insignificant.

The harm threshold is met where an adult working with children has:

- Behaved in a way that has harmed a child, or may have harmed a child.
- Possibly committed a criminal offence against or related to a child.
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children (including relevant conduct outside school).

If a concern meets, or may meet, the harm threshold, follow the Allegations of Abuse Against Staff Policy immediately. Where the threshold is uncertain, the Headteacher or appropriate proprietor/director must seek LADO advice without delay; the matter must not be prematurely

classified as low-level. Where there is immediate danger, take protective action and contact police/emergency services as necessary.

Roles and responsibilities

Proprietor/directors

- Ensure clear, accessible reporting routes, including a route independent of the Headteacher, and oversight of policy implementation.
- Arrange appropriate handling of concerns involving the Headteacher or a director, including external advice where required.
- Ensure secure records, proportionate oversight of themes, and an open safeguarding culture.

Headteacher

- Normally receives low-level concerns, consults the DSL, assesses thresholds and determines proportionate action.
- Seeks LADO advice where in doubt and follows allegations procedures when appropriate.
- Ensures decisions, follow-up, outcomes and pattern reviews are securely recorded.

DSL and deputy DSLs

- Receive concerns, safeguard any affected child, advise the Headteacher and coordinate relevant pupil safeguarding records.
- Contribute to review of repeated concerns and emerging patterns; escalate promptly where needed.
- Ensure low-level concern records about adults are kept distinct from pupils' safeguarding files, with appropriate cross-references where necessary.

All adults

- Maintain professional boundaries and follow the Staff Code of Conduct.
- Report concerns promptly, including about their own conduct; do not investigate, confront witnesses or share information unnecessarily.
- Cooperate appropriately with fair and confidential follow-up.

Prevention and professional boundaries

Induction and refresher training will explain acceptable conduct, low-level concerns and how to report them. The school recognises that SEMH/SEND practice may involve planned one-to-one support, therapeutic relationships and physical intervention; these must remain authorised, proportionate, documented where required and consistent with individual plans and school procedures. Context must be considered without excusing boundary breaches.

Illustrative concerns include excessive familiarity or favouritism, inappropriate gifts or private contact, using personal devices to photograph pupils, inappropriate personal disclosures, unnecessary secluded one-to-one contact, humiliating or discriminatory comments, or boundary issues in digital communication. Depending on the circumstances, any of these may instead meet the harm threshold.

Reporting concerns

Report a concern as soon as possible, preferably on the same day. Do not wait to gather proof or for a reporting form to be completed. Reports may be made verbally or in writing using Appendix A or

the school's approved confidential reporting system. The recipient must ensure a written record is made. A delayed report must still be accepted and assessed.

Concern about	Report to
Staff, supply workers, volunteers, contractors or other adults	Headteacher; the DSL may receive and pass on the concern promptly.
Headteacher	An uninvolved proprietor/director using the school's designated governance contact route; not solely to the Headteacher.
A proprietor/director	Another uninvolved proprietor/director, or obtain advice from the LADO/local authority where independence or threshold is in question.
Immediate risk or suspected harm-threshold allegation	Follow allegations procedures urgently; seek LADO/police advice as appropriate.

For an agency worker or contractor, the Headteacher/proprietor will coordinate appropriate notification to the employer, subject to safeguarding advice and confidentiality. Staff may use the Whistleblowing Policy or contact relevant external safeguarding bodies if internal reporting is inappropriate or ineffective. No one should suffer retaliation for raising a concern in good faith; confidentiality will be respected as far as possible but absolute anonymity cannot be guaranteed.

Self-reporting

Adults are encouraged to self-report behaviour that may have been misinterpreted, appears compromising or falls below expected standards. Self-reporting supports openness but does not prevent proportionate assessment or action. Any self-report must be recorded and considered using the same threshold assessment as other concerns.

Assessing and evaluating concerns

The Headteacher, or the designated uninvolved proprietor/director where the concern involves the Headteacher, will promptly assess the facts with DSL input where appropriate. They will consider the context, the child's views and needs, previous concerns about the adult, relevant records, the Staff Code of Conduct, and whether immediate safeguards are necessary. The person reporting may be asked for clarification. The adult concerned will ordinarily be given a fair opportunity to respond at an appropriate point, unless doing so could compromise safeguarding or external enquiries.

The assessment and rationale must distinguish between: (a) no concern or misunderstanding; (b) a low-level concern requiring guidance or action; and (c) a concern meeting or potentially meeting the harm threshold requiring escalation. Consult the LADO where uncertain. Do not carry out an internal investigation that could compromise a police or LADO-led process.

Acting on concerns

No breach established

Record the facts, assessment and rationale; consider whether clearer guidance, communication or training would prevent future misunderstandings. Inform relevant parties appropriately, without discouraging future reports. Records should be accurate and distinguish unsubstantiated information from established findings.

Low-level concern established

Respond proportionately: this may include a management conversation, reminder of expectations, coaching, supervision, training, written guidance, monitored action plan or formal HR action where justified. Provide pastoral support for any affected pupil. Set an appropriate review point and record whether actions have been completed. Do not automatically treat every low-level concern as a disciplinary matter.

Threshold met or escalation needed

Immediately apply the Allegations of Abuse Against Staff Policy, seek LADO advice as required, and consider protective measures on a case-by-case basis. Repeated low-level concerns can cumulatively indicate a pattern meeting the threshold. Relevant referrals and employment action must follow applicable safeguarding and employment procedures.

Record keeping, retention and references

Every reported low-level concern, including those assessed as unfounded or not meeting the threshold, must have a confidential record of the concern, context, source where known, assessment, advice sought, decisions, actions, outcomes and review. Records should be securely stored with restricted access in a designated adult safeguarding/low-level concerns location; they must be retrievable together for pattern analysis. Avoid duplicating sensitive information unnecessarily in pupil files or general HR systems.

The Headteacher (or designated proprietor/director) and DSL will review records periodically and when a new concern is received to identify repeated conduct, possible escalation and wider cultural or training issues. Records are retained and securely disposed of in accordance with the school's approved records-retention schedule, safeguarding obligations, data protection principles and any litigation or investigation hold. They must not automatically be destroyed simply because an employee leaves.

Whether a concern is also recorded on a personnel file will be decided case by case, taking account of the nature of the concern, employment action, data minimisation and applicable guidance. References must comply with current KCSIE requirements: low-level concerns are not normally included unless they meet the harm threshold and are substantiated as appropriate under the applicable reference rules. Seek HR/safeguarding advice where necessary.

Monitoring, training and review

The Headteacher, DSL and proprietor/directors will review the effectiveness of reporting routes, patterns, training needs and the school's safeguarding culture, without unnecessary disclosure of personal data. The policy will be reviewed annually or earlier following a significant incident or change in guidance.

Appendix A - Low-level Concern Reporting Form

Thank you for raising a safeguarding concern. Please complete this form with as much factual information as possible and submit it promptly to the Headteacher or Designated Safeguarding Lead (DSL).

Where the concern relates to the Headteacher, it must be submitted to an uninvolved proprietor/director. Where the concern relates to a proprietor/director, it should be reported through the alternative arrangements set out in this policy.

Do not delay reporting a concern while completing this form. Information must be shared confidentially and only with those who need to know for safeguarding purposes.

Your details	
Name (optional)	
Role	
Date and time of completing this form	
Details of individual whom the concern is about	
Name	
Role	
Relationship to the individual reporting the concern, e.g. manager, colleague	
Details of concern	
Please include as much detail as possible. Think about the following: What behaviour and/or incident are you reporting? What exactly happened? Why does the behaviour and/or incident worry you? Why do you believe the behaviour and/or incident is not consistent with our Staff Code of Conduct?	
Details of any children or young people involved	
Name(s)	

Do you believe there is a risk of harm to the above children or young people, either now or in the future, as a result of the individual's behaviour? Explain your answer.		
Next steps		
What would you like to see happen in response to your concern?		
Are you willing to meet with the headteacher and DSL to discuss your concern? Please circle as appropriate.	Yes	No
Please state any other information that you believe is relevant to the processing of this concern.		
Signature		
For use by safeguarding team upon receipt of concern		
Received by (Name and role):		
Date and time concern received:		
Initial classification: No breach / Low-level concern / Potential harm-threshold allegation		
LADO consultation: Date, advice and reference (if applicable)		
Immediate safeguarding action:		
Outcome and rationale:		
Review date and follow-up completed:		
Closed by and date:		