

Low-Level Concerns Policy (Safeguarding & Child Protection Policy Appendix)

Reviewed	August 2025
Next review	August 2026 (or KSIE updates)
Approved By	Kate Blackmore, Centre Manager
Safeguarding Oversight	Claire Cottrell, DSL

1. Purpose of This Policy

This appendix supports our Safeguarding and Child Protection Policy and sets out how EquiScholars HQ identifies, responds to and records low-level concerns about staff behaviour.

A low-level concern is any concern, no matter how small, that an adult working in our setting may have acted in a way that is inconsistent with our Staff Code of Conduct, but does not meet the harm threshold for LADO referral under Part 4 of Keeping Children Safe in Education (KCSIE).

This applies to all adults working on behalf of EquiScholars HQ, including:

- Employees
- Volunteers
- Contractors
- Visiting professionals

2. Definition of a Low-Level Concern

A low-level concern is any behaviour that:

- is inconsistent with the Staff Code of Conduct or our relational, trauma-aware ethos

and

- does not meet the threshold for referral to the Local Authority Designated Officer (LADO)

Examples include, but are not limited to:

- Overly familiar or unprofessional behaviour
- Having “favourites”
- Being alone with a learner in a secluded or closed space
- Using personal phones to contact learners

- Taking photos of learners on personal devices
- Comments that are inappropriate, sexualised, intimidating or undermining
- Boundary-blurring behaviour inside or outside of work

Low-level concerns may arise from:

- Observations
- Comments by other staff
- Disclosures from young people or parents
- Information from external professionals
- Pre-employment checks

3. Our Culture of Openness

At EquiScholars HQ we promote a culture of professional curiosity, transparency and psychological safety. Staff must feel able and expected to raise any concern, however small.

We promote this culture by:

- Ensuring all staff understand expected behaviour
- Reinforcing professional boundaries consistently
- Giving staff permission to self-refer
- Training staff to recognise early indicators of concerning behaviour
- Responding proportionately, sensitively and promptly
- Using concerns as learning opportunities
- Monitoring patterns of behaviour over time

Low-level concerns are protective, not punitive.

They help safeguard young people and maintain professional integrity.

4. How to Report a Low-Level Concern

Low-level concerns about any staff member, including volunteers and contractors, must be reported directly to the:

Centre Manager: Kate Blackmore

Designated Safeguarding Lead (DSL): Claire Cottrell

You may report verbally, but a written record must follow.

If the concern is about the Centre Manager, staff must report directly to the Local Authority Designated Officer (LADO).

Concerns about volunteers, contractors or visiting staff will also be shared with their employer or agency where appropriate.

5. Responding to a Low-Level Concern

The Centre Manager (or DSL) will:

1. Acknowledge and log the concern
2. Gather information, which may include speaking to:
 - the person who raised the concern
 - the staff member involved
 - any relevant witnesses
3. Evaluate the behaviour against:
 - the Staff Code of Conduct
 - safeguarding thresholds
 - patterns of previous concerns

4. Decide on the appropriate action:

Possible outcomes include:

- No further action required
- Professional conversation or reflective discussion

- Additional training or supervision
- Clear reminder of boundaries
- Management advice
- Monitoring for patterns
- Internal investigation
- Referral to LADO (if harm threshold met or emerging pattern identified)

Any concern that meets, or may meet, the LADO harm threshold will be referred immediately.

6. Record Keeping

All low-level concerns are:

- Logged securely by the Centre Manager
- Stored in line with GDPR and the Data Protection Act 2018
- Held confidentially and separately from personnel files
- Retained until the individual leaves EquiScholars HQ
- Reviewed regularly to identify any emerging patterns

Records include:

- Details of the concern
- Context
- Names of all involved
- Actions taken
- Rationale for decisions

If the concern relates to a volunteer or contractor, their organisation or employer will be notified when appropriate.

7. Reviewing Patterns of Behaviour

Concerns will be reviewed to identify patterns that may indicate:

- Escalating risk
- Boundary issues
- Emerging safeguarding concerns
- Behaviour that now meets the LADO threshold

Where a pattern is identified, the Centre Manager will decide on the appropriate action, which may include:

- Disciplinary investigation
- Management intervention or training
- Referral to LADO

8. References

Low-level concerns will not be included in references unless:

- They have been substantiated and meet the threshold for LADO referral
- They form part of formal disciplinary proceedings
- They relate to conduct that would normally be disclosed

This follows statutory guidance in KCSIE.

9. Connection to Other Policies

This appendix should be read alongside:

- Safeguarding & Child Protection Policy
- Staff Code of Conduct
- Whistleblowing Policy
- Communications & Online Safety Policy
- Behaviour Policy