



Low-Level Concerns Policy

Introduction

At ExpertEase Tuition, we take safeguarding very seriously. This includes ensuring that adults who work with children do so in a way that is in accordance with the ethos and policies set out by the Company. This policy sets out the detail and processes for staff regarding low-level concerns they may have. This policy is to be read in conjunction with the Safeguarding and Child Protection Policy.

Summary

It may be possible that a member of staff acts in a way that does not cause risk to children, but is however inappropriate. A member of staff who has a concern about another member of staff should inform the Senior Leadership Team (SLT) about their concern using a Low-Level Record of Concern Form (appendix 1).

Keeping Children Safe in Education September 2025

The following is taken from Keeping Children Safe in Education and identifies what may be considered behaviour relating to low level concern:

427. Governing bodies and proprietors should have policies and processes to deal with any concerns or allegations which do not meet the harm threshold, referred to in this guidance as 'low-level' concerns. It is important that schools and colleges have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

428. As part of their whole school or college approach to safeguarding, schools and colleges should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

429. Creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should:

- enable schools and colleges to identify inappropriate, problematic or concerning behaviour early*
- minimise the risk of abuse, and*
- ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.*

What is a low-level concern?

430. The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school or college 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.*

431. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

432. Low-level concerns may arise in several ways and from a number of sources. For example:

suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

433. It is crucial that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings.

Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

Allegation

Any adult linked to our Trust who has: · behaved in a way that has harmed a child, or may have harmed a child and/or; possibly committed a criminal offence against or related to a child and/or; · behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or · behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Low-Level Concern

Any adult linked to our school who has behaved in a way that: · is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and · does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Appropriate Conduct

Behaviour which is entirely consistent with the organisation's Code of Conduct, and the law.

Storing and use of Low-Level Concerns and follow-up information


LLC forms and follow-up information will be stored securely within ExpertEase Tuition's safeguarding systems, with access only by SLT. This will be stored in accordance with the our GDPR and data protection policies.

The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Director or those aware in the senior leadership team.

Low-Level Concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

Whenever staff leave ExpertEase Tuition, any record of low-level concerns which are stored about them will be reviewed as to whether or not that information needs to be kept. Consideration will be given to:

- (a) whether some or all of the information contained within any record may have any reasonably likely value in terms of any potential historic employment or abuse claim so as to justify keeping it, in line with normal safeguarding records practice; or
- (b) if, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted accordingly.

| | |
|-------------------|--------------------------------------------------------------------------------------|
| Approved by | Jade Gill |
| Signature |  |
| Date of Issue | 14/02/2025 |
| Review due (date) | 14/02/2026 |

Appendix 1



Low level concerns form

This form can be used to share any concern with the Director, no matter how small or seemingly insignificant, even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that is inconsistent with the Company's Code of Conduct [including inappropriate conduct outside of work] and/or in a way that on first glance does not appear to meet the allegation, 'harm' threshold.

A concise record is required, including brief context in which the low level concern arose, plus details which are chronological, precise and as accurate as possible, of any such concern and /or relevant incident[s]. [Continue on separate sheets as necessary]. The form should be signed, times and dated.

| | |
|-------------------------------|------------------------------|
| Details of CONCERN : | |
| Name of Staff member : | Department and Role : |
| Signed : | Time and Date : |

| | |
|----------------------|---------------|
| Received by : | |
| At [time] : | Date : |

WAS THE STAFF MEMBER SPOKEN TO? [Good practice will require a response].

NO - Give a brief but valid reason/explanation for not;

YES - Please complete detail below - STAFF MEMBER'S RESPONSE TO CONCERN :

ACTION TAKEN :

Was advice/guidance sought from the LADO and or Human Resources? Yes : No :

| | |
|-----------------|----------------|
| Signed : | Dated : |
|-----------------|----------------|

This record form will be held securely, either digitally or in paper form, in one central file in accordance with the Company's Code of Conduct and any associated guidance regarding the management of concerns and or allegations and in accordance with Company's Data Management practices/policies.

Low Level Concern reporting will be treated as confidential as far as possible, however in certain circumstances it may be necessary to share and or disclose the information with third parties for relevant and necessary reasons. This includes where a reporter has indicated they wish to remain anonymous.