



Low-Level Concerns Policy

1. Purpose and status

ExpertEase Learning Hub is committed to an open and transparent safeguarding culture in which concerns about the conduct of adults are shared promptly, recorded appropriately and acted upon proportionately. **The term “low-level” does not mean insignificant.**

This policy sets out how concerns about adults working for or on behalf of the Hub are reported, assessed, recorded, reviewed and, where necessary, escalated. It is intended to help identify inappropriate, problematic or concerning behaviour early; reinforce professional boundaries; minimise the risk of harm; and protect both children and adults from misunderstandings or unresolved concerns.

Keeping Children Safe in Education 2026 (KCSIE) is statutory guidance for schools and colleges in England. Where its provisions apply directly to ExpertEase Learning Hub they must be followed. Where they do not apply directly to the Hub's legal status, the Hub adopts the low-level-concerns principles in KCSIE as safeguarding best practice, alongside the legal duties that apply to the organisation.

2. Scope

This policy applies to concerns about any adult working in or on behalf of ExpertEase Learning Hub, including:

- employees and tutors
- the Managing Director and senior leaders
- volunteers
- agency, supply or temporary workers
- contractors and self-employed professionals
- visiting professionals or other adults whose role brings them into contact with children through the Hub

Concerns may arise from something witnessed directly, information disclosed by a child or parent/carer, a complaint, information received from another adult or organisation, vetting information, online activity, or the adult's own self-referral.

3. What is a low-level concern?

A low-level concern is any concern, however small, that an adult may have acted in a way that:

- is inconsistent with the Hub's Staff Code of Conduct or expected professional boundaries, including relevant conduct outside work; and

- does not appear to meet the harm threshold, or is otherwise not serious enough at that point to require management under the allegations procedure or referral to the Local Authority Designated Officer (LADO).

Examples may include, depending on the circumstances:

- being over-familiar or over-friendly with a child
- showing favouritism
- using a personal device to photograph or communicate with a child contrary to policy
- unnecessary one-to-one contact in a secluded area or behind a closed door
- humiliating, intimidating or belittling a child
- using inappropriate language, physical contact or social-media interaction
- creating a situation which could reasonably be misunderstood or appear compromising
- Behaviour exists on a spectrum. Conduct may be inadvertent or thoughtless, may look inappropriate but have an innocent explanation, or may form part of a pattern that becomes more serious. Every concern must therefore be considered in context.

4. Harm threshold: when a concern is not low-level

A concern must not be treated as low-level if the available information indicates that an adult may have:

- 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
- behaved, or may have behaved, in a way that indicates they may not be suitable to work with children

Where the harm threshold may be met, the matter must be managed under the Hub's allegations/safeguarding procedure. The appropriate senior safeguarding lead should seek LADO advice promptly where required. If there is uncertainty about whether the threshold is met, advice should be sought rather than categorising the matter as low-level by default.

5. Reporting concerns and self-referral

All staff and adults working on behalf of the Hub are expected to share low-level concerns promptly. A concern should normally be reported as soon as reasonably practicable and preferably on the same working day.

- Report the concern to the Managing Director / Designated Safeguarding Lead (DSL), or the nominated deputy where that is the established reporting route.
- If the concern is about the Managing Director or DSL, report it to the nominated alternative safeguarding lead or contact the LADO directly for advice where appropriate. The concern must not be managed solely by the person who is the subject of it.
- Use the Low-Level Concern Record at Appendix 1, or provide the information in writing by another secure method if immediate reporting is required.
- If there is immediate risk to a child, take protective action first and follow the Safeguarding and Child Protection Policy, including contacting emergency services or children's social care where necessary.

Self-referral is encouraged. Adults should report situations involving their own conduct where they believe their behaviour may have fallen below expected standards, may be open to misinterpretation, or may have appeared compromising. Self-referral supports transparency and early resolution and will not automatically lead to disciplinary action.

6. Anonymous reporting and confidentiality

The Hub encourages named reporting because it assists fair and effective follow-up. A request to remain anonymous will be respected as far as reasonably possible, but absolute confidentiality cannot be guaranteed where information must be shared to safeguard a child, obtain LADO or professional advice, conduct a fair process, comply with legal duties, or respond to lawful requests.

Information will be shared only with those who need it for safeguarding, management, HR, legal or regulatory purposes. Staff must not discuss a concern with colleagues or others except as authorised.

7. Responding to a low-level concern

The person receiving the concern will consider the information promptly and decide whether it is genuinely low-level, may meet the harm threshold, requires safeguarding action for a child, or is more appropriately dealt with under another process such as conduct, capability, grievance or complaints.

Where appropriate and fair, information may be gathered from:

- the person who raised the concern, unless anonymous
- the adult whose conduct is the subject of the concern
- relevant witnesses
- available records, communications or other proportionate evidence

The response should be proportionate to the concern. Possible outcomes include no further action, clarification of expectations, support or supervision, training, a management instruction, review of working practices, disciplinary action, referral to the LADO, referral to another agency, or escalation under the safeguarding allegations procedure.

The written record must include the decision reached, action taken and the rationale for that decision. Where appropriate, the adult concerned should be informed of the outcome and any expectations or support arising from it.

8. Recording requirements

All low-level concerns must be recorded in writing. The record should be factual, concise and sufficiently detailed to explain what occurred and how the Hub responded. It should include:

- date and time the concern was raised and how it was received
- name and role of the adult the concern relates to
- name of the person raising the concern, unless anonymity is requested and can reasonably be maintained
- details of the concern and the context in which it arose
- relevant dates, locations, witnesses and supporting information
- any account given by the adult concerned
- action taken, outcome and any follow-up required

- whether LADO, HR, legal or other professional advice was sought
- the decision-maker's reasoning and rationale

Records must distinguish factual information from opinion or interpretation. They must be stored securely, with access restricted to authorised personnel, and managed in accordance with the Data Protection Act 2018, UK GDPR and the Hub's data protection and retention arrangements.

9. Review of records and patterns

Low-level-concern records will be reviewed periodically by the Managing Director / DSL or another appropriately authorised senior person so that patterns of inappropriate, problematic or concerning behaviour can be identified. Reviews should consider both repeated concerns about an individual and wider organisational or cultural issues.

Where a pattern is identified, the Hub will decide on an appropriate course of action. This may include supervision, training, disciplinary action, changes to practice or policy, or escalation to the LADO if the pattern moves the matter to the harm threshold. The Hub will also consider whether environmental, cultural or management factors contributed to the behaviour and whether wider action is needed.

10. Retention and employment references

Low-level-concern information will be retained for as long as it is necessary and proportionate for safeguarding, employment, legal and regulatory purposes. As a minimum good-practice benchmark, records will ordinarily be retained at least until the individual leaves the Hub, after which retention will be reviewed in line with the Hub's retention schedule and any continuing safeguarding, employment or legal need.

Low-level concerns will not normally be included in employment references where they relate exclusively to safeguarding and have not met the harm threshold. They may be relevant to a reference where they concern matters that would ordinarily be included, such as substantiated misconduct or poor performance. A substantiated safeguarding concern, including a pattern of low-level concerns that has escalated to meet the harm threshold, will be handled in accordance with applicable safer-recruitment and reference requirements. False, unfounded, unsubstantiated or malicious concerns will not be presented as substantiated safeguarding concerns.

11. Whistleblowing and concerns about safeguarding practice

If a member of staff feels unable to raise a concern internally, believes it has not been dealt with appropriately, or is concerned about the safeguarding practice of the organisation, they should use the Hub's Whistleblowing Policy and may seek advice from appropriate external safeguarding bodies. Nothing in this policy prevents a person from contacting the police, LADO, children's social care or another relevant authority where necessary to protect a child.

12. Training and implementation

All relevant staff will be made aware of this policy, the Staff Code of Conduct and the distinction between low-level concerns and allegations that may meet the harm threshold. Induction and safeguarding updates should reinforce professional boundaries, the importance of early reporting, self-referral and the requirement to keep safeguarding information confidential.

13. Related guidance and documents

[Keeping Children Safe in Education 2026 – Department for Education](#)

Working Together to Safeguard Children 2026 – Department for Education
Information sharing to safeguard children and young people – Department for Education
ExpertEase Learning Hub Safeguarding and Child Protection Policy
ExpertEase Learning Hub Staff Code of Conduct
ExpertEase Learning Hub Whistleblowing Policy
ExpertEase Learning Hub Data Protection / Records Retention arrangements

Appendix 1 – Low-Level Concern Record

CONFIDENTIAL ONCE COMPLETED

Use this form to record any concern, however small, that an adult working for or on behalf of ExpertEase Learning Hub may have acted inconsistently with expected professional standards but the matter does not appear, at first sight, to meet the harm threshold. If there is immediate risk or the harm threshold may be met, follow the safeguarding/allegations procedure without delay.

Person raising concern	
Role	
Date and time concern raised	
Method of reporting (in person/email/phone/etc.)	
Adult the concern relates to	
Adult's role	
Date/time/location of incident or conduct	

Details of concern

Record the facts, context, relevant words/actions, who was present and how the concern came to light. Separate fact from opinion.

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Immediate safeguarding action taken

Include any action taken to protect a child or secure evidence.

Account / response of adult concerned

Complete where the adult has been spoken to. If not, record the reason.

Witnesses / other information considered

List names, documents, messages, records or other relevant information.

Advice sought

Record any advice from LADO, HR, legal adviser, DSL, police, children's social care or another body.

Decision and categorisation

State whether the matter is low-level, may meet the harm threshold, requires another process, or needs further enquiries.

Action taken / follow-up

Include training, supervision, management instruction, disciplinary action, policy change, referral or no further action.

Rationale for decision

Explain briefly why the decision and action are proportionate to the information available.

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Record completion

Completed by	
Role	
Signature / electronic confirmation	
Date	

Approved by	Jade Gill
Signature	
Date of Issue	01/09/2026
Review due (date)	01/09/2027