



Safeguarding – Low Level Concerns Policy 2025-2026

Introduction

This policy is written in line with Keeping Children Safe in Education (KCSIE) 2025 and Working Together to Safeguard Children 2023.

Aims of this policy

This policy is written to support staff and the DSL's to better understand:

- What Low Level Concerns are
- How to manage Low Level Concerns or allegations that do not meet the harm threshold
- How to share Low Level Concerns
- The procedure for sharing Low Level Concerns
- How to record Low Level concerns

What is a Low-Level Concern?

The Department of Education DfE describe this in KCSIE 2025 as:

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 Future Roots may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work,
- 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:

- taking photographs of children on their personal mobile phone,
- engaging with a child on a one-to-one basis in a secluded way
- humiliating children
- Inappropriate touch

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.

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.

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



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working in or on behalf of Future Roots from becoming the subject of potential false low-level concerns or misunderstandings.

Managing concerns or allegations that do not meet the harm threshold

As part of our organisation's approach to safeguarding, we promote an open and transparent culture in which all concerns about all adults working within the organisation are dealt with promptly and appropriately.

In doing this we aim to ensure:

- identify inappropriate, problematic or concerning behaviour early
- reduce the risk of abuse, and
- ensure that adults working in or on behalf of the organisation are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the organisation

All concerns must be reported to the DSL immediately. The DSL will need basic information to decide on how to escalate, this information will include, the names of the child/children involved, their age, a description of the allegation and any factors which could place the child at risk.

The Director (DSL) will then discuss with another member of the safeguarding team and if appropriate the Board's safeguarding lead and decide whether this can be managed as a low-level concern or will require a referral to the LADO.

Sharing low-level concerns should ensure that their low-level concerns policy contains a procedure for sharing confidentially such concerns which is clear, easy to understand and implement.

The Procedure for sharing Low Level Concerns

- A young person or member of staff has concerns about another member of staff
- The member of staff shares this with the Director (DSL) immediately
- The Director (DSL) makes a record of the concern and looks for patterns of any previous concerns regarding this member of staff
- The Director (DSL) will conduct a fact-finding investigation initially
- If disciplinary action is required, DSL to follow the Disciplinary Policy
- The Director (DSL), in consultation with the Board's safeguarding Board member, will decide if the threshold of harm has been reached
- If the threshold is met - consult with LADO and await their response before action is taken
- The Director (DSL) informs the staff member of the outcome and if required agree a plan of performance monitoring
- The Director (DSL) to consider any lessons learned from investigation and introduce training where required.



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- The Director (DSL) explains that the concern has been logged and for it to remain on the staff member's file.
- If threshold is not met, an internal investigate **may** be required under the disciplinary policy
- The Director (DSL) ensures that the concern, investigation and outcome are all recorded and stored securely and in an appropriate place
- The Director (DSL) must review this annually as a minimum to ensure they are confident of the threshold for allegations.

Recording low-level concerns

- All low-level concerns should be recorded in writing.
- The record should 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.
- Records should be reviewed so that potential patterns of inappropriate, problematic or concerning behaviour can be identified.
- Where a pattern of such behaviour is identified, Future Roots should decide on a course of action, either through its disciplinary procedures (HR) Disciplinary Policy – or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the LADO
- Consideration should also be given to whether there are wider issues within the organisation and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again.
- Future Roots retain concerns at least until the individual leaves their employment.
- This policy will be reviewed annually.

Signed: 

Name: Julie Plumley

Date: 28/12/2024

Next Review : December 2025

This policy will be reviewed annual or as and when changes to the law, processes or procedures deem



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Appendix A - Low-level Concern Reporting Form

Thank you for reporting your concerns to the safeguarding team; we are grateful to you for taking the safety and welfare of our young people seriously. Please fill in the below form, including as much detail as you can, and return it directly to the Director. Please refrain from discussing this concern with anyone other than the Director until the matter has been dealt with. We ask that you keep all details, including the name of the staff member to whom the concern pertains, confidential.

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.	



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Next steps		
What would you like to see happen in response to your concern?		
Are you willing to meet with the Director 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		
Date and time concern received		
Signature of DSL or deputy DSL		
Actions to be taken (e.g. no action, investigation, reclassification as allegation meeting the harms threshold.)		
Rationale for deciding on actions above		