

Low-Level Concerns Policy

This Provision is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

Various relevant documents were taken into consideration during the drafting of this policy including:
 Keeping Children Safe in Education September 2025

LADO

Kingsley child.protection@hants.gov.uk 01962 87636

Windsor LADO@achievingforchildren.org.uk 020 8891 7370.

Safeguarding Hub - Phone - 0300 4709100/ out of hours - 01483 517898

Single Point of Access No - 01628 683150

[MASH and LADO for all Councils \(ref to Safeguarding Policy\)](#)

Owner: DH/WCJ/KBT/6KP

Version History

Date Created	Date 1st Review Due	Date Reviewed	Version	Next Review Due
September 2021	January 2022		1	January 2022
		January 2022	2	January 2023
		January 2023	3	January 2024
		January 2024	4	January 2025
		January 2025	5	January 2026
		January 2026	6	January 2027

Introduction

The Green Room takes the statutory and moral duty to safeguard and promote the welfare of students very seriously, and understands that staff play a vital role in meeting these responsibilities. The Green Room works to ensure that we promote an open and transparent culture in which all concerns about adults working in or on behalf of the provision are dealt with promptly and appropriately. This policy applies to all staff, volunteers and visitors.

This policy aims to:

- help create a culture in which all concerns about adults are shared responsibly and with the right person and are recorded and dealt with appropriately.
- enable provisions to identify concerning, problematic or inappropriate behaviour early.
- minimise the risk of abuse occurring.
- ensure that adults working in or on behalf of the provision are clear about professional boundaries and act within these boundaries and in accordance with the ethos and values of the provision.
- help create an environment where staff are comfortable to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Definition

The term 'low level' concern does not mean that it is insignificant. It means that the behaviour towards a child or vulnerable adult does not meet the harm threshold for an allegation. 'Keeping Children Safe in Education' defines a low level concern as "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 provision 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 allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO"

Avoiding Low Level Behaviour

Behaviour defined as a 'low level concern' can exist on a spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate but is not in specific circumstances, through to that which is ultimately intended to enable abuse. Staff education and reinforcement on avoiding circumstances which may put them in a difficult situation is key to avoiding the need for dealing with these types of concerns. Our provision ensures that staff are clear about what appropriate behaviour is through their induction and regularly reinforcement of documents such as:

- Staff Code of Conduct and Employee Handbook
- Safeguarding and Child Protection Policy
- Appendix A 'Avoiding Allegations - Do's and Don't of Working with Children and Young People'

Reporting a Low Level Concern

Low level concerns about a member of staff, volunteer or visitor should be reported to the DSL and/or Head of Provision. If the concern is about the Head of Provision this should be reported to the Chair of Trustees. Low level concerns about supply staff, contractors and local authority visiting staff will also be reported to their employers.

Dealing with a Low Level Concern

Where a concern is raised about the practice or behaviour of a member of staff, this information must be recorded and passed to the Head of Provision. The Head of Provision must then make an assessment to determine if the matter is a 'low level concern' or an 'allegation' and follow one of the following routes. Allegations that meet the harm threshold will be referred to the LADO for advice. Low level concerns that the Head feels may meet the threshold will be referred to the LADO for advice. Low level concerns that the Head feels can be dealt with internally will be dealt with via the provision's safeguarding process.

The Green Room will engage with its HR advisor where it is necessary to undertake further investigation and/or deal with the concern under relevant processes.

Recording a Low Level Concern

(Form: <https://docs.google.com/forms/d/1nqcFpqPtrZbcu4bCTQqWBrxsxBj0SLbR-KUAZSEnbj0/edit>)

All low level concerns should be formally recorded by a member of staff when they are made aware of them. This record should then be passed to the Head of Provision (or Chair of Trustees if the concern is about the Head of Provision).

The record should include details of the concern, the context in which the concern arose, the outcome of the investigation and any action taken, and the name of the individual sharing their concerns (if known) (unless the individual wishes to remain anonymous which must be respected as far as possible).

Relevant records will be retained confidentially on the personnel file. A separate record will also be kept of low level concerns to more easily identify patterns that may involve more than one member of staff. All records must be kept in line with data protection principles.

Reviewing a Low Level Concern

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the Head of Provision will decide on a course of action, which may include:

- Disciplinary investigation and/or proceedings
- Management Advice, including recommendations for training
- Referral to the LADO (where a pattern of behaviour moves from a concern to meeting the harm threshold).

The Green Room will take advice, where appropriate, from their HR advisor in respect of low level concerns. The provision will also review appropriate policies and training, or other wider cultural issues in the provision, to see whether anything needs to be done to minimise the risk of similar behaviour happening again. Relevant records will be retained confidentially on the personnel file. A separate record

will also be kept of low level concerns to more easily identify patterns that may involve more than one member of staff. All records must be kept in line with data protection principles.

Low level concerns will not be included in a reference unless they relate to issues which would normally be included in a reference (e.g. misconduct or poor performance).

A low level concern (or group or pattern of concerns) which has met the harm threshold and has therefore been referred to the LADO may be included in a reference depending on the circumstances.

This policy is approved by the CEO of The Green Room Foundation

Date: _____

CEO _____

Appendix A Avoiding Allegations - Do's and Don'ts of Working with Children and Young People

Staff and volunteers must be aware of how to conduct themselves to minimise the risk of becoming the subject of any child protection processes. This list summarises what to do and not to do. It is not exhaustive and we may wish to add to the list.

Do:

- Read and follow the provision's child protection procedures
- Report to the Headteacher/CPLO any concerns about child welfare/safety
- Report to the Headteacher any concerns about the conduct of other provision staff/volunteers/contractors Record in writing all relevant incidents
- Work in an open and transparent way
- Discuss and report any incidents of concern or that might lead to concerns being raised about your conduct towards a child
- Report to the Headteacher any incidents that suggest a student may be infatuated with you or taking an above normal interest in you
- Dress appropriately for your role
- Only use e-mail contact with students via the provision's system
- Avoid unnecessary physical contact with children Ensure you understand the rules concerning physical restraint
- Where physical contact is essential for educational or safety reasons, gain student's permission for that contact wherever possible
- Allow children to change clothes with levels of respect and privacy appropriate to their age, gender, culture and circumstances
- Use humour to diffuse difficult situations
- Avoid working in one-to-one situations with children where possible, except where this is explicitly part of your role.
- If working in a one to one situation with a child, ensure that you are within sight of another adult – e.g. by having a door open/being behind a glass partition/working in one corner of a room whilst another adult is operating elsewhere in the room.
- Ensure Senior staff are aware of when and where you are holding a 1:1.
- If you are unhappy about the venue arrangements, take this up with your Head of Provision before entering into these.
- Avoid volunteering to house children overnight
- Ensure that areas of the curriculum that may involve sexually explicit information are taught in accordance with provision policies
- Be careful about recording images of children and do this only when it is an approved educational activity Contact your professional association or trade Union if you are the subject of concerns or allegations of a child protection nature
- Fully cooperate with any investigation into child protection issues in the provision.
- Listen to students when they express concern (rumours) about staff which might appear to be just, and check facts v fiction

Don't:

- Take any action that would lead a reasonable person to question your motivation and/or intentions Misuse in any way your position of power and influence over children
- Use any confidential information about a child to intimidate, humiliate or embarrass a child
- Engage in activities out of the provision that might compromise your position within the provision
- Establish or seek to establish social contact with students outside of the provision
- Accept regular gifts from children
- Give personal gifts to children
- Communicate with students in inappropriate ways, including personal emails and mobile telephones.
- Pass your home address, phone number, e-mail address or other personal details to students/children. Make physical contact secretive
- Arrange to meet with students in closed rooms without senior staff being made aware of this in advance. Use physical punishment of any kind
- Confer special attention on one child unless this is part of an agreed provision plan or policy
- Transport students in your own vehicle without prior management approval
- Take, publish or share images of students or other children without their parents' permission.
- Access abuse images (sometimes referred to as child pornography) or other inappropriate material Abuse your position of trust with students
- Allow boundaries to be unsafe in more informal settings such as trips out, out of provision activities etc