



Policy: SG04

V.4

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Title: Low Level Concerns Policy

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1	Original	Dale Ball	Olga Bottomley	Created	15/04/2023
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Name Jake Sexton

Chief Commercial Officer & Chair of Positive Futures

Guidance on raising Low level safeguarding concerns.

1. The purpose of this guidance

The statutory framework Keeping Children Safe in Education 2023 notes the importance of creating a culture in which all concerns about adults (including allegations that do not meet the harm threshold) are shared responsibly and with the right person.

Organisations are required to have policies and processes in place to deal with any concerns (including allegations) which do not meet the harm threshold. These are referred to as 'low-level' concerns.

This guidance sets out how this requirement is adopted within PET-Xi Training Limited.



2. Who is this guidance for?

All adults (staff, students, volunteers, and honorary roles) whose work will involve contact with children and young persons under the age of 18.

The guidance will also be a useful reference document for raising low level concerns for other issues including vulnerable adults at risk and welfare concerns relating to the organisation's wider duty of care for its community.

3. Underpinning principles [Guidance for safer working practice for those working with children and young people in education settings February 2022]

The welfare of the child and adults at risk is paramount.

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Staff, leaders and governors should understand their responsibilities to safeguard and promote the welfare of children and adults at risk.

Staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.

Staff should work, and be seen to work, in an open and transparent way including self-reporting if their conduct or behaviour falls short of these guiding principles.

Staff should acknowledge that deliberately invented/malicious allegations are extremely rare and that all concerns should be reported and recorded.

Staff should discuss and/or take advice promptly from their line manager if they have acted in a way which may give rise to concern.

Staff should apply the same professional standards regardless of culture, disability, gender, language, racial origin, religious belief, and sexual orientation.

Staff should not consume or be under the influence of alcohol or any substance, including prescribed medication, which may affect their ability to care for children.

Staff should be aware that breaches of the law and other professional guidelines could result in disciplinary action being taken against them, criminal action and/or other proceedings including barring by the Disclosure & Barring Service (DBS) from working in regulated activity.

4. What are low level concerns?



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 on or on behalf of the organisation may have acted in a way that is inconsistent with our code of conduct. This could include inappropriate behaviour outside of work.

A low-level concern may not meet the 'harm threshold' for referral to the Local Authority Designated Officer (LADO). The harm threshold is an allegation that means that a person who works with children has:

- Behaved in a way that has harmed a child/adult at risk or may have harmed a child/adult at risk.
- Possibly committed a criminal offence against or related to a child/adult at risk.
- Behaved towards children/adult at risk in a way that indicates they may pose a risk of harm to children/adult at risk.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children/adult at risk.

Examples of low-level behaviour would include, but is not limited to:

- Being over friendly with children or adults at risk
- Having favourites

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- Taking photographs of a child/adults at risk on a personal mobile phone
- Engaging with a child/adult at risk on a one-to-one basis in a secluded area
- Humiliating the individual

Low level concerns may arise as a result naivety, be accidental or unintentional, be the result of misinformed action, a failure to follow procedures, a lack of training or, more rarely, deliberate abuse.

Appendix 1: Reporting Procedure and Process

5. What action should be taken?

PET-Xi has a legal duty to keep children safe and protect them from harm. The raising of low concerns is an opportunity for training and process improvement in line with the ‘near missus’ reporting applied in the broader approach to ensuring the health and safety of our community.

Individuals raising a concern do not need to determine if it meets the harm threshold, but they do have an obligation to raise any safeguarding observation as part of our proactive safeguarding culture. Safeguarding breaches can occur in any organisation and escalating low level behaviour concerns for discussion is an important element of the duty of care to our community. This reporting would include a discussion on concerns that have been brought to our attention, even if they are taking place outside of our own community.

Individuals may self-refer an issue of concern. The raising of low-level concerns is a professional dialogue in line with good practice and should provide opportunities for shared learning. It is an important step if the adult has 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.

Concerns should be submitted in writing. The person raising the concern should:

- Provide a concise record including a brief context in which the low-level concern arose.
- Include details which are chronological, and as precise and accurate as possible of any such concern and relevant incident(s)
- The record should be signed, timed, and dated.

Concerns should be submitted to the Safeguarding Team:



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PET-XI SAFEGUARDING

YOUNG PEOPLE AND VULNERABLE ADULTS

INFORMATION FOR LEARNERS AND COURSES



Vivienne Turner
**Head of
Safeguarding**



Jamie Sheerman
**Designated
Safeguarding Lead**



Arfan Shafi
**Deputy
Safeguarding Lead**



Kendall Clark
**Deputy
Safeguarding Lead**



Olivia Cooke
**Deputy
Safeguarding Lead**



Jenny Lisser-Griffin
**Deputy
Safeguarding Lead**

Safeguarding Contact Number: 024 7531 1813 Email: safeguarding@pet-xi.co.uk

The issue should be discussed with the Safeguarding Team if there is any doubt as to whether the concern should be raised or how it should be managed.

The Safeguarding Team should consider the employment status to determine what procedure or process applies.

Safeguarding leads will follow up with the individuals no matter how low level the concern may be perceived to be, to gain their account and to make appropriate records.

Low level concerns raised about suppliers or contractors will be raised with their employer so potential patterns of behaviour can be noticed.

All low-level concerns will be logged on CPOMS (safeguarding reporting software). Staff must self-report as an account is created for all current staff members.



6. Are anonymous referrals permitted?

Anonymous referrals are not encouraged as it limits the opportunity to discuss further details, if needed, as part of the follow up with the individual against whom the concern has been raised.

All concerns, named or anonymous, will be raised with the individual for comment (unless it meets the harm threshold and police advise otherwise) for consideration of appropriate action in the circumstances.

7. How will low level concerns be recorded and retained?

Concerns must be logged on CPOMS.

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Records will be kept confidential (shared only on a need-to-know basis) and will be held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Retention beyond employment will be in line with the Training Providers usual safeguarding practice.

8. Will low level concerns be noted in references?

Only safeguarding allegations that have been substantiated will be included in a reference (including low level concerns that meet the harm threshold).

9. What support and training is available to support the application of this guidance?

PET-Xi's, Safeguarding Team are responsible for bringing this guidance to the attention of their teams and supporting conversations on how this guidance might apply in their local context.

All staff must complete safeguarding and prevent training and carry out annual refreshers.

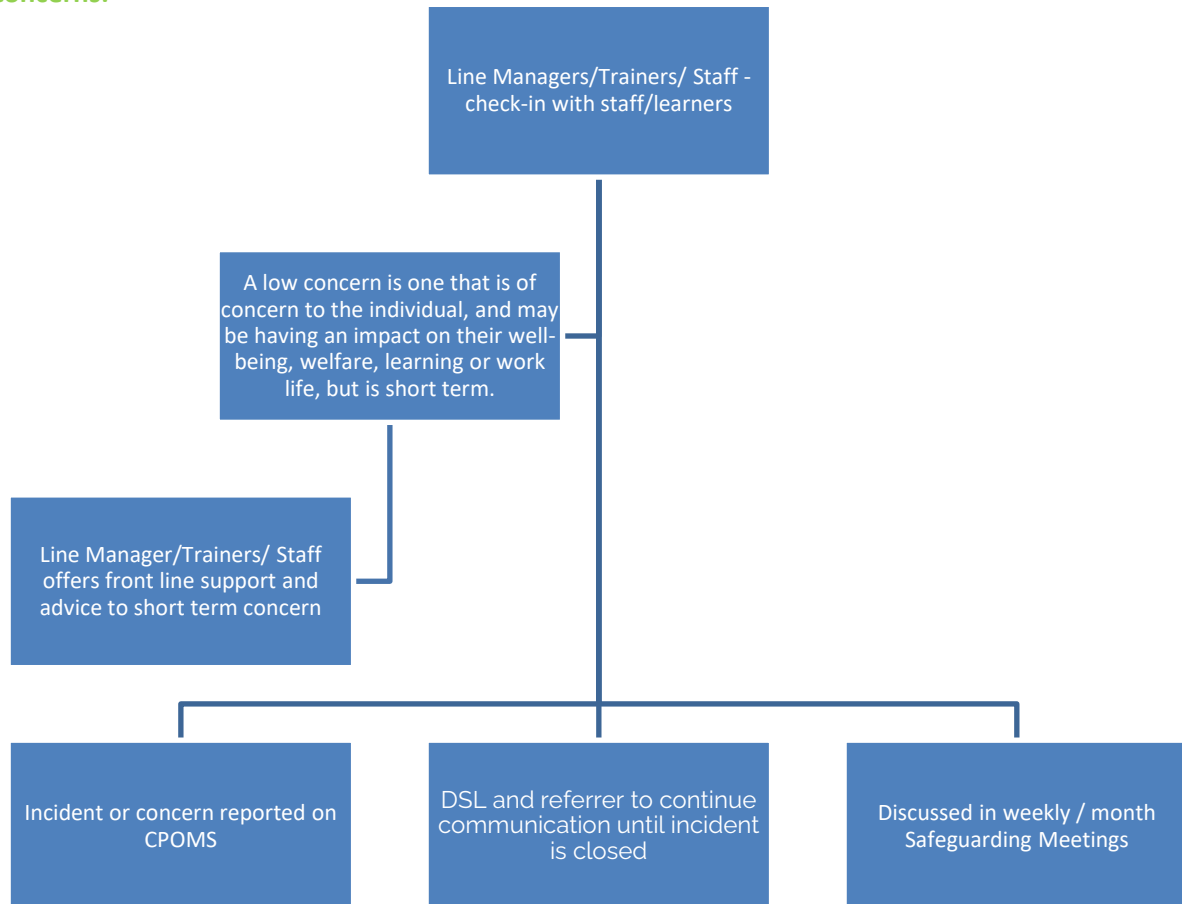
SAFEGUARDING IS EVERYONE'S RESPONSIBILITY

Supporting documents and reference material

- Code of Conduct
- Safeguarding Policy
- Prevent Policy
- Whistleblowing Policy
- E-Safety Policy
- Keeping children safe in education 2023
- NSPCC [What to do if you suspect child abuse | NSPCC](#)
- Guidance safer working practice [Professional and Personnel Relationships](#)
- Farrer & Co [Farrer & Co Low Level Concern Guidance](#)

Appendix 1:

Low Level Concerns:



Low Level – Requires reporting to DSL as an when occur.

A low concern is one that is of concern to the individual, and may be having an impact on their well-being, welfare, learning or work life, but is short term. This may be a reactive response an immediate worry, a short-term worry or welfare concern.



- Low level concerns should be documented for all learners and staff,
- Incident or concern must be reported by **Line Manager and Trainers**
- Requires a planned follow up Trainer/Line Manager within 1-2 weeks.
- Requires check-ins with the individual until closed.
- May require signposting, information, advice, and guidance.
- All staff should be able to signpost an individual to a support network.
- All staff can ask advice of Head of Safeguarding / DSL or DDSL

Should a learner become either an early leaver or be withdrawn the Head of safeguarding should be notified.

Low Risk

Disengagement, increased absence, missing sessions, lack of communication, mental health concerns, anxiety, feeling low, changes in behaviour, disinterest, issues with work environment.

(examples but not exhaustive)

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Appendix 2: Peer on Peer Abuse

Policy on Addressing Low-Level Concerns: Within the scope of this policy, a ‘low-level concern’ is characterised as any observed behaviour by an adult towards or relating to a child that falls below the threshold of harm or does not warrant immediate referral upon its initial report. Such concerns pertain to staff conduct towards students that deviates from accepted safeguarding guidelines. Given the prevalence of peer-on-peer abuse as a significant form of maltreatment among UK children, PET-Xi emphasises the importance of staff recognition and reporting of peer-on-peer abuse as a safeguarding issue.

Comprehending Peer-on-Peer Abuse: Peer-on-peer abuse encompasses a range of abusive behaviours among children, including physical, sexual, emotional, financial abuse, and coercive control within both intimate and non-intimate child relationships. Manifestations of peer-on-peer abuse include severe bullying (cyberbullying included), relationship abuse, domestic violence, child sexual exploitation, youth violence, harmful sexual behaviour, and gender-based violence. These forms of abuse often co-occur with broader safeguarding issues and are seldom isolated incidents.

Children’s experiences with abuse and violence are typically interconnected with other aspects of their lives and environments. Responses to peer-on-peer abuse must therefore account for the full spectrum of potential abuse types and the broader context of the child’s life. Recognizing where a child’s behaviour lies on the spectrum of abuse is crucial for appropriate intervention.

The inherent power dynamics in children’s relationships are critical in identifying and addressing peer-on-peer abuse. Power imbalances may not necessarily stem from age differences but could be influenced by social or economic disparities. It is essential to report all low-level concerns to construct a comprehensive understanding of the child’s experiences, which will inform the necessary support measures.

Indicators of Potential Peer-on-Peer Abuse: Signs of peer-on-peer abuse may overlap with indicators of other abuse types and can include:

- Absenteeism from school, disengagement, or underperformance in academic tasks.
- Physical injuries.
- Mental health or emotional well-being challenges.
- Withdrawal, shyness, somatic symptoms, anxiety, panic attacks, sleep disturbances, or nightmares.
- Noticeable behavioural shifts, including substance misuse.
- Inappropriate changes in appearance or behaviour for the child’s age.
- Aggressive behaviour towards others.

It is important to note that these signs are not exhaustive, and their presence does not conclusively indicate abuse. Children’s behaviours are influenced by their unique circumstances. Staff should be vigilant of concerning behaviours, consider their potential implications, and encourage open communication with children about the reasons behind their actions.