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Title: Low Level Concerns Policy		

Version	Action	Author	Verifier	Comments	Date
1	Original	Dale Ball	Olga Bottomley	Created	15/04/2023
				Date of Next Review	15/04/2024

Signature of Person Responsible



Dale Ball
Head of HR and Designated Safeguarding Lead

Guidance on raising Low level safeguarding concerns

1. The purpose of this guidance

The statutory framework Keeping Children Safe in Education 2022 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 is paramount.

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

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.

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

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

- Being over friendly with children
- Having favourites
- Taking photographs of a child on a personal mobile phone
- Engaging with a child on a one-to-one basis in a secluded area

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- Humiliating the individual

[Keeping Children Safe in Education 2022]

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.

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



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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 referrals should be noted on the relevant local safeguarding log.

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.

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

All low-level concerns should be recorded in writing.

Pending the implementation of a case management system, concerns will be stored securely by the Safeguarding Team.

Concerns can be logged on the C4C Concern Forms found on our website.

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
- Statutory Guidance [Keeping Children Safe in Education 2022](#)
- NSPCC [What to do if you suspect child abuse | NSPCC](#)

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- Guidance safer working practice [Professional and Personnel Relationships](#)
- Farrer & Co [Farrer & Co Low Level Concern Guidance](#)

Appendix:

Low Level Concerns:
Low Level – monthly reporting, requires an action plan of support by direct reported, feedback and guidance given by DSL, requires a review update
submission
via Moodle to log concern

- Disengagement
- Increased absences
- Missing booked sessions, lack of communication; not responding to emails or calls
- Mental health concerns: anxiety, feeling low, emotionally flat, changes in behaviour
 - Limited productivity/ disinterest
 - Issues within the work environment



Medium Level/ Escalation of low – level concerns
Medium – Requires immediate reporting to DSL, will require an action plan of support with DSL and any other stakeholders, requires review dates

Complete Safeguarding Reporting Form

- Financial Strain having an impact on wellbeing
 - Unable to maintain household bills
 - Unable to provide food for the home
 - Issues/concerns around childcare
 - Unhealthy stress levels
- Depression/anxiety without assistance (Meds, Alternative therapy)

Contextualised Safeguarding

- Family dynamics – within the home
- Social groups/community – the influence they may have on the learner

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- Faith based groups - radicalisation, extreme beliefs, views and ideologies

- Online safety: vulnerable learners, accessing chat rooms, grooming, child sexual exploitation, cyber bullying, gambling, radicalisation

Dependant upon when these concerns are raised this may need to be reported as high-level safeguarding

High Level Safeguarding:

High Risk – Requires immediate action, reporting and intervention with the DSL, possible external reporting in an emergency, requires review dates

Contact DSL

Complete Safeguarding Report Form

- Radicalisation/Hate Speech/Racism
- Self harm
- Immediate harm to self and others
- Domestic violence/abuse
- Sexual Harassment in/out of the work environment
- Violence/Crime
- Substance misuse