



**Low Level Concerns
Policy**

Reviewed Date:	Reviewed By:	List of changes	Next Review
March 2026	Luke Collins	<ul style="list-style-type: none"> Separated to allegations from staff grievance policy for better clarity 	March 2027

Contents

1. PURPOSE	4
2. SCOPE	4
3. KEY CONTACTS AND RESPONSIBILITIES	4
4. DEFINITIONS: HARM-THRESHOLD ALLEGATIONS AND LOW-LEVEL CONCERNS	5
4.1 Concerns or allegations that may meet the harm threshold	5
4.2 Low-level concerns	5
5. REPORTING ROUTES	6
6. INITIAL RESPONSE TO A HARM-THRESHOLD ALLEGATION	6
7. DERBYSHIRE LADO ARRANGEMENTS	6
8. MANAGING LOW-LEVEL CONCERNS	7
9. INVESTIGATION AND FACT-FINDING	7
10. SUSPENSION AND INTERIM SAFEGUARDS	7
11. SUPPORT AND CONFIDENTIALITY	8
12. OUTCOMES OF ALLEGATIONS	8
13. RESIGNATIONS, SETTLEMENT AGREEMENTS AND COMPROMISE AGREEMENTS	8
14. DBS, TRA AND OTHER REFERRALS	8
15. RECORD KEEPING AND RETENTION	9
16. LEARNING LESSONS	9
17. TRAINING AND PUBLICATION	9
18. APPENDIX A: QUICK REPORTING FLOWCHART	10
20. APPENDIX B: GUIDANCE AND LEGISLATION CONSIDERED	10

1. Purpose

This policy sets out how New Direction School manages safeguarding concerns and allegations about adults working in or on behalf of the school. It replaces the safeguarding allegations content previously included in the Staff Allegations and Grievance Procedures Policy and should be read alongside the Child Protection and Safeguarding Policy and Staff Code of Conduct.

The policy is designed to ensure that concerns are identified, reported, recorded and responded to promptly, proportionately and in line with statutory guidance, local safeguarding procedures and the Independent School Standards.

2. Scope

This policy applies to all adults who work in or on behalf of New Direction School, whether paid or unpaid, including:

- employees and senior leaders;
- supply staff and agency workers;
- volunteers, visitors and contractors;
- Directors and the Proprietor;
- staff working within the equine provision or off-site activities where they are acting on behalf of the school.

Concerns about pupils are managed through the Child Protection and Safeguarding Policy. Employment grievances raised by staff about their own employment are managed through the separate Staff Grievance Policy, unless the concern is safeguarding-related.

3. Key contacts and responsibilities

Role	Named person / contact	Main responsibility under this policy
Proprietor	Yvonne Evans	Strategic oversight; case manager where appropriate; ensures statutory duties are met.
Directors	Luke Collins and Hannah Oliver	Governance/leadership oversight and support where a senior leader or Proprietor is conflicted.
Head of Education	Luke Collins	Day-to-day case manager for allegations unless conflicted or subject of the allegation.
Designated Safeguarding Lead	Luke Collins	Safeguarding advice, CPOMS recording oversight, liaison with children's social care where required.
Deputy DSLs	Hannah Oliver, Emily Smith and Nikki Morris	Receive and escalate concerns where the DSL is unavailable or conflicted.

Data Protection Officer	Luke Collins	Advice on confidentiality, data protection, retention and information sharing.
School telephone	01246 810456	Main contact number for urgent communication.
Local Authority Designated Officer (LADO)	Derbyshire LADO via Derby and Derbyshire Safeguarding Children Partnership procedures	Provides advice and oversight where allegations may meet the harm threshold.

Immediate safeguarding principle
 Any adult who has a concern that a child may be at risk of harm must act immediately. Staff must not wait to gather evidence, investigate informally, or discuss the matter widely before reporting. Where there is immediate risk of harm, the police and/or children's social care should be contacted without delay.

4. Definitions: harm-threshold allegations and low-level concerns

4.1 Concerns or allegations that may meet the harm threshold

A concern or allegation may meet the harm threshold where a person working in or on behalf of the school 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, including behaviour outside school that raises transferable risk.

These matters must be managed under this allegations procedure and not as ordinary grievances.

4.2 Low-level concerns

A low-level concern is any concern, no matter how small, that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside work, but which does not appear to meet the harm threshold. The term low-level does not mean that the concern is insignificant; it means that the behaviour does not appear, on the information available, to meet the threshold for referral as an allegation.

Examples may include, but are not limited to:

- being over-friendly with pupils or showing favouritism;
- having inappropriate one-to-one contact or contact outside agreed channels;
- using inappropriate language, humour or tone with pupils;
- taking or sharing images without proper authorisation;
- breaching professional boundaries in person, online, by phone or by messaging;
- using restraint, physical intervention or touch in a way that causes concern but does not appear to meet the harm threshold;
- failing to follow agreed safeguarding, behaviour, online safety or supervision procedures.

5. Reporting routes

All staff must report concerns promptly. The route depends on who the concern is about.

Concern about	Report to
Any member of staff, supply staff, volunteer, contractor or visitor	Head of Education / DSL, or a Deputy DSL if the DSL is unavailable.
The Proprietor	A Director who is not implicated and the LADO. Staff may also contact the LADO directly where internal reporting is not appropriate.
A Director, The DSL / Head of Education	The Proprietor and the LADO, unless the Proprietor is implicated, in which case report directly to the LADO.
All senior leaders/proprietor/directors are implicated or internal reporting is unsafe	Report directly to the LADO, children's social care, police in an emergency, or use the Whistleblowing Policy.

Reports should be made verbally without delay and followed up in writing as soon as possible. CPOMS should be used to record safeguarding concerns in line with the school's recording procedures, with access restricted to those who need to know.

6. Initial response to a harm-threshold allegation

1. The person receiving the concern must ensure the child is safe and that any immediate medical, safeguarding or emergency response is taken.
2. The matter must be reported to the case manager without delay. The usual case manager is the Head of Education, unless they are the subject of the allegation or conflicted.
3. The case manager must not investigate the allegation before consulting the LADO, other than establishing basic facts necessary to make an informed referral or obtain advice.
4. Where the allegation may meet the harm threshold, the case manager must contact the LADO in line with Derbyshire procedures and follow the agreed course of action.
5. Where a crime may have been committed, the police must be involved through LADO/children's social care arrangements or immediately where there is urgent risk.
6. Parents/carers should normally be informed as soon as possible where a child is involved, unless doing so may place the child at risk, prejudice an investigation, or conflict with advice from the LADO, police or children's social care.

7. Derbyshire LADO arrangements

New Direction School is based in Derbyshire and will follow Derby and Derbyshire Safeguarding Children Partnership procedures for allegations against adults who work with children. Where the LADO threshold is met or may be met, the school will seek LADO advice and complete the required referral route. At the date of this policy, Derbyshire procedures identify the secure LADO referral email as professional.allegations@derbyshire.gov.uk. The school will check the most current local procedure before making a referral.

8. Managing low-level concerns

Low-level concerns must be shared promptly with the Head of Education/DSL or a Deputy DSL. Staff are encouraged to self-refer where they believe their own behaviour may have fallen below the expected standard. Self-referral will be treated as a positive safeguarding act, although it does not prevent the school taking appropriate action where required.

The Head of Education/DSL will:

- speak to the person raising the concern and, where appropriate, the adult concerned;
- decide whether the concern is consistent with the Staff Code of Conduct, is a low-level concern, or may meet the harm threshold;
- consult the LADO where there is any doubt about the threshold;
- record the concern securely, including the rationale for decisions and any action taken;
- review records for patterns or repeated concerns and escalate where necessary;
- provide guidance, training, supervision, management advice or disciplinary action as appropriate.

Low-level concerns about supply staff and contractors will be shared with their employer or agency, and the school will agree who will take responsibility for any investigation or action. Where the concern may meet the harm threshold, LADO advice will be sought.

9. Investigation and fact-finding

Investigations will be proportionate and led by the appropriate process agreed with the LADO, police, children's social care, the Proprietor or Directors. The school will avoid actions that may compromise criminal, safeguarding or employment investigations. Where an internal investigation is appropriate, an investigating officer with sufficient independence and seniority will be appointed.

The investigating officer may gather written statements, interview relevant people, review CPOMS, Arbor, email, CCTV, phone logs, visitor records, supervision records, incident reports or other relevant information. The person subject to the allegation will be given a fair opportunity to respond, subject to safeguarding, LADO or police advice.

10. Suspension and interim safeguards

Suspension is not automatic and will not be used as a default response. The school will consider whether the children can be protected and the investigation preserved through alternative safeguards. Decisions will be recorded and reviewed regularly.

Possible interim measures include:

- adjusted duties or temporary redeployment;
- increased supervision or no lone working;
- temporary removal from specific pupils, groups or activities;
- restricted access to systems, records or school sites where proportionate;
- working from home where suitable;
- suspension where there is cause to suspect a child is at risk, the allegation is so serious that dismissal may be a possible outcome, or suspension is necessary to allow a fair investigation.

11. Support and confidentiality

The school will provide appropriate support for the child, the child's parents/carers, the person who raised the concern, witnesses and the person subject to the allegation. Support may include safeguarding support, welfare check-ins, signposting to union or professional support, and agreed communication arrangements.

Confidentiality must be maintained. Information will only be shared with those who need to know in order to safeguard children, manage employment duties, meet statutory requirements or comply with LADO/police/children's social care advice. Staff must not discuss allegations with colleagues, parents, pupils or external parties unless authorised.

12. Outcomes of allegations

At the conclusion of the process, the outcome will be recorded using recognised safeguarding categories:

Outcome	Meaning
Substantiated	There is sufficient evidence to prove the allegation.
Malicious	There is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm.
False	There is sufficient evidence to disprove the allegation.
Unsubstantiated	There is insufficient evidence to prove or disprove the allegation. This does not imply guilt or innocence.
Unfounded	There is no evidence or proper basis which supports the allegation being made.

Where an allegation is substantiated, the school will consider disciplinary action, referral to the DBS, referral to the Teaching Regulation Agency where the person is a teacher, referral to any relevant professional body, and whether any safeguarding or safer recruitment lessons must be learned.

13. Resignations, settlement agreements and compromise agreements

The school will not cease safeguarding action solely because a person resigns, refuses to cooperate, is dismissed, leaves agency employment or enters into a settlement agreement. Settlement agreements must not prevent the school from making referrals to the DBS, TRA, LADO, police, children's social care or any other statutory body where required.

14. DBS, TRA and other referrals

Where the school removes an individual from regulated activity, or would have done so had the person not resigned, retired, been redeployed, been dismissed or otherwise left, because they have harmed a child or pose a risk of harm to children, the school will make a referral to the Disclosure and Barring Service where the legal criteria are met.

Where the person is a teacher and the facts may amount to serious professional misconduct, the school will consider whether a referral to the Teaching Regulation Agency is required. The school will also consider

referrals to agencies, contractors, professional bodies, local authorities or placing authorities where appropriate.

15. Record keeping and retention

Records must be clear, accurate, timed, dated and securely retained. They should include the concern or allegation, action taken, decisions made, advice received, rationale, outcome and any follow-up action.

- Harm-threshold allegations will be retained on the person's confidential personnel file in line with KCSIE retention expectations and data protection law.
- Low-level concern records will be kept confidentially and reviewed so that patterns of behaviour can be identified. Where repeated low-level concerns indicate a safeguarding risk, the matter will be escalated and LADO advice sought.
- Records will be processed in line with UK GDPR, the Data Protection Act 2018, the school's privacy notices and retention schedule.

16. Learning lessons

At the end of a case, the Proprietor, Directors, Head of Education and DSL will consider whether there are lessons for safeguarding practice, supervision, safer recruitment, staff induction, training, the Staff Code of Conduct, online safety, behaviour management, low-level concerns, record keeping or site security. Actions will be recorded and monitored.

17. Training and publication

All staff will be made aware of this policy, the Staff Code of Conduct, the Whistleblowing Policy and the Child Protection and Safeguarding Policy at induction and through regular safeguarding updates. Staff must understand how to raise concerns about adults, including low-level concerns and concerns about senior leaders or the Proprietor.

18. Appendix A: Quick reporting flowchart

1. Concern arises about an adult working in or on behalf of the school.
2. Is a child at immediate risk? If yes, take emergency action and contact police/children's social care as required.
3. Report to the correct person using the table in section 5.
4. Case manager considers whether it may meet the harm threshold.
5. If yes or unsure, consult LADO and follow agreed actions.
6. If no, manage as a low-level concern, record securely, review for patterns and escalate if needed.
7. At conclusion, record outcome, referrals, support and lessons learned.

20. Appendix B: Guidance and legislation considered

- Keeping Children Safe in Education 2025, especially Part Four.
- Working Together to Safeguard Children 2026.
- Independent School Standards and Department for Education Independent School Standards Guidance, April 2026.
- Education Act 2002, sections 157/175 safeguarding duties as applicable.
- Safeguarding Vulnerable Groups Act 2006 and DBS referral duties.
- Teaching Regulation Agency teacher misconduct referral arrangements.
- UK GDPR and Data Protection Act 2018.
- Derby and Derbyshire Safeguarding Children Partnership procedures, including LADO procedures.