

Low-Level Concerns Policy

1. Purpose

This policy sets out the procedures for managing and responding to low-level concerns about adults working in or on behalf of Step Into Learning.

The purpose of this policy is to:

- maintain a culture of openness, trust and transparency;
- ensure concerns about adults are identified and addressed at an early stage;
- safeguard children and young people;
- clarify what constitutes a low-level concern;
- ensure concerns are dealt with promptly, fairly and consistently in line with statutory guidance.

This policy should be read alongside:

- Safeguarding and Welfare Policy
- Staff Code of Conduct
- Whistleblowing Policy
- Disciplinary Procedures

This policy is based on statutory guidance contained within Keeping Children Safe in Education 2026 (KCSIE 2026), effective 1 September 2026.

2. Scope

This policy applies to:

- all teaching and non-teaching staff
- supply staff
- volunteers
- governors/trustees
- contractors
- agency workers
- trainee teachers
- any adult working on behalf of Step Into Learning

3. Definition of a Low-Level Concern

A low-level concern is any concern, no matter how small, about an adult's behaviour towards or around a child that:

- does not meet the harm threshold but;
- is inconsistent with the staff code of conduct;
- may be inappropriate, unprofessional or cause a sense of unease.

Examples may include:

- being over-friendly with learners
- inappropriate humour or comments
- favouritism
- excessive one-to-one contact
- using personal devices to communicate with pupils
- breaching professional boundaries
- shouting aggressively or using inappropriate language
- social media conduct that could undermine professional standards
- creating, sharing, or encouraging the sharing of AI-generated explicit images or deepfakes involving pupils
- using generative AI tools to interact with pupils in ways that bypass professional boundaries
- attempting to contact pupils via AI-powered chat or messaging apps outside approved channels
- sharing nudes or semi-nudes (including AI-altered images) or failing to report such sharing
- misogynistic language, sexualised comments, or behaviour undermining dignity and respect
- unregulated or excessive online contact, including on social media and messaging platforms

Low-level concerns may arise from:

- a single incident; or
- a pattern of behaviour over time.

4. Digital Communications and AI Standards

KCSIE 2026 requires clear boundaries around technology use. Staff must:

- only communicate with pupils via approved, work-managed channels
- not use personal devices, private messaging, or social media to contact pupils
- not create, share, or use AI-generated images of pupils

- not use generative AI tools to conduct one-to-one interactions with pupils
- model appropriate professional conduct online, including on personal social media accounts

5. Harm Threshold Allegations

Concerns meeting the harm threshold are not low-level concerns and must be managed in accordance with safeguarding and allegations procedures.

The harm threshold is met where an adult has:

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

Such concerns must be referred immediately to both the DSL and the Local Authority Designated Officer (LADO). Do NOT treat as a low-level concern. If the concern relates to the DSL or Executive Director, refer directly to the Chair of Trustees, who will make the LADO referral without delay.

6. Reporting Low-Level Concerns

All staff have a responsibility to report low-level concerns promptly.

Concerns should be reported to:

- the Designated Safeguarding Lead (DSL); or
- the Senior Leadership Team if appropriate
- If the concern is about the DSL or Executive Director — do NOT report to the DSL. Report directly to the Chair of Trustees. If the concern meets the harm threshold, the Chair will refer to LADO immediately.
- If the concern meets ANY harm threshold criterion above → skip low-level reporting → escalate directly to DSL + LADO immediately.

Where the concern relates to the DSL or Executive Director, it must be reported to the Chair of Trustees.

Reports should include:

- factual details of the concern
- date, time and location
- names of those involved

- any witnesses
- action already taken

Staff should never:

- assume someone else has reported the concern
- dismiss concerns as trivial
- discuss concerns widely outside appropriate safeguarding procedures

Where the concern relates to supply, agency, or contracted staff, the DSL must also inform the relevant agency or provider in line with safeguarding duties. Low-level concerns must not normally be included in references provided to agencies or future employers unless they relate to substantiated misconduct that would ordinarily be referenced. Repeated concerns that are found to be false, unfounded, or malicious must not be included in any reference.

7. Self-Reporting

Staff are encouraged to self-report where they believe:

- their behaviour may have been misinterpreted
- they may have unintentionally breached professional boundaries
- an incident could give rise to concern

Self-reporting demonstrates transparency and helps maintain a safeguarding culture.

Where concerns indicate emerging needs or risks beyond individual behaviour, the DSL will consider whether a Family Help assessment or referral to other services is required. Concerns must be escalated to LADO immediately if the harm threshold appears met or risk of harm is identified — regardless of self-report status.

8. Responding to Low-Level Concerns

The DSL will:

- review the information promptly
- determine whether the concern is low-level or meets the harm threshold
- speak with the individual involved where appropriate
- identify any patterns or recurring behaviours
- Immediate escalation to allegations procedures and LADO AT ANY STAGE if new information, patterns, or changing circumstances suggest the harm threshold may be met or a risk of harm exists.

Possible outcomes may include:

- no further action
- advice/guidance
- increased supervision
- training
- formal management processes
- escalation to allegations procedures/LADO referral if further information emerges

9. Recording Low-Level Concerns

All low-level concerns will be recorded in writing.

Records should include:

- details of the concern
- context of the incident
- action taken
- rationale for decisions
- outcomes

Records will:

- be stored securely
- be kept confidential
- be reviewed periodically to identify patterns
- not normally be included on personnel files unless substantiated or relevant to disciplinary procedures

Records will be retained in accordance with data protection and safeguarding record retention guidance.

Records must be reviewed quarterly by the DSL to identify patterns of behaviour, recurring concerns, or emerging risks across all staff groups. This review will specifically consider:

- whether concerns are increasing in frequency or severity
- whether concerns cluster around specific individuals, year groups, or activities
- whether training, supervision, or policy changes are having the intended effect
- whether patterns of concern, even individually low-level, indicate emerging risk → if yes: escalate to LADO immediately.

10. Confidentiality and Information Sharing

Information regarding low-level concerns will be shared only on a need-to-know basis.

Step Into Learning will:

- respect confidentiality where possible
- comply with data protection legislation
- balance confidentiality with safeguarding responsibilities

11. Staff Awareness and Training

All staff will:

- receive safeguarding training including low-level concerns
- understand professional boundaries
- know how to report concerns
- receive regular reminders through safeguarding updates and induction

All staff must read Part One of KCSIE 2026 in full as part of induction and annual safeguarding training. The former condensed summary (Annex A) is no longer sufficient. Staff will also receive specific training on:

- online safety risks, including AI-generated harms, deepfakes, and nudes/semi-nudes
- professional boundaries in digital communications
- recognising and reporting misogynistic, sexualised, or harassing behaviour

12. Monitoring and Review

The Board of Trustees will ensure:

- appropriate procedures are in place
- safeguarding culture is effective
- policies are reviewed annually or following changes to legislation/guidance

This policy will be reviewed annually in line with updates to KCSIE.

13. Linked Policies

- Safeguarding and Welfare Policy
- Staff Code of Conduct
- Whistleblowing Policy

- Online & Digital Safety Policy
- Safer Recruitment Policy

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