

## Low Level Concerns Policy

### 1. Introduction

This policy is an official document registered within Edsential.

The contents of this policy are mandatory.

#### 1.1 Supporting documentation

This policy refers to other Edsential documents as detailed below:

- Edsential Safeguarding Policy
- Edsential Code of Conduct

#### 1.2 Definitions

For clarity, the following terms are in the body of this document

- DSL - Designated Safeguarding Lead –the person appointed to take lead responsibility for child protection issues in the organisation
- LADO – Local Authority Designated Officer

### 2. Supporting legislation / regulations

This policy has been created with consideration of the following legislation / regulations:

- Keeping Children Safe in Education
- Working Together 2023

### 3. Policy scope and objectives

The Low Level concerns policy enables staff to share any concerns, no matter how small, about their own or another member of staff's behaviour that may have an effect on children's or adults safety or their welfare.

The purpose of the policy is to reflect and embed a culture of openness, trust and transparency which we discuss about in safeguarding training and we live the values and expectations as laid out in our Code of Conduct.

### 4. Roles and responsibilities

The Managing Director is responsible for:

- Ensuring that the company complies with its duties under child protection and safeguarding legislation.

- Ensuring that policies, procedures and training opportunities with regard to reporting safeguarding concerns are compliant and effective.
- Guaranteeing that there is an effective Staff Code of Conduct that outlines behavioural expectations.
- Ensuring that a suitably trained DSL has been appointed, alongside deputy DSLs where appropriate.
- Ensuring that there are robust reporting arrangements.
- Ensuring that there are appropriate procedures in place to handle allegations and low-level concerns reported against members of staff.
- Implementing this policy, and all related policies, throughout the company, and ensuring that staff adhere to it at all times.

The DSL is responsible for:

- Being a point of contact for all staff when they have safeguarding concerns, whether serious or low-level.
- Assessing whether safeguarding concerns about staff members meet the threshold for being termed an allegation, or whether they are low-level concerns.
- Liaising with staff members, the senior HR Lead, the Managing Director and all relevant agencies to act upon concerns, where necessary.
- Keeping detailed, accurate records.
- Ensuring that all staff have an ongoing awareness of low-level concerns and reporting procedures.
- Implementing this policy, and all related policies, throughout the company, and ensuring that staff adhere to it at all times.

Service Leads are responsible for:

- Being a point of contact for all staff when they have safeguarding concerns, whether serious or low-level.
- Raising concerns with the DSL, Head of HR or the Managing Director
- Ensuring that all staff have undertaken safeguarding training.
- Ensuring that all staff have an ongoing awareness of low-level concerns and reporting procedures.

HR are responsible for:

- Ensuring that all staff have undertaken safeguarding training.
- Ensuring that all staff have signed the code of conduct
- Ensuring that safer recruitment procedures are in place

Staff are responsible for:

- Adhering to all the relevant policies and procedures, including acting within the Staff Code of Conduct at all times.
- Interacting with children and young people in a way that is respectful and appropriate for their level of authority and has due regard to the power imbalance between children, young people and adults.
- Understanding the importance of reporting low-level safeguarding concerns.
- Reporting any and all safeguarding concerns they may have about children, young people and adults immediately.
- Reporting any and all safeguarding concerns they may have about the behaviour of a member of staff immediately.

## 5. Who Should You Share Low Level Concerns With

It is critical all low-level concerns are ultimately received by the Designated Safeguarding Lead in order any patterns of inappropriate, problematic or concerning behaviour are identified.

In the first instance you can contact your Safeguarding Lead for your service area or directly contact the Designated Safeguarding Lead, as laid out in the safeguarding policy. Any concerns must be shared as soon as reasonably practicable and definitely within 24 hours of you becoming aware of a concern, although it is never too late to report a concern. Remember that no concern is too small. Safeguarding is everybody's responsibility.

If the Designated Safeguarding Lead is absent and the deputy is unavailable then the Senior HR Manager followed by the Managing Director should be contacted. This can be done by contacting Rossmore on 0151 541 2170 or [hello@edsential.co.uk](mailto:hello@edsential.co.uk) and asking to speak or be contacted by the said manager.

If the member of staff reporting the concern wishes to remain anonymous then wherever practicable we will respect this. However, it is important that when the report is made contact details of the reporting member of staff are recorded in order that we are able to seek further clarification should we need to do so.

Occasionally a member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Staff, wherever possible, should proactively self-report and

be transparent.

Self-reporting in these circumstances can be positive for a number of reasons:

- it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity;
- it demonstrates an awareness of the expected standards of behaviour and self-awareness as to the individual's own actions or how they might be perceived
- it is a crucial element in maintaining a culture of vigilance and where everyone aspires to the highest standards and the protection of children

## 6. How Concerns Can be Shared

Concerns may be shared verbally or in writing to the leaders identified above. A record will be made on Prime and transferred to the Low Level Concerns Reporting Form by the DSL or a designated member of the senior Leadership Team. Any records should have the name of the individual concerned, and the name of the member of staff making the report.

## 7. How are Concerns Handled and Responded To

Once the Designated Safeguarding Lead has received a concern a judgement will be made as to whether to escalate the concern or follow this low level concerns policy. Actions may typically include:

- speaking to the person who raised the concern.
- speaking to any potential witnesses
- speaking to the individual to whom the concern has been raised.
- review the information gathered to determine:
  - the behaviour is in fact appropriate;
  - the behaviour constitutes a low level concern;
- if there is any doubt as to whether the information that has been shared about a member of staff may meet the harm threshold in which case LADO will be consulted.
- In and of itself the behaviour meets the harm threshold, in which case will be immediately referred to LADO;
- When considered with any other low-level concerns that have been previously been shared about the same individual the behaviour may meet the harm threshold and will be referred

to LADO.

As part of the safeguarding record:

- All internal conversations will be recorded
- All external conversations will be recorded
- Their determination will be recorded, along with the rationale for the decision
- Any action taken will be recorded

In all instances, if you raise a concern you should expect to be contacted by the Designated Safeguarding Lead, a member of the Safeguarding Team or a Senior Manager. The outcome will not necessarily be shared with you but it should be confirmed your concern has been noted.

## Low Level Concerns Policy

### Approvals

	Name	Role	Date
Author	Mark Aspden	DSL	7 <sup>th</sup> August 2023
Checked			
Approved			

### Revision History

Rev	Date	Summary of Changes	Reviewed by
V3	14th August 2024	Dates of documents updated	Mark Aspden
V4	14 <sup>th</sup> January 2026	Dates of documents updated	Mark Aspden

Next review date

July 2027

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