

PLYMOUTH COLLEGE
LOW-LEVEL CONCERN POLICY

This policy is for all adults at Plymouth College including volunteers, supply teachers and contractors.



Last reviewed:	August 2025
Next review date:	August 2026
Responsibility:	Assistant Head - Pupil Welfare (Designated Safeguarding Lead)

This policy is available on the school website and on request from the School. It should be read in conjunction with the

- Safeguarding & Child Protection Policy
- Staff & Volunteer Code of Conduct

This document also complies with:

- DfE Keeping Children Safe in Education (September 2025)

Policy Statement

‘Low-level concerns’ are allegations/concerns that do not meet the harm threshold (see Part 4 - Section 2 of KCSIE 2024).

Concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

The School promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the School (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. If implemented correctly, this should maintain the open and transparent culture; enable the Schools to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the School are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

What is a low-level concern?

The term ‘low-level’ concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harm threshold. 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 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 of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on a mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or
- using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Key aims:

- to ensure that staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others;
- to empower staff to share any low-level safeguarding concerns;
- to address any unprofessional behaviour and supporting the individual to correct it at an early stage;
- to provide a responsive, sensitive and proportionate handling of such concerns when they are raised;
- to help identify any weakness in the School's safeguarding system.

How to report and share low-level concerns

- Staff must share **low-level concerns** responsibly and with the DSL (or with the Chair of the Schools' Management Board* if the concern is about the Head).
- They will then be recorded in writing and dealt with appropriately.
- Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Self-Disclosure

Plymouth College aims to create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have 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.

Recording low-level concerns

All low-level concerns will be recorded in writing directly to the DSL. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

These records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the School will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harm threshold, in which case it should be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the

School that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.

Plymouth College will retain this information at least until the individual leaves our employment.

References

Plymouth College only provides substantiated safeguarding allegations in references. Low level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

Responding to low-level concerns

If the concern has been raised via a third party, the Head / Chair of Schools' Management Board* will collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

The Head should be the ultimate decision maker in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns, the Head may wish to consult with the Designated Safeguarding Lead and take a more collaborative decision-making approach.

The information collected will help the Head to categorise the type of behaviour and determine what further action may need to be taken. All of this needs to be recorded along with the rationale for their decisions and action taken.

Staff can use the low-level concern form to report incidents or concerns, or they can email the DSL (Beth Field) or the Head (Peter Watts) directly. Anyone raising a concern or allegation is protected by the School's whistleblowing policy.

*Plymouth College is part of the Galaxy Global Education Group. The College is managed by the Schools Management Board of the Galaxy Global Education Group (*which is responsible for Group Governance and Local Advisory Board Liaison, Co-ordinating Learning Initiatives & Setting Group KPIs, Regulatory Compliance, Safeguarding Oversight & Student Voice*). The Local Advisory Board (LAB) is an advisory sub-committee of the Galaxy Global Education Group Schools Management Board, providing local insight, support, and challenge to the school's leadership in regards to educational standards and school improvement, safeguarding and welfare, community and stakeholder engagement, compliance and reporting. The Chair of the LAB is appointed by the Chair of the Schools Management Board and the LAB is composed of 3-4 local members appointed by the Chair of the Schools Management Board (with whom formal governance authority rests) and approved by the Board of Directors of the Galaxy Global Education Group.

Form for recording Low-Level concerns

Please use this form to share any concern – no matter how small, and even if no more than a ‘nagging doubt’ – that an adult may have acted in a manner which:
 is not consistent with the Plymouth College Code of Conduct, and/or relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult’s suitability to work with children.

Name of responsible adult you are reporting to:	DSL / Head / Chair of Schools’ Management Board* / Other (give reason why other)		
Name of Adult that you have a concern about:			
Date and time of incident:			
Factual account of the incident or concern: Who? What? Where? When? Be concise Be accurate Give context Be chronological			
Name and signature of person completing this form:	Name:	Date:	
	Signature:	Time:	
<i>The section below is to be completed by the person to whom you have reported the LLC to.</i>			
Received by:			
Date & Time of receipt:			
What action has been taken?			
Signature:	Time & Date:		

This record will be held securely in accordance with Plymouth College Low-level Concerns Policy. Please note that low-level concerns will be treated in confidence as far as possible, but Plymouth College may in certain circumstances be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.