LOW LEVEL SAFEGUARDING CONCERNS POLICY

Speak up early, recognise patterns and preserve independent decisions

EFFECTIVE: SEPTEMBER 2026 | REVIEW: SEPTEMBER 2027 | IMPACT AP

1 | DEFINITION AND SCOPE

A low-level concern is a worry about adult conduct that may breach the Staff Code of Conduct but does not appear to meet the harm threshold. Low level does not mean insignificant. Applies to staff, governors, volunteers, contractors and providers, including relevant outside conduct. If harm or unsuitability may be involved, use Managing Allegations and seek LADO advice.

2 | EXAMPLES AND CONTEXT

Examples include inappropriate familiarity, favouritism, private messaging, unauthorised photographs, secluded one-to-one contact or humiliating comments. These examples do not determine the outcome without context. Repetition, grooming patterns or new information can raise the concern to the harm threshold. Staff must not privately agree that something is too small to record.

3 | PROMPT ORDINARY REPORTING

Report promptly to Kate Willis when she is unconflicted. Kirsty Lampkin can receive an immediate confidential report and passes it to Kate promptly. Record facts, dates, words and context, avoiding speculation. Do not discuss reports in staff group chats, confront the adult informally or wait for a pattern before sharing a concern.

4 | INDEPENDENT REPORTING ROUTE

Concerns about Kate or an adult with whom she has a personal or family conflict go to Fiona Styler, Chair: +44 7951 423421. If conflicted or unavailable, contact Jennifer Maunsell: +44 7860 529351, if independent. Kate must not triage, access or close her own case. Seek LADO advice directly if risk or threshold is uncertain and internal contact would delay action.

5 | SELF-REPORTING AND ANONYMOUS REPORTS

Encourage adults to report their own boundary errors or circumstances that might be misunderstood.
Self-reporting supports openness but does not remove accountability. Take anonymous information seriously and assess available facts. Protect the reporter's identity as far as possible, explaining that absolute confidentiality cannot be guaranteed where fair process or protection requires disclosure.

6 | INITIAL REVIEW AND THRESHOLD

An unconflicted lead checks immediate safety, alleged conduct, context, previous concerns and whether agency advice is needed. Seek LADO advice before enquiries that might compromise a safeguarding investigation. For genuinely low-level matters, gather proportionate information separately from the reporter, adult and relevant witnesses and allow a fair response. Record what is known, disputed and unresolved.

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7 | ACTIONS AND SUPPORT

Actions may include clarification, coaching, supervision, training, changed arrangements or a formal conduct response where appropriate. Record reasons, the responsible person, deadline and review date. Support affected learners and the adult fairly and prohibit retaliation. A repeated concern or emerging risk must be escalated rather than continually treated as a coaching matter.

8 | RESTRICTED RECORDS

Keep concerns in a controlled adult-conduct record with dates, source, factual account, conflict check, threshold rationale, actions and outcome. Cross-reference necessary child-protection records without exposing the adult file. Records involving Kate must be under independent control outside accounts she can administer. Retain low-level records at least until the adult leaves, then apply the lawful documented retention schedule.

9 | PATTERNS, EMPLOYERS AND REFERENCES

Review each new concern against previous records and conduct a termly pattern review. Inform the relevant employer or agency where needed to identify cross-setting concerns. References must follow applicable KCSIE and employment rules; do not routinely disclose low-level concerns or include excluded allegation categories. Obtain appropriate advice if substantiated misconduct may properly belong in a reference.

10 | ESCALATION AND ASSURANCE

Tameside LADO: 0161 342 4343, option 3; referrals to ladoreferrals@tameside.gov.uk. Where the harm threshold may be met, notify within one working day; immediate danger requires 999. Governance checks reporting routes, independent access controls and completion of actions using proportionate anonymised assurance. Genuine reporting must not result in disadvantage to the reporter or learner.

11 | POLICY CONTROL AND REVIEW

Policy owner: Kate Willis, Principal and Proprietor. Effective date: September 2026. Scheduled review: September 2027, or sooner after relevant changes, incidents or feedback. Record actual governance approval and implementation decisions and brief staff on their duties. These policy dates do not assert that approval, staff training or operational checks have already occurred. Use the Complaints or independent reporting route for concerns about implementation.

12 | SOURCES AND RELATED DOCUMENTS

Existing Impact staff-allegations and low-level-concerns procedures; KCSIE 2026 Part Four; Tameside LADO.

gov.uk/government/publications/keeping-children-safe-in-education--2; tamesidescp.org.uk

Check current versions and apply according to Impact's legal and commissioning status.