



Little Acorns Forest Schools Ltd

Low-Level Concerns Policy (Safeguarding Policy Add-On)

This policy is based on concerns that do not meet the harm threshold set out in Keeping Children Safe in Education (KCSIE) 2025.

This applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in KCSIE 25.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the Forest School
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of Low-Level Concerns

The term 'Low-Level' concern is any concern – no matter how small – that an adult working in or on behalf of the Forest School may have acted in a way that:

- Is inconsistent with the staff Code of Conduct, including inappropriate conduct outside of work.
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the Designated Officer at the Local Authority.

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

- Being overly friendly with children.
- Having favourites.
- Taking photographs of children on their mobile phone other than for professional use.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- Using inappropriate sexualised, intimidating or offensive language.

Sharing Low-Level Concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring 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.
- Have clear Policies and Procedures.
- Empowering staff to share any low-level concerns.
- Empowering staff to self-refer.
- Addressing unprofessional behaviour and supporting the individual to correct this behaviour at an early stage.
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised.
- Helping to identify any weakness in the Little Acorns Forest Schools Ltd safeguarding system.

Reporting a Low Level Concern

- Low level concerns about a member of staff should be reported to the DSL (Dan Halford).
- If the concern is about the DSL, this should be reported to the Lead Practitioner and Deputy DSL (Kate Morison).
- Low level concerns about supply staff, contractors and local authority visiting staff will also be reported to their employers.

Staff should use the company's Low-Level Concerns Reporting Form.

Responding to Low Level Concerns

If the concern is raised via a third party, the DSL will collect evidence where necessary by speaking:

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

The DSL will use the information collected to categorise the type of behaviour and determine any further action, in line with the staff Code of Conduct.

- Allegations that meet the harm threshold will be referred to the LADO for advice.
- Low level concerns that the company may need further guidance on, will be referred to the LADO for advice.
- Low level concerns that the company feels they can deal with internally will be dealt with via the company's usual child protection investigation process.

Record Keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR.
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold, we will refer it to the designated officer at the Local Authority
- Retained at least until the individual leaves employment at the company. Where a low-level concern relates to a supply staff or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

Reviewing a Low Level Concern

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 DSL will decide on a course of action, which may include:

- Disciplinary investigation and/or proceedings.
- Management Advice, including recommendations for training.
- Referral to the LADO (where a pattern of behaviour moves from a concern to meeting the harm threshold).

If the concern relates to volunteers, or any other concerns arise, Little Acorns Forest School Ltd can contact the LADO for further advice.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the Local Authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.

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