



The Stables Independent School

Low-Level Concerns Policy

**This policy was written and approved by the Proprietors in Autumn term 2025.
It will be reviewed annually and approved by the Proprietors.**

1. Policy Statement

At The Stables Independent School, we are committed to promoting an open, transparent, and safe culture for pupils and staff. We recognise that staff in an SEMH setting regularly undertake duties which may include personal care, lone working, the use of Restrictive Physical Interventions (RPIs), and managing challenging behaviour. These duties must be conducted to the highest professional standards to safeguard pupils and protect staff.

This policy sets out how the school addresses **low-level concerns** about adults working with or on behalf of the school, distinguishing them clearly from allegations that meet the harm threshold and require referral to the Local Authority Designated Officer (LADO).

2. Scope

This policy applies to:

- All staff, including supply, agency staff, and contractors.
- Volunteers and governors.
- Any adult working on behalf of the school.

It should be read alongside the school's **Safeguarding & Child Protection Policy**, **Code of Conduct**, and relevant HR policies.



3. Definitions

3.1 Low-Level Concern

A low-level concern is any concern, no matter how small, 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;
- Does not meet the harm threshold for referral to the LADO; but
- Creates a sense of unease, “nagging doubt,” or is a departure from the expected professional behaviour.

Examples may include (but are not limited to):

- Overly familiar behaviour with pupils.
- Inappropriate use of language or tone.
- Situations where personal care was not managed in line with policy.
- Failing to follow lone working or RPI procedures.
- Comments made to or about pupils that could be misinterpreted.
- Behaviour that, on reflection, the staff member themselves recognises as unprofessional and therefore self-refers.

3.2 Allegations That Meet the Harm Threshold

Allegations that must be referred to the LADO include when it is alleged that a person who works with children has:

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

4. Purpose of Recording Low-Level Concerns

- To ensure all concerns are addressed promptly and appropriately.
- To maintain professional standards and prevent small issues from escalating.



- To protect children and staff by building a culture of openness and reflection.
- To identify potential patterns of behaviour that may require further action.

5. Reporting Low-Level Concerns

5.1 Staff Responsibilities

- All staff have a duty to report any low-level concern.
- Staff may self-refer if they believe their own behaviour may have been unprofessional or open to misinterpretation.
- Concerns should be reported to the **Headteacher/Designated Safeguarding Lead (DSL)** in writing, using the school's Low-Level Concern reporting form.

5.2 Leadership Responsibilities

- The Headteacher/DSL will review and record all low-level concerns.
- Concerns will be logged securely and confidentially.
- Where appropriate, advice will be sought from the **Local Authority Education Duty Desk (01603 307797)**.
- Patterns of concerns will be monitored, and repeated low-level issues may result in disciplinary action or referral to the LADO.

6. Distinguishing Low-Level Concerns from LADO Referrals

- **Low-Level Concerns:** Do not meet the harm threshold. Recorded internally, with support and corrective action provided where necessary.
- **LADO Referrals:** Where harm, risk of harm, or suitability concerns are identified. Consultation will always take place with the Education Duty Desk or LADO before downgrading an allegation to a low-level concern.

Important: Allegations raised by a child, parent, or staff member that indicate harm will never be treated as “low-level” without consultation.

7. Managing Low-Level Concerns

When a low-level concern is reported:



1. The Headteacher/DSL will acknowledge receipt and meet with the staff member (if appropriate).
2. A proportionate response will be agreed, such as:
 - a. Reflective conversation and professional advice.
 - b. Re-training or refresher on procedures (e.g., RPI, lone working, personal care).
 - c. Recording of advice and support given.
3. Where repeated low-level concerns emerge, patterns will be reviewed to determine if further action (disciplinary or referral to LADO) is required.

8. Recording and Confidentiality

- Records will be kept confidential, held securely, and only accessed by the Headteacher/DSL.
- The record will include:
 - Date and nature of concern.
 - Who raised it.
 - Actions taken.
 - Outcome.
- Records will be reviewed regularly to monitor patterns.
- Low-level concerns will not be routinely referenced in employment references unless they relate to issues of misconduct or poor performance. Where concerns have been substantiated and meet the LADO threshold, they must be included in references.

9. Training and Awareness

- All staff will receive training on the importance of reporting and recording low-level concerns.
- The policy will be reviewed annually and updated in line with statutory safeguarding guidance.

10. Policy Review

This policy will be reviewed every 12 months or sooner if there are changes to statutory guidance or local procedures.



The Stables Independent School

Low-Level Concern Reporting Form

This form is to be used for reporting and recording any low-level concerns about adults working in or on behalf of the school. It should be completed promptly and passed directly to the Headteacher/Designated Safeguarding Lead (DSL).

1. Details of Person Raising Concern

- Name: _____
- Role: _____
- Date of Concern: ____ / ____ / _____
- Time (if applicable): _____

2. Person Concern Relates To

- Name: _____
- Role: _____

3. Description of Concern

(Please provide factual detail — what was observed, said, or done. Avoid assumptions or interpretations.)



4. Context of Concern

(Where and when did this occur? Were others present? Was this during personal care, lone working, RPI, or another school activity?)

5. Self-Referral

This is a **self-referral** — I am raising a concern about my own behaviour.

6. Immediate Action Taken (if any)

7. Reported To

- Name of Headteacher/DSL: _____
- Date Reported: ____ / ____ / _____
- Time: _____

8. DSL/Headteacher Use Only

- Concern logged on low-level concerns record: Yes No



- Initial action/response:

- Consultation with Education Duty Desk (01603 307797): Yes No
- Consultation with LADO: Yes No
- Outcome/next steps:

- Signature of Headteacher/DSL: _____ Date: ____ / ____
/ _____

 **Confidentiality Notice:**

This form will be stored securely and confidentially by the Headteacher/DSL. Records will be reviewed to identify patterns. Low-level concerns will not be included in references unless they relate to misconduct, poor performance, or meet the threshold for LADO referral.



The Stables Independent School

LOW LEVEL CONCERN

