



Low-Level Concerns Policy

Approved by:	Lauren Meston	Date: 01/09/2019
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Last reviewed on:	16/08/2026
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Next review due by:	15/08/2027
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Introduction:

Future Pathways is committed to an open, transparent and safeguarding-focused culture in which all concerns about adults working in or on behalf of the provision are shared, recorded and responded to promptly and appropriately. The purpose is to identify inappropriate, problematic or concerning behaviour early, reinforce professional boundaries, minimise the risk of abuse and protect both young people and adults from avoidable harm or misunderstanding.

The term “low-level concern” does not mean that a concern is insignificant. It means that the behaviour does not appear to meet the harm threshold for referral under the allegations-management procedures. A concern may be small, may amount only to a sense of unease or a “nagging doubt”, or may relate to conduct outside work. Staff must not decide that a concern is too minor to report.

This policy replaces the previous process that linked low-level concerns to the general child Cause for Concern form and weekly RAG review. A low-level concern is specifically a concern about the behaviour of an adult working in or on behalf of Future Pathways. Concerns about a child’s welfare must continue to be recorded and reported through the safeguarding/child protection process.

Purpose and aims:

- create a culture in which staff feel safe and confident to raise concerns about adult behaviour, including concerns about their own conduct
- ensure all concerns about adults are considered promptly rather than waiting for a weekly review
- distinguish clearly between a low-level concern, an allegation that may meet the harm threshold, a complaint, a conduct/performance matter and a safeguarding concern about a child
- ensure concerns are recorded accurately, confidentially and securely
- identify patterns of inappropriate or concerning behaviour at an early stage
- ensure the Local Authority Designated Officer (LADO) is consulted whenever there is doubt about whether the harm threshold may be met
- ensure concerns about supply staff, trainee teachers, volunteers, contractors and partner-provider staff are shared with the relevant employer or organisation
- support proportionate, fair and timely management action, including guidance, training, supervision, disciplinary action or safeguarding referral where appropriate
- promote consistent professional boundaries across Future Pathways, including practical, vocational, community-based and off-site activities

Scope:

This policy applies to all adults working in or on behalf of Future Pathways, whether paid or unpaid, permanent or temporary. This includes employees, directors, agency and supply staff, tutors, instructors, trainee teachers, volunteers, contractors, consultants, visiting professionals, transport staff where engaged by the provision, and staff of partner organisations when working with Future Pathways young people.

It applies to behaviour on site, during off-site or community-based activity, on educational visits, during transport or work-related learning, online, through social media or messaging, and to relevant conduct outside work where that conduct may indicate a safeguarding risk, a breach of professional boundaries or unsuitability to work with children.

Legal and guidance framework:

This policy has been reviewed with regard to current national and local safeguarding guidance, including:

- Keeping Children Safe in Education 2026, particularly Part four: safeguarding concerns or allegations made about staff, including supply teachers, trainee teachers, volunteers and contractors (effective from 1 September 2026)
- Keeping Children Safe in Education 2025, which remains in force until 31 August 2026
- Working Together to Safeguard Children 2026, including the arrangements for allegations against people in positions of trust
- City of Doncaster Council / Doncaster Safeguarding Children Partnership procedures for allegations against adults working with children and the Local Authority Designated Officer (LADO)
- Education Act 2002, where applicable, and the Education (Independent School Standards) Regulations 2014 where applicable
- Children Act 1989 and Children Act 2004
- Equality Act 2010
- Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025
- Future Pathways Safeguarding and Child Protection Policy, Staff Code of Conduct, Whistleblowing Policy and disciplinary procedures

Key definitions:

Low-level concern

A low-level concern is any concern, no matter how small and even if it is no more than a sense of unease or a “nagging doubt”, that an adult working in or on behalf of Future Pathways may have acted in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside work, but which does not appear to meet the harm threshold or otherwise require immediate referral to the LADO under the allegations procedure.

Harm threshold / allegation

A concern may meet the harm threshold where it is alleged that an adult 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, including relevant transferable risk arising outside work

Where any of these criteria may be met, the matter must not be managed only as a low-level concern. The Managing Director, or the appropriate person dealing with a concern about the Managing Director, will follow the allegations procedure and seek LADO advice without delay. Where there is doubt, the LADO will be consulted.

Concern about a child

A low-level concern is about an adult’s behaviour. If the concern is about the safety or welfare of a young person, staff must use the Future Pathways child safeguarding reporting process and inform the DSL or DDSL immediately. Where the same incident raises both an adult-conduct concern and a child-protection concern, both aspects must be recorded and managed under the appropriate procedures.

Examples of low-level concerns:

Examples may include, but are not limited to:

- being over-friendly with young people or creating relationships that blur professional boundaries
- showing favouritism or treating a young person in a way that could reasonably be perceived as favouritism

- using personal phones, social media, private messaging or personal accounts to communicate with young people contrary to policy
- taking photographs or recordings of young people on a personal device contrary to policy
- meeting or communicating with a young person outside agreed professional arrangements without a clear, authorised reason
- being alone with a young person in a secluded area or behind a closed or locked door where this is unnecessary or contrary to expected practice
- unnecessary physical contact or touch that falls outside agreed practice but does not appear to meet the harm threshold
- using humiliating, intimidating, sexualised, discriminatory, degrading, overly familiar or inappropriate language
- sharing inappropriate personal information with a young person or encouraging inappropriate emotional dependency
- failing to maintain appropriate boundaries during practical, vocational, sporting, transport, community or off-site activities
- conduct outside work, including online conduct, that causes concern about judgement, professional boundaries or suitability to work with children
- a situation in which an adult recognises that their own behaviour could have been misinterpreted or may have fallen below the expected professional standard

Context matters. A behaviour that appears concerning may have a reasonable explanation in the circumstances. Equally, an apparently minor incident may be significant when considered alongside previous concerns. Staff should report the facts and allow the appropriate senior person to assess the concern.

Professional expectations and self-referral:

Future Pathways expects all adults to maintain professional boundaries and follow the Staff Code of Conduct at all times. Staff are encouraged to self-refer where they find themselves in a situation that could be misinterpreted, appears compromising, or where on reflection they believe their behaviour may have fallen below expected standards.

A timely self-referral will be treated as evidence of openness and professional reflection, although it does not prevent appropriate action being taken. Staff should not attempt to conceal, minimise or privately resolve a boundary concern.

How to report a low-level concern:

Low-level concerns must be shared as soon as reasonably possible and should normally be reported on the same working day. Staff must not wait for a weekly meeting or for several concerns to accumulate.

1. Make the immediate situation safe. If a young person may be at risk of harm, follow the Safeguarding and Child Protection Policy and seek urgent assistance as required.
2. Report the concern to Lauren Meston, Managing Director and DSL, as soon as possible. Concerns may also be reported to Beckie Broadhead or Pete Meston, DDSLs, who must ensure the concern reaches Lauren promptly unless the concern is about Lauren.
3. Complete the Low-Level Concern Record in Appendix 2, recording facts, context, dates/times, people present and any immediate action. Do not investigate, interview children or colleagues, or seek to prove or disprove the concern yourself.
4. If the concern may meet the harm threshold, say so clearly and ensure it is treated as an allegation rather than waiting for the low-level process.

5. If you cannot report internally, believe the concern has not been dealt with properly, or reasonably believe senior leaders may be implicated, follow the Whistleblowing Policy and/or seek advice from the LADO or another appropriate safeguarding authority.

Existing safeguarding contact details recorded by Future Pathways are: Lauren Meston (DSL) - lauren@futurepathwaysscic.com; Beckie Broadhead (DDSL) - beckie@futurepathwaysscic.com; Pete Meston (DDSL). These contact details should be checked whenever this policy is reviewed.

Concerns about Lauren Meston or another senior decision-maker:

A concern about Lauren Meston must not be assessed or closed by Lauren herself. It must be reported directly to another director/proprietor or the person with governance responsibility for safeguarding and allegations. That person will act as case manager and seek advice from the Doncaster LADO where the harm threshold may be met or where there is uncertainty.

If a staff member is unsure who should receive a concern about the Managing Director, or believes there is a conflict of interest, they should use the Whistleblowing Policy and may contact the LADO directly for advice. No person should be disadvantaged for raising a genuine safeguarding concern in good faith.

Initial assessment and decision-making:

Lauren Meston, as Managing Director, is the ultimate organisational decision-maker for low-level concerns unless she is the subject of the concern or has another conflict of interest. Where appropriate she may consult the DSL/DDSL team, HR advice, the commissioning school or the LADO, but information will be shared only on a need-to-know basis.

The concern will be considered promptly to decide whether it is best categorised as:

- a low-level concern requiring a proportionate management response
- an allegation that meets or may meet the harm threshold and therefore requires LADO/allegations management procedures
- a safeguarding concern about a child that requires action under the child protection process
- a conduct, performance, capability, grievance or complaint matter that should be managed under another procedure
- a concern that is unfounded or based on a misunderstanding, while still considering whether any learning or clarification is required

If there is any doubt about whether the harm threshold is met, the Doncaster LADO will be consulted. Immediate child-protection action, police contact or emergency action must not be delayed while the category is being decided.

Responding to a reported low-level concern:

Where a concern is raised by a third party, the Managing Director or nominated case manager should establish sufficient information to understand what happened. This may include speaking to the person who raised the concern, the adult concerned and relevant witnesses. Any contact with a child must be carefully considered so that safeguarding evidence is not compromised and the child is not unnecessarily questioned.

The adult who is the subject of the concern should normally be informed and given an opportunity to respond, unless doing so would place a child at risk, prejudice a LADO/police/social-care process, or there is another safeguarding reason not to do so at that stage.

The decision, action taken and rationale must be recorded in writing. Responses will be fair, proportionate and focused on safeguarding. They may include clarification of expectations, advice, reflective supervision, additional training, increased oversight, changes to working arrangements, a management instruction, disciplinary action, referral to another procedure, or no further action where appropriate.

LADO and allegations that may meet the harm threshold:

The City of Doncaster Council Local Authority Designated Officer (LADO) service manages and oversees allegations and concerns about adults who work with children. Future Pathways will follow the current Doncaster allegations-management procedure. The Doncaster LADO contacts are Milovan Orlandich and Tony Dobbs. They can be contacted at LADO@doncaster.gov.uk or on 01302 737332. Where an allegation may meet the harm threshold, or where there is uncertainty about whether it does, LADO advice must be sought without delay.

If an allegation may meet the harm threshold, the case manager will contact the LADO without delay and, in accordance with local and national procedures, normally within one working day. Future Pathways will not carry out a substantive internal investigation before taking LADO advice where this could compromise a statutory or police investigation.

Where a child is in immediate danger or at immediate risk of significant harm, emergency safeguarding action takes priority. Police should be contacted on 999 where required. The LADO can then be informed once immediate safety action has been taken.

Supply staff, trainee teachers, contractors, volunteers and partner providers:

Concerns about adults who are not directly employed by Future Pathways must still be acted on. Future Pathways will not simply pass a concern to the employer and take no further action.

Low-level concerns about supply staff, trainee teachers, contractors or staff of partner providers will be shared with their employer, agency, training provider or relevant organisation so that any wider pattern can be identified. Where the harm threshold may be met, Future Pathways will follow the LADO/allegations process and will work with the third-party employer to agree responsibilities for investigation, safeguarding and communication.

Future Pathways will retain its own record of the concern and actions taken where it is appropriate and lawful to do so.

Recording requirements:

Every low-level concern must be recorded in writing. The record should include:

- the name and role of the adult who is the subject of the concern
- the date, time and location of the behaviour or incident, where known
- a factual description of the concern and the context in which it arose
- the name of the person raising the concern, unless anonymity is requested and can reasonably be respected
- any young people or witnesses involved or present, recorded only where necessary
- immediate action taken
- whether the harm threshold was considered and whether LADO advice was sought
- evidence or information considered
- the category/outcome of the concern
- action taken, decisions made and the rationale for those decisions
- any follow-up, supervision, training or review required and the date completed

Records will be clear, factual and objective. Staff should distinguish direct observation, information reported by someone else and professional opinion. Exact words should be recorded where they are significant.

Confidentiality, data protection and storage:

Low-level concern records are confidential safeguarding/employment records. Access will be restricted to those who need the information to fulfil safeguarding, management, HR or legal

responsibilities. Records will be stored securely and handled in accordance with applicable data-protection legislation and the Future Pathways retention schedule.

The identity of a person raising a concern will be protected as far as reasonably possible. Absolute confidentiality cannot be guaranteed where information must be shared to safeguard a child, provide a fair process, comply with law or obtain LADO/police/social-care advice.

Anonymous concerns will be considered. However, staff are encouraged to identify themselves because this can make it easier to clarify facts and respond fairly. A request for anonymity must not lead to a genuine concern being ignored.

Reviewing patterns and wider safeguarding culture:

Low-level concerns will not be considered only as isolated events. The Managing Director or nominated safeguarding lead will review the low-level concern record regularly and whenever a new concern is received to identify patterns involving the same adult, location, activity, team, type of boundary issue or organisational practice.

A pattern of behaviour may move the matter from a low-level concern to the harm threshold. Where this occurs, the LADO will be consulted and the allegations procedure followed. A pattern may also justify disciplinary or capability action even if individual incidents did not meet the harm threshold.

Reviews will also consider whether the concern reveals a wider organisational issue, for example unclear lone-working arrangements, weak supervision, inappropriate use of personal devices, poor physical layout, inconsistent boundaries in off-site provision, or a need for additional training. Policies, risk assessments, staffing arrangements or training will be amended where required.

Retention and employment references:

In line with KCSIE, low-level concern records should be retained at least until the individual leaves their employment or engagement with Future Pathways. Future Pathways may retain information for longer where there is a lawful and proportionate reason under its safeguarding, HR and data-retention arrangements.

Low-level concerns should not be included in employment references unless they relate to matters that would normally be included in a reference, such as substantiated misconduct or poor performance. Where a group or pattern of concerns has developed into a substantiated safeguarding allegation meeting the harm threshold, the relevant KCSIE rules for safeguarding references will be followed.

False, unfounded or malicious concerns:

A concern that is not substantiated is not automatically malicious. Staff must not discourage reporting because a concern may later prove to have an innocent explanation. The purpose of the policy is to make it safe to share genuine concerns and allow appropriate assessment.

Where there is evidence that a concern was deliberately fabricated or malicious, Future Pathways may consider action under the relevant behaviour, disciplinary or complaints procedure. Any such decision must be evidence-based and must not undermine the protection of staff, young people or others who raise concerns in good faith.

Whistleblowing and escalation:

Staff should use the Future Pathways Whistleblowing Policy where they believe safeguarding practice is unsafe, a concern is being suppressed or mishandled, they cannot raise the matter through the normal route, or they reasonably believe senior management is implicated.

Staff may seek advice from the Doncaster LADO where the concern relates to an adult working with children and may contact other appropriate safeguarding or regulatory bodies where necessary.

Staff must never be required to report a concern only to a person who is themselves the subject of that concern.

Training, induction and safer culture:

All staff will be made aware of this policy, the Staff Code of Conduct, allegations procedures and whistleblowing arrangements during induction and through safeguarding updates. Training will reinforce that low-level concerns include behaviour that causes unease even when no harm has been proven, and that reporting concerns is a safeguarding responsibility rather than an accusation of guilt.

Managers will model appropriate professional boundaries and respond to concerns in a way that encourages openness, fairness and learning. Staff who raise genuine concerns or self-refer should be treated respectfully and supported through the process.

Monitoring and review:

This policy will be reviewed at least annually and sooner following a significant low-level concern, a harm-threshold allegation, LADO advice, changes to KCSIE or local procedures, an identified pattern of concerning behaviour, or learning from safeguarding audit or inspection.

The review will consider whether concerns are being reported promptly, whether staff understand the distinction between child safeguarding and adult-conduct concerns, whether patterns are being identified, whether decisions and rationales are recorded, and whether training or organisational changes are required.

Related Future Pathways policies and documents:

- Safeguarding and Child Protection Policy
- Staff Code of Conduct / Staff Behaviour Policy
- Whistleblowing Policy
- Safer Recruitment Policy and procedures
- Disciplinary and Capability procedures
- Complaints Policy
- Online Safety / Acceptable Use Policy
- Mobile Phone and Personal Device procedures
- Educational Visits and Off-Site Activity procedures
- Data Protection and Records Retention policies

Appendix 1 - Staff quick decision guide:

If you are worried about the behaviour of an adult working with children:

1. Make the child or young person safe. If there is immediate danger, call 999 and follow safeguarding procedures.
2. Do not investigate the concern yourself. Record what you saw, heard or were told as accurately as possible.
3. Report it promptly to Lauren Meston, Managing Director and DSL, or to a DDSL. Do not wait for a weekly review.
4. If the concern is about Lauren Meston, report it to another director/proprietor with safeguarding governance responsibility. If necessary, seek LADO advice directly.
5. Ask: could the adult have harmed/may have harmed a child, committed a criminal offence involving a child, posed a risk of harm, or behaved in a way indicating they may be unsuitable to work with children? If yes or unsure, the harm-threshold/LADO route must be considered.
6. If it does not appear to meet the harm threshold but is inconsistent with the Staff Code of Conduct or causes a sense of unease, record it as a low-level concern.

7. Continue to report any further concerns. Repetition and patterns can change the level of risk.

Appendix 2 - Low-Level Concern Record:

This form is for concerns about the behaviour of an adult working in or on behalf of Future Pathways. It is not the ordinary child Cause for Concern form. Complete it as soon as possible and pass it through the reporting route in this policy.

Person raising concern:	Role:
Date/time reported:	Contact details (if needed):
Adult subject of concern:	Adult role / employer / agency:
Date/time of incident or behaviour:	Location / activity:

Factual details of concern and context:

Young person(s) / witness(es) involved, if relevant:

Immediate action taken:

Management assessment and outcome:

Does the concern potentially meet the harm threshold?	Yes / No / Unsure
LADO consulted?	Yes / No Date/time:
Child safeguarding action also required?	Yes / No
Third-party employer/agency informed?	Yes / No / N/A
Concern category/outcome:	Low-level / Harm threshold / Conduct or performance / Complaint / Unfounded or misunderstanding / Other
Action required:	
Review/follow-up date:	
Decision-maker:	

Decision, rationale and actions taken:

Signature of decision-maker:	Date:
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Appendix 3 - Key external safeguarding contact:

City of Doncaster Council Local Authority Designated Officer (LADO):

Milovan Orlandich

Tony Dobbs

Email: LADO@doncaster.gov.uk

Telephone: 01302 737332

The LADO service deals with allegations and concerns about adults who work with children and should be consulted where the harm threshold may be met or where there is uncertainty.

For an immediate risk of significant harm or emergency, contact the police on 999 and follow the Future Pathways Safeguarding and Child Protection Policy.

Approval:

Signed: *L. Meston*

Lauren Meston - Managing Director and Designated Safeguarding Lead, Future Pathways

Date: 18/08/2026

Next review due: 15/08/2027