

## **Procedures for when concerns or allegations do not meet the harm test.**

### **Low Level concerns.**

The College will continue to promote an open and transparent culture in which all concerns about all adults working in or on behalf of the College (including peripatetic teachers, casual workers, volunteers, referred to henceforth as staff) are dealt with promptly and appropriately.

All staff will be made aware of the College's Code of Conduct, Child Protection and Safeguarding policies which will provide guidance as to expected levels of conduct whilst working in the College. Safeguarding training will be given to ensure staff are aware of the channels and mechanisms for reporting any concern.

### **What is a low – level concern?**

A low-level concern does not mean it is insignificant. A low-level concern is any concern, no matter how small, and even if no more than a sense of unease or a 'nagging doubt' that a member of staff 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 harm threshold or is otherwise not 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 and young adults (CYA)
- Having favourites
- Taking photographs of CYA
- Humiliating CYA

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.

The College will ensure that staff are

- clear about what appropriate behaviour is
- confident in distinguishing expected and appropriate behaviour from inappropriate, problematic or concerning behaviour, in themselves and others
- encouraged to share any low-level safeguarding concerns (see below)
- given support to address and correct unprofessional behaviour at an early stage
- assured that the College will handle and respond to such concerns sensitively and proportionately when they are raised,
- asked to help identify any weakness in the College's safeguarding system

### **Reporting of concerns**

The College has established procedures for reporting any concerns and staff should follow these procedures and report any concerns to the relevant senior manager (DSL/Senior Tutor/HOD/Senior Manager HR and Administration). Low level concerns regarding a non-staff member should be notified to their employer/recognised professional body.

If appropriate, the DSL should consult with LADO to determine whether the reported low-level concern in fact meets the harm test.

If concerns raised are deemed to be low-level then the incident/ issues may be dealt with using the relevant College policy or procedure. (For example, the Disciplinary Procedure, Prevention from Bullying and Harassment Policy or Capability Procedures).

### **Responding to concerns reported**

The College will

- Acknowledge the raising of the concern
- speak directly to the person who raised the concern and
- to the individual involved and any witnesses

Further investigations, if deemed appropriate, may be conducted in line with the procedures outlined in the College's Disciplinary Procedure.

### **Recording of concerns**

All low-level concerns will be recorded in writing. This will include

- The details of the concern
- The context in which the concern arose
- The action taken.

The name of the individual reporting the incident is also normally recorded. However, if the individual wishes to remain anonymous, then this will be respected as far as is reasonably possible.

Data will be held confidentially and in line with UK General Data Protection Regulations. Records will be held in line with College data retention policies regarding employee files.

Approved by Governing Body	
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