



HIDELOW GRANGE SCHOOL

Safeguarding Policy Suite

Managing Low Level Concerns Policy

Approved by:	Tom Clarke, Executive Headteacher & DSL
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Reviewed by (CareTech):	Laura Dickie, Jo Dunn, Lindsey Appleby-Flynn

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Representative, Proprietor- Cambian Group
September 2026

Tom Clarke
Executive Headteacher
September 2026

Key contacts

LADO (Herefordshire)	Carol Ifill 01432 261739 LADO@herefordshire.gov.uk
Herefordshire MASH	01432 260800 (office hours) 01432 383340 (out of hours) mash@herefordshire.gov.uk
West Mercia Police	999 (emergency) / 101 (non-emergency)
Proprietor Representative	Andrew Sutherland andrew.sutherland@caretech-uk.com
Safeguarding Director (Branas)	Kate Jones 01490 413782 kate.jones@branas.co.uk

Introduction

This policy is written in line with Keeping Children Safe in Education (KCSiE) 2026 and Working Together to Safeguard Children 2023. It applies to Hidelow Grange School, an independent SEMH day school in Acton Beauchamp, Herefordshire, educating pupils aged 7–16 with social, emotional and mental health needs.

The school also provides education to individuals over the age of 18 years. With that in mind, this policy has been written in line with the Care Act 2014, Education Act 2002 and the Mental Capacity Act 2005. Those over the age of 18 are referred to as Students.

This policy must be read alongside the following wider policies:

- The Role of the DSL Policy
- Child Protection and Safeguarding Policy
- Child on Child Abuse Policy
- Filtering and Monitoring Policy
- Missing from Education Policy
- Absent from Education Policy
- Schools Safer Recruitment Policy
- Managing Contextual Risks to Children
- Safeguarding Over 18s Policy
- Remote Learning Policy
- Online Safety Policy
- Whistleblowing Policy
- Behaviour Policy
- PREVENT Policy
- Physical Intervention Policy
- SEND Policy
- Staff Behaviour Policy / Code of Conduct

Aims of this policy

This policy supports staff, the DSL and the Headteacher to understand:

- What constitutes a low-level concern
- How to manage concerns or allegations that do not meet the harm threshold
- How and with whom to share low-level concerns
- The procedure for sharing low-level concerns
- How to record low-level concerns

What is a low-level concern?

The term ‘low-level’ concern does not mean that it is insignificant. A low-level concern is any concern — no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ — 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, and
- Does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO

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

- Being over-friendly with pupils or students
- Having favourites

- Taking photographs of pupils or students on a personal mobile phone, contrary to school policy
- Engaging with a pupil or student on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils or students
- Behaving in a manner inside or outside of work which brings into question their suitability to work with vulnerable individuals
- Excessive use of social media messaging or video calling with pupils, students or their families outside school hours

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, through to behaviour that is ultimately intended to enable abuse. Low-level concerns may arise from suspicion, complaint, or disclosure made by a pupil, student, parent, carer or other adult within or outside the school, or as a result of vetting checks.

Staff are mindful that self-referrals relating to sexual behaviour, child on child or student on student abuse, or online harm must be treated with the same urgency as any other low-level concern.

All low-level concerns are shared responsibly with the right person, recorded and dealt with appropriately. Doing so also protects staff from becoming the subject of potential false low-level concerns or misunderstandings.

Managing concerns or allegations that do not meet the harm threshold

As part of our whole-school approach to safeguarding, Hidelow Grange School promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. In doing this we aim to:

- Identify inappropriate, problematic or concerning behaviour early
- Reduce the risk of abuse, neglect or exploitation
- Ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the school

All concerns are reported to the DSL (Tom Clarke) immediately. The DSL gathers basic information to decide how to escalate. This information includes the name(s) of the pupil or students involved, their age, a description of the concern or allegation, and any factors which could place individuals at further risk.

The DSL then consults with the Headteacher and the wider designated safeguarding team to decide whether the concern can be managed as a low-level concern or will require a referral to an external agency such as the LADO or children's social care.

All low-level concerns are recorded and escalated or closed within 24 hours of the concern being raised. A central register on BehaviourWatch is accessible to the DSL and Headteacher for auditing purposes.

Hidelow Grange School takes all concerns seriously, regardless of how small they may appear. A low-level concern is still a concern and is addressed in line with Section 2 of Part Four of KCSiE 2026 and local multi-agency safeguarding arrangements. Staff familiarise themselves with Herefordshire multi-agency safeguarding arrangements and ensure they adhere to these. What may be considered a low-level concern in one area may constitute a safeguarding concern requiring LADO or social care involvement in another.

Sharing low-level concerns

Hidelow Grange School has a procedure for sharing concerns that is clear, easy to understand and implement.

The DSL informs the Headteacher of all low-level concerns without delay. The Headteacher is the ultimate decision-maker in respect of all low-level concerns, though the DSL and Headteacher take a collaborative decision-making approach.

Low-level concerns about supply staff and contractors are notified to their employers so that patterns of inappropriate behaviour can be identified across settings.

If there is any doubt as to whether information shared about a member of staff is a low-level concern or in fact meets the harm threshold, the DSL consults with the Herefordshire LADO (Carol Ifill, 01432 261739, LADO@herefordshire.gov.uk) or Adult Social Care as appropriate.

Hidelow Grange School has created an environment where staff are encouraged and feel confident to self-refer where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, or where on reflection they believe they have behaved in a way that falls below the expected professional standard.

The procedure for sharing and managing low-level concerns

The table below sets out the step-by-step procedure to be followed when a low-level concern is raised at Hidelow Grange School.

1	Concern arises	A pupil, parent, carer, member of staff or other person has a concern about the conduct of a staff member, supply teacher, volunteer or contractor.
2	Immediate report	The person with the concern shares it with the DSL (Tom Clarke) without delay. Where the concern is about the DSL, it is reported directly to the Headteacher or, if the concern is about the Headteacher, to the Regional Lead (R. McConomy).
3	DSL records the concern	The DSL records the concern on BehaviourWatch on the day it is received. The record includes the name(s) of those involved, the nature of the concern, the context in which it arose, and any immediate action taken.
4	Pattern check	The DSL checks BehaviourWatch for any previous concerns relating to the same member of staff to identify patterns of behaviour.
5	Threshold decision	The DSL consults with the Headteacher to determine whether the concern meets the harm threshold (referral to LADO / social care) or can be managed as a low-level concern.
6a	Threshold MET — referral	The DSL contacts the LADO (Carol Ifill, 01432 261739, LADO@herefordshire.gov.uk) or Herefordshire MASH and follows the Safeguarding and Child Protection Policy.
6b	Threshold NOT MET — internal	The DSL consults with the Headteacher and HR if required and investigates internally. The member of staff may be spoken to directly as part of the process.
7	Record investigation	The DSL records the investigation, rationale and all actions taken on BehaviourWatch. HR is notified where appropriate.
8	Disciplinary action (if required)	If the investigation warrants it, the DSL and Headteacher follow the CareTech Disciplinary Policy.
9	Lessons learned	The DSL and Headteacher consider any lessons learned and introduce additional training or procedural changes as required.

10	Outcome and monitoring	The DSL informs the member of staff of the outcome, confirms the concern has been logged and will remain on their staff file, and agrees a plan of performance monitoring where appropriate.
11	Secure storage	The DSL ensures all records of the concern, investigation and outcome are stored securely on BehaviourWatch and retained for a minimum of 10 years after the member of staff leaves, or until their retirement if later.

When appointed, the DSL contacts the local safeguarding partner to agree the threshold for concerns. The DSL reviews this annually as a minimum to ensure they are confident of the threshold for allegations. The DSL reviews and signs off on the local threshold agreement every 12 months, with documented evidence of that review.

Recording low-level concerns

All low-level concerns at Hidelow Grange School are recorded in writing on BehaviourWatch on the day the concern is received. The record includes:

- Details of the concern
- The context in which the concern arose
- The action taken
- The name of the individual sharing the concern (recorded unless they request anonymity, in which case this is respected as far as reasonably possible)

Records are reviewed by the DSL to identify potential patterns of inappropriate, problematic or concerning behaviour. Where a pattern is identified, the Headteacher and DSL decide on a course of action, either through the disciplinary process or, where a pattern of behaviour escalates to meet the harm threshold, through referral to the LADO.

Consideration is also given to whether there are wider cultural issues within the school that have enabled the behaviour to occur. Where this is the case, the Headteacher contacts the CareTech Head of Policy and Head of Quality and Improvement to update relevant policies, and additional training is delivered to minimise the risk of recurrence.

Records of low-level concerns are retained for a minimum of 10 years after the member of staff leaves, or until their retirement if later. Annual audits of the recording system are conducted by the DSL.

Review history

A review will be undertaken annually as a minimum. Subject to a significant safeguarding concern, this policy and all attached policies will be reviewed and monitored as part of a lessons-learned review.

This policy was reviewed in August 2025 by Laura Dickie (Head of Policy), Jo Dunn (Director of Compliance, Quality and Regulation – Children) and Lindsey Appleby-Flynn (Head of Learning and Development). It was adopted and adapted for Hidelow Grange School in June 2026 by B. Neasom (Headteacher and DSL).

Next review: September 2027.