



Low Level Concerns Policy

Approved by: Board of Directors

Policy Owner: Storyy Education

Responsible Senior Lead: Natalie Lee

Date Approved: August 2026

Review Cycle: Annually and as required

Next Review Date: August 2027

Version: 2.0

Policy Statement

Storyy Education is committed to maintaining the highest standards of professional conduct and safeguarding practice. We recognise that creating a culture of openness, transparency and professional curiosity is fundamental to safeguarding children and young people.

This policy supports our wider safeguarding arrangements by ensuring that concerns about the behaviour of adults working with children are identified, shared, recorded and managed appropriately. It enables concerns to be addressed at the earliest opportunity, helping to maintain professional boundaries, identify emerging patterns of behaviour and reduce the risk of harm to children.

This policy should be read alongside the Storyy Education Child Protection and Safeguarding Policy, Staff Code of Conduct, Managing Allegations Against Staff Policy, Disciplinary Policy and Whistleblowing Policy.

Purpose

The purpose of this policy is to promote a culture where all staff feel confident to share concerns about the behaviour of adults working with children, regardless of how minor those concerns may appear. Early identification and appropriate management of low-level concerns supports a positive safeguarding culture and helps prevent concerns from escalating.

Storyy Education encourages staff to view the reporting of low-level concerns as a positive safeguarding practice rather than a disciplinary process. Sharing concerns protects children, supports colleagues and promotes professional accountability.

The aims of this policy are to:

- Promote an open, transparent safeguarding culture.
- Clarify professional expectations and boundaries.
- Encourage staff to report concerns at the earliest opportunity.
- Identify patterns of behaviour that may require intervention.
- Ensure concerns are managed fairly, proportionately and consistently.
- Protect both children and staff through early intervention.
- Ensure compliance with statutory safeguarding guidance.

Scope

This policy applies to everyone working for or on behalf of Storyy Education, including:

- Directors.
- Senior Leaders.
- Managers.

‘We’re creating a world where every young person has a brighter future’

- Teachers.
- Mentors.
- Volunteers.
- Agency staff.
- Contractors.
- Visitors undertaking regulated activity.

Every adult has a responsibility to report concerns regarding their own behaviour or the behaviour of others where this may fall below the expected professional standards.

What is a Low-Level Concern?

A low-level concern is any concern, no matter how small, that an adult working with children may have behaved in a way that is inconsistent with the Storyy Education Staff Code of Conduct but does not meet the threshold for referral to the Local Authority Designated Officer (LADO).

A low-level concern may simply create a feeling of unease or a "nagging doubt". Staff are **not** expected to decide whether behaviour meets the harm threshold. Their responsibility is simply to share the concern promptly so that the appropriate decision can be made.

Examples may include:

- Inappropriate professional boundaries.
- Overly familiar behaviour.
- Inappropriate language.
- Favouritism towards a child.
- Unprofessional communication.
- Inappropriate use of social media.
- Failure to follow safeguarding procedures.
- Behaviour outside of work that could impact professional suitability.
- Any conduct that does not reflect the values and expectations of Storyy Education.

Allegations that Meet the Harm Threshold

Some concerns may meet the threshold for managing allegations against adults working with children.

An allegation may meet the harm threshold where an adult has:

- Behaved in a way that has harmed, or may have harmed, a child.
- Possibly committed a criminal offence against or related to a child.

‘We’re creating a world where every young person has a brighter future’

- Behaved towards a child in a way that indicates they may pose a risk of harm.
- Behaved in a way that suggests they may no longer be suitable to work with children.

Where this threshold is met, the concern will be managed in accordance with the Storyy Education Managing Allegations Against Staff Policy and appropriate advice will be sought from the Local Authority Designated Officer (LADO).

Reporting a Low-Level Concern

Storyy Education encourages all staff to report concerns as soon as reasonably practicable and, wherever possible, within 24 hours of becoming aware of the behaviour.

Concerns should normally be reported to:

- Head of Safeguarding/ The Designated Safeguarding Lead (DSL).
- The Managing Director or Operations Manager
- A Director (where the concern relates to the DSL or Managing Director).
- Added to CPOMS staff safe

If there is a conflict of interest, or staff believe concerns are not being managed appropriately, they should seek advice directly from the Local Authority Designated Officer (LADO).

Concerns may initially be raised verbally; however, an appropriate written record will always be made. Where the concern relates to a student, it will also be recorded on **CPOMS**.

Responding to a Low-Level Concern

Once a concern has been received, the Designated Safeguarding Lead will consider the information carefully and determine the most appropriate course of action. This may include speaking with the individual raising the concern, any relevant witnesses and the member of staff whose behaviour is being questioned, unless advised otherwise by the LADO or another external agency.

The Designated Safeguarding Lead will determine whether:

- The behaviour is consistent with the Staff Code of Conduct.
- The concern constitutes a low-level concern.
- Advice should be sought from the LADO.
- The concern, either individually or when considered alongside previous concerns, now meets the threshold for an allegation.
- Further action is required through management guidance, supervision, training or formal procedures.

All decisions will be evidence-based, proportionate and clearly recorded, including the rationale for any actions taken.

Outcomes

Many low-level concerns can be resolved through supportive management conversations, clarification of professional expectations or additional guidance. Storyy Education is committed to addressing concerns fairly and proportionately whilst protecting children and supporting staff to maintain high professional standards.

Where appropriate, outcomes may include:

- No further action.
- Professional discussion.
- Additional safeguarding supervision.
- Coaching or training.
- Review of professional boundaries.
- Increased monitoring.
- Formal management action.
- Referral to the LADO or other agencies where required.

Where patterns of behaviour emerge, concerns will be reviewed collectively to determine whether further safeguarding action is necessary.

Recording and Record Keeping

Accurate record keeping is essential to effective safeguarding. All low-level concerns will be recorded securely and confidentially within the Storyy Education central low-level concerns record. Where concerns relate directly to a student, appropriate safeguarding records will also be maintained on CPOMS, and where it relates to a member of staff, records will be maintained on CPOMS Staff Safe.

Records will include:

- The nature of the concern.
- Date and time.
- Individuals involved.
- Actions taken.
- Decisions made.
- Rationale for decisions.
- Outcome.
- Any follow-up actions.

Records will be retained securely in accordance with the Data Protection Act 2018, UK GDPR, safeguarding guidance and the Storyy Education Data Protection Policy.

‘We’re creating a world where every young person has a brighter future’

Monitoring and Quality Assurance

The Designated Safeguarding Lead and Senior Leadership Team will review low-level concerns regularly to ensure concerns are managed consistently and to identify any emerging patterns or organisational learning.

Regular reviews help Storyy Education to:

- Identify repeated concerns relating to individuals.
- Recognise wider safeguarding themes.
- Review the effectiveness of policies and procedures.
- Identify additional staff training needs.
- Promote continuous improvement in safeguarding practice.

Where trends are identified, appropriate action will be taken to strengthen safeguarding arrangements and reinforce professional expectations.

Review

This policy will be reviewed annually, or sooner where there are changes to legislation, statutory guidance or organisational practice.

The Managing Director and Designated Safeguarding Lead are responsible for ensuring this policy remains compliant with statutory safeguarding requirements and reflects current safeguarding best practice.