



Life Skills Enterprise School

Low-Level Concerns Policy

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CONTENTS

1. Introduction
2. Statement of intent
3. Legal framework and related policies
4. Purpose and aims
5. Scope
6. What is a low-level concern?
7. Examples of low-level concerns
8. Distinguishing low-level concerns, allegations and whistleblowing
9. Roles and responsibilities
10. Reporting a low-level concern - Confide
11. Self-referral
12. Responding to a concern
13. Concerns about supply staff, contractors and agency workers
14. Concerns about the Head of School
15. Recording, confidentiality and data protection
16. Reviewing patterns and wider safeguarding culture
17. References and recruitment
18. Training, induction and staff support
19. Whistleblowing
20. Monitoring and governance
21. Contact information
22. Approval & Policy Review
23. Revision History

1. Introduction

Life Skills Enterprise is owned and operated by Cavendish Education. This policy forms part of the school's safeguarding framework and should be read alongside the Child Protection and Safeguarding Policy, Staff Code of Conduct, Whistleblowing Policy, Safer Recruitment procedures and relevant HR/disciplinary procedures.

Life Skills Enterprise is an independent specialist school for pupils with Education, Health and Care Plans (EHCPs), with needs primarily associated with autism. The school is committed to a culture of openness, trust and transparency in which professional boundaries are understood, concerns are shared promptly and safeguarding practice is continually strengthened.

The school's core values are Respectful, Responsible, Resilient and Reflective. These values apply to adult professional conduct as well as to pupils.

2. Statement of intent

Life Skills Enterprise recognises that a concern can be significant even when it does not meet the threshold for an allegation of harm. "Low-level" does not mean unimportant. A low-level concern is any concern, however 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 work, but which does not meet the harm threshold.

The purpose of this policy is to create and embed a culture in which staff feel confident to share concerns about adult conduct, including concerns about their own conduct, so that issues can be considered early, professional boundaries reinforced and potential patterns identified.

Staff must not investigate a low-level concern themselves or wait for proof. They should record what they saw, heard or were told and report it promptly through the school's agreed system.

3. Legal framework and related policies

This policy has due regard to relevant legislation and statutory guidance, including Keeping Children Safe in Education 2026 (KCSIE), the Education (Independent School Standards) Regulations 2014, the Children Act 1989 and 2004, the Data Protection Act 2018, UK GDPR, the Equality Act 2010 and Working Together to Safeguard Children 2026.

It should be read alongside the school's Child Protection and Safeguarding Policy, Staff Code of Conduct, Whistleblowing Policy, Complaints Policy, Safer Recruitment procedures and disciplinary/HR procedures. Where there is any doubt about whether a concern may meet the harm threshold, safeguarding procedures take precedence and advice will be sought from the Local Authority Designated Officer (LADO) as appropriate.

4. Purpose and aims

The aims of this policy are to:

- ensure staff understand expected professional conduct and appropriate boundaries;
- encourage staff to share low-level concerns promptly and to self-refer where appropriate;
- ensure concerns are recorded consistently, securely and factually;
- enable leaders to respond sensitively, fairly and proportionately;
- identify patterns of inappropriate, problematic or concerning behaviour;
- identify wider cultural, training, supervision or safeguarding-system issues;
- protect pupils and support staff by addressing concerns before they escalate.

5. Scope

This policy applies to all adults working in or on behalf of Life Skills Enterprise, including employees, senior leaders, supply staff, agency workers, trainee teachers, volunteers, contractors, therapists and other professionals working with pupils.

It applies to concerns arising from conduct in school, during school-related activity, online, in communication with pupils or families, and to relevant conduct outside work where this may call into question an adult's suitability to work with children or compliance with professional boundaries.

6. What is a low-level concern?

A low-level concern is a concern about an adult's behaviour that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside work, but does not meet the harm threshold. The concern may arise from observation, suspicion, a complaint, a disclosure by a pupil, parent/carer or another adult, information received from outside the school, or a staff member's own reflection on their conduct.

A low-level concern does not need to be deliberate, serious or repeated. The purpose of reporting is to allow the appropriate senior leader to assess the information and decide what, if any, action is required.

7. Examples of low-level concerns

Examples may include, but are not limited to:

- being over-friendly with pupils or showing favouritism;
- using inappropriate, intimidating, humiliating, sexualised, discriminatory or overly familiar language;
- taking photographs of pupils on a personal device or using personal accounts to communicate inappropriately;
- unnecessary one-to-one seclusion or creating situations that could be misinterpreted;
- blurring professional boundaries, including inappropriate gifts, contact or social-media interaction;
- behaving in a way that is inconsistent with the Staff Code of Conduct or safer-working expectations;
- a situation where a member of staff recognises that their own actions could be misinterpreted or fell below expected professional standards.

Context matters. An example listed above is not automatically misconduct; the concern must be considered objectively and in its full context.

8. Distinguishing low-level concerns, allegations and whistleblowing

The school will triage concerns according to their nature:

Route	When it applies
Low-level concern	Adult conduct or a professional-boundary concern that is inconsistent with expected standards but does not meet the harm threshold.
Allegation / harm threshold	Information suggesting an adult may have harmed a child, may have committed a criminal offence against or related to a child, may pose a risk of harm to children, or may have behaved in a way indicating they may not be suitable to work with children. This must be managed immediately under safeguarding/allegations procedures.
Whistleblowing	Concern about organisational wrongdoing, unsafe practice, a failure to act, suppression of concerns or other malpractice in the public interest. This is managed under the Whistleblowing Policy.

If a member of staff is unsure which route applies, they must report the concern promptly rather than trying to categorise it themselves.

9. Roles and responsibilities

The Cavendish Education Board of Directors and the school's governance arrangements provide oversight and challenge, ensuring that safeguarding policies are effective and that concerns about adults are managed appropriately.

Paul Barratt, Head of School, is the ultimate decision-maker in respect of low-level concerns, subject to the arrangements for concerns about the Head of School. He will ensure that concerns are assessed, actions are proportionate and any necessary HR, disciplinary, safeguarding or LADO advice is obtained.

Craig Kelly, Deputy Headteacher and DSL, supports the safeguarding triage of concerns, reviews safeguarding implications and supports monitoring of themes and patterns. Where the DSL receives a low-level concern, the Head of School will be informed in a timely way according to the nature of the concern.

All staff are responsible for maintaining professional boundaries, reporting concerns promptly, cooperating with any review and keeping information confidential. Staff must not investigate concerns themselves or confront the person who is the subject of the concern.

10. Reporting a low-level concern - Confide

Life Skills Enterprise uses Confide as its central system for reporting and recording low-level concerns. All staff have individual Confide logins and are expected to use the system to submit concerns promptly.

When recording a concern on Confide, staff should include:

- the date and time of the incident or observation, where known;
- the name and role of the adult concerned;
- a clear factual account of what was seen, heard, disclosed or reported;
- the context in which the concern arose;
- the names of any witnesses or relevant persons;
- any immediate action already taken;
- the name of the person making the report, unless anonymity is requested and can reasonably be respected.

Records must distinguish fact from opinion and should avoid speculation or assumptions. If there is an immediate safeguarding risk, staff must speak directly to the DSL, a deputy DSL or the Head of School without delay; entering information on Confide must not delay urgent action.

If Confide is temporarily unavailable, the concern must be reported verbally to the Head of School or DSL and recorded on Confide as soon as the system becomes available.

11. Self-referral

Life Skills Enterprise encourages staff to self-refer through Confide where they have found themselves in a situation that could be misinterpreted, appears compromising, or where, on reflection, they believe their behaviour may have fallen below expected professional standards. A self-referral will be considered fairly and in context and is an important part of an open safeguarding culture.

12. Responding to a concern

On receipt of a low-level concern, the Head of School, supported by the DSL and/or appropriate senior/HR colleagues, will review the information and determine the appropriate response. This may include speaking with the person who raised the concern, the adult concerned and any relevant witnesses; reviewing the Staff Code of Conduct or other records; and seeking safeguarding, HR or LADO advice.

Possible outcomes include:

- no further action, with the rationale recorded;
- professional advice, clarification of expectations or a management conversation;
- additional supervision, coaching, training or support;
- a formal management or disciplinary process where appropriate;
- review of working arrangements, risk management or safeguarding procedures;
- referral under the allegation's procedure and consultation with the LADO where the harm threshold may be met;
- consideration of wider cultural or systemic issues where the concern indicates a weakness in school practice.

The response will be proportionate to the concern and will take account of safeguarding, fairness, employment law and the need to protect confidentiality. The fact that a concern is not substantiated does not in itself mean it was malicious or should not have been reported.

13. Concerns about supply staff, contractors and agency workers

Low-level concerns relating to supply staff, agency workers, contractors or other adults employed by another organisation will be considered by Life Skills Enterprise and, where appropriate, notified to the individual's employer or agency so that potential patterns can be identified. The school will not simply pass responsibility to the employer where safeguarding action is required.

14. Concerns about the Head of School

A low-level concern about the Head of School must not be managed by the Head of School. It should be reported through Confide where the system provides the appropriate restricted route and, in all cases, raised directly with the designated Cavendish Education senior/proprietor contact responsible for safeguarding oversight. Where the

concern may meet the harm threshold, the school's allegations procedure and LADO arrangements must be followed without delay.

If a staff member is unsure who should receive a concern about the Head of School, they should contact the DSL or Cavendish Education safeguarding lead immediately so that the concern can be routed safely and confidentially.

15. Recording, confidentiality and data protection

All low-level concerns will be recorded in writing. Confide is Life Skills Enterprise's primary recording system. Records will include the concern, its context, actions taken, decisions made, the rationale for those decisions and outcomes.

Records will be confidential, securely held and accessed only by those who require the information for safeguarding, management, HR, legal or governance purposes. Information will be handled in accordance with the Data Protection Act 2018, UK GDPR and the school's data-protection and retention arrangements.

The identity of a person raising a concern will be recorded. Where they request anonymity, this will be respected as far as reasonably possible, but absolute confidentiality cannot be guaranteed where information must be shared to safeguard a child, ensure fairness or comply with legal duties.

16. Reviewing patterns and wider safeguarding culture

The Head of School and DSL will ensure low-level concern records are reviewed so that potential patterns of inappropriate, problematic or concerning behaviour can be identified. Individual incidents that appear minor in isolation may become significant when viewed together.

Where a pattern is identified, leaders will consider whether the matter should be managed through disciplinary procedures or whether the pattern may now meet the harm threshold and require LADO consultation. Leaders will also consider whether the concern reveals wider cultural issues, unclear expectations, weaknesses in supervision, training needs or gaps in safeguarding systems.

Monitoring will be undertaken sensitively and proportionately. Governance reporting will normally be anonymised and thematic unless there is a lawful and necessary reason to share identifiable information.

17. References and recruitment

Low-level concern records will be considered when responding to requests for employment references in accordance with KCSIE, employment law and safer-recruitment requirements. Life Skills Enterprise will distinguish between low-level concerns and substantiated safeguarding allegations and will ensure that any information included in a reference is accurate, fair, relevant and lawful.

18. Training, induction and staff support

All staff will receive information during induction and safeguarding updates about professional boundaries, the Staff Code of Conduct, the difference between a low-level concern and an allegation, whistleblowing, and how to use Confide. Staff will be reminded that reporting a concern in good faith is part of safeguarding practice.

Leaders will use themes from concerns, without inappropriate disclosure of personal information, to inform supervision, coaching and targeted CPD. Staff who are the subject of a concern will be treated fairly and offered appropriate support while safeguarding responsibilities are maintained.

19. Whistleblowing

Whistleblowing is distinct from reporting an individual low-level concern. It provides a route for staff to raise concerns about wrongdoing, malpractice, unsafe practice, failures in safeguarding or concerns that issues are being ignored, suppressed or handled improperly.

Staff should follow the school's Whistleblowing Policy. If a member of staff feels unable to raise a safeguarding concern internally, they may contact the NSPCC Whistleblowing Advice Line on 0800 028 0285.

20. Monitoring and governance

The Head of School and DSL will monitor the operation of this policy, including the timeliness and quality of recording, the appropriateness of actions taken, recurring themes and whether any training or organisational changes are required. Governors/proprietors will receive appropriate assurance that the system is operating effectively while respecting confidentiality.

This policy will be reviewed at least annually and sooner where statutory guidance, local safeguarding arrangements, Confide processes or school practice changes.

21. Contact Information

For safeguarding advice or questions about this policy, contact Craig Kelly, Deputy Headteacher and DSL, via Life Skills Enterprise, Northdown House, Northdown Park Road, Cliftonville, Margate, Kent CT9 3TP | 01843 260315 | office@lifeskillsenterprise.co.uk. The Head of School is Paul Barratt.

Concerns should normally be recorded through Confide. Immediate safeguarding concerns must also be raised directly with the DSL, a Deputy DSL or the Head of School without delay.

22. Approval & Policy Review

This policy is effective from September 2026 and will be reviewed by September 2027, or sooner where statutory guidance, local safeguarding arrangements or school systems change. It will be approved through Cavendish Education and the school's governance arrangements.

23. Revision History

Version V1.0 - September 2026 – Life Skills Enterprise -specific Low-Level Concerns Policy created in the Cavendish/Life Skills Enterprise policy style, aligned with Keeping Children Safe in Education 2026 and incorporating Life Skills Enterprise's use of Confide for reporting and recording low-level concerns.