LEITHS EDUCATION

Low Level Concerns Policy

Author/reviewer responsible:	Louise Kissane
Date of last review:	September 2026
Next review date:	September 2027
Lead for review:	Culinary School Director
Notable changes:	Amended to reflect Adult Safeguarding policy & procedures

Policy Aims

The purpose of the policy is to create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour which are set out in the school's Code of Conduct are constantly lived, monitored, and reinforced by all staff. Leiths deals with all concerns about adults working in or behalf of the school appropriately and promptly. This policy applies to all staff, visitors and volunteers at Leiths.

This policy seeks to:

- ensure that staff are clear about, and confident to distinguish between, expected and appropriate behaviour from concerning, problematic or inappropriate behaviour – in themselves and others, and the delineation of professional boundaries and reporting lines.
- empower staff to share any low-level concerns with the DSL or one of the DDSLs
- help staff address unprofessional behaviour and help the individual to correct such behaviour at an early stage
- identify concerning, problematic or inappropriate behaviour – including any patterns – that may need to be consulted upon with (on a no-names basis if appropriate), or referred to the relevant Local Authority.
- help identify any weaknesses in the organisation's safeguarding system.

Defining a Low-Level Concern

A low-level concern is any concern, no matter how small, or even where there is no more than a sense of unease or a "nagging doubt", that an adult working in or on behalf of Leiths may have:

- acted in a way that is inconsistent with the Staff Code of Conduct, professional expectations or appropriate safeguarding practice,
- but which does not meet the threshold for a formal safeguarding allegation or referral to an external safeguarding agency.

A low-level concern may relate to behaviour towards a child, where a child is present at or involved with Leiths, or towards an adult student or other adult who may be at risk.

Where a concern relates to an adult student, staff should consider whether the circumstances may indicate abuse, neglect or exploitation, or whether the adult has needs for care and support which mean that they are unable to protect themselves against the abuse or neglect or the risk of it. The Adult Safeguarding Policy should be consulted where there is any possibility that the concern may meet the Care Act 2014 safeguarding criteria.

Examples of low-level concerns may include, but are not limited to:

- behaviour that is inconsistent with the Staff Code of Conduct;
- inappropriate or unclear professional boundaries;
- over-familiarity or inappropriate relationships with students;

- favouritism or preferential treatment;
- inappropriate communication with students, including online communication;
- inappropriate use of personal contact details or social media;
- unnecessary physical contact;
- inappropriate language, jokes or comments;
- conduct which could reasonably be perceived as intimidating, humiliating, discriminatory or disrespectful;
- conduct which causes concern about an individual's professional judgement or suitability to work with students; or
- conduct which, while not amounting to abuse or neglect, gives rise to a concern that may require monitoring or management intervention.

A low-level concern must not be treated as a substitute for reporting a safeguarding concern. Where there is any indication that an adult student may be experiencing or be at risk of abuse or neglect, staff must report the matter to the DSL or DDSL without delay in accordance with the Adult Safeguarding Policy.

Where staff are uncertain whether a matter is a low-level concern or a safeguarding concern, they should report it to the DSL or DDSL. The DSL/DDSL will determine the appropriate safeguarding threshold and procedure.

A concern which initially appears to be low-level may subsequently be reclassified where:

1. the information indicates that a safeguarding threshold has been met;
2. a pattern of low-level concerns emerges;
3. additional information becomes available;
4. the concern indicates possible abuse, neglect, exploitation or other safeguarding risk to an adult; or
5. the concern, when considered alongside other information, indicates that the individual may pose a risk to students.

Responsibilities of Staff

It is important that all staff are clear about the expectations Leiths stipulates from them as contained in the Staff Code of Conduct. This is covered during induction for new staff and reminders and updates are communicated to all staff regularly by the Director of People & Culture.

It is crucial that any concerns in relation to a staff member’s behaviour, including those which do not meet the harm threshold, are shared responsibly with the DSL or one of the DDSLs.

Where there are concerns/allegations about the Culinary School Director/DSL, these should be referred to the Board Member who represents the Board of Directors in matters pertaining to Safeguarding, Melanie Brown.

Staff members who are concerned about how their behaviour may have been interpreted, or, on reflection, re-evaluate their behaviour as one that may have been in contrary to Leiths’ Staff Code of Conduct and expectations, should self-refer to the DSL.

Dealing with Low-Level Concerns

All low-level concerns may be shared verbally with the DSL or one of the DDSLs in the first instance but must then be recorded in writing by the DSL or DDSL on the log of Low-Level Concerns – a confidential log shared by all members of the Safeguarding Committee.

The record should include:

- details of the concern
- the context in which the concern arose
- action taken
- date and time

The name of the individual sharing their concerns should also be noted, but if the individual wishes to remain anonymous then that should be respected if reasonably possible.

Where the low-level concern is provided verbally, the DSL or DDSL should make an appropriate record of the conversation, either at the time or immediately following the discussion, paying heed to the details above. Records will be attributed to the author, timed and dated. Records will remain confidential in accordance with the school's Data Protection policies and GDPR unless or until any serious Safeguarding threshold is exceeded at which point details may be shared with senior management or the local authority (if appropriate).

Responding to a Low-Level Concern

Where a low-level concern relates to an adult student, the DSL or DDSL must consider whether the information indicates that the student:

- has needs for care and support;
- is experiencing, or is at risk of, abuse or neglect; and
- as a result of those needs, is unable to protect themselves against the abuse or neglect or the risk of it.

Where these circumstances may apply, the matter must be considered under the Adult Safeguarding Policy and the DSL should determine whether advice or a referral to Adult Social Care is required.

The adult's wishes, feelings, desired outcomes and consent should normally be central to the safeguarding response. Information may nevertheless be shared without consent where this is lawful and necessary, including where there is a serious or imminent risk of harm, a risk of harm to another person, a serious crime may have been committed, the adult lacks relevant capacity, or another lawful basis for information sharing applies.

Where there is uncertainty about whether a concern meets the threshold for adult safeguarding, staff should report the concern to the DSL/DDSL rather than attempting to determine the threshold themselves.

Having established that the concern is low-level, the DSL or DDSL will discuss it with the individual who has raised it and will take any other steps to investigate it as necessary. If the concern has been raised via a third party; the DSL or DDSL should collect as much evidence as possible by speaking:

- directly to the person who raised the concern unless it has been raised anonymously
- to the individual involved and any witnesses

The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken.

All of this needs to be recorded along with the rationale for their decisions and action taken. Reports about supply staff and contractors will be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Most low-level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training etc. In dealing with a low-level concern with a member of staff, this will be approached in a sensitive and proportionate way. In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised in order to inform future behaviours.

Any conversation with a member of staff following a concern will include:

- being clear with the individual as to why their behaviour is concerning, problematic or inappropriate
- what change is required in their behaviour
- enquiring what, if any, support they might need in order to achieve and maintain that
- being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question.

Ongoing and transparent monitoring of the individual's behaviour may be appropriate.

- An action plan or risk assessment may be required.
- Some concerns may trigger the school's disciplinary, grievance or whistleblowing procedures, which will be followed where appropriate
- Some concerns may be related to performance management and advice may be sought from the Director of People & Culture.

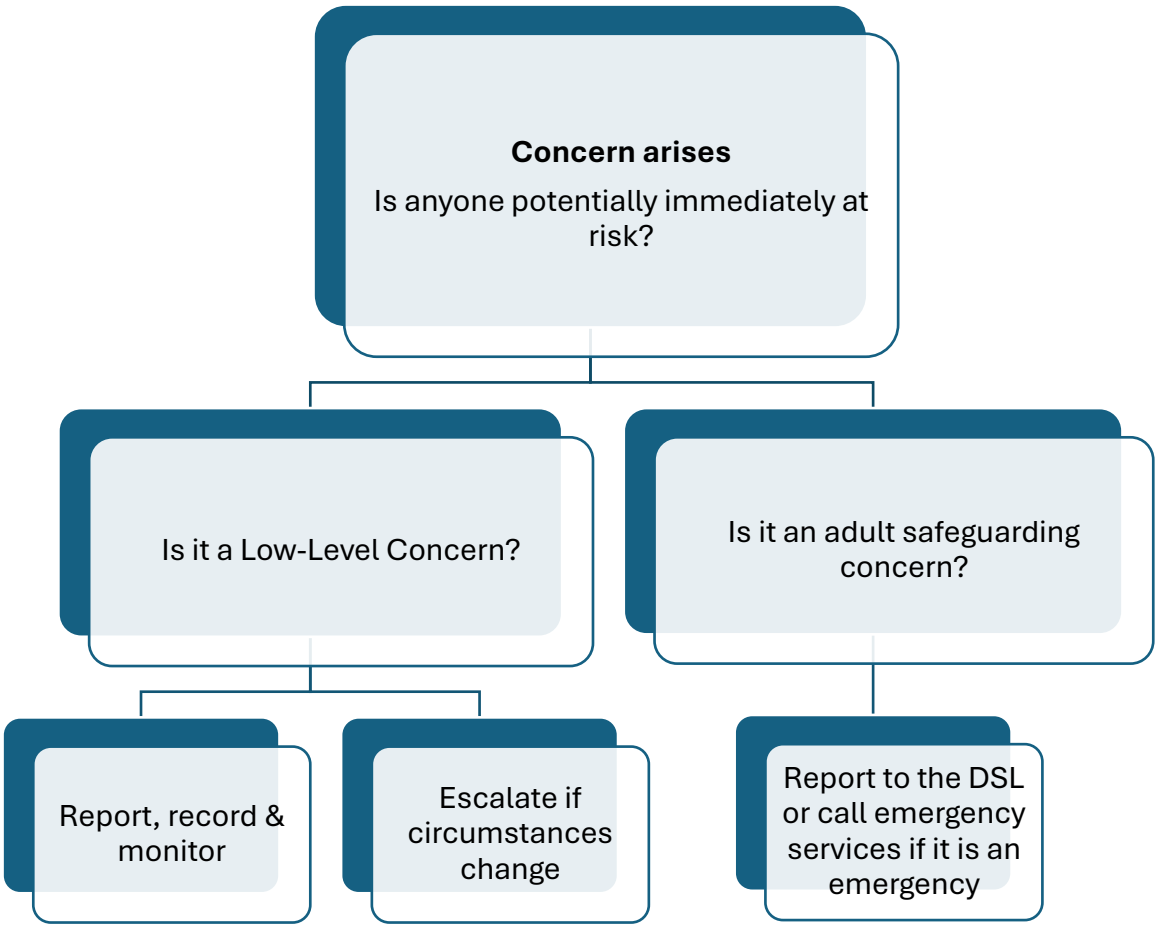
Monitoring of Low-Level Concerns

The Safeguarding Committee (DSL and DDSLs) will securely retain confidential files on low-level concerns. A summary will be shared by the DSL on a no-names basis with the Board Representative for Safeguarding to ensure that all/any such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. A record will be kept of this review within Minutes of the quarterly meeting between the DSL and the Board Member who reports to the Board on Safeguarding

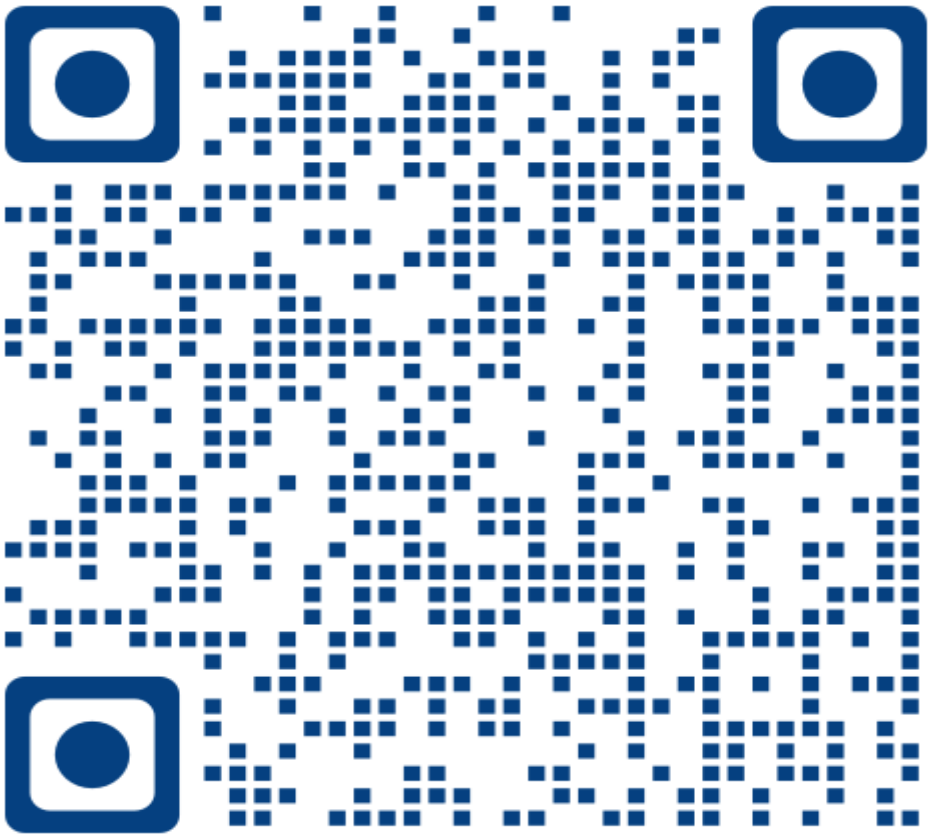
No record will be made of the concern on the individual's HR file (and no mention made in job references) unless either:

- the concern (or group of concerns) has been reclassified as a higher-level concern, or
- b) the concern (or group of concerns) is sufficiently serious to result in formal action under the school's grievance, capability or disciplinary procedure.

Safeguarding threshold/decision flowchart



Do you have a low-level concern?



Scan the QR code to report your concern anonymously to the DSL, Louise Kissane