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Trafford Alternative Education Provision

Low Level Concerns Policy

[2025-26]



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Trafford Alternative Education Provision

Policy Title:	Low Level Concerns Policy		
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Document Control

Version control/History

Name	Description	Date
Sarah Wright	Updated with new logo	January 2026

Approvals

Name	Position	Date
Linda Thompson	Executive Headteacher	January 2026

Links to

Policy
<ul style="list-style-type: none"> • Staff Code of conduct • Recruitment • Child Protection and Safeguarding Policy • Statement of procedures of allegations against staff

General Data Protection Regulation (GDPR)
This policy document has been reviewed in compliance with GDPR (May 2018) Linda H Thompson, Executive Head teacher 



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Trafford Alternative Education Provision

Our Mission Statement:

Trafford Alternative Education Provision is committed to providing....

A 21st Century education that promotes the academic, emotional and social development of our students. Our aim is to create a holistic, nurturing and inspiring environment where students are supported and encouraged to take charge of their lives, their learning and their decisions. Every student will have an understanding of their personal journey, challenges and future opportunities. All will be encouraged to become independent thinkers and learn to value and respect others thus enabling them to meet the challenges of the wider world. In partnership with parents, carers, schools and outside agencies we will provide students and staff with a positive and supportive learning experience.

We will achieve our vision by constantly thinking about the bigger picture, working as one team, valuing our staff and their continual development and by frequently reviewing, debating and developing the curriculum.

1. Aims

At Trafford Alternative Education Provision, we aim to create an open and transparent culture where all concerns about all adults involved with our school are dealt with promptly and appropriately. We aim to identify any concerning, problematic, or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of our school are clear about professional boundaries and act within these boundaries, and by our school ethos.

Chapter 2 of [Working Together to Safeguard Children 2018](#) sets out the guidance on safeguarding children from people in a position of trust and further detail is provided in Part Four of [Keeping Children Safe in Education](#) September 2023

This policy should be read alongside our Safeguarding/Child Protection and Staff Code of Conduct Policies.

This policy is based on concerns that do not meet the harm threshold in part 4 of Keeping Children Safe in Education.

This applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers, and contractors, which do not meet the harm threshold set out in Section 1 above.

Concerns may arise through, for example:

- **Suspicion**
- **Complaint**
- **Disclosure** made by a child, parent or other adult within or outside the school
- **Pre-employment vetting checks**

We recognise the importance of responding to and dealing with any concerns promptly to safeguard the welfare of children.

The purpose of this policy is to ensure that everyone at TAEP knows and understands the importance of reporting any concern about themselves or colleagues, no matter how small, and how to report them. By doing so, we can better safeguard children and adults at risk support staff and volunteers regarding the expectations of TAEP avoid unnecessary escalations and reduce risks.

2. Definition of Low-Level Concerns

The term '**Low-Level**' concern is any concern – no matter how 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 of work, **and**

- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phones engaging with a child on a one-to-one basis in a secluded area or behind a closed-door
- Using inappropriate sexualised, intimidating or offensive language

3. Sharing Low-Level concerns

We recognise the importance of creating a culture of openness, trust, and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Have clear policies and procedures
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

4. Reporting a Low-Level Concern

- Low-level concerns about a member of staff should be reported to the Executive Headteacher as per the school's Safeguarding and Child Protection procedures.
- If the concern is about the Executive Headteacher this should be reported to the Chair of Governors Carrie Oultram
- Low-level concerns about supply staff, contractors and local authority visiting staff will also be reported to their employers.

Supply staff should use the school's Low-Level Concerns Reporting Form Appendix 1

Substantive staff should record concerns on CPOMS

5. Responding to Low-level Concerns

If the concern is raised via a third party, the Headteacher will collect evidence where necessary by speaking:

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

The Executive Headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff Code of Conduct.

- Allegations that meet the harm threshold will be referred to the LADO for advice.
- Low level concerns that the school feel may need further guidance will be referred to the LADO for advice.
- Low-level concerns that the school feels that they can deal with internally will be dealt with via the school's usual child protection investigation process.
- The school will engage with its HR provider where it is necessary to undertake further investigation and/or deal with the concern under relevant processes.

6. Record Keeping

All low-level concerns will be recorded in writing (form below) for supply staff and CPOMS for substantive staff. In addition to details of the concern raised records will include the context in which the concern arose, any action taken, and the rationale for decisions and actions taken.

Records will be:

- Kept confidential, held securely, and will comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic, or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves' employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

7. Reviewing a Low-Level Concern

Records will be reviewed so that potential patterns of concerning, problematic, or inappropriate behaviour can be identified.

Where a pattern of such behaviour is identified, the Headteacher will decide on a course of action, which may include:

- Disciplinary investigation and/or proceedings
- Management Advice, including recommendations for training
- Referral to the LADO (where a pattern of behaviour moves from a concern to meeting the harm threshold).

If the concern relates to volunteers, or any other concerns arise, TAEP can contact the LADO for further advice.

8. References

TAEP will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated.
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Appendix 1 Supply

Low-Level Concern Form		
<p>Please use this form to share any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that:</p> <ul style="list-style-type: none">• is inconsistent with the TAEP staff code of conduct, including inappropriate conduct outside of work, and• Does not meet the allegation threshold or is otherwise not serious enough to consider a referral to the LADO. <p>You should provide a concise record – including the brief context in which the low-level concern arose, and chronological details, and as precise and accurate as possible – of any such concern and relevant incident(s) (and please use a separate sheet if necessary).</p> <p>The record should be signed, timed, and dated and returned to the Executive Headteacher</p>		
<p>Details of Concern</p> <p>Name of staff member</p>		
Date	Signed	Name

Appendix 2

Self-Disclosure Register				
Member of Staff	Parent / Pupil	Type of contact	Date	Action if red