

# Low-Level Concerns Policy

<b>Status</b>	<b>Statutory</b>
<b>Version</b>	<b>6</b>
<b>Responsible Directors' Board</b>	<b>Full Board of Directors</b>
<b>Responsible Persons</b>	<b>Head of Safeguarding and Inclusion</b>
<b>Date Policy Reviewed</b>	<b>August 2025</b>
<b>Next Review Date</b>	<b>September 2026</b>
<b>Academy to implement without Amendment, using appendix when required</b>	

## Summary of Changes from Previous Version

Version	Date	Author	Summary of Updates
V1	October 2021	Advanced HR	New Policy
V2	September 2022	L Burton	Page 8 updated reference to KCSIE 2022 document
V3	October 2022	Dawn Slater	Whole policy reviewed and revised in line with S&CP policy and KCSIE 2022
V4	August 2023	Dawn Slater	Updated onto new format 3. Updated information from KCSIE 2023
V5	September 2024	Strategic Safeguarding Leader	Updated onto new format Whole policy review in line with National College exemplar Additional section added, Legal Framework Appendix A updated to include 'rationale' for decision making or outcomes
V6	August 2025	Head of Safeguarding and Inclusion	Updated reference from KCSIE (2024) to KCSIE (2025) Clarification of arrangements for reporting low-level concerns where they relate to a Principal Addition of a process flow for reporting concerns Addition of LADO contact details Additional appendix – City of Doncaster Council LADO referral threshold document Section 3: Addition of harm threshold description (taken from KCSIE 2025) Section 9: <ul style="list-style-type: none"> <li>• Addition of decisions of disciplinary or safeguarding action to be recorded in writing with a clear rationale</li> <li>• Addition of consideration for risk-assessments where off-duty conduct could transfer into the workplace</li> </ul>

			<ul style="list-style-type: none"> <li>• Addition of taking advice from HR where low-level concerns raise issues of misconduct or poor performance</li> </ul> <p>Section 10:</p> <ul style="list-style-type: none"> <li>• Addition regarding giving consideration to advice given by the LADO</li> <li>• Clarification given re access to low-level concerns records</li> </ul> <p>Appendix A:</p> <ul style="list-style-type: none"> <li>• Request for anonymity included on recording form</li> </ul>
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## 1. Statement of intent

Exceed Learning Partnership and its academies understand the importance of acknowledging, recording and reporting **all** safeguarding concerns, regardless of their perceived severity. We understand that, while a concern may be low-level, that concern can escalate over time to become much more serious.

Our trust prides itself on creating a safe and prosperous environment for pupils, and our staff are expected to adhere to high standards of behaviour when it comes to professional conduct regarding pupils. The trust has clear professional boundaries which all staff are made aware of and will adhere to. All staff are empowered to report concerns without fear of reprisal. We are committed to ensuring that any safeguarding concerns are dealt with as soon as they arise and before they escalate or compound, to minimise the risk of harm posed to our pupils.

## 2. Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- DfE (2025) 'Keeping children safe in education 2025'
- DfE (2023) 'Working Together to Safeguard Children'

This policy operates in conjunction with the following academy policies:

- Child Protection and Safeguarding Policy
- Staff Code of Conduct
- Whistleblowing Policy
- Data Protection Policy
- Trust Child Protection and Safeguarding Policy

### 3. Definitions

For the purposes of this policy, a low-level concern is defined as any concern had about an adult's behaviour towards, or concerning, a child that does not meet the harms threshold (see below) or is otherwise not serious enough to consider a referral to the LADO (Local Authority Designated Officer) at the time of its reporting.

The term 'low-level' concern does not mean that it is insignificant – a low-level concern is any concern that suggests an adult working in or on behalf of an academy may have acted in a way that:

- Is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work.
- Does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Low level concerns may be part of a pattern of behaviour which, in combination, could meet the harm threshold over time.

Low-level concerns are differentiated from concerns that can cause harm. The harms threshold is the point at which a concern is no longer low-level and constitutes a threat of harm to a child. This threshold is defined by KCSIE (2025) as allegations that an adult has:

- Behaved in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offence against, or related to, a child.
- Behaved towards a child in a way that indicates they may pose a risk of harm to pupils.
- Behaved in a way or may have behaved in a way that indicates they may not be suitable to work with pupils.

While low-level concerns are less serious than concerns which meet the harms threshold, academies understand that many serious safeguarding concerns often begin with low-level concerns, e.g. being overly friendly with pupils. Academies will ensure that all staff are aware of the importance of recognising concerns before they have an opportunity to escalate from low-level to serious.

KCSIE (2025) defines concerns that may meet the harm threshold as 'when a person has:

- Behaved in a way that has harmed a child, or may have harmed a child and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicated he or she may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children'

## 4. Roles and responsibilities

The local governing board (LGB) will be responsible for:

- Ensuring that individual academies comply with their duties under child protection and safeguarding legislation.
- Ensuring that policies, procedures, and training opportunities with regard to reporting safeguarding concerns are compliant and effective.
- Guaranteeing that there is an effective Staff Code of Conduct that outlines behavioural expectations.
- Ensuring that a suitably trained Designated Safeguarding Lead (DSL) has been appointed, alongside deputy a Designated Safeguarding Lead(s) (DDSL)
- Ensuring that there are robust reporting arrangements, including inter-agency collaboration.
- Ensuring that there are appropriate procedures in place to handle allegations and low-level concerns reported against members of staff.

The Principal of each academy will be responsible for:

- Assessing whether safeguarding concerns about staff members meet the threshold for being termed an allegation, or whether they are low-level concerns.
- Implementing this policy, and all related policies, throughout the academy, and ensuring that staff adhere to it at all times.
- Safeguarding pupils' wellbeing and maintaining public trust in the teaching profession.
- Ensuring that all staff have undertaken safeguarding training.
- Ensuring that all staff have an ongoing awareness of low-level concerns and reporting procedures.
- Following all procedures outlined in this policy for acting upon low-level concerns.
- Liaising with the trust, staff members, the governing board and all relevant agencies to act upon concerns, where necessary.
- Keeping detailed, accurate and secure records of all low-level concerns and keeping records of decisions made regarding safeguarding concerns, including the rationale for those decisions.
- Being a point of contact for all staff when they have concerns about staff conduct, whether serious or low-level.
- Referring to the academy Child Protection and Safeguarding policy for concerns that may meet the harm threshold.

Staff will be responsible for:

- Adhering to all the relevant policies and procedures, including acting within the Staff Code of Conduct at all times.

- Interacting with pupils in a way that is respectful and appropriate for their level of authority and has due regard to the power imbalance between pupils and staff members.
- Understanding the importance of reporting low-level safeguarding concerns.
- Reporting any and all safeguarding concerns they may have about pupils immediately.
- Reporting any and all safeguarding concerns they may have about the behaviour of a member of staff immediately to the Principal (unless this concern is about the Principal, when it should be reported to the trust's Head of Safeguarding and Inclusion for Primary Principals and the Deputy CEO for the Secondary Principal)

Failure to report any safeguarding concern could itself constitute a safeguarding breach under statutory safeguarding expectations.

## 5. Prevention amongst staff

### **Appropriate and inappropriate behaviour**

Academies will ensure that all staff members are aware of the standards of appropriate behaviour expected towards pupils.

Staff will ensure that they pay due regard to the fact that:

- They are in a unique position of trust, care, responsibility, authority, and influence in relation to pupils.
- There is a significant power imbalance in the pupil-staff dynamic.
- There are more stringent expectations on their behaviour with regard to pupils due to their position as a public professional.

Staff will remain aware of the fact that all pupils under the age of 18, regardless of the phase and year group they are at within the academy, are children by law – resultantly, staff will ensure that they do not assume maturity on behalf of a pupil and do not engage with pupils as they would with their own peers. Staff will be aware that where there is any doubt regarding whether the behaviour of another adult is appropriate, this should be reported to the Principal (or most senior member of staff in their absence such as the Vice Principal) immediately.

Inappropriate behaviour can exist on a wide spectrum, from inadvertent or thoughtless behaviour to behaviour which is ultimately intended to enable abuse. Examples of inappropriate behaviour that would constitute a low-level concern that should be reported include (but are not limited to):

- Being overly friendly with pupils – this could include, but is not limited to, communicating with a pupil through personal social media or allowing inappropriate conversations or enquiries to occur with pupils, e.g. conversations that are about a staff member's personal life or are of a sexual nature.
- Having favourites – this could include, but is not limited to, calling pupils by pet names or terms of endearment or buying pupils gifts.
- Taking photographs of pupils on their personal mobile phones, contrary to academy policy.

- Engaging with a pupil on a one-to-one basis in a secluded area or behind a closed door.
- Behaviours that may belittle or humiliate pupils.

The behaviours listed above are illustrative, not exhaustive.

Staff will be aware that some of the above low-level concerns may meet the harms threshold depending on certain factors, e.g. the age or needs of the pupil or the content of exchanged messages, and that some of the above incidents may not be concerns in context, e.g. a preapproved, one-to-one meeting with a pupil behind a closed door between the pupil and a safeguarding leader who has received all appropriate safety checks.

Staff will also be made aware that behaviour which raises concerns may not be intentionally inappropriate, and that this does not negate the need to report the behaviour. Staff members who engage in low-level inappropriate behaviour in relation to pupils inadvertently will be made aware and supported to correct this behaviour in line with the Staff Code of Conduct. The Principal will follow the processes outlined in this policy for evaluating concerns (section 8) and acting on concerns (section 9).

### **Academy culture**

Staff and adults in our academies are reminded of their duty to report any concerns in-line with the procedures in this policy. Staff are encouraged to maintain an attitude that recognises that abuse can happen anywhere, in any setting, and that anyone can be a perpetrator regardless of their age, sex, level of authority, personality, etc.

Academies will ensure that all staff members have received training as part of their induction that outlines appropriate behaviour towards pupils for staff members. All staff will read, understand, and adhere to the Staff Code of Conduct.

Staff will address any questions they have regarding safeguarding to the Principal or DSL. The academy will work to foster an environment where personal and professional boundaries are clearly set and respected for all individuals in the academy community, e.g. pupils are not treated as friends and an appropriate professional distance is maintained by staff.

Academies will ensure that all staff are sufficiently trained surrounding the reporting of safeguarding concerns as part of their induction, and that refresher training is conducted as necessary. Academies will ensure that all staff understand how to recognise and report safeguarding concerns. Staff will be trained to identify inappropriate, concerning, or problematic behaviour towards pupils that may indicate a safeguarding concern, and how to identify signs of abuse or harm in pupils.

### **Evaluating academy culture following concerns**

Academies will ensure that appropriate consideration is given to culture and whether or not it has enabled the inappropriate behaviour to occur. The Principal will advise the Trust of any changes they feel may be needed to be made to relevant policies or training programmes in light of any evaluations of the academy's culture.

## 6. Reporting concerns

Academies will promote a culture in which safeguarding pupils is the uppermost priority, beyond any perceived professional loyalties to colleagues, ensuring that staff are actively encouraged to report concerns, regardless of their relationship with the staff member.

Staff will report all concerns around staff conduct to the Principal immediately. The Principal will be responsible for following the processes outlined in this policy to evaluate if there has been a breach of policy based on the evidence provided. Where this is the case, they will refer to section 9 of this policy.

Staff members will report their concerns to the Principal verbally, and then submit a Low-level Concern Reporting Form. A record of verbal disclosures should also be summarised in the written submission. When submitting concerns, staff will take care to ensure that they observe the Confidentiality Policy and protect the identity of all individuals to which the concern pertains as far as possible.

Staff members may request anonymity when reporting a concern, and the academy will endeavour to respect this as far as possible. The academy will not, however, promise anonymity to staff members who report concerns in case the situation arises where they must be named, e.g. where it is necessary for a fair disciplinary hearing. In line with the Whistleblowing Policy, staff will be protected from potential repercussions caused by reporting a genuine concern.

**Where a low-level concern relates to a Primary Principal, it should be reported to the trust's Head of Safeguarding and Inclusion. Tel: 07354 848159**

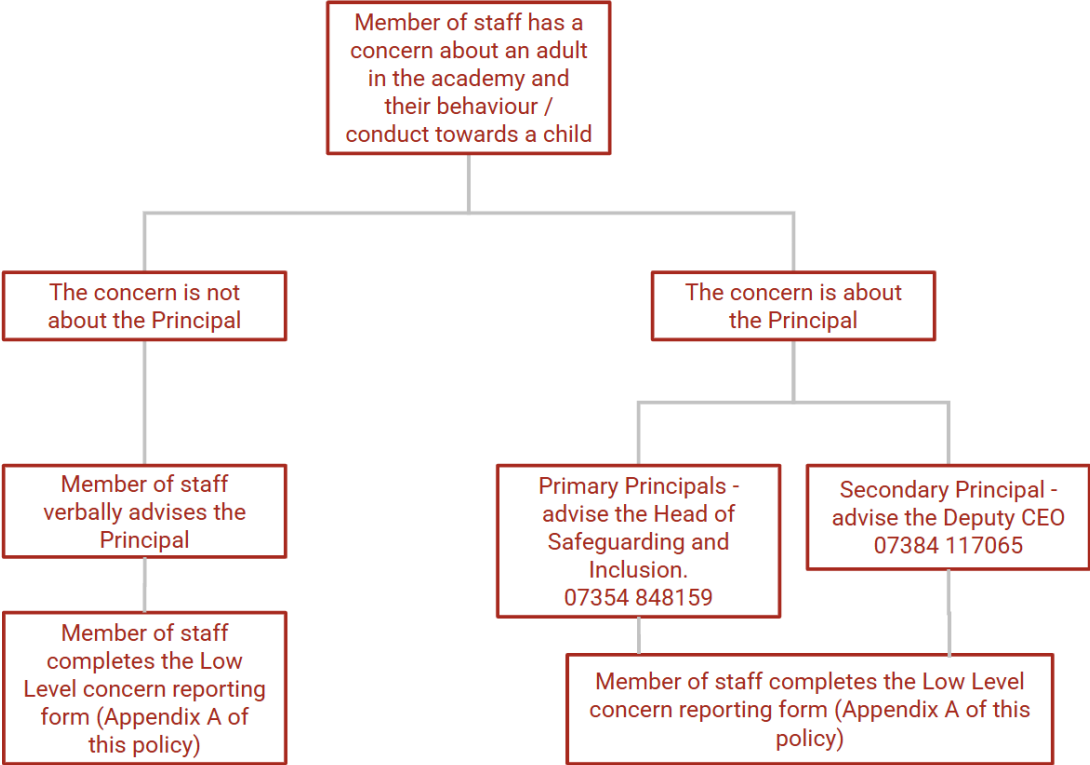
**Where a low-level concern relates to the Secondary Principal, it should be reported to the trust's Deputy CEO. Tel: 07384 117065**

Where a low-level concern relates to a person employed by a supply agency or a contractor to work in the academy, staff will also be required to report this to the Principal, who will, in turn, inform the employer of the subject of the concern.

All concerns reported to the Principal (or most senior person in their absence, e.g. the Vice Principal) will be documented in line with the Data Retention Policy.

In line with the [Evaluating concerns](#) section of this policy, if the academy receives an allegation of a low-level safeguarding concern regarding an organisation that has hired the academy premises, the academy will follow its usual safeguarding procedures and process for managing allegations.

**Process flow for a member of staff to report concerns:**



## 7. Self-reporting

On occasion, a member of staff may feel as though they have acted in a way that:

- Could be misinterpreted.
- Could appear compromising to others.
- They realise, upon reflection, falls below the expected professional standards set out in the Staff Code of Conduct.

Academies will ensure that an environment is maintained that encourages staff members to self-report if they feel as though they have acted inappropriately or in a way that could be construed as inappropriate upon reflection. The Principal and DSL will, to the best of their abilities, maintain a culture of approachability for staff members, and will be understanding and sensitive towards those who self-report.

Staff members who self-report will not be treated more favourably during any resulting investigations than staff members who were reported by someone else; however, their self-awareness, professional reflection and intentions will be taken into consideration. Self-reporting does not mean immunity from accountability.

## 8. Evaluating concerns

Where the Principal (or Head of Safeguarding and Inclusion, or Deputy CEO where the concern relates to a Principal) is notified of a staff conduct concern, they will use their professional judgement to determine if the concern is low-level or if it must be immediately escalated, e.g. where a pupil is at immediate risk of harm. When evaluating if a concern is low-level, the Principal (or Head of Safeguarding and Inclusion, or Deputy CEO where the concern relates to a Principal) may need to discuss the concern with the DSL or member of the Executive Team, and will seek advice from the LADO (01302 737332 [lado@doncaster.gov.uk](mailto:lado@doncaster.gov.uk)) where there is any doubt about whether the concern in fact meets the harm threshold. When seeking external advice, the Principal will ensure they adhere to the Data Protection Policy, and the information sharing principles outlined in the Child Protection and Safeguarding Policy, at all times.

To evaluate a concern, the Principal (or Head of Safeguarding and Inclusion, or Deputy CEO as where the concern relates to a Principal) will follow the steps below:

### 1. Initial information gathering

- Speak to the individual who raised the concern to determine the facts and obtain any relevant additional information.

### 2. Consideration of information

- Review the information and determine whether the behaviour displayed by the individual about whom the concern was reported is consistent with the Staff Code of Conduct and the law.

- Determine whether the concern, when considered alongside any other low-level concerns previously made about the same individual, should be reclassified as an allegation and dealt with accordingly.

### **3. Consultation where required**

- Consult with, and seek advice from, external agencies when in doubt over the course of action to follow (e.g. LADO)

### **4. Discussion with the subject**

- Speak to the individual about whom the concern has been raised to inform them of the concern and to give them an opportunity to respond to it.

### **5. Record keeping**

- Ensure that accurate and detailed records are kept of all internal and external conversations regarding evaluating the concern, and any actions or decisions taken.

## **9. Acting on concerns**

### **Where the concern is unfounded**

If it is discovered upon evaluation that the low-level concern refers to behaviour that was not considered to be in breach of the Staff Code of Conduct and the law, the Principal (or Head of Safeguarding and Inclusion, or Deputy CEO as where the concern relates to a Principal) will speak to the individual about whom the concern was made to discuss their behaviour, why and how the behaviour may have been misconstrued, and what they can do to avoid such misunderstandings in the future. The Principal (or Head of Safeguarding and Inclusion, or Deputy CEO as where the concern relates to a Principal) will also speak to the individual who shared the concern, outlining why the behaviour reported is consistent with academy standards and the law. The Principal will take care to ensure that conversations with individuals who reported concerns that transpired to be unfounded do not deter that individual from reporting concerns in the future.

If a concern has been raised via a third party, the Principal (or Head of Safeguarding and Inclusion, or Deputy CEO as where the concern relates to a Principal) will 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.

### **Where the concern is low-level**

Where the Principal (or Head of Safeguarding and Inclusion, or Deputy CEO as where the concern relates to a Principal) determines that a concern is low-level, the academy will respond to this in a proportionate manner. The following procedure will be followed:

- They will hold a meeting with the individual about whom the concern was reported, during which they will:

- Discuss the concern with the individual.
  - Inform them of how their behaviour was perceived by the individual who reported the concern (without naming them, where possible).
  - Clearly state what about their behaviour was inappropriate and problematic.
  - Discuss the reasons for the behaviour with the individual.
  - Inform the individual clearly what about their behaviour needs to change.
  - Discuss any support that the individual may require in order to achieve the proper standards of behaviour.
  - Allow the individual the opportunity to respond to the concern in their own words.
- The Principal (or investigating officer where the concern relates to a Principal) may ask the individual to re-read the Staff Code of Conduct depending on the nature of the concern.
  - The Principal (or investigating officer where the concern relates to a Principal) will consider whether the individual should receive guidance, supervision or any further training.
  - Where considered appropriate in the circumstances, the Principal (or investigating officer where the concern relates to a Principal) will develop an action plan, with input from the individual, that outlines ongoing and transparent monitoring of the individual's behaviour and any other support measures implemented to ensure the staff member's behaviour improves. Action plans will be reviewed after an initial 4 week period by the staff member and the Designated Safeguarding Leader. Where required, action plans can be extended and must be reviewed again within at least 4 additional weeks.
  - Where it is necessary to undergo an investigation into the behaviour, this will be done discreetly, and information will only be disclosed to individuals on a need-to-know basis.
  - Where any pupil or other individual has been made to feel uncomfortable by the individual's behaviour, they will be offered pastoral support, where appropriate.
  - If a low-level concern involves off-duty conduct that could pose a risk in the workplace, a risk assessment should be considered.
  - Where low-level concerns raise issues of misconduct or poor performance, advice will be taken from HR.

The Principal (or investigating officer where the concern relates to a Principal) will ensure that all details of the low-level concern, including any resultant actions taken, are recorded and securely stored in line with the Data Retention Policy and the Data Protection Policy. The Principal (or investigating officer where the concern relates to a Principal) will ensure that these records are kept organised and up-to-date, and that it is easy to refer back to them if any other concerns are reported about the same individual.

The specific approach to handling low-level concerns will be adapted on a case-by-case basis. A low-level concern may not result in disciplinary procedures; however, individuals may be given warnings in line with the Disciplinary Policy and Procedure where behaviour does not improve once it is brought to their attention. Where behaviour does not improve over a longer period of time, the concerns will be escalated. Decisions on whether disciplinary or safeguarding action is required should be recorded in writing, with a clear explanation of the rationale.

Lessons learned from trends in low-level concerns may feed into staff training, policy revision, or cultural evaluation.

## Where the concern is serious

The Principal (or investigating officer where the concern relates to a Principal) may evaluate that a concern is more serious than the reporter originally thought, e.g. when viewed in conjunction with other evidence or other concerns made about the same individual. Where this evaluation is made, the concern will be escalated, and dealt with as an allegation in accordance with the academy Child Protection and Safeguarding policy.

## 10. Record keeping

Academies will retain all records of low-level concerns, including those that were found to be unfounded. Principals will ensure that all records include the most accurate and up-to-date information and will store them in the electronic low-level concerns file. The Principal will ensure that all low-level concerns are stored together, in an organised and consistent manner, to ensure they can be easily reviewed and analysed where necessary.

Records will include:

- A clear and comprehensive summary of the concern.
- The context in which the concern arose.
- Details of how the concern was followed up and resolved.
- A note of any action taken, decisions reached, and the outcome.
- The name of the individual sharing concerns – if the individual wishes to remain anonymous, this will be respected as far as reasonably possible.
- The rationale for decisions made regarding any concerns.

The Principal will periodically review the recent low-level concerns made to ensure that they are being appropriately dealt with and to check for any concerning behaviour patterns amongst the staff cohort as a whole.

Where a pattern of behaviour has become so concerning that it meets the harms threshold, this will be referred to the LADO. In some cases the LADO may advise against discussing the concern with the individual and provide a rationale for this advice. Leaders need to demonstrate they have considered this advice and have a justifiable reason for any deviation. It should be considered whether there are any wider cultural issues within the academy that enabled the behaviour to occur. The Principal of an academy may raise with the trust if they feel policies, including this one, could be revised.

Where multiple low-level concerns have been made about the same individual, these will be kept together, and in chronological order.

In line with the Data Protection Policy, records will be kept confidentially and held securely to comply with the Data Protection Act 2018 and the UK GDPR. The academy will consider how long information needs to be retained; however, it will be retained at least until the individual leaves their employment.

When providing employment references, the academy will ensure that any information provided confirms whether they are satisfied with the applicant's suitability to work with pupils, and only

provide the facts of any substantiated safeguarding concerns or allegations, including a group of low-level concerns about the same individual, that meet the harm threshold.

Any repeated low-level safeguarding concerns or allegations which do not meet the harm threshold which have been found to be false, unfounded, unsubstantiated, or malicious will not normally be included in any reference.

The Principal will decide in exceptional circumstances if a reference cannot be provided or if certain questions asked by the prospective employer cannot be answered, with HR advice sought when appropriate.

Access to low-level concerns records is managed by the Principal. They may need to be accessed by the Principal or DSL to:

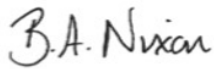
- **Identify Patterns:** A single low-level concern might seem minor, but multiple concerns raised about the same person over time could indicate a more significant issue to be addressed.
- **Inform Training and Support:** The records can highlight a need for broader staff training on topics like professional boundaries or appropriate conduct. They can also be used to provide targeted support or guidance to an individual staff member who may need help understanding the professional expectations of their role.
- **Support Investigations:** In cases where a formal allegation is made against a staff member, reviewing low-level concerns can provide important context.

## 11. Monitoring and review

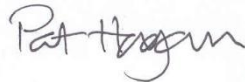
This policy will be reviewed annually by the Strategic Safeguarding Leader, and in response to any new safeguarding guidance. The next scheduled review for this policy is September 2025

Policy reviewed August  
2025

Signed CEO:



Signed:



Chair of Directors:

Policy to be reviewed: September 2026



## Appendix A - Low-level Concern Reporting Form

Thank you for reporting your concerns to the safeguarding team; we are grateful to you for taking the safety and welfare of our pupils seriously. Please fill in the below form, including as much detail as you can, and return it directly to the Principal. Please refrain from discussing this concern with anyone other than the Principal until the matter has been dealt with. We ask that you keep all details, including the name staff member to whom the concern pertains, confidential. If you are unsure if your concern needs to be logged please discuss this with the Principal.

Where concerns relate to the Principal they should be raised with:

- The Head of Safeguarding and Inclusion for Primary Principals – 07354848159
- The Deputy CEO for the Secondary Principal – 07384 117065

Your details	
<b>Name (optional)</b>	
<b>Role</b>	
<b>Request for anonymity (Y / N)</b> <small>Requests for anonymity can be considered but not guaranteed</small>	
<b>Date and time of record completed:</b>	<b>Date and time of concern:</b>
<b>Details of individual whom the concern is about</b>	
<b>Name</b>	
<b>Role</b>	
<b>Relationship to the individual reporting the concern, e.g. manager, colleague</b>	
<b>Details of concern</b>	
<b>Please include as much detail as possible. Think about the following:</b> What behaviour and/or incident are you reporting? What exactly happened? Why does the behaviour and/or incident worry you? Why do you believe the behaviour and/or incident is not consistent with our Staff Code of Conduct?	

**Details of any pupils or young people involved**

<b>Name(s)</b>	
<b>Do you believe there is a risk of harm to the above pupils or young people, either now or in the future, as a result of the individual's behaviour? Explain your answer.</b>	
<b>Please state any other information that you believe is relevant to the processing of this concern.</b>	
<b>Signature</b>	

**For use by safeguarding team upon receipt of concern**

<b>Date and time concern received</b>	
<b>Signature of Principal</b>	
<b>Actions to be taken</b> (e.g. no action, investigation, reclassification as allegation meeting the harms threshold.)	
<b>Rationale for deciding on actions above</b>	

## Appendix B – City of Doncaster Council LADO thresholds (2025)

*N.B: This document has been created externally by City of Doncaster Local Authority Designated Officer (LADO) and reproduced here for reference.)*

### LADO REFERRALS THRESHOLD DOCUMENT

The procedures for dealing with allegations need to be applied using your professional judgement.

Not all allegations, incidents and concerns will fit exactly in the example boxes below. Some cases will not meet the criteria set. Many cases will either not meet the criteria set, or may do so without the need for a police investigation / enquiries by Doncaster Children's Services. In these cases, local arrangements should be followed. Some allegations may require immediate intervention by Children's Services and/or South Yorkshire Police, it is your responsibility to contact Doncaster MASH, Emergency Social Services Team and/or the Police in these circumstances.

The LADO should be informed within 24hrs of all allegations that come to an organisation's attention that appear to meet the criteria set out below. If once the referral has been made, the LADO's view is that the Police, Children's Services and/or any regulatory body should be consulted, LADO will advise as to who is responsible for making the relevant referrals.

Suspension should be considered in any case where there is cause to suspect a child/ren is at risk of significant harm, or the allegation warrants investigation by the police, or is so serious that it might be grounds for dismissal. People must not be suspended automatically, or without careful thought. Employers must consider whether the circumstances of a case warrant a person being suspended from contact with children as part of their role until the allegation is resolved. NB. Neither the local authority, the Police, nor Children's Social Care can require an employer to suspend a member of staff or a volunteer. The power to suspend is vested in the employer alone.

Where an organisation is confident that LADO referral criteria is **not** met, they should maintain a record of the incident/information received and any actions they have taken internally as a result (in case further information comes to light which calls into question why no formal LADO referral was made). The matter should be dealt with by the employer through their HR/ internal management procedures.

In all cases where a referral to LADO is made, irrespective of the outcome, it is the responsibility of the employer to inform the employee/volunteer of the outcome of the referral and/or LADO process. An employer will be advised as to when this information is able to be shared with the employee/volunteer, so as not to prejudice any ongoing investigations. In the case of manager-less organisations, the LADO will agree who the best person is to keep the person subject to the LADO process informed.

Conduct	
Threshold Not Met	Threshold Met
<p>This list is not exhaustive - examples could include:</p> <ul style="list-style-type: none"> <li>Complaint made by a parent or carer or a comment made by a child that does not seem to have any corroborating evidence. There is no presentable evidence and/or witness accounts do not corroborate the allegation.</li> <li>Member of staff alleged to have acted or reacted in a way considered inappropriate but not harmful.</li> <li>Parental or child complains about an incident to outside agency e.g. Ofsted, who have referred to LADO for further enquiries; allegation made but manager believes at this point they can deal with this internally.</li> </ul>	<p>This list is not exhaustive - examples could include:</p> <ul style="list-style-type: none"> <li>Allegation made with credible corroborating evidence, where a child has been placed at risk of harm due to the actions/behaviour of the professional/volunteer.</li> <li>A residential worker drags a child/young person out of the room during an incident. Appropriate restraint techniques were not used. The child was not in immediate danger at the time.</li> <li>A Supervising Social Worker (SSW) has formed an inappropriate (non-sexual) relationship with a Foster Carer. The SSW purposefully fails to report a safeguarding incident involving the Foster Carer and the child in placement, due to the over-friendly relationship she has with the Carers.</li> </ul>

Physical Harm / Abuse	
Threshold Not Met	Threshold Met
<p>This list is not exhaustive - examples could include:</p> <ul style="list-style-type: none"> <li>A young person in a children's home is involved in a confrontation, subsequently making accusations of physical harm where there were several witnesses and there is evidence that the incident/allegation could not have happened.</li> <li>A child accuses a Teacher of pushing them, when it appears they were being guided away from a situation (covered by 'Use of Reasonable Force' DfE 2013).</li> <li>A nursery worker is seen by a parent to be pulling a child away from a situation; parent considers this is done roughly but the worker claims it was to remove the child from a confrontation where they may have been harmed/ may have harmed another child and there is evidence to support this.</li> </ul>	<p>This list is not exhaustive - examples could include:</p> <ul style="list-style-type: none"> <li>A disclosure by a child or young person that uses the word 'hit' or 'hurt.' There is conflicting or lack of evidence to disprove the allegation.</li> <li>Intentional use of non-restraint that has caused an injury to the child being restrained.</li> </ul> <p>An incident witnessed where there is a physical exchange between staff and child or young person. It is unclear whether self-defence or retaliation was involved. The matter needs full investigation.</p>

Sexual Harm / Abuse	
Threshold Not Met	Threshold Met
<p>This list is not exhaustive – examples could include:</p> <ul style="list-style-type: none"> <li>• A young person tells their teacher that another teacher 'makes her feel funny when he looks at her' but no evidence that there is harmful intent.</li> <li>• A professional or volunteer makes a remark of a sexual nature that is not aimed at an individual child or group of children but is considered unprofessional, without any evidence of harmful intent.</li> <li>• A residential worker shows her holiday photos to some young people and accidentally shows a picture of her in a bikini. There is no evidence of harmful intent.</li> </ul>	<p>This list is not exhaustive – examples could include:</p> <ul style="list-style-type: none"> <li>• A child alleges that a professional has touched them inappropriately.</li> <li>• A teacher is communicating with a child on an online platform and there is communication that could be interpreted as sexual or an act of grooming.</li> <li>• Professional or volunteer meets or attempts to meet a child outside the work environment, for the purpose of sexual activity.</li> </ul>

Emotional Harm/Abuse	
Threshold Not Met	Threshold Met
<p>This list is not exhaustive – examples could include:</p> <ul style="list-style-type: none"> <li>• A child is upset because a teacher has shouted at them in the classroom.</li> <li>• A foster carer does not buy a child in placement some sweets as punishment for their behaviour.</li> <li>• A taxi driver refuses to let a child out of the car until they have paid the fare. The taxi driver contacts switchboard immediately for support in resolving the situation.</li> </ul>	<p>This list is not exhaustive – examples could include:</p> <ul style="list-style-type: none"> <li>• Making deliberate targeted and derogatory remarks to a child, for example regarding the child's ethnicity.</li> <li>• A member of residential staff refuses to allow a child to have planned telephone contact with their parent as a means of punishment.</li> <li>• A dance teacher calls a child 'fat' and constantly punishes them for making mistakes during rehearsals.</li> </ul>

Neglect	
Threshold Not Met	Threshold Met
<p>This list is not exhaustive – examples could include:</p> <ul style="list-style-type: none"> <li>• A nursery worker leaves the room for a short period of time, leaving the room understaffed and outside of staffing ratios.</li> <li>• A young person complains that their Foster Carer has bought them second-hand shoes for school.</li> <li>• An overnight carer accidentally falls asleep for ten minutes whilst on shift. The person being cared for is unharmed.</li> </ul>	<p>This list is not exhaustive – examples could include:</p> <ul style="list-style-type: none"> <li>• A foster carer receives complaints against them about poor practice and standards of care, including children in their care presenting as not always clean or appropriately dressed.</li> <li>• A Social Worker's own child is placed on a Child Protection Plan for neglect.</li> <li>• A football coach intentionally fails to seek medical attention for a young person who is injured whilst playing, despite them presenting as significantly unwell.</li> </ul>