



Low Level Concerns Policy

This is a B&FC Group policy

Date approved: 6 July 2026
Approved by: Corporation Board
Responsible Manager (s): Director of Student Services, Director of Student Journey, Head of Student Support Wellbeing and Inclusion
Executive Lead: Executive Principal

Applicable to employees:	Yes
Applicable to students and apprentices:	Yes
Accessible to students and apprentices:	Yes
Accessible to general public: (including clients)	Yes

Consultation

Consultation undertaken with: Safeguarding Board	Date: 19 June 2026
---	-----------------------

Policy review frequency, normally: annually

Contents

1. Scope and purpose of the policy
2. Policy statement
3. Statutory Requirements
4. Accountability
5. Roles and Responsibilities
6. Definitions
7. Record Keeping
8. Linked Policies and Procedures
Equality Impact Assessment

1. Scope and purpose of policy

This policy applies to all employees, senior post holders, governors, volunteers, agency employees, and others working in or on behalf of Blackpool and The Fylde College Group. It sets out the College Group's overarching approach to identifying, reporting, recording and responding to low-level safeguarding concerns about the behaviour of adults working in or on behalf of the Group. This policy does not form part of employee contracts of employment and does not confer any contractual rights.

This policy enables employees and others working in or on behalf of the College Group to share low-level concerns about behaviour, whether in themselves or others, so that appropriate action can be taken before behaviour escalates into harm. Its purpose is to promote a culture of vigilance, transparency and accountability; ensure concerns about adult behaviour are identified and addressed early; support employees to reflect on and improve professional conduct; ensure concerns are managed consistently and proportionately; and reduce the risk of harm to students and apprentices. This policy aligns with Keeping Children Safe in Education, specifically Part Four, Section Two, which relates to concerns or allegations that do not meet the harm threshold.

This policy should be read in conjunction with the Blackpool and The Fylde College Group Safeguarding Policy and the relevant local safeguarding procedures for each member of the Group. Each member of the Group will maintain local procedures, reporting routes and recording arrangements for managing low-level safeguarding concerns in line with this Group policy.

2. Policy statement

Blackpool and The Fylde College Group is committed to safeguarding and promoting the welfare of all students and apprentices. The College Group recognises that creating and sustaining a strong safeguarding culture requires openness, transparency, professional curiosity and early intervention, and that concerns about adult behaviour should be raised and addressed at the earliest possible stage. In support of this safeguarding culture, the College Group will:

- Ensure safeguarding is everyone's responsibility, and all employees, governors, volunteers, and others working in or on behalf of the College Group are expected to contribute to a culture in which concerns are raised without fear, handled sensitively and acted on proportionately;
- ensure that low-level safeguarding concerns are shared, recorded and considered in line with local procedures, even where they appear minor, ambiguous or do not meet the harm threshold;
- support employees to reflect on professional boundaries, seek advice early and self-report where their own behaviour may have been misinterpreted or may have fallen below expected standards;
- manage concerns fairly, consistently and proportionately, with a focus on safeguarding, learning, improvement and prevention, while taking decisive action where patterns, escalation or harm-threshold concerns are identified;
- protect confidentiality where appropriate, while recognising that information will be shared where necessary to safeguard students and apprentices, manage risk, comply with legal obligations or support appropriate employment action;

- ensure that each member of the Group maintains local procedures, reporting routes and recording arrangements for low-level safeguarding concerns, aligned to this Group policy and relevant safeguarding, professional conduct, disciplinary and HR processes.

3. Statutory Requirements

This policy is informed by relevant legislation, statutory guidance and sector expectations relating to safeguarding concerns or allegations about adults working in or on behalf of the College Group, including concerns that do not meet the harm threshold. This includes:

- Keeping Children Safe in Education, particularly Part Four, which sets out expectations for managing allegations and low-level concerns about staff, volunteers, contractors and others working with learners.
- Wider safeguarding legislation and guidance, including Working Together to Safeguard Children, the Education Act 2002, the Education and Training (Welfare of Children) Act 2021, safer recruitment requirements and arrangements for referral to the Local Authority Designated Officer where concerns may meet the harm threshold.
- Employment, equality and data protection requirements, including fair and proportionate management of conduct concerns, non-discriminatory decision-making, and lawful recording, retention and information sharing.
- Inspection and regulatory expectations, including Ofsted and, where relevant, Office for Students expectations relating to safeguarding culture, governance, reporting arrangements and response to concerns.
- Local safeguarding partnership, local authority and LADO arrangements relevant to each member of the Group.

4. Accountability

- The Corporation Board holds ultimate accountability for ensuring that the College Group and each member of the Group maintain effective safeguarding governance, culture, policy and assurance arrangements, including arrangements for identifying, reporting, recording and responding to low-level safeguarding concerns about adults working in or on behalf of the Group.
- The Chief Executive Officer is responsible for ensuring this policy is implemented across the College Group and that each member of the Group has sufficient leadership capacity, local procedures, reporting routes and recording arrangements to manage low-level safeguarding concerns effectively.
- The Director of Student Services is responsible for strategic oversight of this policy across the College Group, including alignment with safeguarding policy, professional boundaries expectations, local procedures, reporting arrangements, assurance activity and statutory guidance.
- The Head of Student Support, Wellbeing and Inclusion, working with the Safeguarding and Wellbeing Manager and safeguarding practitioners, is responsible for supporting the day-to-day management, recording, review and escalation of low-level safeguarding concerns across Blackpool and The Fylde College, in line with this Group policy and local procedures.

- The Director of Student Journey and relevant Furness Senior Safeguarding Leads (DSL and DDSL) are responsible for ensuring that low-level safeguarding concerns are managed effectively within Furness College and Barrow Sixth Form, in line with this Group policy and local procedures.
- Managers are responsible for supporting the fair and consistent application of this policy within their areas, ensuring that employees understand expectations around professional conduct and boundaries, and working with safeguarding and People colleagues where concerns require management action.
- All employees, governors, volunteers, agency employees, contractors and others working in or on behalf of the College Group are accountable for maintaining professional boundaries, raising low-level safeguarding concerns without delay, self-reporting where appropriate, and following the relevant local procedures.
- Where a concern may meet the harm threshold, it must be escalated immediately in line with local safeguarding procedures, including referral to the Local Authority Designated Officer where appropriate.

5. Definitions

- Safeguarding and promoting the welfare of children: providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment, whether within or outside the home, including online; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.
- Low-level safeguarding concern: any concern, no matter how small, and even if it is no more than a sense of unease or a nagging doubt, that an adult working in or on behalf of the College Group may have acted in a way that is inconsistent with the relevant Staff Code of Conduct or professional boundaries expectations, including inappropriate conduct outside work, but does not meet the harm threshold or is otherwise not serious enough to consider referral to the Local Authority Designated Officer.
- Harm threshold: the threshold at which an allegation or concern indicates that an adult may have behaved in a way that has harmed, or may have harmed, a child or learner; possibly committed a criminal offence against or related to a child or learner; behaved towards a child or learner in a way that indicates they may pose a risk of harm; or behaved, or may have behaved, in a way that indicates they may not be suitable to work with children or learners.
- Local Authority Designated Officer: the local authority officer or designated service responsible for providing advice and oversight in relation to allegations that may meet the harm threshold for adults working with children. Where a concern may meet the harm threshold, referral or consultation with the relevant Local Authority Designated Officer must take place in line with local safeguarding procedures.
- Professional boundaries: the expected standards of conduct, judgement and behaviour that maintain safe, respectful and appropriate relationships between adults working in or on behalf of the College Group and students or apprentices.

- Self-reporting: the act of an employee or other adult working in or on behalf of the College Group raising a concern about their own behaviour, conduct or professional boundaries where they recognise that their actions may have been misinterpreted, may have fallen below expected standards, or may require advice, reflection or support.
- Local procedures: the operational arrangements maintained by each member of the Group for raising, receiving, recording, reviewing, responding to and escalating low-level safeguarding concerns, including local reporting systems, named contacts, decision-making routes and links to safeguarding, People/HR and disciplinary processes.

6. Record Keeping

Each member of the College Group will maintain local recording arrangements for low-level safeguarding concerns. Records will be retained locally within the relevant member of the Group, using the approved local system or log, and must be kept securely, confidentially and in accordance with data protection, safeguarding and employment requirements.

Although records will be retained locally, Blackpool and The Fylde College Group must have access to all relevant information required for safeguarding governance, assurance, oversight, statutory compliance, case review, pattern analysis, audit, legal advice, employment processes and risk management. Local arrangements must therefore ensure that information can be shared appropriately with the Director of Student Services, Director of Student Journey, relevant safeguarding leads, People colleagues and other authorised senior leaders where there is a legitimate need to know.

Records should include, as a minimum, the nature of the concern, the context in which it arose, the name of the person sharing the concern where known, the person to whom the concern relates, actions taken, decision-making rationale, outcome, whether the concern was self-reported, and any escalation, advice or referral made. Anonymity should be respected as far as reasonably possible, but confidentiality cannot be guaranteed where information must be shared to safeguard learners, manage risk, comply with legal duties or support appropriate employment action.

Records of low-level safeguarding concerns will be reviewed regularly by the relevant local safeguarding lead and, where appropriate, with People/HR colleagues. Reviews should consider whether there are patterns, repeated behaviours, escalation in concern, wider cultural issues, training needs, management action or safeguarding implications. Where a concern may meet the harm threshold, it must be escalated immediately through local safeguarding procedures, including referral to the Local Authority Designated Officer where appropriate.

Records will be retained in line with the relevant local retention schedule, safeguarding requirements, employment requirements and data protection legislation. As a minimum, records relating to low-level safeguarding concerns should be retained for as long as

7. Linked Policies and Procedures

Group:

- Safeguarding Policy

Blackpool and The Fylde:

- IT Systems Acceptable Use Policy (colleague)
- Data Protection Policy
- Security Policy
- Employee Professional Boundaries Policy
- Employee DBS Policy
- Employee Disciplinary Policy
- Whistleblowing Public Interest Disclosure Policy

Furness:

- Acceptable Use of IT Policy (staff)
- Whistleblowing Policy

Equality Impact Assessment

Impact Assessment for the 4 strands of Equality, Safeguarding, Health and safety and Sustainability					
Initial Form to be completed with Risk Assessments or as part of a proposal or change to a policy, plan or new way of working					
Title of Activity: Low Level Concerns Policy Name and title of proposer: Matt Dillon, Director of Student Service				Revision or New New	
Equality and Diversity. Are there students, apprentices, other customers, community/stakeholders, and/or colleague concerns that the proposed policy, project or change may be discriminatory or have an adverse impact on people with protected characteristics?					
A	Students/Apps/Customer	N	If so, how many individuals / which groups of are likely to be affected?		
B	Community/stakeholders	N			
C	Colleague	N			
Equality group		Positive impact High Low None	Negative impact High Low None	Reason / comments for positive impact why it could benefit any /all of the equality groups	Reason /comments for negative impact /what could disadvantage any/all of the equality groups
Gender (Men/women/Non-binary/Transgender)		N	N		
Age		N	N		
Race or ethnicity		N	N		
Learning difference		N	N		
Physical and/or sensory disability		N	N		
Mental health need		N	N		
Sexual Orientation		N	N		
Religion and Belief		N	N		
Marriage and civil partnership		N	N		
Pregnancy and maternity		N	N		
Carers/care experienced		N	N		
Socio Economic deprivation indicators		N	N		
Applies to ALL groups		N	N		
What changes or actions do you recommend to improve the service, project, policy, or change to eradicate or minimise the negative impacts identified? Who will be responsible for monitoring these actions?					
Have students, apprentices/other customers, communities and/or colleagues been consulted in the review / proposed change?					
A	Students/Apps/Customers	Yes			
B	Community	NO			
C	Colleague	Yes			
	If yes, who and how many have you involved and how have they been involved?	Student representatives through elected members of student Union. Managers through CCMT and Heads through AMT Members of Exec and Directors			
Safeguarding: Are there any aspects of this proposal which could cause a Student/member of staff/visitor to feel unsafe? If yes, how has this been considered? What are the risks? What are the benefits?				No	
Health and Safety: Have any risks been identified? If yes, how has this been considered? What are the risks? What are the benefits?				No	
Sustainability: Are there expected benefits or impacts on sustainability issues? If yes, how have these been considered?				No	
Evidence: What evidence do you have for your conclusions and expectations for these conclusions? How will this impact be monitored for all these considerations?					
Is this policy of a high/medium or low risk?:				Low	