

Process for Reporting Low-Level Concerns

Purpose

To ensure that all concerns about adults working with or on behalf of MTC Training learners, no matter how small, are reported, recorded, and addressed promptly and appropriately. This process promotes an open and transparent safeguarding culture and helps early identification and response to inappropriate, problematic or concerning behaviour.

While this process is titled 'Low-Level Concerns', MTC Training recognises that no concern is too minor to warrant attention. Such concerns will not ordinarily require immediate escalation to the Designated Safeguarding Lead or external agencies; however, all concerns, regardless of perceived severity, must be recorded. Colleagues are expected to exercise professional curiosity rather than judgement when identifying and documenting concerns. These records will be subject to ongoing review, and escalation will occur promptly should the level of risk increase.

Definition of a Low-Level Concern

A low-level concern is any concern, however minor, and even if it causes only a sense of unease or a 'nagging doubt' that an adult working in or on behalf of MTC Training may have acted in a way that:

- Is inconsistent with the Colleague Code of Conduct, including inappropriate conduct outside of work; and
- Does not meet the harm threshold or is otherwise not serious enough to consider a referral to the Local Authority Designated Officer (LADO).

Examples include:

- Being overly friendly with learners.
- Having favourites.
- Taking photographs of learners on a personal device.
- Using inappropriate language or humiliating learners.
- Contacting learners via personal phone or social media.

(KCSIE 2025, paras. 430–431)

Reporting Procedure

1. Immediate Action

- Any colleague who identifies a low-level concern must report it as soon as possible.
- Concerns should be reported via a Cause for Concern form or directly to the Designated Safeguarding Lead (DSL) or to a Deputy DSL.
- If the concern relates to the DSL or a Deputy DSL, report to the Director of Training and Skills.

2. Self-Reporting

- Colleagues are encouraged to self-report if they find themselves in a situation that could be misinterpreted or falls below expected professional standards.
(KCSIE 2025, para. 440)

3. Confidentiality

- The identity of the person raising the concern will be respected as far as reasonably practicable, unless disclosure is required for disciplinary or legal reasons.

Recording

- All low-level concerns must be recorded in writing in a Cause for Concern form
- Records should include:
 - Details of the concern.
 - Context in which it arose.
 - Action taken.
 - Name of the individual reporting (or note if anonymous).
- Records must be kept confidential, secure, and compliant with UK GDPR.

(KCSIE 2025, paras. 441–442)

Review and Monitoring

- Records will be reviewed quarterly by the Safeguarding Committee, and when required the People Business Partner to identify patterns of behaviour.
- If a pattern emerges, concerns may be escalated to meet the harm threshold and referred to the LADO.

(KCSIE 2025, para. 443)

Responding to Concerns

- The DSL or Director Training and Skills will:
 - Gather relevant information by speaking to the person raising the concern and, if appropriate, the individual involved.
 - Determine whether:
 - No further action is required.
 - Additional training or guidance is needed.
 - Disciplinary or capability procedures should be considered.
 - The concern meets the harm threshold and requires referral to the LADO.

(KCSIE 2025, paras. 446–447)

Key Principles

- Promote a culture of openness, trust, and transparency.
- Encourage staff to report concerns without fear of reprisal.
- Ensure proportionate, sensitive responses.
- Protect staff from false allegations or misunderstandings.

(KCSIE 2025, paras. 428–429, 434–436)

References in Safeguarding Policy

This section will state:

“This process is based on statutory guidance in Keeping Children Safe in Education 2025, Part Four, Section Two: Concerns or allegations that do not meet the harm threshold (paragraphs 427–449).”