



STARFISH AP
The Starfish Way
Low-Level Concerns Policy
Academic Year 2026–2027

Document Title	Low-Level Concerns Policy
Organisation	Starfish Alternative Provision
Academic Year	2026–2027
Version	1
Policy Owner	Chloe Fox – Director & Head of Provision
Applies To	All employees, volunteers, agency staff, contractors, consultants, visitors, placement students and professionals working with or on behalf of The Starfish Hub
Date Approved	Sep 2026
Review Date	Sep 2027
Next Review	Annually, or sooner following legislative or organisational changes

Document Purpose

This policy sets out The Starfish Hub's approach to identifying, reporting, recording and responding to low-level concerns relating to the conduct of adults working with children and young people.

At The Starfish Hub, we recognise that safeguarding is most effective when concerns are identified and addressed early. Not every concern about an adult's behaviour will meet the threshold for a safeguarding allegation. However, concerns that appear minor in isolation may, when viewed collectively, indicate patterns of behaviour that require reflection, support, intervention or escalation.

This policy promotes a culture of openness, professional curiosity and accountability where staff feel confident to raise concerns without fear of blame or judgement.

The purpose of this policy is not to create a culture of suspicion. Rather, it is to create a culture where safeguarding is everyone's responsibility and where concerns can be discussed professionally, proportionately and transparently.

This policy should be read alongside The Starfish Hub's Safeguarding & Child Protection Policy, Staff Code of Conduct, Whistleblowing Policy, Safer Recruitment Policy, Disciplinary Policy and the wider policies forming part of The Starfish Way Governance & Practice Framework.

The Starfish Way

At The Starfish Hub, we believe that safeguarding is built through everyday practice. Children are safest in environments where adults notice concerns early, remain professionally curious and feel confident to speak up when something does not feel right. Many serious safeguarding incidents are preceded by smaller concerns that, when viewed individually, may appear insignificant. Effective safeguarding requires us to pay attention to those moments, reflect upon them and respond appropriately.

The Starfish Way is built upon eight guiding principles:

Safety

The welfare of children is always our primary consideration.

Trust

Strong safeguarding cultures are built upon honesty, transparency and accountability.

Attunement

We remain attentive to behaviours, patterns and professional boundaries.

Regulation

Concerns are managed calmly, fairly and proportionately.

Flexibility

Responses are tailored according to context, risk and individual circumstances.

Inclusion

Everyone has a responsibility and a right to raise concerns.

Support

Low-level concerns provide opportunities for reflection, guidance and professional growth.

Humanity

We approach concerns with fairness, dignity and compassion whilst maintaining clear professional standards.

When concerns arise, we do not simply ask:

"Has a policy been breached?"

Instead, we ask:

"What happened, what can we learn, are there emerging risks, and what action is needed to maintain a safe culture?"

Scope

This policy applies to:

- Employees.
- Volunteers.
- Agency staff.
- Contractors.
- Consultants.
- Placement students.
- Apprentices.
- Visitors working regularly with children.
- Any adult working with or on behalf of The Starfish Hub.

The policy applies regardless of whether conduct occurs:

- On site.
- Off site.
- During educational visits.
- During online interactions.
- Through digital communication.
- Through social media activity where relevant to professional conduct.

Legislative Framework

This policy has been developed in accordance with:

- Keeping Children Safe in Education (Current Edition).
- Working Together to Safeguard Children (Current Edition).
- Children Act 1989.
- Children Act 2004.
- Education Act 2002.
- Human Rights Act 1998.
- Data Protection Act 2018.
- UK General Data Protection Regulation (UK GDPR).

The Starfish Hub will review this policy whenever legislation or statutory guidance changes.

Definition of a Low-Level Concern

A low-level concern is any concern, doubt, sense of unease or information relating to an adult's behaviour that:

- Does not meet the threshold for harm.
- Is inconsistent with the Staff Code of Conduct.
- Falls below formal safeguarding allegation thresholds.
- Creates professional concern, uncertainty or discomfort.

The concern may involve behaviour towards:

- A child.
- A group of children.
- Another adult.
- The wider professional environment.

A low-level concern does not require proof before it is reported.

Examples of Low-Level Concerns

Examples may include, but are not limited to:

- Being overly familiar with a pupil.
- Favouritism towards a particular child.
- Inappropriate joking or language.
- Failure to maintain professional boundaries.
- Sharing excessive personal information.
- Inappropriate use of social media.
- Contacting pupils outside agreed professional channels.
- Not following safeguarding procedures.
- Being unnecessarily isolated with pupils.
- Conduct that causes colleagues professional unease.
- Dismissing or minimising safeguarding concerns.
- Behaviour that is inconsistent with The Starfish Hub's values.

These examples are not exhaustive. The context, frequency, severity and pattern of behaviour will always be considered.

Professional Curiosity and Safeguarding Culture

The Starfish Hub is committed to fostering a culture where concerns can be raised openly and professionally.

Staff should not ignore concerns because:

- They appear minor.
- They are uncertain whether the concern is significant.
- They do not wish to upset a colleague.
- They feel they lack evidence.

Professional curiosity means being willing to notice, question and discuss concerns when something feels inconsistent with expected standards. A concern does not need to be proven before it is shared.

Self-Reporting

The Starfish Hub recognises that adults may occasionally make mistakes, experience lapses in judgement or find themselves in situations that could be misinterpreted.

Staff are encouraged to report incidents involving themselves where:

- Professional boundaries may have been compromised.
- A misunderstanding may have occurred.
- A situation could be misinterpreted.
- They believe transparency is necessary.

Self-reporting demonstrates professional integrity and supports a culture of openness and trust.

Reporting a Low-Level Concern

Low-level concerns should be reported as soon as reasonably possible. Concerns may be reported verbally or in writing.

Reports should normally be made to:

- The Director and Head of Provision.
- The Designated Safeguarding Lead.
- An appropriate senior leader.

Where concerns relate to the Director and Head of Provision, concerns should be raised with the appropriate governance representative, proprietor or safeguarding authority. The individual raising the concern is not responsible for investigating or proving it. Their responsibility is to share the concern.

Responding to a Concern

Upon receiving a low-level concern, the Director and Head of Provision or designated senior leader will:

- Consider the information available.
- Assess immediate safeguarding risks.
- Determine whether the concern meets a higher threshold.
- Gather relevant information.
- Speak with individuals where appropriate.
- Maintain accurate records.
- Determine an appropriate response.

Responses will be proportionate to the circumstances and level of risk identified.

Possible Outcomes

Following consideration of a low-level concern, outcomes may include:

- No further action.
- Clarification or discussion.
- Informal guidance.
- Reflective supervision.
- Additional training.
- Professional mentoring.
- Review of working practices.
- Increased monitoring.
- Formal management action.
- Escalation to safeguarding procedures.
- Escalation to disciplinary procedures.
- Referral to external agencies where required.

The aim is always to ensure safety whilst supporting professional development and accountability.

Record Keeping

Accurate records are essential.

Records may include:

- Details of the concern.
- Dates and times.
- Individuals involved.
- Actions taken.
- Outcomes reached.
- Follow-up actions.

Records will be:

- Kept confidential.
- Stored securely.
- Managed in accordance with data protection requirements.

Records may be reviewed alongside other safeguarding information to identify patterns or emerging concerns.

Identifying Patterns and Trends

Individual low-level concerns may not indicate significant risk when viewed alone. However, repeated concerns, recurring themes or patterns of behaviour may indicate the need for further intervention.

The Director and Head of Provision will monitor records to identify:

- Repeated concerns involving the same individual.
- Emerging safeguarding risks.
- Professional conduct issues.
- Organisational learning opportunities.

Pattern recognition is a key component of effective safeguarding.

Relationship with Other Procedures

This policy operates alongside:

- Safeguarding & Child Protection Policy.
- Staff Code of Conduct.
- Whistleblowing Policy.
- Safer Recruitment Policy.
- Behaviour & Relational Practice Policy.
- Disciplinary Procedures.
- Grievance Procedures.

Where concerns meet a higher threshold, they will be managed through the appropriate safeguarding or disciplinary process.

Equality, Fairness and Confidentiality

The Starfish Hub is committed to ensuring that low-level concerns are managed fairly, objectively and without prejudice. Individuals will be treated with dignity and respect throughout any process.

Reasonable adjustments will be made where necessary to support:

- Disability.
- Communication needs.
- Neurodivergence.
- Language needs.
- Other vulnerabilities.

Confidentiality will be maintained wherever possible whilst ensuring that safeguarding responsibilities are fulfilled.

Learning and Continuous Improvement

Low-level concerns provide valuable opportunities to strengthen safeguarding culture.

Learning from concerns may contribute to:

- Staff training.
- Policy development.
- Professional supervision.
- Safeguarding improvements.
- Organisational reflection.

The Starfish Hub views low-level concerns as an important preventative safeguarding measure rather than solely a disciplinary mechanism.

Monitoring and Review

The Director and Head of Provision will monitor the implementation of this policy to ensure that concerns are reported, managed and recorded consistently.

Monitoring may include:

- The number of concerns raised.
- Themes and patterns.
- Staff confidence in reporting.
- Timeliness of responses.
- Safeguarding outcomes.
- Training needs.

This policy will be reviewed annually, or sooner where changes to legislation, safeguarding guidance or organisational practice require amendment.