



Low-level Concerns Policy

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MONITORING, EVALUATION AND REVIEW

This policy will be reviewed when there are changes in the law or at least every two years, to assess implementation and effectiveness in line with DfE guidance September 2022.

Contents

1. Policy Statement	3
2. Introduction to the concept and importance of sharing Low-level Concerns	3
3. What is the Low-level Concerns policy?	3
4. What is the purpose of the Low-level Concerns policy?.....	4
5. What are the aims of the Low-level Concerns policy?.....	4
6. Definitions	5
7. School culture.....	5
8. Data protection and confidentiality.....	5
9. Who should staff share Low-level Concerns with?.....	6
10. Should staff share Low-level concerns be able to remain anonymous?.....	6
11. Should staff share concerns about themselves?.....	7
12. How should Low-level Concerns be shared and recorded?.....	7
13. How should a Low-level Concerns be responded to?.....	8
14. Review the information and determine the behaviour in question.....	8
15. What action will be taken if it is determined that the behaviour is entirely consistent with the academy’s safe working practice for staff and student policy and the law?.....	9
16. What action will be taken if it is determined that behaviour constitutes a Low-Level Concern?.....	9
17. What action will be taken if it determined that the behaviour is more than a low-level concern?.....	10
18. How should Low-level Concerns be held?.....	10
19. How often should the central Low-level Concerns file be reviewed?.....	10
20. How long should records of a Low-level Concerns be kept?.....	11
21. References.....	11
22. Role of the Governors.....	11
Appendix.....	12
LADO Referral Indicator Matrix	

1. Policy Statement

1.2. Chiltern Hills Academy understands the importance of a positive culture where concerns can be identified and spoken about openly and acknowledges that this is a key element of a strong safeguarding system. This Low-level Concerns Policy seeks to ensure that all staff who work with children behave appropriately and to enable the early identification and prompt and appropriate management of concerns.

1.3. As part of its whole school approach to safeguarding, the Academy will ensure that it promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the Academy (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

1.4. Creating a culture in which all concerns about adults (including allegations that do not meet the harm threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage an open and transparent culture; enable the Academy to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the Academy are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the Academy.

2. Introduction to the concept and importance of sharing low-level concerns

2.1. Behaviour which is not consistent with the standards and values of an organisation, and which does not meet the organisational expectations encapsulated in the Academy's Safe Working Practice for Staff and Students policy, needs to be addressed. Such behaviour can exist on a wide spectrum from the inadvertent or thoughtless, through to that which is ultimately intended to enable abuse.

2.2. All staff need to be informed about and be able to identify concerning, problematic or inappropriate behaviour and understand the importance of sharing concerns when they observe behaviour which violates the Academy's Safe Working Practice for Staff and Students policy.

3. What is the low-level concerns policy?

3.1 The Low-level Concerns Policy enables all staff to share any concerns – no matter how small – about their own or another member of staff's behaviour to the Principal or the DSL. Safeguarding and promoting the welfare of children is everyone's responsibility.

4. What is the purpose of the low-level concerns policy?

4.1 The purpose of the Low-level Concerns Policy is to create and embed a culture of openness, trust and transparency, in which the clear values and expected behaviour which are set out in the Academy's Safe Working Practice for Staff and Students policy, are constantly lived, monitored and reinforced by all staff.

5. What are the aims of the low-level concerns policy?

The aims of the Low-level Concerns Policy are to:

5.1 ensure that 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, and the delineation of professional boundaries and reporting lines.

Empower staff to share any low-level concerns with the Principal / DSL, and to help all staff to interpret the sharing of such concerns as a neutral act.

5.2 address unprofessional behaviour and support the individual to correct it at an early stage.

5.3 identify concerning, problematic or inappropriate behaviour including any patterns that may need to be consulted upon with (on a no-names basis if appropriate), or referred to, the Local Authority Designated Officer ("LADO").

5.4 provide for responsive, sensitive and proportionate handling of such concerns when they are raised; and

5.5 help identify any weaknesses in the Academy's safeguarding system.

6 Definitions

Who does the policy apply to?

6.1 The policy applies to all staff whether working in or on behalf of the Academy, engaged as a paid employee (including supply teacher), worker or contractor, or unpaid member of staff or volunteer. It also includes anyone who is a Governor.

Allegation that may meet the harm threshold. The term 'allegation' means it is alleged that an adult who works with children has:

6.1.1 behaved in a way that has harmed a child, or may have harmed a child; and/or

6.1.2 possibly committed a criminal offence against or related to a child; and/or

- 6.1.3 behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or
- 6.1.4 behaved or may have behaved in a way that indicates they may not be suitable to work with children.

In terms of managing cases of allegations that may meet the harm threshold, these might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school.

6.2 Concern (including an allegation) that does not meet the harm threshold i.e. a low-level concern. The term ‘low-level concern’ does not mean that it is insignificant, it means that an adult’s behaviour towards a child does not meet the harm threshold set out above (at paragraph 6.2). A low-level concern is 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:

- 6.2.1 is inconsistent with the Academy’s Safe Working Practice for Staff and Students policy, including inappropriate conduct outside of work; and
- 6.2.2 does not meet the allegation threshold or is otherwise not serious enough to consider a referral to the LADO but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary.

Although it is important that staff feel comfortable with, and are clear about, the concept of low-level concerns, and know what to do if they have such a concern, they do not need to be able to determine in each case whether their concern is a low-level concern, or if it is not serious enough to consider a referral to the LADO, or whether it meets the threshold of an allegation. Once staff share what they believe to be a low-level concern, that determination should be made by the Principal and DSL

The table in Appendix 1 further illustrates the distinction between an allegation that may meet the harm threshold, and a concern (including an allegation) that does not meet the harm threshold i.e. a low-level concern.

7 School Culture

- 7.1 The Academy promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the Academy are dealt with promptly and appropriately.

8 Data protection and confidentiality (privacy)

- 8.1 The Academy will always respect the personal data of staff (and others, where they may be identifiable) in implementing the Low-level Concerns Policy and in keeping records of low-level concerns secure.

- 8.2 The Data Protection Act 2018 includes a specific provision which permits organisations to process even the most sensitive personal data where necessary for the purposes of
- 8.3 protecting children from harm. Although sharing of low-level concerns will not always involve legally sensitive categories of data, the safeguarding purpose is the same as that under the Academy's Safeguarding and Child Protection Policy and the Allegations of Abuse Policy.
- 8.4 A proportionate approach must be taken by all to consider what personal data is in fact necessary to share and record by way of low-level concern(s) in each case in order to support the safeguarding purpose and to ensure the information is accurate, fair and, as far as possible, recorded in neutral terms.
- 8.5 If a member of staff who raises a low-level concern does not wish to be named, then the Academy will respect their wishes as far as possible. However, staff should be aware that in certain circumstances this anonymity may need to be waived (as explained further in paragraph 10 below).
- 8.6 All staff are entitled, under data protection law, to ask to see the content of any low-level concern(s) retained by the Academy under the Low-level Concerns Policy as it relates to them personally and to make any reasonable objection as to the fairness or accuracy of that content. The Academy will process such requests within the period prescribed by law, subject always to any necessary protection of the rights of third parties and unless any other relevant exemptions apply (including if complying with the request would be likely to prejudice the safeguarding purpose of the Low-level Concerns Policy).
- 8.7 All personal data processed in connection with the Low-level Concerns Policy will be processed in accordance with the Academy's Privacy Notice.

9 Who should staff share low level concerns with?

- 9.1 It is important that low-level concerns are shared with the Principal/Vice Principal (DSL) as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it (where the concern relates to a particular incident). However, it is never too late to share a low-level concern.
- 9.2 If the Principal is absent for any reason, low-level concerns should be shared with the Vice Principal who will ensure they inform the Principal immediately on their return.
- 9.3 If any low-level concern relates to the behaviour of the Principal, it should be referred to the Chair of Governors.
- 9.4 If there is a conflict of interest in sharing a low-level concern with the Principal, the low-level concern should be shared with the Chair of Governors, unless there is conflict of interest in doing so, in which case it should be reported directly to the LADO.

10. Should staff who share low-level concerns be able to remain anonymous?

- 10.1 Staff are encouraged to consent to be named when sharing low-level concerns, as this will help to create a culture of openness and transparency. If the staff member who raises a

low-level concern does not wish to be named, the Academy will respect that person's wishes as far as possible. However, there may be circumstances where the staff member will need to be named (for example, where disclosure is required by a court or local authority, or under a fair disciplinary process) and, for this reason, the Academy will not promise anonymity to members of staff who share low-level concerns.

11. Should staff share concerns about themselves (i.e. self-report)

11.1 Occasionally a member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, a member of staff may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the Academy's Safe Working Practice for Staff and Students policy. Self-reporting in these circumstances can be positive for a number of reasons, and staff are encouraged to self-report on the basis that:

11.1.1 it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity

11.1.2 it demonstrates awareness of the expected behavioural standards and self-awareness as to the member of staff's own actions or how they could be perceived; and

11.1.3 crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour

11.2 The Academy's aim is to create an environment where staff are encouraged and feel confident to self-refer.

12. How should low-level concerns be shared and recorded?

12.1 The concern can be shared verbally with the Principal or Vice Principal/DSL in the first instance if necessary.

12.2 Staff are required to complete an online referral form (located on the Academy's learning Platform) as soon as possible. If necessary, staff can request to discuss this in the first instance with the Vice Principals/Principal.

12.3 Where the low-level concern is provided verbally, the Principal or DSL will make an appropriate record of the conversation, either contemporaneously or immediately following the discussion and will exercise sound professional judgement in determining what information is necessary to record for safeguarding purposes.

12.4 Where a low-level concern relates to a person employed by a supply agency, a contractor, or volunteer the Academy will notify that person's employer so that any potential patterns of inappropriate behaviour can be identified.

13. How should a low-level concern be responded to?

Once the Principal has received the low-level concern, they will, in conjunction with the DSL if appropriate, and according to the nature and detail of the particular concern shared with them:

- 13.1.1. Acknowledge the report by email to the person who has raised the concern
- 13.1.2. Speak to the person who has raised the low-level concern (if appropriate).
- 13.1.3. Speak to potential witnesses (unless advised not to do so by the LADO/other relevant agencies, where they have been contacted)
- 13.1.4. Speak to individual whom the low-level concern has been raised (unless advised not to do so by the LADO/other relevant agencies, where they have been contacted)
- 13.1.5. If they are in any doubt, seek advice from the LADO on a no-names basis if necessary.

14. Review the information and determine whether the behaviour in question:

- 14.1 is entirely consistent with the Academy's Safe Working Practice for Staff and Students policy and the law.
 - 14.1.1 constitutes a low-level concern.
- 14.2.1 is not serious enough to consider a referral to the LADO but may merit consulting with and seeking advice from the LADO, and no-names basis if necessary.
- 14.3.1 when considered with any other low-level concerns previously raised about the same person, could now meet the threshold of an allegation, and should be referred to the LADO/other relevant external agencies, and in accordance with the Academy's Safeguarding and Child Protection Policy and the Allegations of Abuse Policy. Part 4 of KCSIE 2024, and the relevant procedures and practice guidance stipulated by the Academy's Local Safeguarding Partnership; or
- 14.4.1 in and of itself meets the threshold of an allegation and should be referred to the LADO/other relevant external agencies, and in accordance with the Academy's Safeguarding and Child Protection Policy, Part 4 of KCSIE 2024, and the relevant procedures and practice guidance stipulated by the Academy's Local Safeguarding Partnership.
- 14.5.1 Ensure that appropriate and detailed records are kept of all internal and external conversations regarding the concern, their determination, the rationale for their decision and any actions taken, and retain records in accordance with the Low-level Concerns Policy.
- 14.6.1 Consider whether the concern also potentially raises misconduct or capability issues, taking advice from HR on a named or no-names basis where necessary.

15. What action will be taken if it is determined that the behaviour is entirely consistent with the academy's safe working practice for staff and student policy and the law?

The Principal will update the individual in question and inform them of any action taken.

15.1.1 The Principal will speak to the person who shared the low-level concern to provide them with feedback about how and why the behaviour is consistent with the Academy's Safe Working Practice for Staff and Students policy and the law.

16. What action will be taken if it is determined that the behaviour constitutes a low-level concern?

16.1. The Principal will respond in a sensitive and proportionate way maintaining confidence that such concerns when raised will be handled promptly and effectively, whilst protecting staff from any potential false allegations or misunderstandings. Any investigation of low-level concerns will be done discreetly and, on a need-to-know basis.

16.2. Most low-level concerns, by their very nature, are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action. Others may be most appropriately dealt with by means of management guidance and/or training. In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised.

16.3. Any such conversation with individuals in these circumstances will include being clear with them as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual, and regularly reviewed with them, may also be appropriate.

16.4. Some low-level concerns may also raise issues of misconduct or poor performance. The Principal will also consider whether this is the case by referring to the Academy's disciplinary and/or capability procedure and taking advice from HR on a named or no-names basis where necessary.

16.5. If the Principal considers that the Academy's disciplinary or capability procedure may be triggered, they will refer the matter to the HR. If HR advises that the Academy's disciplinary or capability procedure is triggered, the individual will have a full opportunity to respond to any factual allegations which form the basis of capability concerns or a disciplinary case against them.

- 16.6. Staff should be aware that when they share what they believe to be a low-level concern, the Principal will speak to the adult who is the subject of that concern no matter how 'low' level the concern may be perceived to be (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted). The purpose is to gain the subject's account and to make appropriate records (as above), which may be referenced in any subsequent disciplinary proceedings.
- 16.7. How the Academy responds to a low-level concern may be different depending on the employment status of the individual who is the subject of the concern i.e. whether they are an employee or worker to whom the Academy's disciplinary and/or capability procedure would apply, or supply teacher, a contractor, Governor or volunteer. The Academy's response will be tailored accordingly.
- 17. What action will be taken if it is determined that the behaviour is more than a low-level concern?**
- 17.1 Whilst not sufficiently serious to consider a referral to the LADO nonetheless merits consulting with and seeking advice from the LADO, and on a no-names basis if necessary? Then action (if/as necessary) will be taken in accordance with the LADO's advice; or
- 17.2 When considered with any other low-level concerns that have previously been shared about the same individual, could now meet the threshold of an allegation, or in and of itself meets the threshold of an allegation? Then it will be referred to the LADO/ other relevant external agencies, and in accordance with the Academy's Safeguarding and Child Protection Policy and Allegations of Abuse Policy, Part 4 of KCSIE 2024 and the relevant procedures and practice guidance stipulated by the Academy's Local Safeguarding Partnership.
- 18. How should low level concerns be held?**
- The Academy will retain all records of low-level concerns (including those which are subsequently deemed by the Principal to relate to behaviour which is entirely consistent with the Academy's Safe Working Practice for Staff and Students policy) in a central low-level concerns file kept electronically.
- 18.1. Where multiple low-level concerns have been shared regarding the same individual these will be kept in chronological order as a running record, and with a timeline alongside. These records will be kept confidential and held securely with access afforded only to a limited number of individuals such as the Principal, DSL, Chair of Governors and HR

19. How often should the central low-level concerns file be reviewed?

19.1 The Principal will review the central low-level concerns file periodically to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. A record of these reviews will be made.

19.2 Where a pattern of behaviour is identified in respect of a specific individual, the Principal will also consider whether any wider cultural issues are at play that may have enabled the behaviour and/or whether the Academy should arrange for additional training or a review of any of its policies to reduce the risk of it happening again.

20. How long should records of a low-level concern be kept?

20.1 Low-level concerns will be retained securely by the Academy for as long as deemed relevant and necessary for a safeguarding purpose unless the Academy is required to disclose by law (for example, where the threshold of an allegation is met in respect of the individual in question). In most cases, once a staff member leaves the Academy, any low-level concerns which are held relating to them:

20.1.1. Will be retained for the same duration as that individual's personnel file and

20.1.2. Will not be included in any onward reference, except as set out in paragraph 20. 20.

20.2 Low-level concerns will be retained on the Academy's central low-level concerns file (securely and applying appropriate access restrictions) unless and until further guidance provides otherwise.

21. References

21.1 Where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and is found to be substantiated, it will be referred to in a reference.

21.2 Low-level concerns (or a group of concerns) which have not met the threshold for referral to the LADO which relate only to safeguarding will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance.

22. What is the role of governors?

22.1 The Principal will regularly inform the Governors about the implementation of the Low-Level Concerns Policy and any evidence of its effectiveness, e.g. by including reference to it in any safeguarding reports and providing any relevant data.

22.2 The Governors will also review an anonymised sample of low-level concerns at regular intervals, to ensure that these concerns have been responded to promptly and appropriately.

APPENDIX 1

LADO Referrals Indicator Matrix

Please note that LADO indicators can apply to organisations as well as to individuals. The LADO service will analyse referral information to identify organisations that may need additional support with their implementation of safeguarding policies.

Indicators Matrix LADO – Tiers 1-4			
Tier 1 Incident that does not need LADO input but may be a conduct issue	Tier 2 Incident which might require logging with LADO but will be 'No Further Action'	Tier 3 Incident which requires consideration of referral to other agency such as police of Ofsted	Tier 4 Incident which requires immediate suspension / police referral / arrest / immediate action to protect child
<p>Complaint made by parent or carer or comment made by child that does not seem to have any corroborating evidence. There is no injury seen, or witness accounts do not corroborate the allegation, the manager is confident this does not meet the threshold for a referral but is intending to investigate further.</p> <p>In such cases the relevant manager may wish to have a consultation discussion with the LADO, and both can make a record of the discussion and agree it will be dealt with internally, in case further</p>	<p>Member of staff alleged to have acted or reacted in a way considered inappropriate but not harmful; parental or child complaint about such 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 and are checking with LADO for information only.</p> <p>This category also includes volunteers and professionals where there are</p>	<p>Allegation made which meets the threshold for referral to LADO under Bucks Procedures and appears in the first instance to meet the threshold for referral to police. Such cases may not always involve serious injury to a child but present as a breach of the position of trust the professional or volunteer was in.</p> <p>A proportion of these types of referral may result in a 'no crime' outcome from police, but the allegations process must be followed as the</p>	<p>Allegation made with credible corroborating evidence, where a child has been injured or harmed.</p> <p>Behaviour by the professional or volunteer which is deemed to be extremely concerning towards the children they are caring for and requires immediate suspension.</p> <p>Allegation by a member of the professional / volunteer's family which is so serious it requires immediate consideration by employer.</p>

<p>information comes to light to question why no formal LADO referral was made.</p>	<p>domestic issues which require them to inform their line manager (for example a section 47 investigation at home) but the employer / manager is clear there are no risks presented by this person in their place of work.</p> <p>These are incidents where an escalation to a police referral would be considered a disproportionate response.</p> <p>These cases are likely to meet the threshold for a confidential record to be kept by the LADO, with the knowledge of the person concerned and their manager.</p>	<p>referring information met the threshold. Sometimes these referrals do not immediately appear to have a criminal element but the reported actions mean that a regulatory body such as Ofsted, or the TRA, or SW England, will need to be informed.</p> <p>It is essential in these cases that there is a clear outcome and this is communicated to the professional / volunteer. These referrals can result in a note on future DBS checks and could have an impact on the professional / volunteer's future career.</p>	
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Physical Abuse			
<p>Examples could be: Child objecting to a sanction imposed in school, describing an event to a parent who then comes in to complain about how their child says they have been treated</p>	<p>Examples could be: Child accusing a teacher of pushing them, when it appears they were being guided away from a situation Nursery worker seen by parent to be pulling a</p>	<p>Examples could be: a credible disclosure by a child or young person that uses the word 'hit' or 'hurt'; yet there is no injury seen and no corroborating evidence of child's account.</p>	<p>Examples could be: Child has clearly been injured or could have been injured as a direct result of the actions of a professional or volunteer.</p>

<p>but does not have all the information.</p> <p>Young person in children's home involved in a confrontation and making accusations where there were several witnesses and there is an incident report that appears to refute the child's account that they were harmed.</p> <p>An allegation that is made second or third hand and facts are not clear, or the professional alleged to have done this was not there at the time; or there is confusion about the account.</p>	<p>child away from a situation, parent considers this is done roughly but professional claims it was to remove child from a confrontation where they may have been harmed / may have harmed another child.</p> <p>Professional or volunteer accused of domestic violence assault on own children but there have never been any concerns at work about them.</p>	<p>Restraint that has caused an injury to the person being restrained.</p> <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>	<p>Incident within the professional / volunteers home life that is of high risk and high level of concern.</p>
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Sexual Abuse			
<p>A schoolgirl telling a friend, who tells the teacher, that another teacher 'makes her feel funny when they look at her' but no other concerns or complaints expressed.</p>	<p>A professional / volunteer makes an inappropriate remark that appears on the surface to be naïve rather than potentially grooming or acts in a way that could be deemed unprofessional.</p>	<p>A very young child still requiring personal care / nappy changing, indicates that a nursery worker touched them in the genital area.</p> <p>A professional or volunteer has been sending inappropriate but not necessarily sexual texts to young people they work with.</p>	<p>Professional / volunteer arranging to meet young person outside the work environment and asking them not to tell anyone; or making inappropriate contact through social media with sexual overtones.</p>
Emotional Abuse Neglect			
<p>A child with a history of challenging behaviour, alleging they feel bullied by a well- respected member of staff.</p> <p>Concerns that family members of the professional / volunteer may be involved in criminal activity.</p>	<p>Teacher under stress who is heard to shout inappropriately at the children one day towards the end of term.</p> <p>Childminder witnessed to ignore children crying and speak rudely to them, but further context not known.</p>	<p>A foster carer where there have been several complaints about poor practice and standards of care; children in their care who are not always clean or appropriately dressed or seen to be treated in a way that causes concern to observing professionals. Reference to both safeguarding and fostering standards of care regulations would be needed in this case.</p>	<p>Making racist or derogatory remarks to a child or young person in the presence of a witness.</p>

Suggestions/Actions			
Managers to investigate further to satisfy themselves this matter does not meet the threshold for a referral outside the organisation and identify any appropriate actions.	Investigate further with the clear view that this could be escalated to a full LADO referral if more information comes to light. If no further information is discovered, offer words of advice / training and make a record of this on the personnel file	Full referral to LADO and consideration of what actions are required under the procedures (which may include other procedures relating to the context such as an Academy's safeguarding policies or fostering standards of care). This may or may not include a referral to police.	Full referral to LADO and consideration of what actions are required under the procedures. This will include referral to police and a LADO Strategy Meeting.