



University of Bolton Guidance on Raising and Reporting Low-Level Safeguarding Concerns and Supporting Students and Staff with Pastoral and Welfare Related Issues

threshold is an allegation that means that a person who works with children/adult at risk has:

behaved in a way that has caused harm, or may have caused harm
possibly committed a criminal offence against or related to a child/adult at risk;
and/or
behaved towards a child or children/adult at risk in a way that indicates they may pose a risk of harm to children/adult at risk; and/or
behaved or may have behaved in a way that indicates they may not be suitable to work with children/adult at risk.

Examples of low-level behaviour would include, but is not limited to:

Not adhering to professional standards/codes of conduct relevant to the role/workplace including but not limited to placements
Observing someone not adhering to codes of conduct and or codes of practice in relation to their work with a child or adult at risk e.g., a student nurse on placement not adhering to professional practice
Being over friendly with children or adult at risk, not applying boundaries in terms of relationships
Having favourites
Taking photographs of a child/adult at risk on a personal mobile phone
Engaging with a child on a one-to-one basis in a secluded area
Humiliating the individual
Using discriminatory language including language which may cause offence or inappropriate sexualised or intimidating language.
Inappropriate conduct outside of the workplace
Inappropriate touching of a child or adult at risk

3.3 Low level concerns may arise as a result naivety, be accidental or unintentional, be the result of misinformed action, a failure to follow procedures, a lack of training or, more rarely, deliberate abuse.

4 Reporting a Low-Level Concern?

- 4.1 The University has a legal duty to keep children and adults at risk safe and protect them from abuse/harm. The reporting of a low-level concern i.e., the behaviour of a staff member employed at the University, a contractor employed on behalf of the university, an official visitor, student on placement or an apprentice in work could be an opportunity for training and process improvement not dissimilar to “near miss” reporting applied to the broader health and safety of the University community.
- 4.2 Individuals raising a concern do not need to determine if it meets the harm threshold,



Speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO or equivalent professional and/or other relevant external agencies, where they have been contacted)

Review the information and determine whether the behaviour:

- i. is consistent with relevant code of conducts/expectations of the university
- ii. constitutes a low-level concern
- iii. is not serious enough to consider a referral to the local authority/external safeguarding partners – but may merit consulting with and seeking advice from them
- iv. when considered with any other low-level concerns that have previously been raised about the same individual, could now meet the threshold of an allegation and should be referred to the LADO or equivalent local authority external safeguarding partners
- v. in and of itself meets the threshold of an allegation and should be



University Insurers

Health and Safety Executives

Other University staff as required e.g., Head of School, Dean of Faculty, Personal

- 6.7 All students have access to additional professional support services including:
- Life Lounge (Student Mental Health and Wellbeing)
 - Disability Team
 - Student Funding
 - Student Advisors
 - International Student Advisors
 - Student Liaison Officers
 - Library including Subject Librarians, Learning Excellence Achievement Pathway (LEAP) Online and Live
 - Careers Service and Employability
 - Chaplaincy
 - Students' Union
- 6.8 In the event a pastoral or welfare related issue is reported to the Senior Designated Safeguarding Champions, Deputy Safeguarding Officer or Safeguarding Officer via safeguarding@bolton.ac.uk or a Designated Safeguarding Champion Safeguarding Reporting Form and the concern does not constitute a safeguarding concern then the following actions may be taken
- the person making the report will be offered advice on how best to support the individual for whom a concern has been raised
 - if appropriate the person for whom a concern has been raised may be contacted directly by a member of the safeguarding team.
- 7 Staff Pastoral and Welfare Issues**
- 7.1 The University takes the health, safety and wellbeing of its staff seriously and understands that safeguarding issues can affect the wellbeing of staff involved.
- 7.2 Staff should never be afraid to ask for appropriate advice and guidance if they are unsure of what action to take. Confidential advice can be given by the relevant local Designated Safeguarding Champion, Heads of School / Service or relevant HR Safeguarding Champion. Further details are contained in the Safeguarding Policy as updated from time to time.
- 7.3 Staff affected by any aspect of any low-level safeguarding case / process can also access the University Employee Assistance Programme provider, Spectrum Life. The contact details can be found via the HR A to Z.
- 7.4 If it is alleged that a member of staff has breached any aspect of this guidance or the Safeguarding Policy an investigation may be carried out in line with the staff disciplinary procedure.



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Appendix 1

