



Darul Uloom London School

SAFEGUARDING POLICY – LOW LEVEL

Last Reviewed: Monday, 1 September 2025
Next Review: Tuesday, 1 September 2026

LOW LEVEL CONCERNS

- ensure that staff are clear about, and confident to distinguish between, 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 Headteacher.
- help staff address unprofessional behaviour and help the individual to correct such behaviour at an early stage
- 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 LADO
- provide for responsive, sensitive and proportionate handling of such concerns when they are raised
- help identify any weaknesses in the organisation's safeguarding system.

This applies to **all** staff at Darul Uloom London School.

DEFINING A LOW-LEVEL CONCERN

A low-level concern is one that **does not** meet the harm threshold as stated in the school's Safeguarding Policy. That is, when anyone working in a school (including volunteers, supply staff and contractors) has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (which includes behaviour that may have happened **outside** school posing a transferable risk to children).

Responses and actions to behaviours that may meet the harm threshold are contained specifically within the policy, 'Allegations Regarding Staff (or volunteers)'. These should be reported to the Principal without delay.

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' (i.e. they *believe* it could be a concern) – that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

RESPONSIBILITIES OF STAFF

It is important that **all** staff are clear of the expectations the school stipulates from them as contained in the Staff Code of Conduct 'Staff Handbook'. This is covered annually by the Designated Safeguarding Lead, and as part of the school's induction for all and new staff.

It is crucial that **any** concerns in relation to a staff member's behaviour, including those which do not meet the harm threshold, are shared responsibly and with the Headmaster/Principal. This should be done without delay.

Where there are concerns/allegations about the Headmaster/Principal, this should be referred to the Chair of Trustees or The Trustee with overall responsibility of Safeguarding at the school, Mr. Mohammed Khan.

Staff members who are concerned about how their behaviour may have been interpreted, or, on reflection, re-evaluate their behaviour as one that may have been in contrary to the school's code of conduct and expectations, they self-refer to the Principal.

DEALING WITH LOW-LEVEL CONCERNS

All low-level concerns may be shared verbally with the Principal in the first instance, but must then be recorded in writing.

The record should include:

- details of the concern
- the context in which the concern arose
- action taken

The name of the individual sharing their concerns should also be noted, but if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Where the low-level concern is provided verbally, the Principal should make an appropriate record of the conversation, either at the time or immediately following the discussion, paying heed to the details above. Records will be signed, timed and dated.

Records will remain confidential in accordance with the school's Data Protection policies and GDPR.

RESPONDING TO A LOW-LEVEL CONCERN

The Principal will in the first instance satisfy themselves that it is a low-level concern and should not be reclassified as a higher level concern/allegation and dealt with under the appropriate procedure below.

The circumstances in which a low-level concern might be reclassified are where:

- (a) the threshold is met for a higher-level concern/allegation
- (b) there is a pattern of low-level concerns which collectively amount to a higher-level concern/allegation or
- (c) There is other information which when taken into account leads to a higher-level concern/allegation.

Where the Principal is in any doubt whatsoever, advice will be sought from the LADO, if necessary, on a 'no-names' basis.

Having established that the concern is low-level, the Principal will discuss it with the individual who has raised it and will take any other steps to investigate it as necessary. If the concern has been raised via a third party, the Principal should collect as much evidence as possible by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. All of this needs to be recorded along with the rationale for their decisions and action taken.

Reports about supply staff and contractors will be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Most low-level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training etc. In dealing with a low-level concern with a member of staff, this will be approached in a

sensitive and proportionate way. In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised.

Details of the concern will be recorded along with the rationale for decisions and action taken.

Any conversation with a member of staff following a concern will include being clear with the individual 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 may be required. Some concerns may trigger the school's disciplinary, grievance or whistleblowing procedures, which will be followed where appropriate. Some concerns may be related to performance management and advice may be sought from the school's HR manager.

MONITORING OF LOW-LEVEL CONCERNS

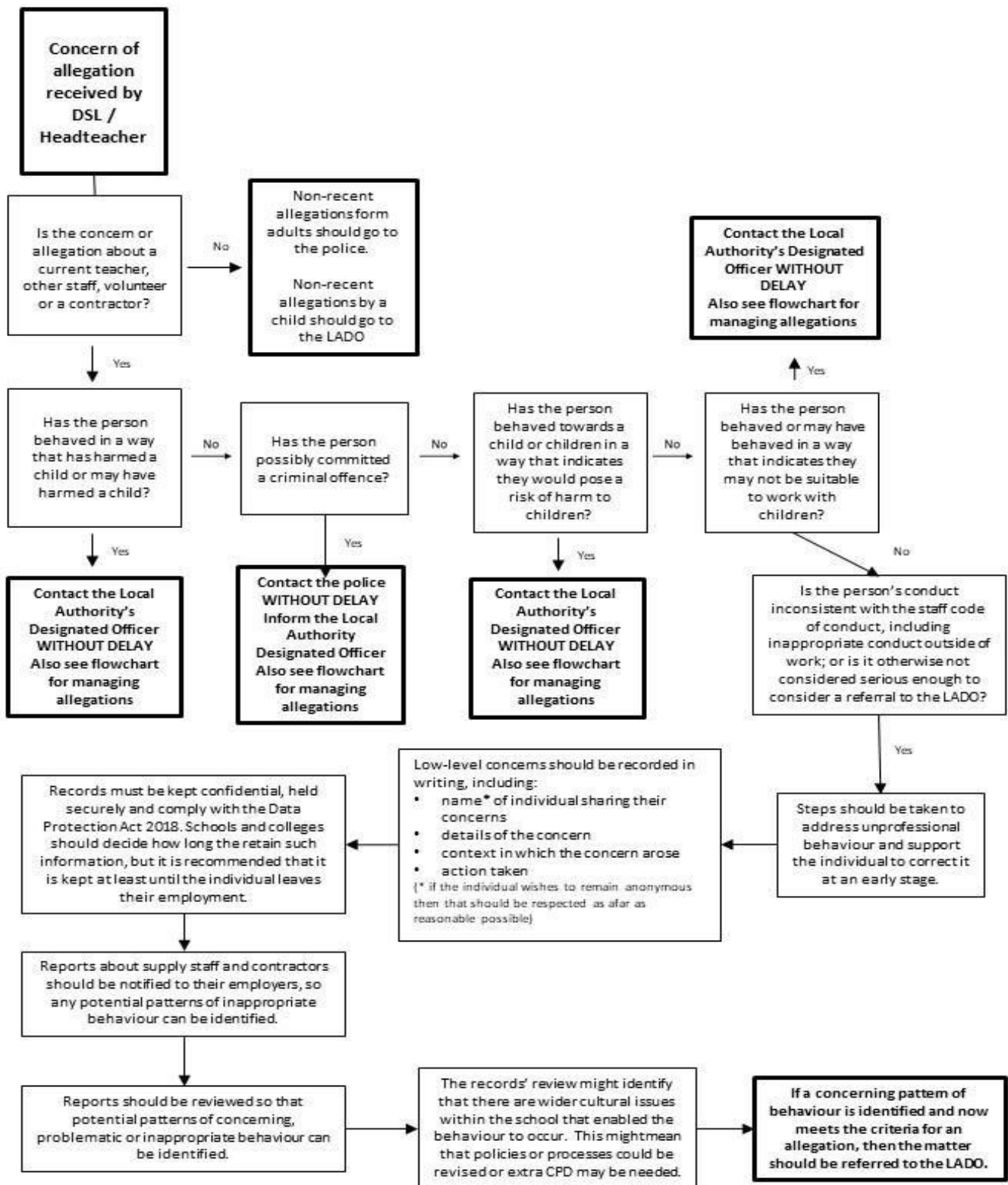
The Principal will securely retain confidential files on low-level concerns. A central log will be shared and monitored by the school's Senior Leadership Team on a monthly basis to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. A record will be kept of this review within SLT Minutes.

No record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either:

(a) the concern (or group of concerns) has been reclassified as a higher-level concern, or

(a) the concern (or group of concerns) is sufficiently serious to result in formal action under the school's grievance, capability or disciplinary procedure.

PROCESS TO FOLLOW WHEN A LOW-LEVEL CONCERN IS RAISED



*NB – if the concern is about the Headteacher, then the Chair of Trustees should be informed.

LOW LEVEL CONCERNS REPORTING FORM – DARUL ULOOM LONDON SCHOOL

Stage 1

Your details		
Name (optional)		
Role		
Date and time of completing this form		
Details of individual (including yourself for self-reporting) whom the concern is about		
Name		
Role		
Relationship to the individual reporting eg manager, colleague		
Details of concern		
Please include as much detail as possible. Think about the following: What behaviour and/or incident are you reporting? What exactly happened? Why does the behaviour and/or incident worry you? Why do you believe the behaviour and/or incident is not consistent with our Staff Code of Conduct?		
Details of any children or young people involved		
Name(s)		
Next Steps		
Are you willing to meet with the headteacher and DSL to discuss your concern? Please circle as appropriate.	Yes	No

Please state any other information that you feel is relevant to the processing of this concern.	
Signature	

Stage 2

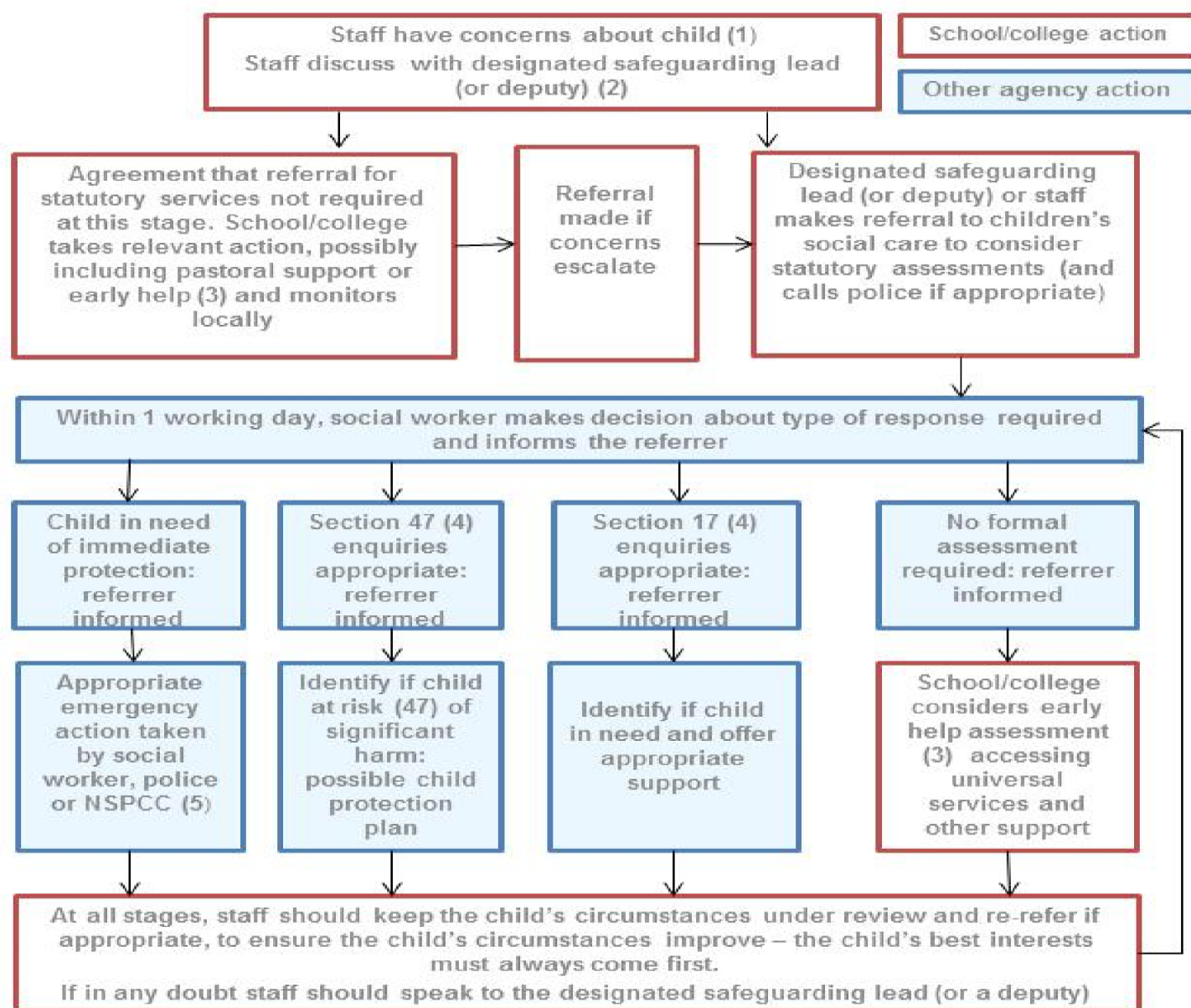
For use by HT/safeguarding team upon receipt of the concern	
Date and time concern received	
Signature	
Role	
Actions to be taken and follow-up.	

Stage 3

WHAT ACTION HAVE YOU ALREADY TAKEN IN RELATION TO THE CONCERN/INCIDENT? (include details of first aid treatment if this was given, and by whom. If a near miss, state lessons learnt)

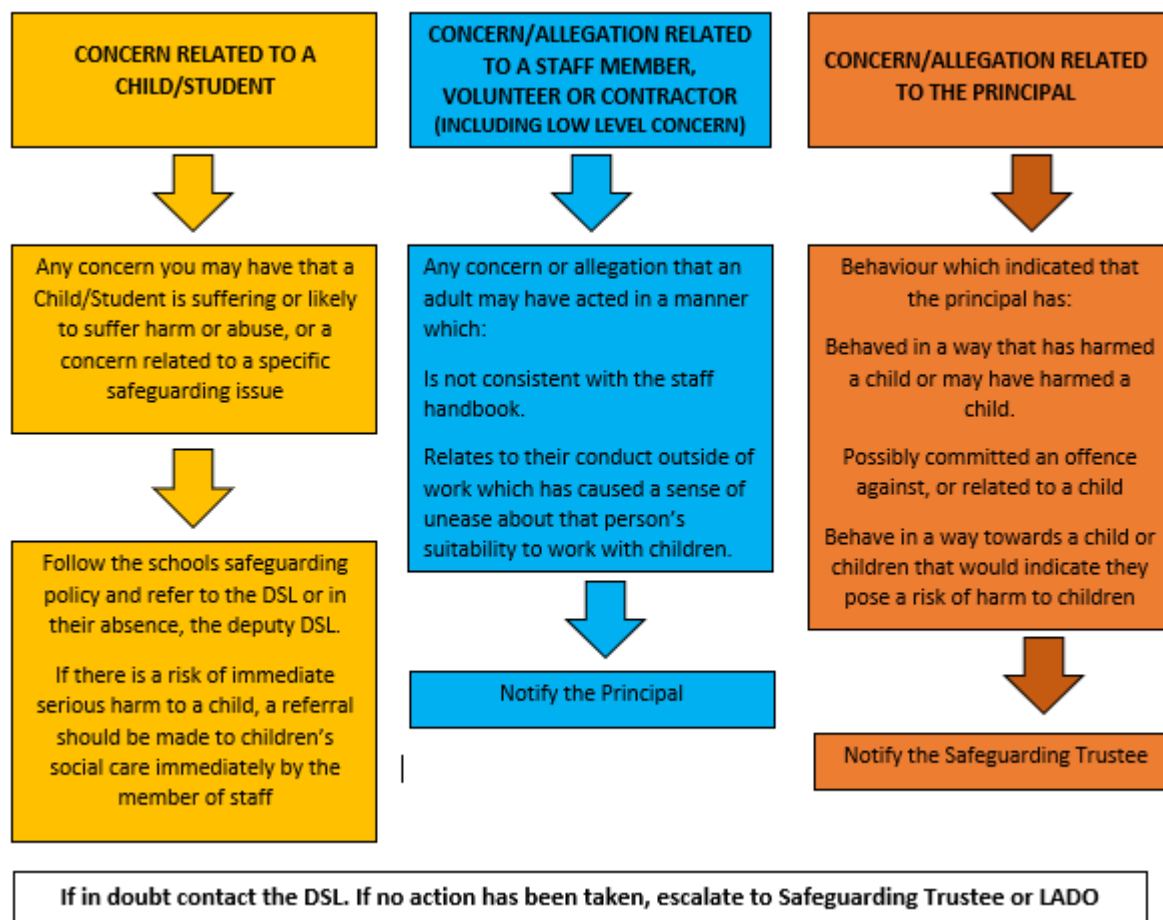
Parent/carer needs informing during event?	Yes, during event ☐ date/time: Yes, on collection ☐ Not required ☐	Any comments from parent	
WHAT FURTHER ACTION IS REQUIRED? (IF APPLICABLE) (WHO WILL ACTION / OBSERVE, MONITOR)			
Report written by (Name, signature and role on event)		Witness to the incident (if relevant (name and signature))	
FINAL UPDATE ON FURTHER ACTIONS (IF APPLICABLE)			
Added by:		Role:	Date:
Reviewed by lead staff member on site (name & signature)		Date:	

ACTIONS WHERE THERE ARE CONCERNS ABOUT A CHILD



DESIGNATED SAFEGUARDING LEAD (DSL)	MR Redwan Hussain TELEPHONE: 020 8092 9265 / 07588658905
DEPUTY DESIGNATED SAFEGUARDING LEAD	Maulana Abubakr Baporia 020 8092 9265
DESIGNATED SAFEGUARDING TRUSTEE	MR MOHAMMED KHAN TELEPHONE: 07807031722
LOCAL AUTHORITY DESIGNATED OFFICER	MS GEMMA TAYLOR TELEPHONE: 0208 461 7775 or 0208 313 4325.

Reporting Concern Flowchart



Immediate Threat	999
Serious Concerns	101
School Designated Safeguarding Lead (DSL) and Prevent Lead	Mr Redwan Hussain 07588658905 Email: Safeguarding@darululoomlondon.com
School Deputy Designated Safeguarding Lead (DDSL)	Maulana Abubakr Baporia Email: Abubakr.baporia@darululoomlondon.com
Local Authority Designated Officer (LADO)	Ms Gemma Taylor Phone: 0208 461 7775 or 0208 313 4325 Email: lado@bromley.gov.uk – gemma.taylor@bromley.gov.uk
Headteacher	Maulana Tajammul Islam Email: tajammul@darululoomlondon.com

5. USEFUL CONTACTS

Immediate Threat	
Telephone	999
Serious Concerns	
Telephone	101
Prevent	
Contact DfE helpline for non-emergency advice	0207 340 7264
Email	Counter-extremism@education.gsi.gov.uk
Bromley Common Assessment Framework Team	
Telephone	0208 461 7174
Address	Bromley Central Library, High Street, Bromley, BR1 1EX
Bromley Multi-Agency Safeguarding Hub (MASH)	
Telephone	0208 461 7379 / 7026 / 7373 / 7309
Email	mash@bromley.gov.uk
Address	1st Floor St Blaise Building, Civic Centre, Stockwell Close, Bromley, BR1 3UH
Female Genital Mutilation (FGM)	
FGM Helpline Contact	0800 028 3550
Email	fgmhelp@nspcc.org.uk
NSPCC Abuse Helpline	
NSPCC helpline	0800136663
Email	help@nspcc.org.uk
Chair of Trustees	Mr. Ismail Maljee - dultrustees@darulloomlondon.co.uk
Darul Uloom School Safeguarding Team	
Trustee with lead responsibility for safeguarding	Mr Mohammed Khan
Email	m.khan@darulloomlondon.com
Designated Safeguarding Lead	Mr Redwan Hussain
Telephone	020 8092 9262
Mobile	
Email	safeguarding@darulloomlondon.com
Deputy Designated Safeguarding Lead	Mr Abubakr Baporla
Telephone	020 8092 9265
Mobile	
email	abubakr.baporla@darulloomlondon.com
Local Authority Designated Officer	
Contact – Team Manager	Ms Gemma Taylor
Telephone	0208 461 7775 or 0208 313 4325
Email	lado@bromley.gov.uk – gemma.taylor@bromley.gov.uk



DARUL ULOOM LONDON

SAFEGUARDING INCIDENT/CONCERN FORM

Pupil/Child Name	Date of Birth (if not know, please put child's age or year up)
Name and position of individual completing form	
Date of incident/concern	
Details of incident. Please include as much information as possible, including who, what, where and when.	
Any other relevant information such as witnesses, or any immediate action taken	
Signature of individual completing this form:	Date and time form completed:
Would you like feedback about your concern? (Yes or No)	
Signature of DSL	Date and Time form received by DSL

PLEASE CONTINUE ON A SEPARATE SHEET IF NECESSARY. ONCE COMPLETE, PLEASE SUBMIT THIS FORM TO MR REDWAN HUSSAIN (DSL) OR IN HIS ABSENCE MOULANA ABUBAKR BAPORIA (DEPUTY DSL)

Policy Reviewed by

Mr Mohammed Khan (Safeguarding Trustee) Reviewed
on Monday, 1 September 2025

Sign:

Mr Redwan Hussain (Designated Safeguarding Lead)

Reviewed on Monday, 1 September 2025

Sign:

Moulana Delwar Hussain

Reviewed on Monday, 1 September 2025

Sign: