Harvey Bears Nursery and Preschool

Low Level Concerns Policy and Procedures

Date of last review	September 2026
Signature of registered provider	*C. Hall* Committee Chair

We recognise the importance of ensuring staff working with children and young people remain suitable throughout their employment. This includes ensuring that all adults who work with children either paid or voluntary do so in accordance with our settings values and policies including the Staff Code of Conduct.

Concerns may come from a parent, colleague or the public. Any allegation must be made to the Designated Safeguarding Officer unless the concern is about them. If this is the case the manager should be informed. If the DSL is the manager go straight to the Chairperson, who will contact the LADO.

What is a low-level concern

Keeping children safe in education, 2026 (KCSIE) states:
'The term 'low-level' concern does not mean that it is insignificant. 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'.

A low-level concern is therefore where an adult may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- behaviour that may be considered inappropriate, thoughtless or inadvertent
- does not meet the harm threshold or is otherwise not 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, contrary to setting policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- humiliating children
- using inappropriate sexualized, intimidating or offensive language.
- exhibiting behaviours which breach the professional standards required by the setting as set out in the staff code of conduct.

Identification

A concern is not low level if adult has;

- Behaved in a way that has harmed or may have harmed a child.
- Possibly committed a crime against a child.
- Behaved towards a child in a way that indicates they may pose a risk of harm to a child.
- Behaved in a way that shows they are not suitable to work with children.

Safeguarding Culture

In our duties to safeguard children and young people we recognise our responsibility to create and embed a culture of openness, trust and transparency which reflects our settings values. As part of this we ensure our staff code of conduct is understood, adhered to and reviewed in conjunction with staff. Through effective supervision and on-going training we support adults working with children to distinguish between expected and appropriate behaviour from inappropriate, problematic or concerning behaviour, in themselves and others.

The importance of sharing low level concerns

We recognise that creating an environment where low-level concerns can be shared appropriately is pivotal to our safeguarding duties and may prevent the abuse of children, either accidentally, neglectfully or deliberately.

We also recognise the sharing of low level concerns as a positive action and one which can help us address unprofessional behaviour and support the individual to correct this at an early stage.

Reporting a low level concern

Any reporting of incidents contributes towards a safeguarding culture of openness and trust.

The reporting of low level concerns should be direct to the settings manager or DSL and recorded accurately. It is an expectation that they would then liase with each other in a timely manner to discuss the low level concern and then plan the next steps. The LADO team must be contacted within 1 working day if necessary and they will advise if the parents of the child involved or the police are notified.

However, if the concern is regarding the DSL and/or manager this should be directed to the registered person or if this is inappropriate, the LADO.

Low level concerns raised about students, supply staff or contractors will also be reported to their employers or educational institution.

All allegations are investigated even if the person involved resigns or ceases to volunteer.

Self-reporting

We encourage adults working with children to self-report where they have found themselves in a situation which may have been misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Responding to low level concerns

Concerns will be dealt with sensitively and proportionately. To understand the concern raised the Manager will collect as much evidence as possible by speaking:

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

Information collected will help them to categorise the type of behaviour and determine what further action may need to be taken in line with the staff code of conduct. If it is not clear whether the matter is a low level concern the DSL should contact the LADO for clarification.

Potential actions could be:

- Allegations that meet the harm threshold will be referred to the LADO for advice
- Low level concerns that the setting feel may need further guidance on will be referred to the LADO for advice
- Low level concerns that the setting feel they can deal with internally will be dealt with via the settings normal processes. This can range from the requirement to revisit training, supervisions and appraisals, coaching and mentoring or in some cases disciplinary action.

Recording low-level concerns

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, along with the rationale for decisions made and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.
Records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Reviewing low level concerns

We recognise that reviewing low-level concerns can help us to improve our settings safeguarding processes and potentially identify any weakness or wider cultural issues which have enabled the behaviour(s) to occur. Learning from reviews will be shared with staff in the form of policy change or training to minimise risks. Where patterns of inappropriate, problematic or concerning behaviour have been identified a course of action, will be taken either through our disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, this will be referred to the LADO.

References

Low-level concerns will remain on an employee's record until the individual leaves their employment.
We will not include low-level concerns in references unless:

- the concern (or group of concerns) has met the threshold for referral to the LADO and is found to be substantiated; and/or
- the concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.

Escalating concerns

If a member of staff feels their allegations have not been dealt with correctly THEY should contact the chairperson and the LADO as soon as possible
The LADO will decide whether they are happy for the allegation to be dealt with in house of if their team will become involved.

Policy Review

This policy will be reviewed annually or when an incident occurs or there are new local or national policies and procedures. The review process will be led by the registered provider and the DSL and include all those working in the setting.