Low-Level Concerns Policy

Introduction
At Cedar Park Day Nursery we are committed to safeguarding children and promoting their welfare at all times.

This policy applies to all concerns (including allegations) about members of staff, including students, volunteers and agency staff. We ensure that all those working with children behave appropriately and the early identification and prompt and appropriate management of concerns about adults is critical to effective safeguarding. This section is based on concerns that do not meet the harm threshold, as defined in Keeping Children Safe in Education.

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the nursery
- Pre-employment vetting checks.

This policy should be read in conjunction with the following policies: Safeguarding children and child protection policy, Staff code of conduct, Online safety policy, Whistleblowing policy, Attendance policy.

Definition of 'low-level' concerns
The term 'low-level' concern is any concern – no matter how small – that an adult working in, or on behalf of, the nursery may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of nursery
- Does not meet the harm threshold or is otherwise not considered serious enough to consider a referral to the local authority designated officer (LADO).

The behaviour of the staff, student or volunteer may not relate directly to a particular child or children but may raise an issue or issues of concern with respect to safeguarding a child/children. This may potentially call into question the adult's suitability to work with children.

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

- Being overly 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
- Using inappropriate sexualised, intimidating or offensive language
- Inadvertent or thoughtless behaviour

- Behaviour that might be considered inappropriate depending on the circumstances
- Behaviour which is intended to enable abuse.

Reasons to identify and respond to low-level concerns
We respond to all potential concerns about an adult's behaviour, including those which are considered low-level, in order to help create a culture where the safety of children is always prioritised.

We believe that responding to low-level concerns gives a clear message that any form of inappropriate behaviour will not be tolerated. Staff are made aware that a concern can still be significant even if it does not meet the threshold of harm, recognising that, if left unaddressed, low-level concerns can escalate into more significant rule-breaking or even abuse.

In addition, through monitoring low-level concerns raised, we may identify training needs or improved staff induction.

Sharing low-level concerns
We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately. This ensures that adults consistently model our values and helps keep children safer.

We create this culture by:
- Ensuring all staff are clear about what appropriate behaviour is, and are confident in differentiating expected and appropriate behaviour from concerning, challenging or inappropriate behaviour, in themselves and other adults
- Ensuring adults understand what a low-level concern is and the importance of sharing low-level concerns
- Having clear policies and procedures so staff are confident to report any concerns
- Empowering staff to share any low-level concerns
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to reflect on and identify any weakness in the nursery safeguarding procedure
- Having clear procedures for recording, reviewing and responding to concerns.

A low-level concern about a member of staff should be reported to the Designated Safeguarding Lead (DSL) and the manager following the nursery Safeguarding children and child protection procedures. Staff should use the nursery Low-Level Concerns Reporting Form (below).

Responding to low-level concerns
Responding appropriately, following clear and consistent procedures, will help to protect our staff from potential false allegations or misunderstandings.

- If the concern is raised via a third party, the DSL/manager will collect evidence where necessary by speaking directly to the staff who raised the concern, unless it has been raised anonymously, regardless of whether a written summary or low-level concerns form has been provided
- If the staff member who raises the concern does not wish to be named, then the nursery should respect that person's wishes as far as possible. However, there may be circumstances where the staff member who raises the concern will need to be named (for example, where it is necessary in order to carry out a fair disciplinary process) and, for this reason, anonymity should never be promised to members of staff who share low-level concerns. Where possible, we will encourage staff to consent to be named, as this will help to create a culture of openness and transparency
- The DSL/manager will speak to any potential witnesses, unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted
- The DSL/manager will speak to the staff member about whom the low-level concern has been raised, unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted
- The DSL/manager will use the information collected to categorise the type of behaviour and determine any further action, in line with our staff Code of conduct
- Allegations that meet the harm threshold will be referred to the LADO for advice
- Low-level concerns that the nursery feel may need further guidance on will be referred to the LADO for advice
- Low-level concerns that the nursery feel we can deal with internally will be dealt with via the nursery Safeguarding children and child protection procedures and/or Disciplinary procedures
- Where a low-level concern relates to agency staff, we will notify the agency, so any potential patterns of inappropriate behaviour can be identified.

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern was raised, any action taken and the reasons for decisions and action taken.

Records will be:

- Reviewed so that potential patterns of concerning, difficult or inappropriate behaviour can be identified
- Retained at least until the volunteer, student or staff leaves employment at the nursery
- Kept confidentially, held securely and comply with Data Protection Act 2018 (DPA 2018) and UK GDPR procedure.

Reviewing low-level concerns

When reviewing records of low-level concerns, patterns of concerning, challenging or inappropriate behaviour may be identified. When this occurs, the DSL/manager will decide on a course of action, which may include:

- Disciplinary investigation and/or proceedings

- Management advice, including recommendations for training
- Referral to the LADO (where a pattern of behaviour moves from a concern to meeting the harm threshold).

Dated: January 2026