

1.9 Low Level Concerns Policy

At Perins Pre-School, we are committed to safeguarding children and always promoting their welfare.

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 adult 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:

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

This policy should be read in conjunction with the following policies:

- Safeguarding children and Child protection
- Staff code of conduct
- Whistleblowing

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 pre-school may have acted in a way that:

- Is inconsistent with the Vita Multi Academy Trust code of conduct and the pre-school team working practices and standards, including conduct outside of the pre-school.
- Does not meet the harm threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

Examples of such behaviour could include:

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

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 help 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.
- Having clear policies and procedures.
- Empowering staff to share any low-level concerns.
- 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 pre-school safeguarding.
- Ensuring adults understand what a low-level concern is and the importance of sharing low level concerns

A low-level concern about a member of staff should be reported to the DSL or DDSL.

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/DDSL 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 that concern does not wish to be named, the pre-school 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 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 create a culture of openness.
- The DSL/DDSL will speak to any potential witnesses, unless advised not to do so by the LADO or other relevant external agencies, where they have been contacted.
- The DSL/DDSL will speak to the member of staff about whom the low-level concern has been raised, unless advised not to do so by the LADO or other relevant external agencies, where they have been contacted.
- The DSL/DDSL will use the information collected to categorise the type of behaviour and determine any further action, in line with Vita Multi Academy Trust's code of conduct and the pre-school's team Working practice and standards.
- Allegations that meet the harm threshold will be referred to the LADO for advice.
- Low-level concerns that the pre-school feel may need further guidance on will be referred to the LADO for advice.
- Low-level concerns that the pre-school feel they can deal with internally will be dealt with via the pre-school safeguarding procedures 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 reason for this decision.

Records will be reviewed so that potential patterns of concerning, difficult, or inappropriate behaviour can be identified. Records will be retained until the volunteer, student, or staff member leaves employment at the pre-school. Records will be kept confidentially and held securely, complying with Data Protection Act 2018 and UK GDPR procedures.

Reviewing low-level concerns

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

- Disciplinary investigation and/or proceedings.
- Management advice, including recommendations for training.
- Referral to the LADO.

This policy was adopted on

10th April 2026

Date to be reviewed

10th April 2027

Signed on behalf of the provider

Michelle Osman

Role of signatory (e.g. chair, director or owner)

Pre-School Manager
