



## Home-Grown in Malvern

### Low-Level Concerns Policy

#### 1. Purpose

This policy sets out how our setting identifies, records, and responds to *low-level concerns* about the behaviour of adults towards children or young people.

Our aim is to maintain a culture of openness, trust, and accountability, ensuring that all concerns—no matter how small—are addressed promptly and appropriately.

#### 2. Definition of a Low-Level Concern

A *low-level concern* is any behaviour by a member of staff, volunteer, or contractor that:

- Is inconsistent with our **Staff Code of Conduct** or professional expectations, **but**
- Does not meet the threshold for a formal safeguarding allegation to the police or LADO

Examples may include:

- 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
- exhibiting behaviours which breach the professional standards required by the setting as set out in the staff code of conduct.

#### 3. Principles

- **Early intervention** prevents escalation.
- **Transparency** builds trust and protects both children and staff.
- **Non-punitive reporting** encourages openness.
- **Proportional response** ensures fairness.

#### 4. Reporting a Low-Level Concern

- Concerns should be reported **as soon as possible** to the setting manager, who would then report to the **Designated Safeguarding Lead (DSL)** or deputy if they do not hold this position themselves.
- If the concern is regarding the DSL or manager, then the concern is referred to the registered person (Denise) or if this is inappropriate, the LADO.
- Reports can be made verbally, or in writing, but must be documented by the manager or DSL.

## 5. Recording

The Manager or DSL will:

- Log the concern in the **Low-Level Concerns Register** in writing.
- Include date, details of the concern, context, and rationale for any decisions and actions taken.
- Record the name of the individual who is sharing their concerns, respecting any anonymity request, where reasonable.
- Keep records secure and confidential.

## 6. Responding

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 staffs code of conduct. 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, coaching and mentoring or in some cases disciplinary action.

## 7. Confidentiality

Records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

## 8. Monitoring & Review

- The DSL will review the register regularly to identify patterns or repeated behaviours.
- This policy will be reviewed annually or after any significant safeguarding incident. Where a pattern of behaviour is identified as being inappropriate, problematic or concerning we will conduct disciplinary procedures or where a pattern of behaviour moves from low-level concern to meeting the harm threshold, this will be referred to the LADO.

## 9. Related Policies

- Safeguarding & Child Protection Policy
- Staff Code of Conduct
- Whistleblowing Policy