



Achieve and Nurture Limited

Low Level Concern Policy

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KEY PERSONNEL			
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STATEMENT OF INTENT

Our provision is committed to safeguarding and promoting the welfare of all children. We recognise that creating and maintaining a strong safeguarding culture requires openness, transparency, accountability, and vigilance.

This Low-Level Concerns Policy enables all staff, volunteers, agency staff, contractors, and visitors to share concerns about the behaviour of adults working within the provision where that behaviour:

- Is inconsistent with the staff behaviour policy;



- May appear inappropriate, unprofessional, or unsafe;
- Causes a sense of unease or concern;
- Does not meet the threshold for a formal safeguarding allegation.

We believe that early identification and reporting of low-level concerns:

- Helps maintain clear professional boundaries;
- Protects children and staff;
- Supports a culture of safeguarding;
- Prevents escalation of concerning behaviour;
- Encourages reflective and accountable professional practice.

This policy should be read alongside the safeguarding and child protection policy, staff behaviour policy, whistleblowing policy and behaviour policy.

SCOPE OF THE POLICY

This policy applies to:

- All staff
- Volunteers
- Agency staff
- Supply staff
- Contractors
- Visitors working regularly with pupils
- Therapeutic and external professionals

This policy applies to conduct:

- Within the provision;
- During any off site visits;
- Outside work where behaviour may impact safeguarding suitability.

DEFINITION OF A LOW-LEVEL CONCERN



A low-level concern is any concern, no matter how small, about an adult's behaviour towards a child that:

- Is inconsistent with the staff code of conduct;
- May be inappropriate, unprofessional, or unsafe;
- Causes discomfort, concern, suspicion, or unease;
- Does not meet the harm threshold for referral to the Local Authority Designated Officer (LADO).

A low-level concern may relate to a single incident or a pattern of behaviour.

EXAMPLES OF LOW-LEVEL CONCERNS

Examples may include, but are not limited to:

- Being overly familiar with pupils
- Showing favouritism
- Using inappropriate language or humour
- Inappropriate or unnecessary physical contact
- Spending time alone with pupils without transparency
- Private messaging or social media contact with pupils
- Sharing personal information with pupils
- Breaching professional boundaries
- Repeatedly shouting at pupils
- Using intimidating or humiliating language
- Ignoring safeguarding procedures
- Failing to maintain appropriate supervision
- Taking photographs on personal devices
- Giving gifts without authorisation
- Emotional over-involvement with a pupil

In a primary alternative provision setting, staff should be especially mindful of relational boundaries due to the nurturing and therapeutic nature of the provision.



DISTINGUISHING LOW-LEVEL CONCERNS FROM ALLEGATIONS

A low-level concern is different from an allegation that an adult has:

- Behaved in a way that has harmed a child or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child in a way that indicates they may pose a risk of harm to children;
- Behaved in a way that may make them unsuitable to work with children.

Where concerns meet the harm threshold, the matter will be managed in accordance with statutory safeguarding procedures and referred to the LADO where appropriate.

SAFEGUARDING CULTURE

Our provision promotes a culture where:

- Safeguarding is everyone's responsibility;
- Concerns are shared openly and promptly;
- Staff feel confident to report concerns;
- Staff understand that reporting concerns is protective, not punitive;
- Professional curiosity and accountability are encouraged;
- Children's welfare remains paramount.

We recognise that low-level concerns may reveal patterns of behaviour over time which require further action.

REPORTING LOW-LEVEL CONCERNS

All staff are expected to report low-level concerns promptly.

Concerns should normally be reported to:

- The Designated Safeguarding Lead (DSL); or
- The Deputy Designated Safeguarding Lead (DDSL)

Where the concern relates to the Head of Provision, concerns should be reported to:



- Appropriate authority.

Staff may also self-report where they believe their own behaviour may have been misinterpreted or may have fallen below expected standards.

Reports should be factual and include:

- Date and time;
- Individuals involved;
- Description of behaviour;
- Witnesses where applicable;
- Context of the concern.

Reports should be made as soon as reasonably possible.

RESPONDING TO LOW-LEVEL CONCERNS

The DSL or DDSL will:

- Review the concern promptly;
- Clarify details where necessary;
- Consider the context and level of concern;
- Determine whether the concern remains low-level;
- Identify whether patterns or repeated concerns exist;
- Decide on appropriate next steps.

Responses may include:

- Informal discussion;
- Professional guidance;
- Supervision or support;
- Additional training;
- Increased monitoring;
- Review of professional boundaries;
- Escalation to formal procedures where necessary.

The welfare of children will remain central to all decision-making.



RECORDING AND STORAGE

All low-level concerns will be:

- Recorded in writing;
- Stored securely and confidentially;
- Kept separate from child protection records;
- Retained in accordance with safeguarding and employment guidance.

Records will include:

- Nature of the concern;
- Actions taken;
- Decisions made;
- Outcomes;
- Rationale for decisions.

Low-level concern records may be reviewed to identify emerging patterns.

CONFIDENTIALITY

Information relating to low-level concerns will be handled sensitively and shared only with those who need to know.

Staff involved will be treated fairly and respectfully.

The provision recognises the importance of balancing:

- Safeguarding responsibilities;
- Fairness to staff;
- Confidentiality;
- Transparency.

FALSE, MALICIOUS OR UNSUBSTANTIATED CONCENS



Where a concern is found to be false or malicious, appropriate action may be taken.

However, staff will not be criticised for reporting genuine concerns made in good faith.

All concerns will be considered carefully and objectively.

PROFESSIONAL BOUNDARIES

All staff must maintain clear professional boundaries.

Staff should:

- Maintain professional relationships with pupils;
- Avoid favouritism;
- Follow safeguarding procedures consistently;
- Use approved communication systems;
- Avoid unnecessary physical contact;
- Record concerns appropriately;
- Use professional judgement at all times.

Staff must not:

- Share personal contact details with pupils;
- Communicate with pupils via personal social media;
- Arrange to meet pupils outside authorised activities;
- Develop inappropriate emotional dependency;
- Use degrading, humiliating, or intimidating language.

ONLINE CONDUCT

This policy applies equally to online conduct.

Staff are expected to:

- Use professional communication systems;
- Maintain professional boundaries online;



- Follow the online safety and acceptable use policies;
- Avoid inappropriate online interactions with pupils.

Concerns relating to online behaviour should be reported in line with this policy.

WHISTLEBLOWING

Staff who feel unable to report concerns internally may use the whistleblowing procedure.

No staff member will suffer detriment for reporting concerns in good faith.

TRAINING AND AWARENESS

All staff will receive:

- Safeguarding training;
- Staff behaviour policy;
- Low-level concerns awareness training;
- Guidance regarding professional boundaries.

This policy will be:

- Shared during induction;
- Reviewed regularly;
- Referenced within safeguarding updates.

MONITORING AND REVIEW

DSL and DDSL will monitor:

- Patterns of concerns;
- Staff understanding of procedures;



- Effectiveness of safeguarding culture.

This policy will be reviewed annually or sooner where required due to:

- Changes in legislation or guidance;
- Learning from incidents;
- Organisational changes.