

Safeguarding Children and Child Protection

Low Levels Concern Policy

At The Island Day Nursery, we aim to create an open and transparent culture where all concerns about adults involved with our nursery are dealt with promptly and appropriately. We aim to identify concerning, problematic or inappropriate behaviour early, minimise the risk of abuse and ensure that adults working in or on behalf of our nursery are clear about professional boundaries and act within these boundaries and in accordance with our ethos. This policy should be read alongside our Safeguarding policies and our Staff Code of Conduct.

It may be possible that a member of staff acts in a way that does not cause risk to children, but is however inappropriate. A member of staff who has a concern about another member of staff, volunteer or contractor should inform their manager about their concern, using the Low-Level Record of Concern Form in this policy (Appendix C).

Keeping Children Safe in Education – September 2026

The following statement is taken from Keeping Children Safe in Education 2026 and identifies what may be considered behaviour relating to a low level concern.

What is a Low Level concern (LLC)?

509. 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' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- 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 overfriendly with children,
- having favourites,
- taking photographs of children on their mobile phone, contrary to school policy,
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children.

510. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

511. Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

512. It is crucial that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect

those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings.

Storing and use of Low-Level Concerns and follow up information

LLC forms and follow up information will be stored securely within the nurseries safeguarding files with access only by the Designated Safeguarding Leads. This will be stored in accordance with GDPR.

The staff member reporting the concern must keep the information confidential and not share the concern with others apart from their manager/General Manager.

Low Level Concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

Persons responsible for implementing this policy:

Erica Dunwell/Heather Bishop/Rosalind Moreno/Cara Bonner – Barton

Erica Dunwell/ Heather Bishop/Jonathan Reed – Sandown

Erica Dunwell/Becky Kujabi/Sam Hicks – Wootton

Review: August 2027

APPENDIX A

ALLEGATION vs LOW LEVEL CONCERN vs APPROPRIATE CONDUCT

ALLEGATION

Any adult linked to our nursery who has:

- **Behaved in a way that has harmed a child and/or**
- **Possibly committed a criminal offence against or related to a child and/or**
- **Behaved towards a child or children in a way that indicates he or she may pose a risk or harm to children and/or**
- **Behaved or may have behaved in a way that indicates they may not be suitable to work with children.**

LOW LEVEL CONCERN

Any adult linked to our nursery who has behaved in a way that:

- **Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work**
- **Does not meet the allegation threshold or is otherwise not considered serious enough to consider a referral to the LADO**

APPROPRIATE

- **Behaviour which is entirely consistent with our nurseries Code of Conduct and the law**

APPENDIX B

PROCESS TO FOLLOW WHEN A LOW LEVEL CONCERN IS RAISED

APPENDIX C

LOW LEVEL CONCERNS REPORTING FORM – THE ISLAND DAY NURSERY

Your Details:

Name:	
Role:	
Nursery;	
Date and time of completing this form	

Details of Individual whom the concern is about:

Name:	
Role:	
Nursery: Relationship to individual reporting e.g. manager/colleague	

Details of Concern:

Please include as much detail as possible. Think about the following: what behaviour/incident are you reporting? What exactly happened? Why does this behaviour/incident worry you? Why do you believe the behaviour/incident is not consistent with our Staff Code of Conduct?

Details of any children involved:

Names:

Are you willing to meet with the Manager/General Manager to discuss further	YES/NO
Please state any other information that you feel is relevant to the processing of this concern	

Name (Print):

Signature:

Date:

For use by Manager/General Manager upon receipt of the concern

Date and time concern received	
Received by (name and Signature)	
Role	
Actions to be taken and followed up:	