



Spinney Pre-School

Low Level

Concerns Policy

2026/2027

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This Policy was adopted at a meeting of the Pre-School held on (date) _____

Signed on behalf of the Pre-School _____

Introduction

This policy forms part of Spinney Pre School's and should be read in conjunction with the setting's Safeguarding Policy. The Whistleblowing and low-level concerns policy is based upon the statutory guidance for school's '[Keeping Children Safe in Education](#)', the expectations within '[Guidance for Safer Working Practice 2022](#)' and the principles within Farrer & Co's '[Developing and Implementing a Low Level Concerns Policy 2023](#)'. These documents are referenced throughout the policy. Whilst KCSIE is not statutory for Early Years provisions, the EYFS states that they should refer to this document.

It is important to recognise that, in practice, the words 'allegation' and 'concern' can be and are used interchangeably by different people. Sometimes individuals may shy away from the word 'allegation' and express it as a 'concern' instead. The crucial point is that whatever the language used, the behaviour referred to may, on the one hand, be capable of meeting the harm threshold (and hence be referable), or, on the other, it does not meet the harm threshold (in which case it should be treated as a low-level concern). So, the focus should not be on the language used by the person disclosing it; the focus should, instead, be on the behaviour being described.

Purpose of a Whistleblowing ad Low Level Concerns Policy

This policy enables all staff, students and volunteers to share any concerns – no matter how small – about their own or another member of staff's, student's or volunteer's behaviour with the Supervisor.

Safeguarding and promoting the welfare of children is everyone's responsibility.

The purpose of the policy is to create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour set out in the staff code of conduct, are constantly lived, monitored and reinforced by all staff.

Safeguarding and promoting the welfare of children is everyone's responsibility.

For the purpose of this policy, where 'staff' are referenced, this includes paid staff, students and volunteer

In order to achieve this purpose, Spinney Pre School will:

- ensure that staff are clear about what appropriate behaviour is and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour – in themselves and others, and the delineation of professional boundaries and reporting lines;
- empower staff to share any low-level concerns with the Supervisor and to help all staff to interpret the sharing of such concerns as a neutral act;
- address unprofessional behaviour and support the individual to correct it at an early stage;
- identify concerning, problematic or inappropriate behaviour – including any patterns – that may need to be consulted upon with (on a no-names basis if appropriate), or referred to, the LADO;
- provide for responsive, sensitive and proportionate handling of such concerns when they are raised.
- help identify any weaknesses in the organisation's safeguarding system.

As part of Spinney Pre School's approach to safeguarding, we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the setting (including supply staff, volunteers, and contractors) are dealt with promptly and appropriately.

Creating a culture in which **all** concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. By doing so, it will encourage an open and transparent culture; enabling the setting to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the setting are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of our institution.

Allegation that may meet the harm threshold

All staff at Spinney Pre School are aware of their duty to raise concerns, where they exist, which may include the attitude or actions of colleagues. The Whistleblowing Policy is there to support and aid them in these circumstances. The whistleblowing policy is shared with all staff, volunteers, and Committee members/Trustees at induction, and available to all and can be found in the folder in the entrance hall or online.

Whistleblowing regarding the Supervisor should be made to the Chair of the Committee, whose contact details should be readily available to staff.

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other channels are open to them:

- NSPCC whistleblowing advice line is available. Staff can call 0800 0280285 – 08:00 to 20:00, Monday to Friday and 09:00 to 18:00 at weekends. The email address is: help@nspcc.org.uk. Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH.
- Ofsted provides guidance on how to make complaints about a childcare provider: Complaints procedure - [Complaints procedure - Ofsted - GOV.UK](#)
- General guidance on whistleblowing can be found via: [Whistleblowing for employees: What is a whistleblower - GOV.UK](#)

As outlined in [Working Together to Safeguard Children](#), the LADO must be informed of all allegations against adults who work with children. The criteria for making a report to the LADO are that a member of the Children's Workforce or volunteer may have:

- Behaved in a way that has harmed a child or may have 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 they may pose a risk of harm to children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children
- Behaved in a way in their personal life that raises safeguarding concerns. These concerns do not have to directly relate to a child; and/or
- As a parent or carer, has a child that has become subject to child protection procedures; and/or
- Is closely associated with someone in their personal lives (e.g. partner, member of the family or other household member) who may present a risk of harm to child/ren for whom the member of staff is responsible in their employment/volunteering

In these instances, the setting will follow [Halton's LADO \(Local Authority Designated Officer\) Procedure](#).

Where no further action is taken, the case Supervisor (Supervisor, or Chair of Committee/Trustees) and the LADO will:

- record the decision and justification for it; and,
- agree on what information should be put in writing to the individual concerned and by whom.

Responding to the allegation in a timely and fair manner is essential. The Supervisor will consider what immediate actions are required to reduce any risk to children within the setting. This may include the staff member being moved to a position in the setting where they have no contact with children or could include that the person is suspended from duty whilst an investigation is undertaken. Suspension will be the last resort and should be seen as a neutral act. Appropriate support will be offered to both the subject of the allegation and complainant. For setting staff this support should be a member of the committee or management team who will not be involved in the actual LADO process with the staff member

Contact should be made with the Local Authority Designated Officer (LADO) in Halton within 24 hours of receiving the allegation it must also be notified to Ofsted using the online notification form <https://www.gov.uk/guidance/report-a-serious-childcare-incident> or by emailing enquiries@ofsted.gov.uk The LADO will request that the setting complete a Consultation Form (available from the Halton Safeguarding Children Partnership website) in order to provide advice and guidance regarding the matter. The LADO will, where appropriate and where the threshold has been met, arrange for a Strategy Meeting to be undertaken. **The contact details for LADO in Halton are Andrew Chisnall: 0151 511 7122, LADO@halton.gov.uk and safeguarding.adminteam@halton.gov.uk**

Please note: *Working Together to Safeguard Children* refers to LADO as the “Designated Officer”, but in line with the Northwest area, the full title in Halton remains Local Authority Designated Officer.

Where the details of the allegation also suggest that criminal offence may have been committed, the Police will also be contacted.

The Supervisor should record as much detail as possible about the initial disclosure but should not take statements from children or employees or investigate the matter further until a consultation has taken place with LADO. The Supervisor will not undertake an investigation prior to consulting with the LADO.

A registered provider must notify Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided.

Providers must notify Ofsted about any allegations of harm relating to people living, working or looking after children on the childcare premises.

Concern That Does Not Meet the Harm Threshold: Low-Level Concern

KCSIE (Keeping Children Safe in Education) states that, *Governing bodies and proprietors should ensure that there are procedures in place to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold, about staff members (including supply staff, volunteers and contractors).*

The term 'low-level' concern does not mean that it is insignificant, it means that the adult's behaviour towards a child does not meet the threshold set out above. 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 may have acted in a way that:

- is inconsistent with an organisation's staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the allegation threshold or is otherwise not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary.

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

- being over 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; or,
- using inappropriate sexualised, intimidating, or offensive language.

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.

It is crucial that any such concerns are shared responsibly and 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 our setting from potential false allegations or misunderstandings. It also ensures that the values and expected behaviour which are set out in our staff code of conduct are constantly lived, monitored and reinforced by all staff.

We have a book of concerns and a Safeguarding welfare folder, both of which are stored in the filing cabinet in the cupboard.

Through training, thorough induction, exit interviews and other opportunities we can:

- ensure our staff, volunteers and other adults in the setting are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others;
- empower staff to share any low-level safeguarding concerns with the Supervisor
- address unprofessional behaviour and support the individual to correct it at an early stage;
- provide a responsive, sensitive, and proportionate handling of such concerns when they are raised; and,
- help identify any weakness in our safeguarding systems.

The Supervisor will respond to any low-level concerns in line with the guidance set out within Keeping Children Safe in Education Part 4 Section 2.

Staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is not serious enough to consider a referral to the LADO, or whether it meets the threshold of an allegation. Once staff have shared what they believe to be a low-level concern, that determination should be made by the Supervisor and responded to in line with this policy.

A Culture of Vigilance and Staff Training on Whistleblowing

Spinney Pre School ensures that a culture of openness and trust is fostered within the organisation in which staff can share any concerns about the conduct of colleagues and be assured that these will be received in a sensitive manner.

At Spinney Pre School there is a commitment from leadership to adhere to, enforce and reinforce the staff code of conduct and its expectations, and to address any attempt to bypass policies or procedures – regardless of the person in question's status. Staff are briefed on the staff code of conduct and low-level concerns policy so that everyone is familiar with it, and clear on the standard of behaviour expected of them – it is to be a lived document; seen to apply to all staff, volunteers, visitors and Committees and Trustees. All new staff will receive a briefing on low level concerns and a copy of this policy will be provided, along with a copy of GfSWP.

At Spinney Pre School we acknowledge that having a clear DBS simply confirms that an individual has not been discovered to present a risk to children; it is not predictive about potential risk. Research shows that the majority of organisational child sex offenders did not have a previous criminal record at the time they offended, although they may subsequently be found to have had numerous previous victims. We must therefore continue to have an ongoing culture of vigilance and maintain a mind-set of 'it could happen here'.

Sharing Low-Level Concerns

At Spinney Pre School we have ensured our Whistleblowing and Low-Level Concerns Policy contains a procedure for sharing confidentially low-level concerns which is clear, easy to understand and implement. It is critical that all low-level concerns are ultimately received by the Supervisor Anne Rix. Having one recipient of all such concerns should allow any potential patterns of concerning, problematic or inappropriate behaviour to be identified, and ensure that no information is potentially lost.

It is important that low-level concerns are shared with the Supervisor as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it (where the concern relates to a particular incident) - although it should also be emphasised that it is never too late to share a low-level concern and a delay should never be seen as a barrier to sharing.

If the Supervisor is absent for any reason, low-level concerns should be shared with a clearly identified 'deputy,' who should ensure that they inform the Supervisor immediately on their return. In our Setting the 'deputy' for low level concerns is Mandy Hughes

If any low-level concern relates to the behaviour of the Supervisor, it should be dealt with in accordance with part 4, section 2 of KCSIE.

Anonymity

If the staff member who raises the concern does not wish to be named, then Spinney Pre School will respect that person's wishes as far as possible.

However, there may be circumstances where the staff member 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 will never be promised to members of staff who share low-level concerns. Where possible, Spinney Pre School will try to encourage staff to consent to be named, as this will help to create a culture of openness and transparency.

Self-Reporting

Occasionally a member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, a member of staff may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the staff code of conduct.

Self-reporting in these circumstances can be positive for a number of reasons: it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity; it demonstrates awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived; and, crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

In line with KCSIE Spinney Pre School will ensure that there is an environment where staff are encouraged and feel confident to self-refer.

Sharing and Recording of Low-Level Concerns

Staff will be given the option of sharing their low-level concern verbally with the Supervisor in the first instance, or by completing a simple low level concerns form, an example of which can be found in Appendix D of this policy. This form can be found in the policy folder in the foyer.

Where the low-level concern is provided verbally, the Supervisor will make an appropriate record of the conversation, either contemporaneously or immediately following the discussion.

Sound professional judgement will be exercised by the Supervisor in determining what information is necessary to record for safeguarding purposes. The name of the individual sharing the low-level concern and their role should be stated, as should the name of the individual about whom the concern is being raised, and their role within the organisation at the time the concern is raised.

If the latter individual has an opposing factual view of the incident, this will be fairly recorded alongside the concern. The record will include brief context in which the low-level concern arose, and concise details (which are chronological and as precise and accurate as possible) of any such concern and relevant incident(s). The record must be signed, timed and dated.

Records should be reviewed so that potential patterns of inappropriate, problematic or concerning behaviour can be identified. When a pattern of such behaviour is identified, the setting will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the LADO.

Responding to a Low-Level Concern

Once the Supervisor has received the low-level concern, they will (not necessarily in the below order but in an appropriate sequence according to the nature and detail of the particular concern shared with them):

- speak to the person who raised the concern (unless it has been raised anonymously), regardless of whether a written summary, or completed low-level concerns form has been provided.
- speak to any potential witnesses (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted).
- speak to the individual 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).
- review the information and determine whether the behaviour:
 - (i) is entirely consistent with their staff code of conduct and the law,
 - (ii) constitutes a low-level concern,
 - (iii) is not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO (on a no-names basis if necessary),
 - (iv) when considered with any other low-level concerns that have previously been raised about the same individual, could now meet the threshold of an allegation and should be referred to the LADO,
 - (v) in and of itself meets the threshold of an allegation and should be referred to the LADO.

Where they are in any doubt whatsoever, the Supervisor will always seek advice from the LADO - on a no-names basis if necessary.

- While responding to any incident, the Supervisor will make appropriate records of:
 - all internal conversations – including with the person who initially shared the low-level concern (where this has been possible), the adult about whom the concern has been shared (subject to the above), and any relevant witnesses (subject to the above),
 - all external conversations – for example, with the LADO/SCIE Officer (where they have been contacted, and either on a no-names or names basis),
 - their determination,
 - the rationale for their decision, and
 - any action taken.

Possible Outcomes from a Low-Level Concern

If it is determined that the behaviour is **entirely consistent** with the setting's staff code of conduct and the law, the Supervisor will:

- update the individual in question and inform them of the action taken as above.
- speak to the person who shared the low-level concern – to provide them with feedback about how and why the behaviour is consistent with the organisation's staff code of conduct and the law.
- Consider if the situation may indicate that the staff code of conduct or Whistleblowing and Low-Level Concerns policy are not clear enough, or if further training is required.

If the same or a similar low-level concern is subsequently shared by the same individual, and the behaviour in question is also consistent with the staff code of conduct, then an issue may need to be addressed about how the subject of the concern's behaviour is being perceived, if not about the behaviour itself, and/or the setting may need to look at the implementation of its W&LLC policy.

If it is determined that the behaviour constitutes a low-level concern:

- It will be responded to in a sensitive and proportionate way – on the one hand maintaining confidence that such concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff from any potential false allegations or misunderstandings. Any investigation of low-level concerns will be done discreetly and, on a need-to-know basis.
- Most low-level concerns by their very nature are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action. Others may be most appropriately dealt with by means of management guidance and/or training.
- In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised. It has long been understood that lasting change in behaviour is least likely to be achieved by an approach experienced as critical or threatening. Any such conversation will include being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that, and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question.
- Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual, and regularly reviewed with them, may also be appropriate.
- Some low-level concerns may also raise issues of misconduct or poor performance. The Supervisor will also consider whether this is the case – by referring to the organisation's disciplinary and/or capability procedure and taking advice from the setting's Chairperson on a named or no-names basis where necessary. Where a low-level concern does not raise misconduct or poor performance issues, it will not be a matter for the Chairperson.
- Where a low-level concern relates to a person employed by a supply agency or a contractor, that concern will be raised with their employers, so that any potential patterns of inappropriate behaviour can be identified. How an organisation responds to a low-level

concern may be different depending on the employment status of the individual who is the subject of the concern - i.e. whether they are an employee, or worker to whom the organisation's disciplinary procedure would apply; or a contractor, Governor, Trustee, Director or volunteer who may be subject to alternative procedures.

- Where a setting receives a low-level concern or allegation relating to an incident that happened when an individual or organisation was using their premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, schools and colleges should follow their safeguarding policies and procedures, including informing the LADO if necessary.
- Some concerns may trigger the setting's disciplinary, grievance or whistleblowing procedures, which should be followed where appropriate. Where low-level concerns are raised which in fact require other internal processes to be followed, it is sometimes difficult to determine how best to investigate the concern and which procedure to follow. The Supervisor will exercise their professional judgement and, if in any doubt, they will seek advice from other external agencies including the LADO or Early Years Safeguarding and Welfare Officer.
- If the Setting's disciplinary procedure is triggered, Spinney Pre School will ensure that the individual has a full opportunity to respond to any factual allegations which form the basis of a disciplinary case against them. If an organisation ultimately disciplines or dismisses a staff member for cumulative alleged 'breaches' of the staff code of conduct which were not brought contemporaneously to the individual's attention, and to which they have not had a proper opportunity to respond, clearly there will be a lack of fairness and natural justice and the risk of a finding of unfair dismissal by an Employment Tribunal. Staff therefore need to understand that when they share what they believe to be a low-level concern, the Supervisor will speak to the adult who is the subject of that concern – no matter how 'low' level the concern may be perceived to be, to gain the subject's account – and to make appropriate records (as above), which may be referenced in any subsequent disciplinary proceedings.

If it is determined that the behaviour, whilst not sufficiently serious to consider a referral to the LADO nonetheless merits consulting with and seeking advice from the LADO, then action (if/as necessary) will be taken in accordance with the LADO's advice.

If, when considered with any other low-level concerns that have previously been shared about the same individual, could now meet the threshold of an allegation, then it should be referred to the LADO in accordance with Part 4 of KCSIE.

Storage of Low-Level Concerns

Spinney Pre School will retain all records of low-level concerns (including those which are subsequently deemed by the Supervisor to relate to behaviour which is entirely consistent with the staff code of conduct) in a central electronic low-level concerns file.

Where multiple low-level concerns have been shared regarding the same individual these will be kept in chronological order as a running record. These records will be kept confidential and held securely, with access afforded only to a limited number of individuals such as the Supervisor and the individual they report to such as Deputy Safeguarding Lead.

The rationale for storing such records on a central file, rather than in staff members' personnel files, is that (a) it makes it easier to review the file and spot any potential patterns of concerning, problematic or inappropriate behaviour; and (b) it reassures staff and encourages them to share low-level concerns.

However, if a referral is made to the LADO where the behaviour in question:

- (i) had not originally been considered serious enough to consider a referral to the LADO but merited consulting with and seeking advice from them,
- (ii) is determined to meet the threshold of an allegation when considered with any other low level concerns that have previously been raised about the same individual, or

- (iii) in and of itself meets the threshold of an allegation then records relating to the behaviour should be placed and retained on the staff member's personnel file, whilst also being retained on the central low level concerns file.

Material on the personnel file will be retained in accordance with Part 4 of KCSIE – which requires Settings and colleges in England to produce a clear and comprehensive summary of all allegations (except those which are found to have been malicious), details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, to be kept on the confidential personnel file of the staff member, and a copy provided to them.

Reviewing the Low-Level Concerns File

The Supervisor will review the central low-level concerns file periodically to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. A record of these reviews will be made and stored alongside the file, along with any subsequent actions taken.

Committee/Trustees will receive relevant data relating to low-level Concerns and review anonymised samples of low-level concerns at regular intervals, in order to ensure that these concerns have been responded to promptly and appropriately.

Retaining Low-Level Concerns

Low-level concerns will be retained on an organisation's central low-level concerns file (securely and applying appropriate access restrictions) unless and until further guidance provides otherwise.

When a staff member leaves and/or takes up new employment, that creates a natural point at which the content of the file may be reviewed to ensure it still has value (either as a safeguarding measure or because of its possible relevance to future claims) and is therefore necessary to keep.

This is subject to the rights of individuals to object to or seek to erase or correct records about them under data protection law.

Low-Level Concerns and References

KCSIE prohibits Settings from referring to unsubstantiated, malicious or false allegations in references. Only safeguarding allegations that have been substantiated should be included in references. KCSIE states that: "schools and colleges should only provide substantiated safeguarding concerns/allegations (including a group of low-level concerns about the same individual) that meet the harm threshold in references. Low-level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference".

Appendix A – Spectrum of Behaviour

Allegation

Behaviour which indicates that an adult who works with children has:

- behaved in a way that has harmed a child, or may have 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 they may pose a risk of 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

Does not mean that it is insignificant, it means that the adult's behaviour towards a child does not meet the threshold set out above. 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 may have acted in a way that:

- is inconsistent with an organisation's staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO - but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary.

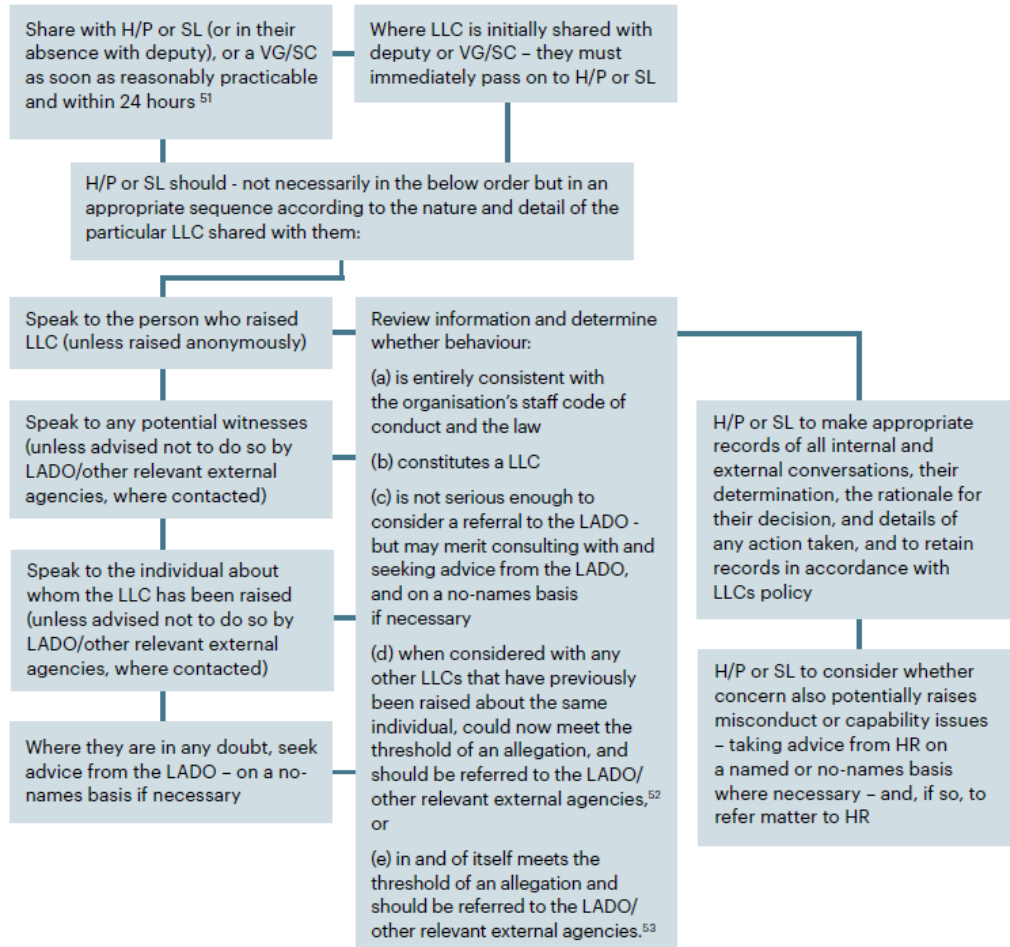
Appropriate Conduct

Behaviour which is entirely consistent with the organisation's staff code of conduct, and the law.

Appendix B – Responding to a Low-Level Concern Flowchart

KCSIE now requires low-level concerns to be shared with the Headteacher/Principal – unless they relate to the Headteacher/Principal – as per paragraph 74 of KCSIE (set out in our main guidance).⁵⁰

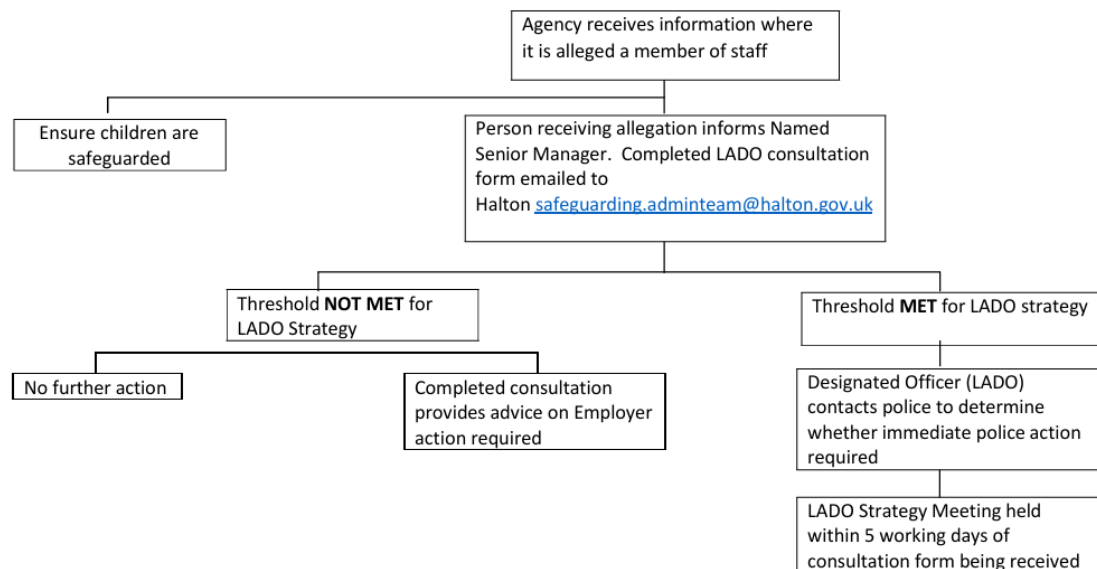
ACTION REQUIRED



Appendix C – LADO Procedure Flowchart for Settings

Agency receives information where it is alleged a member of the Children's Workforce or volunteer may have:

- Behaved in a way that has harmed, or may have harmed a child
- Possibly committed a criminal offence against, or related to, a child
- Behaved towards a child or children in a way that indicates he or she would post a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children
- Behaved in a way in their personal life that raises safeguarding concerns. These concerns do not have to directly relate to a child
- As a parent or carer, has a child that has become subject to child protection procedures
- Is closely associated with someone in their personal lives (e.g. partner, member of the family or other household member) who may present a risk of harm to child/ren for whom the member of staff is responsible in their employment/volunteering



Further advice and guidance can be found on the Halton Safeguarding Children Partnership website. Click [here](#) to view.

Appendix D – Example Low-Level Concerns Form

Low Level Concerns Form

Please use this form to share any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult may have acted in a way that:

- is inconsistent with Spinney Pre School’s staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the allegation threshold or is otherwise not serious enough to consider a referral to the LADO.

You should provide a concise record – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s) (and please use a separate sheet if necessary).

The record should be signed, timed and dated.

Details of Concern

Name of Staff Member:

Concern:

Signed:

Name:

Date and Time:

Received by:

Date:

Time:

Action Taken:

Signed:

Date: