SOUTH WEST INTERVENTION SERVICES

Date of Review	September 2025
Reviewed by	Director of Safeguarding
Approval Body	SWIS Board
Date Approved	13/10/2025
Date of Next Review	By 1st September 2026
This Low Level Concerns Policy has regard to the Statutory Guidance, Keeping Children Safe in Education 2025 and Working Together to Safeguard Children.	

MANAGING LOW-LEVEL CONCERNS POLICY

This policy aims to ensure that colleagues understand the need to share concerns that do not meet the threshold for harm, and is in place to promote a safer environment for children, young people and colleagues

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OCTOBER 2025



PURPOSE

This policy helps staff recognise and report concerns about colleagues' behaviour towards children and young people that do not meet the threshold for serious harm, but still could be inappropriate or worrying.

WHAT IS A LOW LEVEL CONCERN?

- **Any behaviour by an adult towards a child or young person that is inappropriate or makes you feel uneasy, but does not meet the threshold for serious harm or a formal referral.**
- **Examples include**
- **being overly friendly**
- **having favourites**
- **using inappropriate language**
- **or engaging with a child or young person in a secluded area.**

WHY REPORT LOW LEVEL CONCERNS

- **Early reporting helps prevent more serious issues from developing.**
- **All staff have a duty to speak up if they see or hear anything concerning, no matter how small.**

WHO DOES THIS APPLY TO?

- **All staff, volunteers, agency staff, and contractors working at SWIS.**

HOW TO REPORT

- **Report concerns to the Designated Safeguarding Lead (DSL) as soon as possible, either verbally or using the Low-Level Concerns Form.**
- **If the concern is about the DSL, report to the Nominated Safeguarding Lead (NSL).**
- **If a child is at immediate risk, call 999.**

WHAT HAPPENS NEXT?

- **The DSL and NSL will review the concern and decide if it is low-level or needs to be escalated.**
- **Accurate records are kept of all concerns and actions taken.**
- **Staff who self-report concerns will be treated fairly and supported.**

APPROPRIATE BEHAVIOUR

- **Respect and promote children's rights and welfare.**
- **Speak up about any concerns.**
- **Maintain professional boundaries.**
- **Be honest, polite, and accountable.**
- **Protect sensitive information and maintain confidentiality.**
- **Engage in training and follow the Staff Code of Conduct.**

INAPPROPRIATE BEHAVIOUR

- **Unacceptable Behaviour (What Not to Do)**
- **Do not be overfriendly or have favourites.**
- **Do not engage with children in secluded areas.**
- **Do not arrange to meet children outside work without permission.**
- **Do not take children to your home or give them gifts.**
- **Do not use personal devices to take photos of children.**
- **Do not belittle, humiliate, or physically harm children.**
- **Do not ignore or dismiss any concerns.**

RECORD KEEPING

- **All concerns are recorded and stored securely.**
- **Patterns of behaviour are monitored to identify potential risks.**
- **Only substantiated safeguarding allegations are included in employment references.**

CULTURAL AND PSYCHOLOGICAL SAFETY

- **SWIS promotes an open, transparent, and psychologically safe environment where staff feel confident to raise concerns without fear of negative consequences.**

SUMMARY

- **If you see or hear anything that makes you uneasy about how an adult is behaving towards a child—even if it seems minor—report it to the safeguarding team. This helps keep children safe and supports a positive, open culture at SWIS.**

APPROPRIATE & ACCEPTABLE PROFESSIONAL BEHAVIOUR

The following provides examples of acceptable behaviour. Colleagues must always:

- **Respect and promote the rights of children and young people.**
- **Speak up about/raise any concerns you may have about the behaviour of any colleague, including any low-level concerns.**
- **Be responsible and accountable.**
- **Promote an environment that supports openness and transparency.**
- **Be open to reasonable challenge and welcome opportunities to enhance practice.**
- **Be empathic and understanding.**
- **Be polite, courteous, and friendly.**
- **Be honest.**
- **Work transparently.**
- **Respect the need for professional boundaries.**
- **Respect personal space.**
- **Respect the privacy of children and young people.**
- **Listen to children and young people. Take any concerns they have concerns seriously.**
- **Be factual when reporting or recording information.**
- **Communicate effectively with all stakeholders.**
- **Be punctual.**
- **Maintain confidentiality and share information responsibly (on a need-to-know basis).**
- **Turn off personal mobile phones (or any personal portable internet enabled device) when working with children and young people.**
- **Protect sensitive information.**
- **Engage in training and development opportunities, with particular regard to core training requirements.**
- **Engage with team meetings, supervisions, and appraisals.**
- **Work together to safeguard children and young people.**
- **Protect the welfare of children and young people.**
- **Advocate for children and young people.**
- **Be familiar with the DSL and NSL, as well as their function within the organisation.**
- **Ask a senior colleague if in any doubt about what to do.**

SWIS recognise that the above list is non-exhaustive. However, it does provide a simple way to promote a safe working environment for everyone.

SWIS expect that all colleagues will embrace and maintain the above mandatory requirements, which are regarded as fundamental standards of conduct.

INAPPROPRIATE & UNACCEPTABLE BEHAVIOUR

The following provides examples of unacceptable behaviour. SWIS expect that colleagues will speak up and raise a concern if they (a) witness, (b) hear of, or (c) suspect an adult of any of the following points. For clarity. If a colleague becomes aware of a:

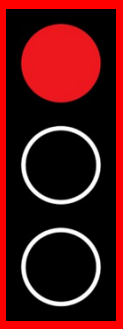
- **Low-level concern they must follow the procedure outlined in this policy.**
- **Concern that may meet the harm threshold, they must follow the conditions of our Allegations Policy and/or our Safeguarding Policy.**

Colleagues must never:

- **Be overfriendly with children or young people.**
- **Have favourites or treat individual children and young people differently from their peers.**
- **Engage with a child or young person on a one-to-one basis in a secluded area or any such location or environment. For example, behind the closed door of a young person's bedroom.**
- **Arrange to meet or see a child or young person outside working hours without the knowledge and agreement of a manager.**
- **Take a child or young person to their home or other such private address.**
- **Disclose personal information to children and young people.**
- **Accept "friend requests" from children and young people on social media platforms.**
- **Belittle or humiliate children and young people, thereby creating a sense of shame.**
- **Be abusive or rude to any child, young person, and/or any adult.**
- **Strike, lash out or in any way physically harm any child, young person, and/or any adult.**
- **Be sexist or make any comments with deliberate sexual innuendo.**
- **Exhibit prejudice towards any individual or group (i.e., regarding their religious belief, race, gender, sexual orientation, etc.).**
- **Use their personal mobile phone (or any camera) to take picture of children or young people.**
- **Drive above speed limits and/or dangerously (i.e., without due care and attention).**
- **Falsify any record and/or attempt to cover up or hide a matter of concern.**
- **Give or lend children and young people any keys to property, cars, etc.,.**
- **Let children and young people drive personal vehicles or company vehicles (where applicable)**
- **Consume alcohol or smell of alcohol.**
- **Consume illegal drugs/smell of illegal drugs.**
- **Smoke or vape in front of children and young people.**
- **Give children or young people any of your personal possessions or purchase gifts for them.**
- **Purchase anything from children or young people.**
- **Make promises to children to keep their confidence.**
- **Ignore or dismiss any matter, issue or occurrence that could indicate a low-level concern or a concern that meets the harm threshold. (N.B., Not raising such a concern could be seen as a form of complicity).**

GUIDANCE ON THE SPECTRUM OF BEHAVIOUR

CONCERN THAT MAY MEET HARM THRESHOLD



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

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

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 with children or young people 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 harm threshold or is otherwise not serious enough to merit a referral to the LADO.**

APPROPRIATE CONDUCT



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

IMPORTANT

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 SWIS' staff code of conduct (as confirmed in our low-level concerns policy – including inappropriate conduct outside of work; and
- Does not meet the harm threshold / is otherwise not serious enough for a referral to the LADO.

You should provide a concise record (online/electronically or hard copy) – 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. Once completed, this form must be sent to the Designated Safeguarding lead (DSL)without delay.

Colleague (Completing this form):	**Role:**
Colleague (Subject of LLC):	**Role:**

Signed:	**Time & Date:**

Received by:	At (Time):	On (date):

Action taken: (Please be specific)	
Signed:	**Time & Date:**

This record will be held securely in accordance with SWIS' low-level concerns policy.

Please note that low-level concerns will be treated in confidence as far as possible, but SWIS may in certain circumstances be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.

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