



## Low-Level Concerns Policy

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**Date of review:** 2<sup>nd</sup> September 2025

### Policy Statement

Lexia is committed to creating a safe and secure environment for all individuals. This policy outlines our procedure for managing low-level concerns regarding the conduct of adults who work with children or vulnerable adults. The purpose of this policy is to:

- Encourage an open, reflective, and safe culture where everyone feels confident to report concerns, no matter how small.
- Ensure that all concerns about an adult's behaviour are captured and recorded, allowing for the identification of potential patterns.
- Provide a clear and consistent process for staff to follow when they observe, are told about, or feel they may have been involved in concerning behaviour.

### The purpose of this policy is:

- To manage and record concerns about an adult's behaviour that do not meet the threshold for a formal referral but still warrant attention.
- It is a proactive tool for creating a safe culture and identifying potential patterns of concerning behaviour before they escalate.

### Definition of a low-level concern

A low-level concern is defined as any behaviour by an adult working with children or vulnerable adults that does not meet the "harm threshold" but causes concern. It could include behaviour that:

- Seems inappropriate, unprofessional, or inconsistent with the organisation's code of conduct.
- Appears to be overly familiar or friendly with a child or vulnerable adult.
- Is not in line with the expected professional standards.

- Could be misinterpreted or appear compromising to others, even if there was no malicious intent.

#### Examples:

- An adult repeatedly giving a particular child gifts or unnecessary attention.
- An adult using a private social media account to contact a child.
- An adult engaging in "overly friendly" physical contact with a child.

### Procedures for reporting a low-level concern

#### Who to report to

All low-level concerns should be reported to the Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead (DDSL).

#### How to report

Reports can be made in person, by phone, or by using the Cause for Concern form. The reporter should provide as much detail as possible, including:

- Details of the concern, including the nature of the behaviour.
- The context in which the concern arose (e.g., date, time, location).
- Any other relevant details or witnesses.

#### Self-reporting

The policy also encourages adults to self-report situations where they feel their behaviour could be misinterpreted or was not in line with professional standards. This fosters a culture of openness and helps to prevent issues from escalating.

### Management of low-level concerns

#### Recording

All low-level concerns, including self-reported ones, must be documented in writing or digitally. A single, confidential log will be maintained by the DSL or DDSL.

#### Initial assessment

The DSL will review the concern to determine if it meets the harm threshold.

- **If the concern meets the harm threshold:** The DSL will immediately escalate it according to the organisation's main safeguarding and whistleblowing policies, involving relevant statutory agencies such as the Local Authority Designated Officer (LADO) as required.
- **If the concern does not meet the harm threshold:** It will be managed under this low-level concerns policy.

## **Review and action**

### **The DSL will:**

- Speak to all adults involved, including the person named in the concern and any witnesses, unless advised otherwise by other agencies.
- Take appropriate action, which may include further training, a supervision meeting, or a discussion with the individual about professional boundaries.
- Consider any contextual information that may be appropriate.

The DSL will regularly review the log of low-level concerns to identify any patterns of behaviour by an adult over time. If a pattern of concerning behaviour emerges, the concern may be reclassified as a serious allegation and escalated accordingly.

## **Confidentiality**

All information related to low-level concerns will be handled confidentially and shared only on a "need-to-know" basis. Staff involved in reporting concerns will be protected from any reprisal.

## **Policy review**

This policy will be reviewed regularly and updated in line with new safeguarding guidance and best practices.