



SAFEGUARDING

Low level concerns policy

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We want to create and embed a culture of openness, trust, and transparency in which the clear values and expected behaviour are set out.

This is in line with the “Premier League Safer Working Practice Guidance” and “Keeping Children Safe in Education”.

You should also refer to our Safeguarding Policies and our Safeguarding Code of Conduct.

Definition of a low-level concern

A low-level concern is any concern, no matter how small, even if it is a ‘nagging doubt’, that a person working in or on behalf of Wolves FC may have acted in a way that:

- Is inconsistent with our safeguarding policies and safeguarding code of conduct as well as the “Premier League Safer Working Practice Guidance” and may include inappropriate conduct outside of work.
- However, a low-level concern does not meet the allegations threshold or is otherwise not considered of severity to make a referral to the LADO but may meet the thresholds as defined by The FA Safeguarding Concerns in the Professional Game, Referral & Threshold Document.

Examples of behaviour that could require reporting of a low-level concern include, but are not limited to:

- being overly friendly with children or an adult at risk.
- Behaving in a way that people may give the impressions you have 'favourites'
- Being friends with children/participants or adults at risk on social media or allowing them to follow private accounts.
- taking photographs of children or adults at risk on a personal mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- 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, however it is crucial that any such concerns, including those which do not meet the harm threshold, are shared responsibly with a Safeguarding Lead.

Sharing concerns responsibly means they are dealt with sensitively and we will support those individuals who have low-level concerns raised against them and potential false allegations or misunderstandings.

You may also 'self-refer' this is particularly useful if on reflection you think 'I shouldn't have said that' or perhaps a conversation could have been handled better and you lost your temper? Or if a child or a young person finds you on social media and send a friends request it would be sensible to share as a low-level concern. Any situation that you find yourself in that you think might be misinterpreted, potentially compromising or where you have reflected and decided that your behaviour is below expected professional standards.

Staff may also wish to follow Wolves FC whistleblowing procedures. If the concern warrants more information (fact finding) this will be completed by the Designated Safeguarding Lead, who will consult with the Department Manager. The Head of Safeguarding must be made aware of the outcome including the case management documentation being sent for referencing to HR and disciplinary procedures may be initiated.

This policy is not about making people feel bad or 'spying' on colleagues. It is about flagging concerns early to PREVENT issues from escalating.

It helps ensure that adults consistently model Wolves values and helps keep children safe. It will also protect adults working with children from potential false allegations or misunderstandings.

Procedure for managing a low-level concern:

Step 1 - Initial concern raised

low-level concerns shared with a Safeguarding Lead as soon as possible and a written summary should be obtained from the individual raising the concern.

This should be recorded centrally through HR systems. The record should include brief context, concise details, and relevant incidents.

Step 2 - Response

Review the information with wit the Head of Safeguarding and decide whether the behaviour is a safeguarding concern.

Does it constitute a low-level concern?



Yes

This is a low level concern only

The individual concerned is to be informed of what was shared about their behaviour and give them an opportunity to respond.

Consider feedback to the person who raised the concern.

Consider if a review of the Safeguarding Policy and Procedure is necessary - is the Policy clear?

What needs to be put in place to address this staff members behaviour?

A sensitive and proportionate response is essential.



No

Is it serious enough to consider a referral or to be reclassified as an allegation referred to the LADO?

Where there is any doubt whatsoever, advice will be sought from the LADO, if necessary, on a no-names basis.

The circumstances in which a low-level concern might be reclassified are where the threshold is met for an allegation, there is a pattern of low-level concerns which collectively amount to an allegation or there is other information which when considered leads to an allegation.

Speak to the individual about whom the concern is raised unless LADO/Police have advised otherwise.

Records must be kept of the following:

All internal & external conversations, the rationale for a decision and any action taken.

Wolves FC will send a referral to The FA Safeguarding Team where repeated poor practice incidents occur.

Specifically, a referral will be made where there are three incidents of poor practice by the same individual. This is whether these incidents are for the same type of poor practice, or for different forms of poor practice.



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