

# 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 lowlevel 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:**

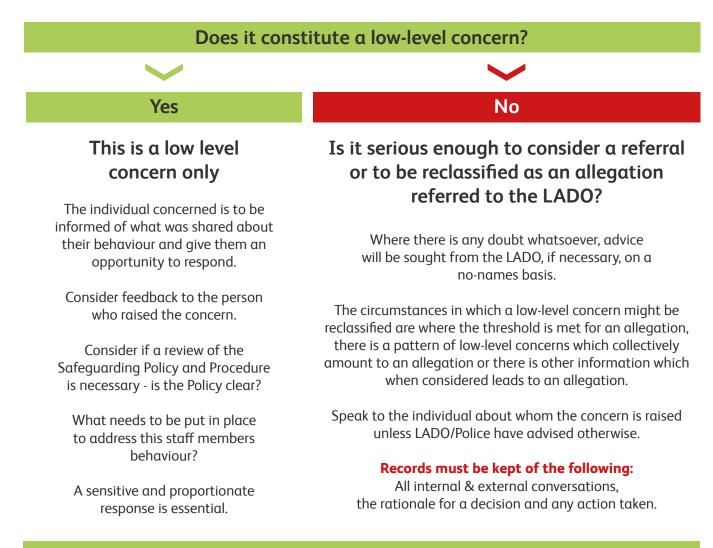
#### Step 1 - Initial concern raised

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.



### 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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