



## **Hartlepool United Football Club** **Low Level Concern Policy**

### **Introduction**

Hartlepool United Football Club is committed to providing an enjoyable and safe environment for children and young people where the wellbeing of the child or young person is paramount, and they are protected from abuse.

HUFC recognises that a critical step to safeguarding is to ensure that all those who work with children and young people behave appropriately, and that any concerns about an adult's behaviour are identified early, and are then managed promptly and appropriately.

The aim of this policy is to support a culture whereby concerns (no matter how small those concerns may be) about an adult's behaviour that may fall below the expected standards of our Employee Policies and Procedures in the Employee Handbook, including the Code of Conduct, can be shared responsibly with the appropriate person and be dealt with promptly and appropriately.

### **Purpose**

The purpose of this policy is to manage low level concerns regarding adult behaviour towards a child or young person. In particular it is to:

- Ensure staff understand and have confidence to recognise behaviour that falls below the expected standards
- Empower staff to have the confidence to share low level concerns with the Designated Safeguarding Officer (DSO)
- Address unprofessional behaviour at the earliest opportunity
- Identify concerning, problematic or inappropriate behaviour
- Clarify the difference between low level concerns and allegations or safeguarding concerns
- Provide responsive, sensitive and proportionate action to such concerns

This policy should be read in conjunction with the HUFC Safeguarding Policy.

### **Concerns**

Concerns that are **NOT** covered by this policy are as follows:

## **Allegations**

An “allegation” means that it is alleged that a person that works with children has

- Behaved in a way that has harmed a child, or may have harmed a child,
- Possibly committed a criminal offence against or related to a child; or
- Behaved towards a child or children in a way that indicates they are unsuitable to work with children.

To report an allegation please refer to the HUFC Safeguarding Policy.

## **Safeguarding Concerns**

Safeguarding concerns are defined as follows:

- Concerns about a child’s safety or welfare
- Concerns regarding peer-on-peer abuse

To report a safeguarding concern please refer to the HUFC Safeguarding Policy.

Concerns that **ARE** covered by this policy are as follows:

### **Low Level Concern**

A “low level concern” is a concern about an adult’s behaviour towards a child that does not meet the allegation threshold set out above, or is not otherwise serious enough to consider a referral to the Local Authority Designated Officer (LADO).

A low-level concern is any concern, no matter how small, that an adult may have acted in a manner which;

- Is not consistent with the code of conduct and/or
- Relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult’s suitability to work with children.

### **Reporting a low level concern**

All low level concerns should be reported as follows:

- To the Designated Safeguarding Officer (DSO) within 24 hours of being aware of the concern
- To the Safeguarding Senior Manager (SSM) in the absence of the DSO within 24 hours of being made aware of the concern
- To the SSM if the concern relates to the DSO

## **Procedure for managing a low level concern**

### **Step 1 – Report the concern**

- Report the concern to the DSO or SSM either verbally or in writing
- The DSO/ SSM will ensure a written record of the concern reported is taken
- The DSO/ SSM may request further information for clarification from the individual reporting the concern, if not already included in the initial verbal or written report
- The written record should include concise details and relevant incidents with dates/ times/ location wherever possible
- The written record is to be signed and dated

### **Step 2 – DSO Response**

The DSO will review the information and decide the following:

- Whether the concern is inconsistent with the expected standards of behaviour of the Code of Conduct and Employee Handbook
- Whether the behaviour constitutes a low level concern
- Whether the concern is serious enough to require a referral to the SSM or LADO, in which case the HUFC Safeguarding Policy will be followed.
- Where the concern is not the first instance of a low level concern reported about this individual, whether it constitutes an allegation and as such should be referred as such, in which case the HUFC Safeguarding Policy will be followed.

If the DSO is in any doubt as to the outcome of Step 2 they must raise it with the SSM before making the decision.

Once the DSO has decided on the above and has concluded that it does not constitute a referral, the DSO will speak to the individual about the low level concern raised.

The DSO will record all discussions (both internal and external), the determined outcome, with rationale for the outcome, and any action taken.

### **Step 3 – Decision Making and Next Steps**

In the event that the decision is taken that the concern(s) raised are not in breach of the club's policies and procedures and/or Code of Conduct the DSO/ SSM will:

- Confirm the decision back to the individual concerned, and provide them with the opportunity to respond
- Confirm the outcome back to the individual that raised the concern, and provide them with feedback as to why the decision was taken, and how the behaviour was deemed not to breach the policies and procedures
- Consider any lessons learned regarding the policies and procedures, code of conduct and this policy, training and communication.

In the event that the decision is taken that the concern(s) raised are deemed a low level concern the DSO/SSM will:

- Ensure an appropriate and proportionate response

- Maintain confidence that concerns will be handled promptly and effectively, without undue delay, whilst protecting staff from potential false or malicious allegations
- Ensure any further investigations are confidential and any staff involved in such investigations are reminded as such
- Determine appropriate action and next steps, which may include further guidance, support or training/re-training

### **Record Keeping**

All records of low level concerns reported will be stored on the Club's Safeguarding Reporting System.

The Safeguarding Reporting System is a confidential system with access restrictions to a limited number of individuals.

In the event that the behaviour is confirmed as a low level concern, this will not be held on the individuals personnel file.

In the event that the behaviour is deemed serious enough for referral to the LADO and/or EFL/FA Safeguarding Teams (and as such deemed a low level concern) then record will be held on the personnel file.

Low level concern files will be retained until Government safeguarding guidance provides otherwise.

### **Review**

Low Level Concern Files will be reviewed by the DSO and SSM on a quarterly basis to identify any commonality, patterns or training needs to inform policy or practice reviews/ actions.