



COMMUNITY
SPORTS
FOUNDATION

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NEST

LOW LEVEL CONCERNS

Date of Next Update: April 2024

Scope

This policy applies to all Norwich City Community Sports Foundation (“Foundation”) staff and affiliated entities to ensure a consistent standard across the Foundation, Norwich City Football Club (“Club”), Norwich City Women’s Football Club and Regional Development Programme.

This policy supersedes any previous policies on this topic prior to its issue date.

Policy Statement

The Foundation believes that all our environments should be inclusive and welcoming for everyone and people should feel safe, valued, and respected in line with our own Foundation values. The Foundation is committed to creating a culture in which all concerns (including where the threshold for an allegation is not met) are shared responsibly with the right person and recorded and dealt with appropriately. Concerns should only be shared with those who need to know and not openly discussed.

This policy should encourage an open and transparent culture and enable the Foundation to identify concerning, problematic or inappropriate behaviour at the earliest opportunity. It will ensure that individuals working for or with the Club are clear about professional boundaries and act in accordance with the Foundation’s Staff Code of Conduct. This policy will outline the processes to deal with such matters to minimise the risk of abuse.

Policy and Procedure

What is a low-level concern?

A low-level concern is any concern that an adult has acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- Doesn’t meet the threshold of harm or is not considered serious enough for the Foundation to refer to the local authority

Low-level concerns are part of a spectrum of behaviour. This includes:

- Accidental or thoughtless behaviour
- Behaviour that might be considered inappropriate depending on the circumstances
- Behaviour which is intended to enable abuse

Examples of these behaviours could include:

- Being over friendly with children
- Having favourites
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate language; this might be intimidating or offensive

Difference between an allegation and a low-level concern

Allegation	Low-level concern	Appropriate conduct
<p>Behaviour which indicates that an adult who works with children or adults at risk has:</p> <ul style="list-style-type: none"> • Behaved in a way that has harmed a child or adult at risk, or may have harmed a child or adult at risk • Possibly committed a criminal offence against or related to a child or adult at risk • Behaved or may have behaved in a way that indicates they may not be suitable to work with children or adults at risk 	<p>Any concern – no matter how small, even if no more than a ‘nagging doubt’ – that an adult may have acted in a manner which:</p> <ul style="list-style-type: none"> • Is not consistent with the staff code of conduct • 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 	<p>Behaviour which is entirely consistent with the Foundation’s staff code of conduct, and the law.</p>

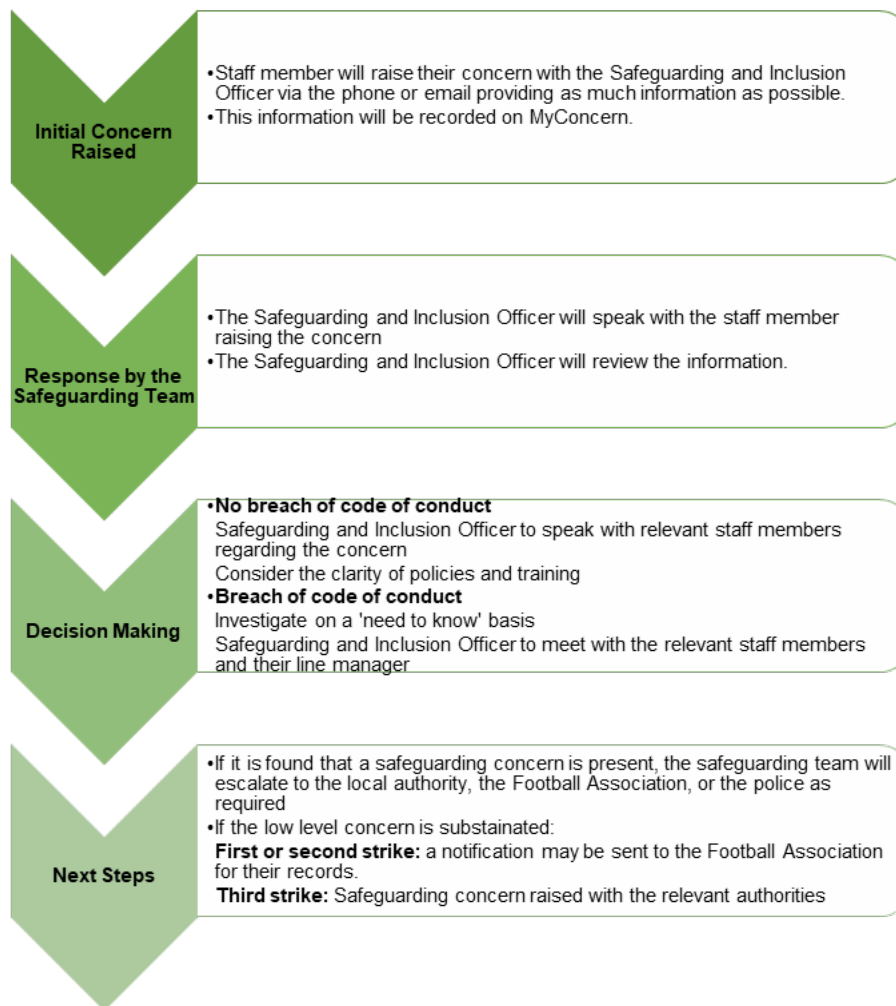
Procedure

What should you do if you have a low-level concern?

All low-level concerns should be received by the Safeguarding and Inclusion Officer. It is important to:

- Share concerns with the Safeguarding and Inclusion Officer within 24 hours of becoming aware of it
- In the absence of the Safeguarding and Inclusion, speak with another Designated Safeguarding Officer
- If the behaviour is about a member of the Foundation’s safeguarding team, share your concern with the Club’s Head of Safeguarding

Managing a low level Concern



Previous low-level concern

If someone has had a previous low-level concern raised against them, the safeguarding team must inform the Foundation's Senior Safeguarding Manager or Club's Head of Safeguarding. The information available will be reviewed and a decision may be made to reclassify the concerns as the concern as an allegation, and the concern will be dealt with in accordance with the Foundation's Safeguarding Policies and Procedures.

Equality, Diversity, and Inclusion

The Foundation endorses the principle of equality and will strive to ensure that everyone who wishes to be involved in the Foundation has a genuine and equal opportunity to participate to the full extent of their own ambitions and abilities and can be assured of an environment in which their rights, dignity and individual worth are respected.

This includes everyone's right to be safe from harm.

It is important to understand and acknowledge that people with disabilities may be more vulnerable to abuse and may have different ways that they communicate their thoughts and feelings. It is vital that we are open to the fact there is not one way to support and safeguard children

Monitoring and Evaluation

Anonymised reporting of low-level concerns will be reported to the Senior Leadership Team and the Board of Trustees via the quarterly board reports. This anonymised reporting will also feature in the annual safeguarding report along with any lessons learned to develop organisational learning.

Associated Policies

Speak Up Policy
Safeguarding Codes of Conduct
Information Sharing
Managing Allegations

Policy Issue Date: **April 2023**

Date of Next Update: **April 2024**

This policy is next due for general review on the above date. It may however be reviewed and updated earlier, in the event of a change in Foundation requirements or relevant legislation.

