



SAFEGUARDING

IT'S A TEAM SPORT!

LOW LEVEL
CONCERN POLICY

Version Control Sheet

Version I.D	Author	Date of Review	Review Points	Endorsed Cardiff City Football Club Board of Directors and date
V 5.0	Rob Cronick, Head of Safeguarding	01/06/26	Scheduled review	Yes – June 2026
V 4.0	Rob Cronick, Head of Safeguarding	01/06/25	Scheduled review	Yes – June 2025
V 3.0	Rob Cronick, Head of Safeguarding	01/07/24		Yes – June 2024
V 2.0	Rob Cronick, Head of Safeguarding	01/06/23	- Scheduled review - Change of staff details - Additional members of Safeguarding Team added	Yes – June 2023
V 1.0	Rob Cronick, Head of Safeguarding	01/01/21		Yes – January 2021
This policy will be reviewed annually or when there is a legislative change or review due to lessons learnt or best practice guidance.				

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INTRODUCTION

Cardiff City Football Club believes every child, young person and adult at risk who participates our activities should be able to take part in an enjoyable and safe environment and be protected from abuse. This is the responsibility of everyone involved in Club activities. Cardiff City Football Club recognises its responsibility to safeguard the welfare of all children, young people, and adults by seeking to protect them from all forms of neglect and abuse.

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Cardiff City Football Club recognises that a critical step to safeguarding is to ensure that all those who work with children, young people and adults in our sport, behave appropriately and that any concerns about an adult's behaviour are identified early and are managed promptly and appropriately.

The aim of Cardiff City Football Club's Low-Level Concerns Policy, is to support a culture that enables staff to feel confident to report any concern, no matter how small that concern is.

- *This policy is endorsed by the Cardiff City Football Club Board of Directors.*

Cardiff City Football Club Policy Statement

- The welfare of the child is paramount. 'The term child or young person is used within this policy to define a person under the age of 18'.
- The term adult refers to persons over the age of 18, formerly known as 'adult at risk'.
- The welfare and interests of the child are paramount in all circumstances regardless of age, ability or disability, gender reassignment, race, religion or belief, sex or sexual orientation and socio-economic background.
- All allegations, suspicions of harm and/or abuse and related concerns, will be taken seriously and responded to swiftly fairly and appropriately.
- Everyone is required to work in partnership to promote the welfare, health, safety and development of a child or adult.

PURPOSE OF POLICY

This Policy focuses on any low level concerns regarding adults' behaviour towards children or adults by ensuring we comply with the following:

- To treat and embed a culture of openness
- Ensure staff are clear about and are confident to distinguish between expected and problematic behaviour
- Empower staff to share any low level concern with the Designated Safeguarding Officer or Cardiff City Football Club's Head of Safeguarding
- Address unprofessional behaviour at an early stage
- Identify concerning, problematic or inappropriate behaviour
- Provide for responsive, sensitive and proportionate handling of such concerns
- Help identify weaknesses in the organisation's safeguarding systems

THIS POLICY APPLIES TO

This policy applies to all Cardiff City Football Club staff, volunteers, and participants.

RELEVANT POLICIES AND GUIDANCE

This policy should be read in conjunction with the following policies

- Cardiff City Football Club Safeguarding Children Policy and Procedures
- Cardiff City Football Club Safeguarding Adults Policy and Procedures
- Cardiff City Football Club Community Foundation Safeguarding Policies

LEGISLATION AND GUIDANCE

- Working Together to Safeguard Children (2026)
- Keeping Children Safe in Education (2026)
- Care Act 2014
- Social Services and Well-being (Wales) Act 2014
- Developing and implementing a Low Level Concerns Policy: A guide for organisations which work with children - Farrer and Co 2020
- Wales Safeguarding Procedures

CONCERNS THAT ARE NOT COVERED BY THIS POLICY

Allegations

An 'allegation' means that it is alleged that a person who works with children or adults has:

- Behaved in a way that has harmed or may have harmed a child or adult
- Possibly committed a criminal offence against a child or adult
- Behaved towards a child or adult in a way that indicates they may pose a risk of harm to that child or adult
- Have behaved in a way in their personal life that raises safeguarding concerns. These concerns do not have to directly relate to a child or adult but could for example, include an arrest for possession of a weapon
- Have, as a parent or carer, become subject to public protection procedures

Safeguarding concerns

- Concerns about a child's safety or welfare
- Concerns about an adult's safety or welfare
- Concerns regarding peer-on-peer abuse

To report a concern of child peer-on-peer abuse or the welfare of a child or adult, please see Cardiff City Football Club's Safeguarding Policies that can be found on the Cardiff City Football Club website at: www.cardiffcityfc.co.uk/club/safeguarding

CONCERNS THAT ARE COVERED WITHIN THIS POLICY

Low level concern

A low level concern about an adult's behaviour towards a child or adult that does not meet the allegation threshold set out above, or is not otherwise serious enough to consider a referral to Social Care.

A low level concern is any concern, no matter how small, and even if no more than a 'nagging doubt', that an adult may have acted in a manner which:

- is not consistent with our Clubs' Safeguarding Policy and Procedure, 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 or adults

WHAT TO DO IF YOU HAVE A LOW LEVEL CONCERN

All low level concerns should be received by the relevant Designated Safeguarding Officer (DSO). It is important to:

- Share concerns with your DSO within 24 hours of becoming aware of it
- In the absence of your DSO inform the Club Head of Safeguarding (HoS)
- If behaviour relates to the DSO, then share the concern with the HoS

PROCEDURE FOR MANAGING A LOW LEVEL CONCERN

Step 1 - Initial Concern Raised

In the first instance, staff will report verbally to the DSO or to the Head of Safeguarding providing a written summary of concern. Those staff trained in the use of the online platform 'CPOMS' should create a concern which informs the HoS. Please note the following:

- Verbal account – 'contemporaneous recording by DSO'. Ensure a written record is taken as information is shared
- Sound professional judgment should be used in determining what information is necessary to record for Safeguarding purposes
- The record should include brief context, concise details, and relevant incidents
- The record should be signed, timed and dated.

Step 2 - Response by DSO

- The DSO should speak to the person who is raising the concern
- Review the information and decide whether the behaviour is:
 1. entirely consistent with Club Safeguarding Policy and Procedure
 2. constitutes a low level concern
 3. serious enough to consider a referral to the Head of Safeguarding or to Social Care
 4. serious enough to be reclassified as an allegation and referred to the Head of Safeguarding, Social Care, or any other statutory Agencies, having considered any other previous low-level concerns about this individual.
- If the DSO is in any doubt of points (1) to (4) above, they should seek advice from the Head of Safeguarding
- Speak to the individual about whom the concern is raised (unless Social Care/Police have advised otherwise if within (3) or (4) above)

*If the DSO is in doubt about the outcome of Step 2, the DSO **must** discuss the matter with the Head of Safeguarding before a decision is made.*

DSO must make records of:

- All internal conversations
- All external conversations
- Their determination
- The rationale for their decision; and
- Any action taken

Step 3 – Decision Making and Next steps

If the information shared meets the Clubs' expectations and is compliant with Safeguarding Policy and Procedure regarding a low level concern:

- DSO to inform the individual concerned what was shared about their behaviour and give them an opportunity to respond
- DSO to speak to the person who shared the low level concern, providing feedback about how and why the behaviour is consistent with Safeguarding Policy and Procedure and the law
- Consider if a review of the Safeguarding Policy and Procedure is necessary - *is the Policy clear? Has the training been unsatisfactory? Is the Low Level Concern Policy clear enough?*
- Consider training/support of the Low Level Concern Policy if the same individual reports similar low level concerns and it is found not to breach Club Policy

If the information shared does not meet the Clubs' expectations and is in breach of the Safeguarding Policy and Procedure regarding a low level concern:

- A sensitive and proportionate response is essential
- Maintain confidence that concerns will be handled promptly and effectively, whilst protecting staff from potential false or malicious allegations
- Any investigation is on a 'need to know' basis
- This may be dealt with by management guidance and/or training and not give rise to further action
- A positive and supportive conversation with the individual will enable them to meet future expectations (see appendix 1)

"It has been long understood that lasting change in behaviour is least likely to be achieved by an approach experienced as critical or threatening."

If the information shared is a low level concern or further evidence that has been gained raises the level of concern, the DSO is to seek guidance from the Clubs' Head of Safeguarding and/or Social Care.

- It is important to refer to Social Care and always inform the Head of Safeguarding.

Previous low level concern

If an individual has had a previous low level concern raised against them, the DSO must inform the Head of Safeguarding. The information available will be reviewed and a decision may be made to reclassify the concern as an allegation, and the concern will be dealt with in accordance with Safeguarding Policies and Procedures.

USEFUL CONTACTS

Cardiff City Safeguarding Team

Head of Safeguarding: **Rob Cronick**

Mobile: **07872 147351**

Email: safeguarding@cardiffcityfc.co.uk

Club/Stadium/Academy

Disability Access Officer: **Billy Gregory**

Mobile: **02920 643718**

Email: billy.gregory@cardiffcityfc.co.uk

Stewarding and Event Manager: **Tom Nash**

Mobile: **07712 300648**

Email: tomos.nash@cardiffcityfc.co.uk

Academy Player Care Manager: **Sarah Nightingale**

Mobile: **07872 147436**

Email: sarah.nightingale@cardiffcityfc.co.uk

Women and Girls Designated Safeguarding Officer: **Nicola Barry**

Mobile: **07484 071620**

Email: nicola.barry@cardiffcityfc.co.uk

Academy Designated Safeguarding Officer: **Daisy Carey**

Mobile: **07718 111630**

Email: daisy.carey@cardiffcityfc.co.uk

Community Foundation

Senior Safeguarding Manager: **Roxanne Williams**

Mobile: **07487 846778**

Email: roxanne.williams@cardiffcityfc.co.uk

RECORDING AND RETENTION OF INFORMATION

All records of Low Level Concerns, (including behaviour deemed by the DSO to be entirely consistent with the Safeguarding Policy and Procedure) should be retained on CPOMS. These records are confidential, with access to a limited number of individuals.

The DSO may store the Low Level Concern records with other safeguarding and child protection records.

In the event of a decision that behaviour is a low level concern, the information should not be held on personnel files.

If disciplinary, grievance or whistleblowing procedures are triggered, a copy should be held on both safeguarding and personnel files.

If the concern is deemed serious enough to consider referral to Social Care, records should be retained on the personnel file.

Cardiff City Football Club will retain all information regarding any level of Safeguarding concern centrally within the online platform 'CPOMS' and in line with both GDPR protocols and the Club's Data Protection Policy.

Review

The HoS will review all Low Level Concerns periodically to ensure such concerns are being dealt with appropriately, and any potential problematic behaviour patterns are identified.

Timeframe

Low Level Concern files should be retained unless further Government guidance dictates otherwise.

APPENDICES

A. MEETING WITH A STAFF MEMBER WHO HAS BEEN FOUND TO HAVE BREACHED THE SAFEGUARDING POLICY AND PROCEDURE (LOW LEVEL CONCERN HAS BEEN FOUNDED)

The holding of a 'value-based conversation' is important to be effective and help maintain a positive, professional relationship with the member of staff. An example being:

"I am sure you subscribe to our Club's values, so help me understand how you came to behave in a way which is not in keeping with those. We can then determine what actions or support you may need so that we can both be confident that it will not happen again..."

The conversation must be clear:

- Why their behaviour is concerning, problematic or inappropriate
- What change is required in their behaviour
- Enquire what support they might need in order to achieve and maintain that
- Being clear about the consequences should they fail to reach the required standard
- Ongoing and transparent monitoring of behaviour may be required
- An agreed action plan or risk assessment where appropriate, is to be regularly reviewed.
- Some low level concerns may raise performance/misconduct issues and therefore advice from the Head of HR or Social Care may be necessary. It is important when speaking to HR, to remember the concerns are Safeguarding issues, and if necessary, can be conducted on a no-names basis.
- The response to the low level concern will need to be tailored to the individual, whether it be an employee, worker, self-employed, contractor, Trustee, Director or volunteer.
- If there are concerns relating to whether the whistleblowing policy or disciplinary or grievance procedures are relevant, the DSO should exercise their professional judgement and seek advice from the Head of HR, Head of Safeguarding, Social Care and/or other external agencies
- Staff need to be trained to understand that when they share what they believe to be a low level concern, the DSO will speak to the adult who is the subject of that concern - no matter how 'low' the concerns

B. FURTHER INFORMATION AND RESEARCH

Why is it important to share low level concerns?

"Agencies providing services to children (and /or adults)... should ensure that there is a culture of openness and trust is fostered within the organisation in which staff can share any concerns about the conduct of colleagues and be assured that these will be received in a sensitive manner."

Research supporting importance of sharing low level concerns

Marcus Erooga's 2016 research into 20 serious case reviews relating to abuse in the UK from 2010-2016 found:

- A.** a factor in 17 cases was a failure of staff and management to understand and implement their Safeguarding policies (including around sharing their concerns)
- B.** Emphasised in 14 reviews was the importance of staff and management understanding the dynamics of organisational abuse (including grooming) and
- C.** A factor identified in 11 cases was the significance of organisational culture to minimise risk

What does Grooming look like?

In the 2016 research, grooming behaviours were described as follows (not an exhaustive list):

- Direct use of authority to offend
- Using material or practical benefits for victims
- Providing support for isolated children/adults at risk
- Favouring, particular children/adults at risk
- Use of alcohol

The method of commencement of abuse included:

- Erosion of boundaries
- Slow progression to abuse
- Use of trust and authority
- Meeting the child/adults at risk's needs (including physical and emotional)
- Developing relationships with a child's family

Research identifies the potential for three types of abusers

Preferential offenders are those who have a conscious desire to sexually abuse children, and who either do not see or are not easily deterred, by obstacles. Jimmy Saville is a classic example of a preferential offender.

Opportunistic offenders are those who abuse because potential victims are available and potentially vulnerable, and the organisational setting either inadvertently facilitates, or fails to prevent, abusive activity.

Situational offenders are those whose propensity to abuse is previously unknown or unacknowledged, and their offending is specific to the set of organisational factors which perpetuates their offending.

Behaviours, not the Person

There is a perception that people can accurately judge people, or profile a sex offender. The importance, in fact, is to focus instead on specific behaviours.

“If we educate adults to be informed about, and to identify, concerning problematic or inappropriate behaviour rather than think they can recognise dangerous people, they can be prepared to act when they observe behaviour which violates a **Code of Conduct**”.



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