



# LEICESTER TIGERS *Foundation*

## Low-Level Concerns Policy

### Introduction

The Leicester Tigers Foundation takes safeguarding very seriously. This includes ensuring that adults who work with children adhere to the ethos and policies set out by the Foundation, including the Staff Code of Conduct. This policy provides detailed guidance on managing low-level concerns about the conduct of staff members. Safeguarding remains a primary focus, and we encourage anyone with concerns to share them with the Designated Safeguarding Lead (DSL), no matter how minor they may seem.

### Summary

A low-level concern may involve a staff member acting in an inappropriate manner that does not pose an immediate risk to children but is inconsistent with the Foundation's expectations. Such concerns should be reported to the DSL and logged on CPOMS. If the DSL cannot be contacted, the CEO should be informed, and if this is not possible, the Chair of Trustees should be contacted instead.

### KCSIE 2023 Guidance

- **Section Two: Concerns or Allegations That Do Not Meet the Harm Threshold:**
  - Governing bodies and proprietors should have policies to deal with concerns that do not meet the harm threshold, known as 'low-level' concerns. Schools and colleges should promote a transparent culture where all concerns are addressed promptly and appropriately.
  - A culture where concerns are shared responsibly helps identify problematic behaviour early, minimizes the risk of abuse, and ensures that professional boundaries are clear.
- **What Is a Low-Level Concern?**
  - Low-level concerns are any concerns, no matter how small, that an adult may have acted in a way inconsistent with the staff code of conduct or inappropriate conduct outside of work. Examples include:
    - Being over-friendly with children
    - Showing favoritism
    - Taking photographs of children on personal mobile phones
    - Engaging with a child in a secluded area
    - Humiliating children

### Self-Reporting Guidance

1. **Self-Reporting Requirement:**



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- Staff members must self-report any behaviour or incidents that might raise a concern, even if they believe the behaviour to be minor or inadvertent. This includes any actions, comments, or interactions that could be perceived as inappropriate or inconsistent with the Foundation's code of conduct.
  - Self-reporting should occur as soon as possible, ideally within 24 hours of the incident.
- 2. How to Self-Report:**
- Staff should report their self-identified concerns to their line manager or the DSL. Reports should include a clear description of the incident, context, and any mitigating factors.
  - If the line manager or DSL is unavailable, staff should report the concern to the CEO or Chair of Trustees.
- 3. Support and Guidance:**
- Staff who self-report are encouraged to seek support from their line manager, DSL, or HR. This support may include discussing the incident, understanding potential implications, and exploring ways to address or mitigate concerns.
- 4. Follow-Up and Reflection:**
- Staff who have self-reported will have the opportunity to discuss the matter in a supportive environment, which may include reviewing the incident, reflecting on how it was handled, and identifying any additional training or support needed.
- 5. Confidentiality and Non-Retaliation:**
- Self-reporting should be done in good faith. Staff will be protected from retaliation, and all reports will be handled with confidentiality and sensitivity.

### Clarity Around Allegation vs Low-Level Concern vs Appropriate Conduct

- **Allegation:**
  - Behaviour that has harmed or may have harmed a child
  - Possibly committed an illegal offence against or related to a child
  - Behaviour indicating a risk to children
- **Low-Level Concern:**
  - Behaviour inconsistent with the Foundation's code of conduct
  - Minor breaches of conduct, including outside of work
- **Appropriate Conduct:**
  - Behaviour in line with the Foundation's code of conduct and legal requirements

### Storage and Recording of Low-Level Concerns

- All low-level concerns will be recorded on CPOMS. Follow-up information will be accessible only by the Senior Leadership Team (SLT) and stored in accordance with the Foundation's GDPR and data protection policies.
- Staff must keep concerns confidential and not share them outside of the DSL or SLT.
- Low-level concerns will not be included in references unless formalized into significant concerns leading to disciplinary actions.



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- When staff leave the Foundation, records of low-level concerns will be reviewed to determine if they should be kept for potential future reference or deleted.

### **Conclusion**

The Leicester Tigers Foundation is committed to maintaining a culture of openness and accountability. All staff members are expected to adhere to this policy and engage in self-reporting as required. This approach ensures that concerns are addressed effectively, supporting a safe and respectful environment for everyone.

**Policy reviewed Sep 24. Next review Sep 25**