



Low Level Concerns Policy

Introduction

Bolton Wanderers 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.

BWFC 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.

This policy is underpinned by and should be read alongside the statutory guidance Keeping Children Safe in Education 2025 and any successor guidance, relevant Premier League/EFL and FA safeguarding regulations, and local safeguarding partnership procedures. Threshold decisions, including when a matter meets the harms threshold for referral to the LADO or other statutory agencies, will be made with reference to that guidance and the Club's Safeguarding Handbook.

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 confidence to share low level concerns with the relevant Designated Safeguarding Officer (DSO) and or Head of Safeguarding (HOS)
- 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

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 he or she is unsuitable to work with children

To report an allegation please refer to the BWFC Safeguarding Handbook and Managing Staff Allegations 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 BWFC Safeguarding Handbook.

Low level concerns

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.

The Club will review all reported low level concerns promptly and without undue delay. As a general expectation, an initial review of the concern and confirmation to the individual who raised it will normally take place within five working days, recognising that more serious or complex matters may require longer in order to reach an informed and proportionate decision.

Reporting a low level concern

All low level concerns should be reported as follows;

- to the relevant Designated Safeguarding Officer (DSO) within 24 hours of being aware of the concern
- to the Head of Safeguarding (HOS) in the absence of the DSO within 24 hours of being made aware of the concern
- to the Safeguarding Board Representative if the concern relates to the Designated Safeguarding Officer or Head of Safeguarding.

Where a low level concern relates to the Designated Safeguarding Officer and/or the Head of Safeguarding, the concern must be reported to the Club's Safeguarding Board Representative in the first instance. Where the Safeguarding Board Representative considers that there may be a conflict of interest, or that independent oversight is required, they will escalate the concern to the Head of People and/or the Chief Executive Officer, who will determine next steps, including any referral to the Local Authority Designated Officer (LADO) or statutory agencies in line with Club and statutory procedures.

Procedure for managing a low level concern

Step 1 – Report the concern

- Report the concern to the DSO or HOS either verbally or in writing
- The DSO/HOS will ensure a written record of the concern reported is taken
- The DSO/HOS may request further information for clarification from the individual reporting the concern, if not already included in the initial written or verbal 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 on 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 HOS or LADO, in which case the BWFC Safeguarding Handbook Policy and Managing Staff Allegations 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 BWFC Safeguarding Policy and Managing Staff Allegations Policy will be followed

If the DSO is in any doubt as to the outcome of Step 2 they must raise it with the HOS 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/HOS 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/HOS 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 allegation
- 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 store on the Clubs 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/PL/FA Safeguarding Teams (and as such is not deemed a low level concern) then records will be held on the personnel file. Low level concern files will be retained until Government safeguarding guidance provides otherwise. In the event that behaviour is confirmed as a low level concern, the record will be held only on the Club's Safeguarding Reporting System and will not be placed on the individual's personnel file.

Where a series of low level concerns about the same individual, when considered together, indicates that the harms threshold may have been met, the matter will be reviewed by the Head of Safeguarding and Head of People to determine whether it should be treated as an

allegation and managed under the Managing Staff Allegations Policy, including any referral to the LADO in accordance with Keeping Children Safe in Education 2025. In those circumstances, resulting formal employee relations documentation will usually be stored on the personnel file in line with HR procedures.

Low level concern records will be retained on the Safeguarding Reporting System, with appropriate access restrictions, in accordance with statutory safeguarding guidance and Club data retention schedules, and reviewed regularly to identify any patterns, themes or training needs.

The Club is committed to a culture where all staff and volunteers feel safe to raise low level concerns, allegations or wider safeguarding concerns in good faith, without fear of detriment. Individuals who raise concerns honestly and reasonably will be supported and will not suffer any detrimental treatment as a result of doing so, even where concerns are not substantiated.

This Low Level Concerns Policy should be read alongside the Club's Whistleblowing Policy, Safeguarding Handbook and Code of Conduct, which together set out how staff can raise concerns, the protections available to them, and the standards of behaviour expected when working with children, young people and all those associated with Bolton Wanderers Football Club.

Review

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

Approved By: David Ray

Signed........

Date 19 February 2026

Review: July 2026