



Safeguarding

Low Level Concerns Guidance

This guidance will look into the best practice on how clubs can manage low level concerns (LLC).

This guidance can help provide openness and curiosity by looking at a framework and language to help clubs and volunteers better understand how important it is to notice unusual or concerning behaviours and create a culture which promotes a positive child protection culture.

Difference between low-level concern and allegation

An LLC is when an adult or peer has not met the threshold for an allegation but have acted in a way that, no matter how small, has caused a sense of unease and is inconsistent with a club's code of conduct or values. This includes any inappropriate conduct outside of their role. Some examples of concerns include, but are not limited to:

Adult LLC

- Being overly friendly (for example, tagging a player on personal social media profiles, hugging players, inappropriate banter etc.)
- Having favourites
- Being connected on personal Social Media platforms
- Taking photographs of children, contrary to club policy
- Using inappropriate sexualised, intimidating, or offensive language
- Engaging on a one-to-one bases in a secluded area
- Humiliating children

Young people LLC

- Player self-harming
- Player stopped attending training for a period of time unexpectedly

An allegation is when an adult or peer have:

- Behaved in a way that has harmed or may harm a child or young person.
- Possibly committed a criminal offence against or related to a child or young person.
- Behaved towards a child or young person in a way that indicates they may pose a risk of harm to children.
- Behaved or may have behaved in a way that indicated they may not be suitable to work with children.

Any allegations must be escalated to the Safeguarding Team for support and potentially involving Scottish Rugby Case Management Panel for further advice and action.



Spectrum of low-level concerns

There are a range of reasons behind behaviour that falls under LLC's. The lower end of the scale is unintentional and thoughtless where the person requires training and support in understanding their action and consequence. In the middle, the concern may look inappropriate, but might not be in specific circumstances. For example, an Uncle or Aunt who coaches their Neice or Nephew and interacts with them via Facebook. Finally, the higher end of the spectrum is the behaviour is ultimately intended to enable abuse. For example, building and abusing a relationship of trust with intention to groom that child or young person.

Making a safe club environment for children and young people

This should be a continuous process which involves everyone to evaluate, reflect upon, plan, and implement to ensure children's voices are being heard. Some key fundamental points create a strong foundation for a safe and secure environment.

- Having clearly defined values and expected behaviours which are identified and promoted through club code of conduct.
- Setting clear boundaries which are considered important and adhered to in every aspect of paid and volunteer roles.
- Creating a low-level concerns process that encourages everyone to question and share any concerns.
- That all concerns, no matter how small, about someone's own behaviour or that of another person which does not meet professional standards or club expectations, need to be shared with confidence, received in a sensitive manner and responded to proportionately.

Responding to a LLC step by step

1. LLC information shared with club Child Protection Officer (CPO) within 24 of becoming aware of it. However, it is heavily emphasised that it is never too late to share a LLC.
2. Contact Clare Forrest from Scottish Rugby Safeguarding Team (see contact details below) with all information gathered by completing a [Report a Concern Form](#) with relevant information attached. Get in touch with the Safeguarding Team for support and advice where needed.
3. CPO speak to person who raised LLC (unless raised anonymously).
4. CPO speak to person whom the LLC has been raised about. If club deems appropriate, explain they will need to be suspended as a precautionary measure pending outcome of the fact finding process. Not all situations will require precautionary suspension (e.g. a coach has shouted and intimidated players but is remorseful and will undertake training). A precautionary suspension should be done as a reasonable and proportionate step to mitigate any potential risk to the children and/or the club
5. CPO to fact find by speaking to any potential witnesses and others involved.



6. CPO review with club committee member nominated to support in confidential safeguarding matters on whether concern:
 - breaches code of conduct, club policies and/or the law. It is mindful to note it is not clubs' responsibility to decide if laws have been broken, but their duty of care to report to the necessary external agencies if required.
 - constitutes as LLC or meets the threshold of an allegation and needs to be referred to relevant external agencies.
 - when comparing with other LLCs previously raised about the same individual could now meet the threshold of an allegation and should be referred to relevant external agencies. If club are unsure whether this threshold is met, speak to Safeguarding team for support.
7. Club Board to make appropriate records of all information gathered, decision(s) made, rationale for decision and any action taken. This will help keep track of any patterns and when to escalate LLC to an allegation.
8. Club committee reflect on concern to see what improvements can be made to policy and practice to reduce LLC from reoccurring.

Bear in mind, as per Scottish Rugby's Safeguarding Policy, all safeguarding concerns should be referred to a member of the Scottish Rugby Safeguarding Team in the first instance. All safeguarding concerns must be reported as soon as possible, irrespective of whether they occur within the rugby environment. The concern will be dealt with as follows:

- (i) Scottish Rugby Safeguarding Team's will mostly act in an advisory capacity by providing any club who raises a concern with advice and support to allow the club to directly dealing with the safeguarding issue.
- (ii) However, if Scottish Rugby's Safeguarding Team deem (at its sole discretion) a concern to be significantly serious or of a high risk to an individual, club or Scottish Rugby then the Safeguarding Team will refer the concern to its internal Safeguarding Case Management Panel ("CMP").

Reviewing LLC

Reviewing how child wellbeing and protection concerns have been managed is an important part of good practice and risk management. It provides an opportunity to:

- Explore if policies and procedures were followed and were affective.
- Establish whether appropriate action was taken.
- Examine the role of individuals involved in responding to and managing the concern to establish whether further support or training is required.
- Review how well the club worked with other organisations involved in the concern.
- Identify if any changes are required or recommendations for the future.
- Identify specific areas of risk, trends, or patterns.
- Increase the confidence of those involved in the club by demonstrating an open and transparent approach.



If the CPO is away from the club for any period of time it is important for a deputy CPO to be clearly identified who can start the LLC process and share findings once lead CPO has returned.

Self-reporting LLC

Occasionally, a club member may find themselves in a situation which could be misinterpreted, or might appear compromising to others. For example, a parent is late to pick up their child and the coach decides to drive them home rather to ensure they aren't left alone at the club.

Equally, a club member may have behaved in a manner which, on reflection, they consider falls below the standard set out in the club code of conduct.

Self-reporting in these circumstances can be positive for several reasons:

- a) it is **self-protective**, in that it enables a potentially difficult issues to be addressed at the earliest opportunity.
- b) it **demonstrates awareness of the expected behavioural standards** and self-awareness as to the individual's own actions or how they could be perceived.
- c) it is an important means of **maintaining a culture** where everyone aspires to the highest standards of conduct and behaviour.

Clubs should ensure that they create an environment where everyone is encouraged and feel confident to self-refer.



Contacts

Faye Henderson
Child Wellbeing and Protection Manager
0131 346 5056/ 07976 279473
Faye.henderson@sru.org.uk

Clare Forrest
Child Wellbeing and Protection Advisor
07966 902246
clare.forrest@sru.org.uk

Safeguarding Team
safeguarding@sru.org.uk

Alternatively, you can contact these services for more advice:

Children 1 st Parentline (if you are concerned about a child)	08000 28 22 33
NSPCC Helpline	0808 800 5000
Childline	08001111 / www.childline.org.uk

If you feel a child is in immediate danger then call 101 or 999.