



Low Level Concerns Policy

NEWPORT COUNTY AFC

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Reviewed By	Kelly Anderson
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Newport County AFC acknowledges its responsibility to safeguard the welfare of every child and young person who has been entrusted to its care and is committed to working to provide a safe environment for all members.

A child or young person is anyone aged 18 or below engaged in any club football activity.

Newport County AFC expects all members of staff, players, and volunteers to adhere to a strict code of conduct and to follow all safeguarding processes to ensure they work safely with all young people.

Poor practice is unacceptable and will be treated seriously with appropriate action as detailed in the Grievance and Disciplinary Policy.

Any behaviour that contravenes our Codes of Conduct, infringes an individual's rights and/or reflects a failure to fulfil Newport County AFC's normal high standards of care and welfare is classed as poor practice. On occasions, a child or adult at risk may not be aware that poor practice is taking place, as they may deem the behaviour as normal or 'how it has always been'.

If the poor practice is serious and liable to cause harm it will be dealt with using parameters set about in existing Newport County AFC policies. Such existing policies relating to the correction and eradication of poor practice include but are not limited to:

- Safeguarding Children Policy,
- Whistleblowing Policy
- Managing Allegations Policy
- Putting Things Right Policy
- Grievance & Disciplinary Policy
- Anti-Bullying and Harassment Policy.

Newport County AFC therefore believes that it is not solely the responsibility of the child or at-risk adult to raise concerns about the poor practice of our staff. Safeguarding is everyone's responsibility and therefore all staff, volunteers and players at Newport County AFC have a responsibility to raise concerns about the practice of others if required.

No one's place at our Club will ever be at risk for raising a concern in good faith.

What is a low level/poor practice concern?

The FA describe low level concerns as follows:

'Low-level concerns are behaviours which fall below the standard required by Professional Clubs and CCOs as set out in their Codes of Conduct.

Whilst the behaviour may not be immediately dangerous or intentionally harmful it does set a poor example and may lead to harm or put a child or adult at risk in danger.

To allow low-level concerns to continue unchallenged may result in an environment developing in which abuse may be able to take place.

It can also normalise behaviour which is unacceptable and should not be condoned. Where individuals display low-level concerns and hold positions of trust, have elevated roles and act as role

models, children and/or adults at risk may mirror this behaviour. and breed an unhealthy culture contrary to that outlined in the Affiliated Football Safeguarding Policy.'

Examples of low-level concerns/poor practice

- When insufficient care is taken to avoid injuries (e.g., by excessive training or inappropriate training for the age, maturity, experience, and ability of players.
- Allowing abusive or concerning practices to go unreported (e.g., a coach who ridicules and criticises players who make a mistake during a match.)
- Allowing hazing practices to go unreported
- Placing children or young people in potentially compromising and uncomfortable situations with adults (e.g., unprofessional use by a coach on social media with young players)
- Unprofessional use of their own or the Professional Club's social media accounts
- Ignoring health and safety guidelines (e.g., wearing seat belts in club transport)
- Using foul and abusive language to children or other adults (e.g., abusive language towards match officials)
- Giving continued and unnecessary preferential treatment to certain individuals on a regular basis
- Failure to provide safe and appropriate coaching sessions whilst taking into consideration the ages of the players (e.g., overtraining and exerting undue influence over players)
- Putting performance over the safety of players
- Lack of respect for other individuals, such as match officials, opposition coaches, players, managers, and spectators
- Allowing rough and dangerous play, bullying, the use of bad language or inappropriate behaviour by players
- Using punishments that humiliate or harm children
- Providing one to one coaching without any supervision or the presence of other club officials
- Allowing children to discriminate on the grounds of religion, race, gender, social class, or lack of footballing ability
- Failure to encourage children to accept responsibility for their own performance and behaviour
- Failure to challenge low-level concerns in other Club Officials
- Allowing allegations of abuse to go unchallenged or unrecorded and failing to report these concerns (e.g., bystanders of abuse)
- Failure to record incidents or accidents
- Failing to address the additional needs of disabled players or other vulnerable groups
- Allowing confidential information to be shared inappropriately
- Failure to respect and listen to the opinions of children and consider the rights and responsibilities of children - Smoking and consuming alcohol during coaching sessions

- Consuming alcohol whilst on duty on an official club trip
- Taking children to their own home
- Not adhering to guidance when transporting children including travel abroad
- The above list is not exhaustive but should provide guidance of the type of behaviour which constitutes low level concerns

Reporting

Low level concerns/poor practice can be reported to any manager at Newport County AFC including the Academy Manager, the General Manager, or the Safeguarding Team and they should then report this directly onto our safeguarding software – My Concern. Full details regarding reporting can be found in the Grievance and Disciplinary Policy, Whistleblowing Policy, and Managing Allegations.

Investigation

On notification of any low-level concerns around poor practice, the Safeguarding Officer will review the incident and deal with any matters arising, with reference to all relevant Newport County AFC policies. If a member of staff tenders their resignation during the investigation, it will continue until it is satisfactorily concluded. Possible outcomes include:

- Advice, guidance, and education
- Referral to FA Case Management Team
- Referral to the Local Authority Designated Officer (LADO)
- Disciplinary action
- Referral to police
- Referral to the DBS service
- No further action

In the instance of a substantiated outcome of poor practice, this can also be referred to the FA safeguarding management team, who will hold that information as intelligence, or decide to launch an FA safeguarding investigation.

Confidentiality

Newport County AFC will make every effort to maintain confidentiality throughout any investigation to protect the discloser and the staff member and to ensure the investigation is not compromised by others.

Recording

The Safeguarding Officer will be responsible for the case management of all low level/poor practice concerns, updating records and any referrals made. These records will be held on the Club's password protected safeguarding software – My Concern and is accessible by the Safeguarding and Senior Management Teams. All staff are responsible for recording incidents of poor practice via the My Concern software, or by telephone call or email directly to a Safeguarding Officer.

Further details of low-level concerns/poor practice, as well as means of eradicating them and preventing the possibility of poor practice, can be found within numerous Newport County AFC policies and codes of conduct, many of which are in the above policy.

Useful Contacts

Gareth Evans – Club Secretary

Email: Gareth.evans@newport-county.co.uk

Luke Hussey – Academy Manager

Email: Luke.hussey@newport-county.co.uk

Darren Green – EFL Regional Safeguarding Officer

Tel: 07581 048977

Email: dgreen@efl.com

Mike Sloan – Local Authority Designated Officer (LADO)

Tel: 01633 851485

Email: Mike.sloan@newport.gov.uk

FA Safeguarding

Tel: 0800 169 1863

Email: safeguarding@TheFA.com

NSPCC Helpline

Tel: 0808 800 5000

Police

Tel: 999 or 101

