BRITISH WRESTLING

LOW LEVEL CONCERN POLICY

SCOPE

This Guidance applies to all BWA staff, members, volunteers, affiliated Clubs and personnel.

PRINCIPLES

To create and maintain a safe wrestling culture in our sport and ensure that individuals who are working in or part of the BWA are clear about professional boundaries.

Safeguarding governance- your club must have the following:

- policies and processes in place to deal with concerns;
- a system to record concerns;
- insight that concerns may arise in several ways and from several sources such as complaints made by staff, parents or disclosures made by athletes; and
- a transparent open culture where all concerns about individuals are shared, recorded, and dealt with appropriately.

To reduce the opportunity and acceptability of inappropriate behaviours by increasing the effort required to offend.

- increasing the risk and perception of the risk of detection.
- ensuring there are robust and effective staff support systems in place.
- not over-relying on DBS or overseas criminal records checks – they are essential but are not a silver bullet. A clear DBS check simply confirms that an individual has not been found to present a risk to children or adults; it is not predictive.

DEFINITIONS

LOW-LEVEL CONCERNS

The term 'low-level' concern does not mean that it is insignificant, it is any concern - no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult or volunteering in or on behalf of the BWA may have acted in a way that:

- is inconsistent with the BWA code of conduct and values; and,
- does not meet the allegations threshold or not considered serious enough to refer to the LADO by the BWA Safeguarding Case Management Team.

Examples

- Being over friendly with children and/or adults;
- Having favourites;
- Engaging with a child and/or adult on a one-to-one basis in a secluded area or behind a closed door; and
- Using inappropriate sexualised, intimidating, or offensive language.

DEFINITION OF ALLEGATION AND CONCERN

The relationship between low level concerns and allegations should be made clear. For example, the person receiving the low-level concern must always consider whether it meets the threshold for reporting to the BWA Safeguarding Case Management Team as an allegation. If they are in any doubt, they should contact the Safeguarding Lead at British Wrestling for advice. Equally, a series of low-level concerns may cumulatively meet the threshold and need to be treated as such.

ALLEGATION

The term 'allegation' means that it is alleged that a person who works with children or adults at risk has:

i. Behaved in a way that has harmed or may have harmed a child or adult at risk

ii. Possibly committed a criminal offence against a child or adult at risk

iii. Behaved towards a child or adult at risk in a way that indicates they may pose a risk of harm to that child or adult at risk

iv. 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 at risk, but could for example, include an arrest for possession of a weapon or drug related

v. Have, as a parent or carer, become subject to public protection procedures.

LOW-LEVEL CONCERN

A low-level concern is any concern about an individual's behaviour towards a child (or adult who is at risk) that does not meet the allegation threshold set out above or is not otherwise serious enough to consider a referral to their local LADO (or nation equivalent in Northern Ireland & Scotland) via the BWA Safeguarding Case Management Group (CMG) and/or Home Nation Lead for Safeguarding who will refer it back to the BWA Safeguarding CMG.

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

- is not consistent with BWA Values and 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 person's suitability to work with children or adults at risk.

Staff or club welfare officers do not need to be able to determine in each case whether their concern is a low-level concern, or if it is in fact serious enough to consider a referral to the LADO (or nation equivalent) or meets the threshold of an allegation. Once staff share what they believe to be a low-level concern, that determination should be made by the BWA Safeguarding Case Management Group.

In addition, refer to the CPSU Case management thresholds| CPSU (**thecpsu.org.uk**).

'This document contains guidance on how safeguarding concerns can be scaled using thresholds, enabling for the concern to be properly dealt with. This guidance should be documented as part of your safeguarding procedures. It is important that this guidance is shared and understood by all staff and volunteers at all levels of your sport.'

REPORTING LINES

Anyone who has a concern reported to them by another staff or volunteer member/manager and/or observes this concern (as detailed above) should use the appropriate BWA reporting Form (Appendix 1) Low level concern reporting form and send to **safeguarding@britishwrestling.org**.

RETENTION OF DATA

All access to forms and data limited strictly to those who need to know, lower- level concerns and concerns that meet the threshold for referral will both be retained unless and until further guidance provides otherwise - the former on the central safeguarding file and the latter on their personnel file (staff).

SECTION/ STAGES

SHARING LOW-LEVEL CONCERNS

Low-level concerns should be reported to the BWA Safeguarding Lead and Case Management Group or Home Nation Lead if staff or clubs have justification. Where there are concerns/allegations about the members of the Safeguarding Case Management Group, this should be referred to BWA Safeguarding Lead on the Board.

The Safeguarding Case Management Team will ensure:

i. staff code of conduct, behaviour policies and safeguarding policies and procedures are implemented effectively;

ii. appropriate action is taken to safeguard children and/or adults at risk; and,

iii. there is an appropriate approach to dealing with any concerns.

It is important staff or clubs are encouraged and feel confident to self-refer, where:

- they have found themselves in a situation which could be misinterpreted, might appear compromising to others; and/or,
- on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

LOW LEVEL CONCERN REPORTING PROCESS:

i. Recognition and Reporting:

ii. Record, sign, and date concern on the Low-level concern reporting form.docx and email to safeguarding@britishwrestling.org (or Home Nation Lead Safeguarding Case Management Teams)

PREVIOUS LOW-LEVEL CONCERN

If an individual has had a previous low-level concern raised against them, the Safeguarding Case Management Team must be informed. 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.

INITIAL ASSESSMENT:

i. An initial assessment will be completed by the Safeguarding Case Management Team. If it is decided that this concern is an allegation that requires external discussion with the LADO (or nation equivalent), then the escalation will be followed accordingly by the Safeguarding Case Management Team.

ii. Monitoring and review:

iii. The Safeguarding Case Management Team will Review Reporting forms to assess for patterns/links and action if needed.

REPORTING TO THE CPSU

BWA will consider whether to report concerns to the CPSU regarding any individuals who may be involved in other sports. DPA & GDPR will be adhered to when sharing information.

WHAT HAPPENS NEXT?

The information contained in the Online Outcome of the Low-Level Concerns Investigation Form will be kept as intelligence (in accordance with BWA's Privacy Notice). This will allow the BWA to monitor individuals who do not meet the threshold for a LADO safeguarding referral.

REVIEW OF LOW-LEVEL CONCERNS

The BWA Safeguarding Case Management Team (or Home Nation Equivalent) will review all Low- Level Concerns periodically to ensure such concerns are being dealt with appropriately, and any potential problematic behaviour patterns are identified.

They will provide overview of all concerns to the Safeguarding Lead for BWA board reports.

If there are serious concerns about the immediate safety of the child or young person, as a club we will contact the Police and/or Social Services. Additionally, the Safeguarding Case Management Team will consult with the LADO (or nation equivalent) and update departments or clubs on action taken.

APPENDIX 1

LOW-LEVEL CONCERN REPORTING FORM LOW

This form should provide a concise record – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s) (and please use a separate sheet or overleaf if necessary).

The record should be signed, timed, and dated.

Details of concern:

Person Reporting the low-level concern:

Name:

Signed: Date: Time:

Action Taken: (Specify)

BWA Safeguarding Case Management Team (or Home Nation Lead):

Name:					
Signed:		Date:		Time:	

Follow Up/Resulting Action:

Continuation page:

APPENDIX 2

OTHER APPLICABLE BWA POLICIES:

- Disciplinary Policy & Procedures.
- Managing Allegations against Staff Policy & Procedures. Safeguarding Policy & Procedures (Safe landings).
- Safeguarding Adults at Risk Policy & Procedures.
- Whistleblowing Policy

LEGISLATION AND GUIDANCE:

- Working Together to Safeguard Children (2018) & Home Nation Equivalent Keeping Children Safe in Education (2023) & Home Nation Equivalent Care Act 2014 & Home Nation Equivalent
- Developing and implementing a Low-Level Concerns Policy: A guide for organisations which work with children - Farrer and Co 2020 & 2022
- Safeguarding Company leaflet on Allegations & Low-Level Concerns.

REVIEW

This Procedure will be reviewed by the Safeguarding Case Management Team every year, or sooner where new developments in employment legislation necessitate such a review, where factual clarification is required or changes to operational practices take place. The next review will be in March 2026.