



Herefordshire Cricket Ltd

Low-Level Concerns Policy

Cricket is a game which unites communities and improves lives. Across England and Wales, the enjoyment, structure, fitness, and companionship which cricket brings to its participants, including children, is of immense value to them in their formative years. Our aim must be to harness the power of the game for their benefit and continue to inspire a generation.

We are very clear that cricket should be a game for everyone. Children and young people are the future of our sport – so it's vital that they experience cricket in a safe, secure, and enjoyable environment. Everyone involved in cricket, whether as a player, coach, umpire, administrator, staff member, volunteer, spectator, or parent/carer has a role to play.

Individually and collectively, it is our actions both on and off the field, which can help achieve this positive outcome. It is our commitment that every individual and club should have the appropriate tools and confidence to create a supportive and safe environment in which children can flourish. A welcoming, inclusive, and diverse environment is at the heart of this commitment.

We will create a safe culture across cricket which engages children and adults through effective leadership, values, and learning. We commit to supporting all those involved in the game to understand their personal and organisational responsibilities.

Everyone that participates or watches our game should do so safe in the knowledge that we see our responsibility to keep them safe and protected as our paramount consideration.

Purpose of this Policy

We set the highest expectations of behaviour for our staff, volunteers, and contractors. We are committed to a culture in which behaviour that does not meet these standards or does not adhere to good practice guidance, such as the Coaches Code of Conduct and ECB Safe Hands Guidance, is identified and addressed at an early stage.

We are committed to fostering a culture of transparency and openness in reporting and responding to concerns. This policy outlines how staff, volunteers and contractors can raise a concern, no matter how small, about their own or another's behaviour and the framework in which this concern will be recorded and addressed.

Who does this policy apply to?

This policy applies to any employee, including casual staff, and volunteers working in or on behalf of Herefordshire Cricket Ltd.

Concerns that are covered by this policy:

A low-level concern is a concern about the behaviour of an employee, including casual staff or volunteers, towards a child or adult that does not meet the threshold for referral to a statutory agency such as the Police or Local Authority. It might be a concern, no matter how small, that someone might have acted in a manner which:

- Is not consistent with Safe Hands Safeguarding Policy and Guidance
- Is not consistent with the ECB Coaches Code of Conduct or other professional codes of conduct.



For Example

- Swearing or using inappropriate language in front of a child
- Showing favouritism towards a particular child
- Having social media contact with a child in a way that does not adhere to agreed guidance.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour which may look inappropriate but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

The term “low-level concern” does not mean that the concern isn’t important, or that the behaviour doesn’t need to be addressed, but that it is a concern that does not on its own meet the threshold for referral to a statutory agency such as a Local Authority Designated Officer or Children’s Social Care. The latter are often referred to as “allegations” and are defined as situations in which someone who works with children or adults has:

- Behaved in a way that has harmed or may have harmed a child
 - Possibly committed a criminal offence against a child
 - Behaved towards a child or children in a way that indicates that they may pose a risk of harm to children, and/or
 - Behaved or may have behaved in a way that indicates they may not be suitable to work with children*.
- (*this would include behaviour with or towards adults).

In addition, a safeguarding concern might include:

- Concerns about a specific child’s safety or welfare
- Concerns about a specific adult’s safety or welfare.

Concerns of this type must be reported to the appropriate statutory agency in line with the ECB Safe Hands Safeguarding Policy.

Irrespective of whether you think a behaviour might be an allegation or a low-level concern the important thing is that you report it.

What to do if you have a concern?

Addressing low-level concerns positively at an early stage can prevent more concerning behaviours from developing and provide staff or volunteers with the support and training they need to ensure that they can maintain the highest standards in their practice. Dealing with these concerns effectively not only protects children and adults but also protects those working within our organisation from allegations and misunderstandings.

The approach promotes a culture in which everyone is clear regarding expected standards and provides an opportunity to identify developing patterns of behaviour that might place children and adults at risk, ensuring that they are effectively addressed.

All low-level concerns should be reported to the County Safeguarding Lead. A reporting form is provided at Appendix 3 to ensure that all the relevant information is captured.

Very often there will be an innocent explanation for the conduct concerned and individuals should not feel awkward either about making or being the subject of reports. Reporting is and should be seen as a neutral act and any person making a report of a low-level concern or an allegation in good faith will suffer no detriment as a result and will benefit from protection under the County/ECB Whistleblowing Policy.

Procedure for Managing a Low-Level Concern

The County Safeguarding Lead will work closely with the Cricket Regulator Safeguarding Team and may consult with them at any stage of the process described below.

Commented [HR(1)]: I have removed the reference to adults from this section as it is a direct lift from section 1 of KCSIE 2023. The fourth category would capture concerns regarding how someone has behaved towards an adult. Legal are currently seeking external counsel advice on the extension of the procedures to all adults (not just adults at risk). For now I have slightly amended the final bullet to ensure it is clear that it captures behaviour towards adults.

Commented [G(2R1)]: do we need to remove that and/or too?

Commented [H(3R1)]: @Graham Hurst (He/Him) Have rechecked KCSIE and it is as written there. Have added in the comma!





The person who has the concern should speak to the County Safeguarding Lead and/or complete a reporting form with as much information as possible. The record (whether completed by the staff member or County Safeguarding Lead) should be signed, timed, and dated and provide a chronological, factual account of the concern.

On receipt of a report our County Safeguarding Lead will assess whether the concern is a low-level concern, or an alternative response is required.

Provided that it is deemed to be a low-level concern, the County Safeguarding Lead will discreetly speak with any witnesses and the individual identified in the concern to ascertain their view of the incident or behaviour and record this.

The County Safeguarding Lead will review the information and determine whether the reported behaviour is appropriate and in line with expected behaviour, remains in their view a low-level concern or may meet the harm threshold and must therefore be referred to the Cricket Regulator Safeguarding Team immediately.

If the behaviour is assessed as being within expected standards of behaviour, the individual who is the subject of the concern will still be made aware of this and feedback will be provided to the person raising the concern. Consideration will be given to whether additional clarity is required in specific guidance/code of conduct or in the implementation of this low-level concerns policy.

If a low-level concern is identified the County Safeguarding Lead and the individual will develop a proportionate plan to address any behaviour which has fallen short of expectations. This may include guidance or advice regarding conduct or identification of training or support needs and in certain circumstances, may need to be addressed through disciplinary or capability procedures (see Appendix 1).

Repeated Low-Level Concerns

Several similar reports regarding poor practice by the same individual which in isolation may be considered low-level concerns may, viewed together, potentially meet the harm threshold and result in a referral to the Cricket Regulator Safeguarding Team, especially if there appears to be a failure by the individual to respond to advice or training already provided.

Self-Reporting

From time-to-time, individuals may be aware that their own conduct or practice could have, or may be seen to have, fallen short of expected standards, could be misinterpreted or may appear compromising to others. Self-reporting of concerns is encouraged in these circumstances as it demonstrates self-awareness on the part of the individual and enables us as an organisation to identify and address any potential gaps in policy and practice guidance. This also emphasises our commitment as an organisation to aspire to the highest standards of conduct and behaviour.

Recording and Retention of Information

All low-level concerns will be recorded in line with ECB systems as defined in Appendix 3

Periodic reviews of low-level concerns will be undertaken to ensure that they are being dealt with appropriately and that patterns, problematic behaviour or cultural/policy issues are identified and addressed.

(Further detailed information regarding low-level Concerns and data protection can be found in Appendix D of "Developing and implementing a low-level concerns policy. A guide for organisations which work with children". Farrer and Co 2022)





Appendix 1

Addressing a Low-Level concern

- Discussion regarding conduct that constitutes a low-level concern should be proportionate and positive for example: "I am sure that you adhere to Herefordshire Cricket Ltd values, and to help me understand how you came to behave in a way which is not in keeping with those values, so that we can understand what actions or support you might need so that we can both be confident that it won't happen again."
- Be clear regarding why the behaviour is inappropriate, problematic, or concerning and what change is required, including what support might be required to achieve this change.
- Be clear about the possible consequences of repeated behaviour.
- Ensure at the end of the meeting that you and the individual have a clear plan regarding how the concern is to be addressed.
- For employees there may be a need to refer to disciplinary or capability procedures if a low-level concern raises misconduct or poor performance issues and advice should be taken from human resources as appropriate.
- For contractors, any report of a low-level concern on their part should be notified to their employer.

Appendix 2

Key Documents and Guidance

- Keeping Children Safe in Education 2022
- Keeping learners safe: The role of local authorities, governing bodies and proprietors of independent schools under the Education Act 2002
- Working Together to Safeguard Children 2023
- Social Services and Wellbeing (Wales) Act 2014
- Wales Safeguarding Procedures 2019
- Developing and implementing a Low-Level Concerns Policy: A guide for organisations which work with children – Farrer and Co 2022
- County/ECB Whistleblowing Policy

Appendix 3

See link to Smartsheet [ECB Safeguarding - Herefordshire Low-Level Concern Reporting Form. \(smartsheet.eu\)](https://smartsheet.eu/ECB-Safeguarding-Herefordshire-Low-Level-Concern-Reporting-Form)

