



# Low Level Concerns

## Introduction

This Low Level Concerns Policy (the “**Policy**”) reflects the ethos of Tottenham Hotspur Football and Athletic Co. Limited (trading as “**Tottenham Hotspur Football Club**”), its Group Companies, Tottenham Hotspur Foundation (a registered charity known as the “**Foundation**”) and Tottenham Hotspur Women Football Club Limited – together known as the “**Club**”.

The Club prioritises the safety, welfare and wellbeing of all, and relies on all Staff (as defined below) to behave in accordance with our values, and in line with the Safeguarding Code of Conduct.

The purpose of the Policy is to create a culture of openness, trust and transparency. Reporting low level concerns is an opportunity for training, coaching and continuous improvement. The Policy is designed to support Staff (as defined below) in acknowledging mistakes and learning from them without fear of blame or penalty.

This Policy applies to all employees (including players and coaching staff), workers, contractors, secondees, volunteers, interns and apprentices (collectively known as “**Staff**”).

This Policy should be read in conjunction with the Safeguarding Policy (Adults and Children), the Safeguarding Code of Conduct and the Managing Allegations Policy. Any policies referenced in this Policy can be found on the Shelf.

This Policy does not form part of your contract of employment, and we reserve the right to amend it at any time.

Please note that all references to a “child” or “children” within this Policy follow the legal definition of a child under the Children Act 1989, which defines a child as anyone under the age of 18.

## What is a low level concern?

Low level concerns are behaviours which fall below the standard required by the Club, as set out in our Code of Conduct, within your job description, and in our values & behaviours, and do not meet the threshold for serious misconduct or harm or warrant referral to external authorities such as the police or the Local Authority Designated Officer (“**LADO**”). Low level concerns include your behaviours both inside and outside of work, which may be inadvertent, unintentional, inappropriate or thoughtless.

Please find below a non-exhaustive list of example low level concerns:

- connecting on social media with children met in a professional context;
- taking photographs of a child or adult at risk on a personal mobile phone or camera;
- using inappropriate sexualised, intimidating or offensive language;
- allowing or engaging in hazing practices, which may include the embarrassment or humiliation of an individual or member of Staff, participation in activities that are not truly voluntary, to go unreported;



- placing children in potentially compromising and/or uncomfortable situations with adults (e.g., unprofessional use of social media, by a coach, which involves young players);
- ignoring health and safety guidelines (e.g., children and adults not wearing seat belts in Club transport);
- engaging inappropriately with a child or adult at risk on a one-to-one basis in a secluded area or behind a closed door;
- when insufficient care is taken to avoid injuries of players (e.g., by excessive training or using inappropriate training methods for the age, maturity, experience and ability of the players of the Club);
- using foul and abusive language towards or around children or adults at risk (e.g., abusive language towards match officials);
- 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);
- allowing rough and dangerous play, bullying, the use of bad language or inappropriate behaviour by players;
- consuming alcohol while responsible for the care and supervision of children, and/or adults at risk on an official Club trip, match or tour; and/or
- failing to report safeguarding concerns or follow safeguarding processes as outlined in the Clubs Safeguarding Policy.

## Reporting a low level concern

Whenever a member of Staff identifies concerning behaviours in Staff, third parties, and other adults, they must report them as soon as possible. To ensure the confidentiality of those who the concern relates to, low level concerns should be reported to your Safeguarding Manager, Designated Safeguarding Lead or the Head of Safeguarding, either in person, by telephone, on a Teams call or via email, unless they relate to children or adults at risk, in which case they should be reported on MyConcern.

When you report a low level concern, provide as much information as possible, including

- the context in which the low level concern arose;
- details of the concern which are chronological, precise and accurate; and
- details of any dates, times and any witnesses (if applicable).

If a low level concern is reported verbally (i.e. in person, by telephone or on a Teams call), this should then be followed up in writing by the individual reporting the concern and submitted via email to the Safeguarding Manager, Designated Safeguarding Lead or the Head of Safeguarding.

### **Anonymity**

Where the person raising the concern wishes to remain anonymous, this will be respected as far as possible. However, in order to conduct a fair and thorough investigation it may be necessary to use names and so anonymity cannot be guaranteed. In the spirit of an open and transparent culture, Staff are encouraged to give their consent to be named, wherever possible.

### **Self-Reporting**

The Club recognises that Staff may find themselves in a situation which could be misinterpreted, or might appear compromising to others, or, on reflection, feel they behaved in a manner which they consider falls below the standard set out in the Club's Code of Conduct.



The Club encourages self-reporting in these circumstances, and it is seen as a positive action. Self-reporting promotes safeguarding and safer practice by:

- enabling Staff to get support with a potentially difficult issue and/or addressing it at the earliest opportunity;
- demonstrating awareness of the expected behavioural standards and self-awareness as to the person's own actions or how they could be perceived; and
- contributing to maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

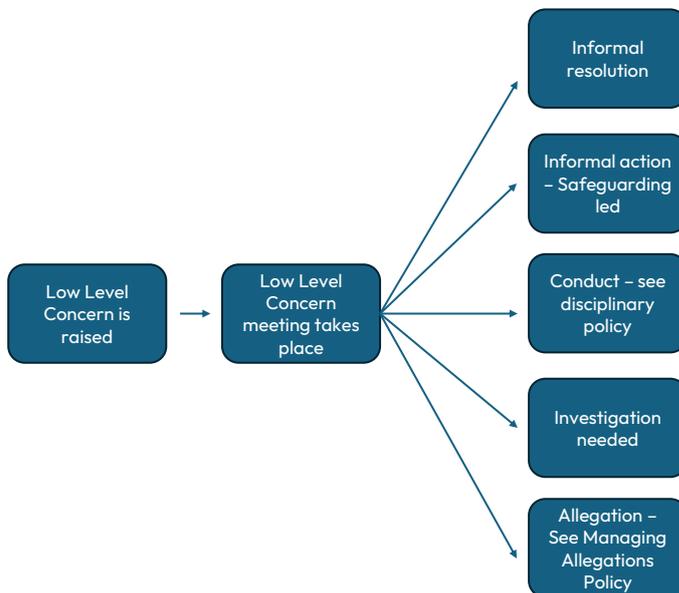
### External Partners and Third Parties

Low level concerns should be raised, regardless of whether the person works directly for the Club or via a third party. The Safeguarding team may share low level concerns with external partners and third parties if they are engaged through such partners or third parties. Such low level concern will be dealt with under the third party's Low Level Concern Policy.

## Responding to a low level concern

Once a concern is received, depending on the circumstances, the Club may deal with the concern under this Policy or an alternative policy such as the Managing Allegation Policy or Disciplinary Policy.

In all cases, once a concern is raised, the respective Safeguarding Manager, HR Business Partner and/or Line Manager will arrange to meet with the individual who raised the concern and discuss it via telephone, Teams call or face to face. The outcome of the discussion could result in any of the below outcomes:





1. Informal resolution – in cases where the concern is deemed inadvertent or thoughtless, and no prior low level concerns are recorded, an informal resolution may be considered. This may include receiving training from your line manager around low level concerns and the Club's Code of Conduct, discussing your actions in 1-2-1 review meetings, setting objectives around abiding by this Policy and/or reviewing the low level concern in PDR/probation review meetings.
2. Informal action led by the Safeguarding team – in cases where poor practices have taken place and specific safeguarding learning, development and/or coaching is required, the specific safeguarding manager will talk through a monitoring period, which shall be agreed with the Staff member, and any required actions during the period in an informal meeting. The agreed monitoring period shall include periodic reviews and may be extended, depending on the actions taken by the Staff member.
3. Conduct – there may be some cases which are raised as low level concerns, but when reviewed, they fall under another policy (such as our Disciplinary Policy). In these cases, the concern will be dealt with under the correct procedure in accordance with the correct policy.
4. Further investigation needed – we may need to conduct an investigation to understand the situation and the allegations made in more detail. As part of this investigation process, we may conduct investigation meetings, review any evidence/documentation (such as CCTV footage) and/or speak to witnesses prior to determining next steps and an appropriate outcome. The outcome will be assessed in detail and discussed with the relevant parties and confirmed in writing.
5. Managing allegations – following a low level concern meeting, it may be deemed that the concern is more serious and therefore should be dealt under our Managing Allegations Policy.

## Record Keeping

Where low level concerns relate to children or adults at risk, the concerns will be recorded on MyConcern and recorded (by the Safeguarding team) on 'Confide' which is only accessible by relevant people in the Safeguarding and HR teams.

Low level concerns will not be stored on personnel files. In line with best practice, keeping low level concerns separate from Staff personal files will allow the Club to spot any potential patterns of behaviour whilst reassuring Staff and volunteers to share their concerns. The Club will store investigation notes, documentation and witness statements on Confide.

Records relating to conduct, performance or allegations will be placed and retained on the Staff member's personnel file, whilst also being retained on the central low level concerns file (MyConcern).

### Retention

Records will be kept confidential (shared only on a need-to-know basis) and will be held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Retention beyond employment will be in line with the Club's usual retention and Football Association (FA) guidelines.

## Referrals

In line with FA guidelines, the Club must refer any member of Staff who has three low level concerns, to the FA. These low level concerns are **not** time sensitive and could be at any time during your engagement with the Club.



In certain circumstances, the Club may need to refer the concern to the LADO or other external agencies or authorities such as the police or the Multi-Agency Safeguarding Hub (MASH).

