Fun, Learning & Achievement

# Low-Level Concerns Policy

| Person Responsible for Review and Policy | Method of Approval |
|---|---|
| Head of Safeguarding | Board of Management and Chief Officer |

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# National Federation of Young Farmers' Clubs

# Low-Level Concerns Policy

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## 1. Policy Statement

The primary aim of the National Federation Of Young Farmers' Clubs (NFYFC) Low-Level Concern Policy is to promote a positive safeguarding culture throughout the whole organisation in which our core values and expected behaviours that are set out in our YFC Code of Conduct are constantly lived, monitored and reinforced by all members, staff and volunteers.

This policy is designed to create a culture of openness and transparency where all members, staff and volunteers feel empowered to report to report minor, ambiguous behaviours where individuals have those *'nagging doubts'* about someone else's behaviour or something that *'just doesn't feel quite right.'*

Key objectives include:

- **Early Identification:** Noticing concerning, problematic, or inappropriate behaviour before it crosses the threshold into serious harm or requires a formal referral.
- **Promoting Transparency:** Maintaining an open and trusting organisation where everyone understands the YFC Code of Conduct and values and are clear about behavioural boundaries.
- **Pattern Recognition:** Allow YFCs to identify and record multiple low-level concerns that, when viewed together, may reveal a larger pattern of inappropriate behaviour by an individual.
- **Provide Clarity:** Give members, staff and volunteers a clear, safe, and stress-free mechanism to report concerns about other individuals within YFC or self-report their own behaviour without the fear of disciplinary action for minor misunderstandings as well as protecting individuals from false allegations

## 2. What is a Low-Level Concern

A low-level concern is any concern or doubt, no matter how small that a YFC member, member of staff or volunteer may have acted in a way that conflicts with the standards set out in our YFC Code of Conduct and core values. These concerns can relate to behaviour inside or outside of YFC and do not have to directly involve children or adults at risk.

Low-level concerns might not be considered serious enough to meet the 'harm threshold'[1] whereby concerns should be referred to the police or children's services. However, any concerns raised still require a response.

Low-level concerns might include:

- Careless or thoughtless behaviour.
- Behaviour that might be considered inappropriate.
- Behaviour which is intended to enable abuse e.g. grooming behaviour.[2]

[1] The harm threshold is the level of risk or abuse that triggers statutory safeguarding intervention from partner agencies such as social services or the police. In the UK, this is legally defined as 'significant harm' (Children Act 1989).
[2] Grooming behaviour is a deliberate process of building trust and manipulating a child or vulnerable person to enable abuse or exploitation.

Examples of such behaviour could include:

- Being over-friendly with children or adults at risk.
- Demonstrating favouritism towards certain individuals.
- Engaging with a child or adult at risk in a secluded area or behind a closed door.
- Humiliating other members, volunteers and staff.

## 3. Self-Reporting Low-Level Concerns

Sometimes an individual may find themselves in a situation which might give rise to a concern. Equally, an individual may for whatever reason have behaved in a manner which on reflection they consider falls below the standard set out in the YFC Code of Conduct. Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived by another member, member of staff or volunteer. As such, the NFYFC sees self-reporting as an important means of maintaining a positive safeguarding culture where everyone can be open and honest and we can learn both as individuals and an organisation as a whole.

## 4. What Should I Do if I have a Low-Level Concern

If you have a low-level concern about someone else or you wish to make a self-report this should be reported to your County Designated Safeguarding Officer (DSO) or a member of the NFYFC Safeguarding Team, as soon as possible. This report can be made either verbally or in writing. If the concern relates to your County DSO then the report should be made to a member of the NFYFC Safeguarding Team. If the concern relates to any staff member of the NFYFC team the report should also be made to a member of the NFYFC Safeguarding Team unless it is about one of the NFYFC Safeguarding Team members, in which case the report should be made to NFYFC Chief Officer.

## 5. Dealing with Low-Level Concerns or Self-Reports

When the low-level concern is received it will be recorded on the CPOMS system as a low-level concern or self-report against the name of the person that the concern relates to. The person receiving the report will decide what action to take next which may include a conversation with another member of the safeguarding team within the county or a member of the NFYFC Safeguarding Team.

In the first instance a decision will be made that it is a low-level concern and that it should not be reclassified as an allegation of harm or abuse. The circumstances in which a low-level concern might be reclassified as an allegation are where:

i. The threshold is met for an allegation.[3]

ii. There is a pattern of low-level concerns which collectively amount to an allegation, and/or

iii. There is other information which, when taken into account, leads to an allegation.

If the concern raised is classified as a low-level concern the safeguarding lead dealing with the report will usually discuss it with the individual who has raised the concern and then take any other steps to investigate it as necessary.

Most low-level concerns by their very nature are likely to be minor and will be dealt with by means of advice, guidance, training, etc. The person about whom the concern has been raised will normally be informed of the concern and they will usually be invited to discuss the concern with the safeguarding lead dealing with the concern. The person who has raised the low-level concern will remain anonymous unless circumstances are exceptional. They will be given an assurance that their concern will be responded to and will be logged but will not be given any detail about any subsequent action.

## 6. The Importance of Responding to Low-Level Concerns

It is important that we as a youth organisation respond to all concerns of an individual's behaviour, including those that are considered to be low-level as this consistent response helps to create a culture where the safety of all our members is always prioritised.

Responding to low-level concerns gives a clear message that any form of inappropriate behaviour will not be tolerated. A concern can still be significant even if it does not meet the threshold of harm. Left unaddressed, low-level concerns can escalate into more significant breaches of our Code of Conduct and values or even abuse.

Low-level concerns may also highlight a need for further training or improved induction for members, staff and volunteers within YFC.

[3] A safeguarding allegation is a report that a person in a Position of Trust may have acted in a way that has or may have caused harm to a child or adult at risk or that they pose a risk of harm.

## 7. NFYFC Key Contact Details

| Name | Role | Email | Telephone |
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