Policy Purpose

The purpose of this policy is to ensure that any low-level safeguarding concern regarding adults working for, or on behalf of Norwich City Football Club ("the Club"), is identified early, recorded appropriately, and responded to consistently and proportionately.

This policy supports a proactive safeguarding approach by promoting professional curiosity, transparency, and accountability.

Scope

This policy applies to all individuals working for or on behalf of the Club, including:

- Employees
- Volunteers
- Contractors and consultants
- Agency staff

It applies to behaviour towards:

- Children (under 18)
- Adults at risk involved in Club activities

Policy Statement

Norwich City Football Club is committed to being a Home for Everyone – an inclusive and safe environment where everyone can thrive, and all feel welcome. We will do this by embedding a culture where every individual engaged with the club is treated with respect and met with positivity and compassion. We are all responsible for upholding the Club's values by ensuring others feel included and valued, championing equality, and challenging all forms of discrimination, increasing our knowledge to develop the confidence to do so.

We believe that together we are stronger; we celebrate diversity and will proactively work with our community to ensure everyone has a fair opportunity to participate. This way Norwich City Football Club will build a culture to be proud of – we will build a Home for Everyone.

Our Safeguarding Culture

The Club promotes a culture of vigilance where:

- all staff are expected to report any concern, however small;
- concerns are treated as a safeguarding responsibility, not a personal judgement;
- leaders model openness, accountability, and transparency;

- failure to report a concern may itself constitute a safeguarding concern.

Creating an open and transparent culture in which concerns are shared, recorded, and addressed is critical to safeguarding.

Definition of a Low-Level Concern

A low-level concern is any concern, no matter how small, that an adult may have acted in a way that:

- is inconsistent with the Club's **Safeguarding Behaviour Code;** or
- does not meet the harm threshold for referral to statutory agencies but may indicate emerging risk.

This includes behaviour that creates a sense of unease or a "nagging doubt."
Examples may include (but are not limited to):

- being over-friendly with children;
- demonstrating favouritism;
- engaging in one-to-one situations in secluded environments;
- inappropriate use of personal devices (e.g. taking photographs);
- humiliating or inappropriate language or behaviour;
- encouraging participation through injury.

Definition of an Allegation

An allegation relates to behaviour where an individual has:

- caused or may have caused harm;
- possibly committed a criminal offence; or
- behaved in a way that indicates they may pose a risk of harm.

Concerns may relate to behaviour inside or outside the workplace.

Reporting Low-Level Concerns

All low-level concerns must be reported to:

- a Line Manager;
- a Designated Safeguarding Officer (DSO); or
- Safer Sport staff.

Reports should be made:

- as soon as possible; and

- always within 24 hours.

Reports may be made in person, by telephone, or via CPOMS or email.

Anonymous reporting will be respected where possible; however, anonymity cannot be guaranteed where a fair process requires disclosure.

Self-reporting is actively encouraged and supports a positive safeguarding culture.

Recording and Information Management

All low-level concerns must be:

- recorded on CPOMS within 24 hours;
- factual, accurate, and contemporaneous;
- stored securely and separately from personnel files.

Records will include:

- details of the concern;
- context and circumstances;
- individuals involved;
- actions taken and rationale.

Record Retention and Review

- Records will be retained in line with safeguarding and GDPR requirements.
- Regular reviews will take place to identify patterns or emerging risks.
- Information may be shared with relevant organisations where safeguarding risk is identified.

Initial Review and Decision-Making

Upon receipt of a concern, Safer Sport staff will:

- speak to the reporting individual (where possible);
- assess the behaviour against the Behaviour Code;
- determine whether it:
    - meets the low-level concern threshold;
    - meets the harm threshold; or
    - requires escalation.

Advice may be sought from statutory agencies where required.

Responding to Low-Level Concerns

Where a low-level concern is identified:

- responses will be proportionate, fair, and handled confidentially;
- information will be shared on a need-to-know basis only;
- a values-based conversation will normally take place.

This conversation should:

- clarify why the behaviour is concerning;
- reinforce expected standards;
- identify support or training needs;
- outline expectations moving forward.

Where appropriate:

- monitoring arrangements may be implemented;
- an action plan may be agreed;
- HR involvement may be required if misconduct or performance issues are identified.

Pattern Recognition and Escalation

All low-level concerns will be reviewed collectively to identify patterns of behaviour.
Whilst the FA "three-strike" principle will be considered:

- escalation decisions will not rely solely on a numerical threshold;
- any pattern, repetition, or concerning behaviour may result in escalation;
- a single serious concern may also meet the threshold for referral.

Where a pattern is identified, concerns will be reclassified and referred appropriately.
The FA will be notified where required to support national monitoring of safeguarding risk.

Outcomes

Outcomes may include:

- no further action;
- informal management action or guidance;
- training or supervision;
- formal HR processes (where applicable);
- safeguarding referral to external agencies.

Safer Recruitment Link

Low-level concerns form part of the Club's safer recruitment and ongoing suitability processes. This includes:

- considering relevant and substantiated concerns when assessing suitability for roles;
- identifying patterns of behaviour that may impact safe working practice;
- ensuring appropriate safeguarding checks, supervision, and risk assessments are in place.

Information will be considered in line with KCSIE safer recruitment principles and data protection requirements.

Employment References

Low-level concerns will not be included in references unless they:

- relate to substantiated misconduct or poor performance; or
- meet referral thresholds and are upheld.

False, malicious, or unsubstantiated concerns will not be included.

Governance, Oversight and Learning

The Club will:

- provide anonymised reporting to the Senior Managers and Board;
- analyse themes, trends, and recurring behaviours;
- identify learning and improvement actions;
- review policy, training, and practice in response to findings.

This supports continuous improvement in safeguarding practice.

Process Flow (Low-Level Concerns)

Step 1 – Concern Identified

Staff member observes, receives, or experiences a concern (including self-report).

Step 2 – Report

Report to Line Manager / DSO / Safer Sport staff within 24 hours.

Step 3 – Record

Concern recorded on CPOMS (factual, contemporaneous record).

Step 4 – Initial Review

Safer Sport assess whether:

- low-level concern; or
- harm threshold met; or
- further information required.

Step 5 – Decision & Action

- No concern → feedback provided
- Low-level concern → values-based conversation / monitoring
- Escalation → HR / external referral / FA notification

Step 6 – Review & Pattern Monitoring

All concerns reviewed collectively to identify patterns or escalation risk.

Related Policies

- Safeguarding Children Policy
- Safeguarding Adults Policy
- Safeguarding Behaviour Code
- Responding to & Managing Allegations Policy
- Speaking Up Policy
- Safer Recruitment Policy

Responsibility and Key Contacts

https://www.canaries.co.uk/club/safeguarding

Policy Issue Date	September 2020	
Policy Review	May 2022	KCSIE and FA Threshold updates
Policy Review	February 2024	Removal of terms young people and adults at risk as standard.

		Change from term Code of Conduct to Behaviour Code. Contact link added
Policy Review	June 2025	Change to Safer Sport and update from Confide to CPOMS.
Policy Review	July 2026	Scope expanded, Step Procedure added. Reference of Safeguarding Panel amended to Senior Managers.
Review Due	July 2027	

This policy is next due for a general review on the above date. It may however be reviewed and updated earlier, in the event of a change in Club requirements, or relevant legislation.