



BRITISH TAEKWONDO

LOW LEVEL CONCERNS POLICY

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1. Introduction

A low-level concern is any concern that an adult has behaved in a way that is inconsistent with the British Taekwondo code of conduct.

This includes inappropriate conduct both inside and outside of the sport that does not meet the threshold of harm or is not considered serious enough for British Taekwondo to refer to the local authority.

Low-level concerns include a spectrum of behaviours which may be intentionally designed to facilitate abuse, unintentional, inadvertent or thoughtless. The key is that the behaviour is inappropriate and not what British Taekwondo expects, as set out in our Code of Conduct and our Safeguarding Policy.

It may take place face-to-face, in writing or digitally such as in online meetings, or via social media or email. Examples include:

showing favouritism
being over-friendly
using inappropriate language that is sexual, profane, intimidating or offensive
inappropriate touching or initiating hugging
intimidation, punishment or degrading treatment

To support the implementation of this policy, British Taekwondo will provide support and information so that all members:

Are clear about what is meant by appropriate behaviour and can distinguish this from concerning, problematic or inappropriate behaviour in themselves and others

Can recognise the importance of professional boundaries and when to report concerns

Feel empowered to share any low-level concerns with the Safeguarding and Compliance Manger through the reporting system

Know that the response will be measured and proportionate

2. When receiving low-level concerns, British Taekwondo will:

Ensure all concerns that are raised are handled sensitively and proportionately;
Undertake to weigh up information in order to distinguish between unprofessional behaviour and intentional harm or abuse;

Identify concerning, problematic or inappropriate behaviour – including any patterns – that may need to be consulted upon with, or referred to, the local authority dedicated officer (LADO) or equivalent officer;

Focus on the behaviour, not the language used to describe or report it;
Address unprofessional behaviour and support the individual to correct it at an early stage;
Identify any areas for development in the organisation's safeguarding system as well as any training needs

3. Thresholds and when this Policy applies

An 'allegation of harm' is where it is alleged that a person who works with children or adults at risk has or may have behaved in a way that meets the harm threshold as specified below:

- behaved in a way that has harmed or may have harmed a child or adult at risk;
- possibly committed a criminal offence against or related to a child or adult at risk;
- behaved towards a child or children or adult/s at risk in a way that indicates they may pose a risk of harm to children or adults at risk;
- behaved or may have behaved in a way that indicates they may not be suitable to work with children or adults at risk (this behaviour includes inside and outside of the workplace)

In this case, members and staff should follow the Safeguarding Policy and report the matter to their Club Welfare Officer or the British Taekwondo Safeguarding and Compliance Manager.

Concerns that do not meet the harm threshold are treated as low-level concerns. The term 'low level' concern does not mean that it is insignificant, it means that the adult's behaviour towards a child or adult at risk does not meet the harm threshold.

Once the concern has been shared, the determination about thresholds and appropriate action should be made by the Safeguarding and Compliance Manager (SCM) who will follow the appropriate procedures in line with that decision.

The SCM may seek advice from the local authority LADO or local authority equivalent in order to make the determination and decide next steps.

4. Procedures

Sharing a Low-Level Concern

Any low-level concern must be shared with the SCM without delay and within 12 hours of the incident or becoming aware of it. The SCM can be contacted by emailing safeguarding@britishtaekwondo.org. Where the concern relates to the SCM, it must be raised with the Chief Executive Officer. If for any reason, a Low-Level Concern is not shared within the 12 hours, delay should never be seen as a barrier to raising it with the SCM.

Recording the Concern

The concern may be shared verbally or in writing, using the taekwondo.vissro.com/public/Taekwondocase.nsf/safeguarding-report. Where raised verbally, the SCM will make a written record at the time or immediately after. The SCM will use professional judgement to decide the detail to be recorded but it will include:

- name and role of the person sharing the concern » name and role of the person about whom the concern is raised (including their role at the time of the concern, if different)
- brief context in which the concern arose
- details of the concern including dates, ensuring information is accurate as possible and chronological
- the record must be signed and dated. The time the record was made should also be included

5. 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 promised.

In the spirit of an open and transparent culture, staff and members are encouraged to give their consent to be named, wherever possible.

6. Self reporting

British Taekwondo recognises that staff or members 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 code of conduct.

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

- enabling staff and volunteers 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

7. Responding to the Concern

Investigation into a low-level concern will be done discreetly and on a need-to-know basis. On receipt of the concern, the SCM will take the following actions (not necessarily in the order set out):

1. speak to the person who raised the concern (unless it has been raised anonymously), regardless of whether a written summary, or completed low-level concerns form has been provided;
2. speak to any potential witnesses (unless advised not to do so by the LADO or equivalent professional and/or other relevant external agencies, where they have been contacted);
3. speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO or equivalent professional and/or other relevant external agencies, where they have been contacted);
4. where the concern relates to the individual's behaviour or relationships outside the workplace, the SCM must conduct a risk assessment concerning transferrable risk into the workplace and the safety of children or adults at risk they work or volunteer with
5. review the information and determine whether the behaviour:
 - is entirely consistent with the British Taekwondo's code of conduct and the law;
 - is not serious enough to consider a referral to the local authority – but may merit consulting with and seeking advice from them;
 - when considered with any other low-level concerns that have previously been raised about the same individual, could now meet the threshold of an allegation and should be referred to the LADO or equivalent local authority professional
 - In and of itself meets the threshold of an allegation and should be referred to the LADO or equivalent local authority professional.

8. Records during investigation

Whilst conducting the investigation and making decisions, the SCM will make a record of

- all internal conversations »
- all external conversations – for example, with the LADO or equivalent local authority professional, other professionals
- the rationale for decisions
- actions to be taken and by who.

The record will include the names, roles, dates and times of conversations; emails and other relevant documentation.

9. Possible Outcomes

If the behaviour is found to be entirely consistent with the British Taekwondo Code of Conduct and the law, the SCM will:

- Update the individual in question and inform them of the action taken as above
- Speak to the person who shared the low-level concern to provide them with feedback about how and why the behaviour is consistent with the Code of Conduct and the law
- Consider if the situation may indicate that the Code of Conduct or Low-Level Concerns Policy are not clear enough, or if further training is needed
- If the same or a similar low-level concern is subsequently shared about the same individual, and the behaviour in question is also consistent with the Code of Conduct and the law, then an issue may need to be addressed about how the subject of the concern's behaviour is being perceived by others.

If the behaviour is found to constitute a low-level concern, it will be responded to in a sensitive and proportionate way – on the one hand maintaining confidence that such concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff and volunteers from any potential false allegations or misunderstandings.

Most low-level concerns by their very nature are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action.

Other concerns may most appropriately require guidance and/or training including a refresher about the Code of Conduct. Conversations will include

- being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, using examples
- explaining clearly what change is required in their behaviour
- discussing what, if any, support they might need in order to achieve and maintain the required behaviour
- being clear about the consequences if they fail to be consistent with the Code of Conduct and/or repeat the behaviour in question The approach should be positive and avoid critical, threatening or blaming language or behaviour.

Follow up actions may include:

- ongoing and transparent monitoring of the individual's behaviour
- an action plan or risk assessment which is agreed with the individual, and regularly reviewed with them

10. Low-Level Concerns and other Policies and Procedures

Where the concern is found to require other internal processes to be followed, such as disciplinary, the SCM will exercise their professional judgement and, if in any doubt, they will seek advice from other external agencies including the LADO or equivalent professional.

Where British Taekwondo's disciplinary procedure is triggered, we will ensure that the individual has a full opportunity to respond to any factual allegations which form the basis of a disciplinary case against them.

If the behaviour, whilst not sufficiently serious to consider a referral to the LADO or equivalent professional but nonetheless merits consulting with and seeking advice from them, then action (if/as necessary) will be taken in accordance with such advice.

If, when considered with any other low-level concerns that have previously been shared about the same individual, the present concern could now meet the threshold of an allegation, then it will be referred to the LADO or equivalent professional

If the behaviour in and of itself meets the threshold of an allegation, it will be referred to the LADO or equivalent professional.