



Title of document:

Safeguarding – Low Level Concerns Policy

Policy Management:	
Business Area	Safeguarding
Author	County Safeguarding Officer - Julie Rafferty
Effective Date	7 February 2025
Review regularity	Annually
Last review Date	25 August 2026
Next review date	August 2027
Version number	V3
Applicable to	Cheshire Cricket Board, Cheshire County Cricket Club, Cheshire Youth Cricket, Cheshire Clubs Cricket Committee, affiliated Cheshire cricket Clubs
Method of dissemination	Induction, website, email



Cheshire Cricket Board **Low-Level Concerns Policy**

1. Introduction

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 recognise that individuals involved in cricket, including children, young people, and adults, may have experienced trauma. Trauma can impact how people perceive, respond to, and communicate about behaviour and concerns. We are committed to ensuring that all safeguarding practices, including the management of low-level concerns, are trauma-informed, promoting safety, trust, choice, collaboration, and empowerment, and avoid unnecessary distress wherever possible.

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 and adults can flourish. A welcoming and inclusive 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 the game should do so safe in the knowledge that we see our responsibility to keep them safe and protected as our paramount consideration.

2. 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 England and Wales Cricket Board (ECB) Safe Hands Policy and Guidance, is identified and addressed at an early stage.

We are committed to fostering a culture of transparency and psychological safety in reporting and responding to concerns, where individuals feel able to raise issues without fear of blame, shame, or negative consequences. 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.

Our approach to low-level concerns is underpinned by a trauma-informed ethos. This means we seek to understand behaviour in context, respond with curiosity rather than judgement, and ensure that all individuals involved, those raising concerns, those affected, and those subject to concerns are treated with dignity, respect and fairness.

3. Who does this policy apply to?

This policy applies to any person involved in cricket within the Cheshire Cricket area specifically employees, including casual staff, and volunteers working in or on behalf of Cheshire Cricket Board (CCB) and cricket clubs in the Cheshire Cricket area.

4. Definition of Low-Level Concerns

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 the ECB 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 or 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 and Guidance.

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

When considering low-level concerns, it is important to recognise that people may experience, interpret and communicate about events differently, and that past experiences, including trauma, may influence these responses. All concerns will therefore be taken seriously, explored sensitively, and assessed objectively and within context, without minimising the experience of the person raising the concern or compromising safeguarding responsibilities.

5. 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 Officer. A Low-Level

Concern reporting form is provided at **Appendix 3** to ensure that all the relevant information is captured.

There may be a range of explanations for the conduct. It is important that concerns are explored openly and sensitively, without assumptions, ensuring that all perspectives are heard and considered.

Individuals raising concerns will be listened to, taken seriously, and supported throughout the process.

Reporting is a responsible and valued act that contributes to a safer environment. We recognise that raising concerns can feel difficult, particularly where there may be power dynamics or previous experiences of harm, and we are committed to supporting individuals to do so safely.

6. Procedure for Managing a Concern

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

All enquiries will be conducted in a manner that is proportionate, respectful and trauma informed. Reasonable steps will be taken to promote psychological safety and minimise unnecessary distress, while ensuring that safeguarding concerns are appropriately explored and assessed.

The person who has the concern should speak to the County Safeguarding Officer and/or the Club Safeguarding Officer and complete a Low-Level Concern reporting form with as much information as possible. The record should be timed and dated, providing a chronological and factual account of the concern.

On receipt of a report the County Safeguarding Officer 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 Club Safeguarding Officer(s) and/or the County Safeguarding Officer will sensitively and appropriately speak with relevant witnesses and the individual identified in the concern to understand their perspective and establish the circumstances surrounding the incident or behaviour. Conversations will be conducted in a way that promotes psychological safety and minimises unnecessary distress. Relevant contextual factors may be considered as part of this assessment; however, these will not diminish the importance of maintaining appropriate professional boundaries or safeguarding standards.

The County Safeguarding Officer will review the information and determine whether the

reported behaviour is appropriate and in line with expected behaviour, remains 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 Officer and the individual will develop a proportionate and supportive plan to address any behaviour which has fallen short of expected standards. This may include guidance or advice regarding conduct, reflective practice, additional training or other support. The approach will prioritise learning, reflection, and improvement alongside appropriate accountability. Where necessary, concerns may also be addressed through disciplinary or capability procedures (see **Appendix 1**).

7. Repeated 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.

Patterns will be reviewed carefully and contextually, ensuring that decisions are balanced, evidence-informed, and mindful of both safeguarding risks and individual circumstances. A trauma-informed approach does not prevent escalation where a pattern of behaviour indicates an increased safeguarding risk or potentially meets the harm threshold.

8. 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 actively encouraged and will be responded to in a supportive and non-punitive manner wherever this is appropriate and consistent with safeguarding and other organisational responsibilities. Self-reporting supports a culture of openness, reflection, professional curiosity, and continuous improvement.

9. Recording and Retention

All 'low-level concerns' will be recorded in line with ECB systems and Privacy Policy as outlined 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, cultural or policy issues are identified and addressed.

Information will be recorded sensitively, proportionately and in line with data protection requirements, ensuring confidentiality and respect for all individuals involved.

Appendix 1

Addressing a 'Low-Level concern'

- Discussion regarding conduct should be proportionate, supportive, and trauma-informed, focusing on understanding, learning, and accountability rather than blame or shame. For example: *"We want to understand what happened from your perspective and explore what needs to happen next, including any support you may need, so that practice is consistent with our safeguarding responsibilities and CCB values."*
- 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

- Working Together to Safeguard Children 2026
[Working Together to Safeguarding Children 2026](#)
- Keeping Children Safe in Education 2026
[Keeping Children Safe in Education 2026](#)
- Keeping learners safe: The role of local authorities, governing bodies and proprietors of independent schools under the Education Act 2002
[Education Act 2002](#)
- Developing and implementing a Low-Level Concerns Policy: A guide for organisations which work with children – Farrer and Co 2022
[Farrer & Co - Developing and implementing a LLC policy](#)
- CCB Whistleblowing Policy
[CCB Whistleblowing policy V2 May 2025](#)
- ECB Low Level Concerns Guidance (November 2024)
[Low Level Concerns Club Guidance](#)

Appendix 3

Cheshire Cricket Board Reporting form

All CCB staff, volunteers and contractors and representatives from cricket clubs in the Cheshire Cricket area are encouraged to report all 'low-level concerns' to the County Safeguarding Officer and/or using the relevant reporting form below.

Link to the Cheshire Cricket Board 'Low Level Concern' Reporting form:

[LLC Reporting Form](#)

All reported 'low-level concerns' will be recorded in line with ECB systems and the Cricket Regulator privacy policy

[Cricket Regulator Privacy Policy](#)