



RLSS UK
Safeguarding

The Royal Life Saving Society UK (RLSS UK) Low Level Concern Policy

“Safeguarding is everyone’s business”.

RLSS UK is committed to safeguarding and promoting the welfare of children, and adults at risk and expects everyone involved in RLSS UK activity to share this commitment.

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Control Sheet

Document Review

Name	Title
Representatives of	S.E.D.A.G

Document Approval

Name	Title	Department	Signature	Date
Lee Heard	Charity Director	Charity		12/04/2023

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v1.0	Initial document	12/04/2023

Associated Documents

Document	Version
RLSS UK Adult at Risk Safeguarding Policy and Procedures	V1.0
RLSS UK Child Safeguarding Policy and Procedures	V1.0

Review dates

This document should be reviewed in line with the details in section 11 and updated to reflect relevant changes.



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1.0 Purpose

- 1.1 This policy sets out a framework whereby all individuals involved in RLSS UK Activities are expected to report concerns, no matter how small, about their own behaviour or that of another individual whether a member of staff, volunteer, contractor or any other person involved in RLSS UK activities.
- 1.2 The purpose of this policy is to help create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour as set out in the RLSS UK Child Protection and Adult Safeguarding policies are lived, monitored, and reinforced.

2.0 To whom does the policy apply?

- 2.1 This policy applies to everyone involved in all aspects of RLSS UK work, operations and activities. Where RLSS UK staff or volunteers work across multiple sites any low-level concerns about individuals should be reported to the relevant person at the site in question, e.g. Club and Branch Dedicated Safeguarding Leads (DSLs).

3.0 Definition of a low-level concern

- 3.1 A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a 'nagging doubt' that a person involved in RLSS UK activities may have acted in a way that:
 - is inconsistent with the Staff Code of Conduct, and
 - does not meet the allegations threshold, or is otherwise not considered serious enough, to make a referral to the LADO or Local Authority.
- 3.2 Examples of behaviour that could require reporting of a low-level concern include, but are not limited to:
 - being over-friendly with children
 - having favourites
 - taking photographs of children on their mobile phone
 - engaging with a child on a one-to-one basis in a secluded area or behind a closed door, including through digital media.
- 3.3 Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, to behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.
- 3.4 It is crucial that any such concerns, including those which do not meet the harm threshold, are shared responsibly with the right people, and are recorded and dealt with appropriately. Such action will ensure that all concerns are dealt with effectively and will also protect those engaged in RLSS UK activities from potential false allegations or misunderstandings.



4.0. Reporting low-level concerns

- 4.1 Where a low-level concern has been identified, this must be reported as soon as possible to the Club or Branch Dedicated Safeguarding Lead.
- 4.2 Where the Club or Branch Dedicated Safeguarding Lead is not available, the information will be reported to the RLSS UK HQ Designated Safeguarding Lead (or Deputy).
- 4.3 Low-level concerns about the RLSS UK HQ Designated Safeguarding Lead or their Deputy will be reported to the Safeguarding Executive Lead. If the Safeguarding Executive Lead is not available such concerns will be reported to the Chair of the Safeguarding, Equality and Diversity Advisory Group. (providing this is not the Safeguarding Executive Officer or DSL).
- 4.4 Low-level concerns about the Safeguarding Executive Lead will be reported to the RLSS UK CEO.
- 4.5 All lower-level complaints should be recorded by the DSL via the RLSS UK account platform, powered by tahdah.

5.0 Recording concerns

- 5.1 A summary of the low-level concern should be written down, signed, timed, dated and shared by the person bringing the information forward. Low level concerns should be reported using the report form located [here](#). Appendix A contains a form that can be used to record the actions following a report from being received. Not having access to the form should not prevent a concern being shared.
- 5.2 Where concerns are reported verbally to the Club/Branch Dedicated Safeguarding Lead or RLSS UK HQ Designated Safeguarding Lead a record of the conversation will be made by the person receiving the information which will be signed, timed, and dated.
- 5.3 All concerns will be held in a single file within the Club concerned. Whether held electronically or in hard copy this file must be stored securely.
- 5.4 Where multiple low-level concerns have been shared regarding the same individual these should be kept in chronological order as a running record.
- 5.5 The Data Protection Act 2018 does not stipulate how long records pertaining to low-level concerns should be held. As such Clubs will retain records of low-level concerns until such times as further guidance is issued Nationally. However, when a member of staff, volunteer or other person involved in RLSS UK activities leaves and/or takes up new employment this creates a natural point at which the content of the file may be reviewed to ensure it still has value (either as a safeguarding measure or because of its possible relevance to future claims) and is therefore



necessary to keep. This is subject to the rights of the individuals to object to, or seek to erase or correct records about them under the data protection law.

6.0 Responding to low-level concerns

6.1 Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The Club and/or Branch Designated Safeguarding Lead or RLSS UK HQ Designated Safeguarding Lead will:

- Speak to the person reporting the concern to gather all the relevant information.
- Consider whether it is appropriate to contact the LADO or Adult Social Care equivalent for advice and guidance.
- Speak to the individual, unless advised not to do so by the LADO or Adult Social Care equivalent or police about the concern raised, to ascertain their response.
- If appropriate, take advice from the Central RLSS UK Safeguarding team

6.2 Where necessary to form a view on next steps, further relevant information will be gathered via a 'fact finding' process This may involve speaking to any potential witnesses to establish factual information related to the concern. **In all such cases, advice should be sought from the RLSS HQ Safeguarding Team.** The information reported and gathered will then be reviewed to determine whether the behaviour:

- is consistent with the RLSS UK Code of Conduct in which case no further action will be required.
- constitutes a low-level concern, in which case no further action may be required, or additional training/guidance/support may be required to rectify the behaviour via normal day-to-day management processes. The person whose behaviour has led to the concern being raised should understand that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g. via the Disciplinary Procedures. The RLSS UK recognises the advice¹ around the benefit of 'values based conversations' rather than a critical or threatening approach when speaking to individuals about concerns. Management advice, guidance or support should be recorded and followed up in writing.
- is serious enough to consult with or refer to the LADO (or Adult Social Care equivalent), via the DSL, in which case the LADO (or Adult Social Care) equivalent should be contacted and their advice followed as to whether a referral should be made.
- when considered with previous low-level concerns about the same individual could now meet the threshold of an allegation, in which case the LADO (or Adult Social Care equivalent) should be contacted and their advice followed as to whether a referral should be made.
- in and of itself meets the threshold of an allegation and should be referred to the LADO and/ or other relevant external agencies.

¹ <https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/low-level-concerns-guidance-2021.pdf>



6.3 ***Where the Club or Branch DSL has any doubt whatsoever as to how to respond to a concern they should seek advice from the RLSS UK HQ Designated Safeguarding Lead.***

6.4 In all cases of low-level concerns records will be made and kept securely in the single, central file of:

- all internal conversations, including any relevant witness statements;
- all external conversations, e.g. with the LADO;
- the decision made and the rationale for it;
- any action taken.

7.0 Can the person reporting the low-level concern remain anonymous?

7.1 The person bringing forward the concern will be named in the written record. Where they request to remain anonymous, this will be respected as far as possible. However, there may be circumstances where this is not possible, e.g. where a fair disciplinary investigation is needed or where a later criminal investigation is required.

8.0 Should staff/volunteers report concerns about themselves (i.e. self-report)?

8.1 It may be the case that a person finds themselves in a situation which could be misinterpreted, or might appear compromising to others. Equally, they may have behaved in a manner which on reflection they consider falls below the standard set out in the RLSS UK Code of Conduct. In these circumstances they should self-report the incident. This will enable a potentially difficult situation to be addressed at the earliest opportunity. RLSS UK will work proactively to create an environment where staff and volunteers are encouraged and feel safe to self-refer.

8.2 Where behaviour is consistent with the Code of Conduct feedback will be given to both parties to explain why this was the case.

8.3 Where behaviour is not consistent with the Code of Conduct the necessary action will be taken in line with this policy and the RLSS UK Disciplinary Policy.

9.0 Should the low-level concerns file be reviewed?

9.1 The Club/ Branch DSL will review the central file in each Club annually and/or when a new concern is filed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and referred to the LADO (or Adult Social Care equivalent) if required. Such patterns of behaviour might include those associated with a particular location or setting, group of staff/volunteers or interactions with an individual member. A cover note will added to the file to state date of review, person conducting review and any actions taken.



9.2 A record of these reviews will be retained and will be available to appropriate members of the RLSS UK HQ Safeguarding team as required to allow them to fulfil their wider quality assurance role.

10.0 References

10.1 Subject to the requirement to include information related to misconduct or poor performance (managed via separate procedures), low-level concerns will not be included in references unless a low-level concern, or group of concerns, has met the threshold for referral to the LADO (or Adult Social Care equivalent) and found to be substantiated.

11.0. Procedural implementation and review

11.1 These procedures were implemented on 11th May 2023 and will be reviewed on an annual basis or in response to changes in safeguarding legislation and/or best practice.



APPENDIX A

Low-level Concern Action Log

Received by Name and Role:	
At time and on date:	
Have low level concerns been raised about this individual previously? <ul style="list-style-type: none">• If so, provide brief chronological notes.• Consider whether this history, alongside the current concern now meet the threshold for referral	
Action Taken: <ul style="list-style-type: none">• Provide a concise, chronological record of how the concern was followed-up, including details of any conversations held. Ensure that there is sufficient detail to understand the decision- making process that led to either no further action or an action(s). <p>Please use a separate sheet if necessary</p>	



Signed:	
Time and Date when form completed:	

This form should be held in a single secure file within each Club. This may be electronic or in hard copy.