



Grimsby Town Football Club, Academy and Foundation

Low Level Concern Policy

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Statement of Commitment

Grimsby Town Football Club (GTFC) and Grimsby Town Foundation (GTF) are committed to safeguarding and promoting the welfare of all children, young people and adults at risk. GTFC and GTF recognises that safeguarding is everyone's responsibility and that creating a safe culture requires vigilance, openness and accountability from all adults working on behalf of GTFC and GTF

GTFC and GTF are committed to fostering a culture of openness, trust and transparency in which concerns about the behaviour of adults are shared, recorded and addressed promptly and appropriately.

This policy supports GTFC and GTF's commitment to safer working practices and forms part of our wider safeguarding framework.

Purpose

The purpose of this policy is to create and embed a culture in which all staff, volunteers and others working on behalf of GTFC and GTF feel confident to share concerns, no matter how small, about their own behaviour or that of another adult.

The policy aims to:

- Promote a culture of openness and transparency.
- Reinforce the standards of behaviour outlined within the Code of Conduct.
- Enable concerns to be identified and addressed at an early stage.
- Prevent the escalation of inappropriate, problematic or concerning behaviour.
- Identify patterns of behaviour that may indicate a safeguarding risk.
- Strengthen the safeguarding culture and safer working practices.
- Ensure the welfare of children remains paramount.

Scope

This policy applies to all adults working in or on behalf of GTFC and GTF including:

- Employees
- Coaches
- Academy staff
- Volunteers
- Matchday staff
- Board Members
- Contractors

- Consultants
- Scouts
- Chaperones
- Community Trust staff working with children
- Agency or temporary staff
- Any person representing GTFC and GTF

Relationship to other policies

This policy can be read alongside:

- Safeguarding Children and Vulnerable Adults Policy
- Staff Code of Conduct
- Whistleblowing Policy
- Safer recruitment Policy
- Social Media Policy

What is a Low-Level Concern?

A low-level concern is any concern, no matter how small, that an adult working in or on behalf of GTFC and GTF may have acted in a way that:

- Is inconsistent with the Code of Conduct and/or safer working practice guidance;
- Does not meet the threshold for referral to external safeguarding agencies; and/or
- May otherwise indicate that they may not be suitable to work with children.

Low-level concerns are not allegations of abuse. However, they may indicate behaviour that requires discussion, support, guidance, monitoring or further assessment.

All concerns should be shared regardless of how insignificant they may appear in isolation.

Examples of Low-Level Concerns

Examples may include, but are not limited to:

Professional Boundaries

- Favouring one player over others.
- Spending excessive time alone with a child without clear justification.

- Seeking opportunities for unnecessary one-to-one contact.
- Allowing inappropriate familiarity from players.

Communication

- Using personal social media accounts to communicate with players.
- Contacting children outside approved GTFC and GTF's communication channels.
- Sending messages late at night without a legitimate reason.
- Excessive communication with individual players.

Physical Contact

- Unnecessary physical contact.
- Physical contact that is not age, activity or role appropriate.
- Failure to respect personal boundaries.

Academy and Football Activities

- Transporting a player alone without appropriate authorisation.
- Failing to follow supervision arrangements.
- Arranging meetings with players away from GTFC and GTF activities.
- Being alone with a child in changing rooms or treatment rooms where this could reasonably be avoided.

Conduct and Language

- Inappropriate jokes or comments.
- Sharing personal information with players.
- Discussing adult issues with children.
- Using language that may humiliate, intimidate or undermine a young person.

Safeguarding Practice

- Failure to challenge poor practice.
- Not following safeguarding procedures.
- Repeated minor breaches of safeguarding expectations.
- Attempting to bypass established safeguarding processes.

What is Not a Low-Level Concern?

The following should be reported immediately through the GTFC and GTF safeguarding procedures and may require referral to external agencies:

- Allegations of abuse.

- Grooming behaviour.
- Sexualised behaviour towards a child.
- Physical assault.
- Emotional abuse.
- Neglect.
- Online exploitation.
- Possession or sharing of indecent images.
- Criminal offences.
- Any behaviour that may meet the harm threshold.

Where there is uncertainty, advice should be sought from the Safeguarding Manager immediately.

Self-Reporting

GTFC and GTF encourages all adults to self-report situations where:

- Their conduct may have been misunderstood.
- They have unintentionally breached professional boundaries.
- They have found themselves in a situation that could be misinterpreted by others.
- They believe their actions may appear inconsistent with the Code of Conduct.

Examples may include:

- Emergency transportation of a player.
- Unplanned one-to-one situations.
- Accidental contact via personal social media. *For example, accidentally sending a message to a player through a personal account, inadvertently interacting with a player's personal content, or responding to contact from a player before recognising that the communication should be moved to an appropriate club channel.*
- Receipt of inappropriate communications from a player.

Self-reporting demonstrates professionalism, accountability and a commitment to safeguarding.

Reporting a Low-Level Concern

Any person working in or on behalf of GTFC and GTF who become aware of a low-level concern should report it as soon as reasonably possible and, wherever practicable, within 24-48 hours.

Concerns should be reported to:

- Senior Safeguarding Manager
- Safeguarding Manager
- Academy Safeguarding Officer

If safeguarding personnel are unavailable, concerns should be reported to an appropriate member of the Senior Leadership Team.

The reporting individual does not need evidence or proof. Concerns should be reported based on what has been observed, heard or experienced.

GTFC and GTF will not tolerate victimisation or retaliation against anyone who raises a concern in good faith.

Recording Concerns

All low-level concerns will be recorded securely and confidentially.

Records should include:

- Date and time of concern.
- Name of reporting person.
- Name of individual subject to concern.
- Details of the concern.
- Context of the incident.
- Any witnesses.
- Actions taken.
- Outcome and rationale.

Records will be maintained in accordance with safeguarding requirements and data protection legislation.

Responding to Low-Level Concerns

Upon receiving a concern, the Safeguarding manager will:

- Speak with the person raising the concern where appropriate.
- Gather relevant information.
- Speak with witnesses where necessary.

- Speak with the individual concerned where appropriate.
- Consider whether the concern:
 - Is consistent with expected professional conduct;
 - Constitutes a low-level concern;
 - Requires advice from the Local Authority Designated Officer (LADO);
 - Meets the threshold for formal safeguarding procedures.

All decisions and actions will be proportionate, fair and appropriately recorded.

Identifying Patterns of Behaviour

GTFC and GTF recognise that a single low-level concern may not indicate safeguarding risk.

However, when viewed collectively, multiple concerns may demonstrate a pattern of inappropriate, problematic or concerning behaviour.

Safeguarding leads will actively review records to identify:

- Repeated boundary breaches.
- Favouritism towards specific players.
- Excessive one-to-one contact.
- Repeated breaches of communication protocols.
- Attempts to circumvent safeguarding procedures.
- Behaviour that may create opportunities for grooming.

Where patterns emerge, concerns may be escalated through safeguarding, disciplinary or external referral processes as appropriate.

Concerns Regarding Contractors and External Personnel

Where concerns relate to contractors, agency workers, consultants or individuals employed by partner organisations, GTFC and GTF may share relevant safeguarding information with their employer or organisation in accordance with safeguarding and data protection requirements.

This enables potential patterns of behaviour to be identified across organisations and helps safeguard children effectively.

Creating a Culture of Openness

Reporting a low-level concern should be viewed as a neutral and professional act undertaken in the interests of safeguarding children and maintaining professional standards.

GTFC and GTF expects all adults to:

- Accept responsibility for safeguarding.
- Challenge poor practice.
- Share concerns promptly.
- Support a culture of accountability and learning.
- Promote professional boundaries at all times.

No individual should fear negative consequences for reporting a genuine concern in good faith.

Monitoring and Review

The Safeguarding manager will maintain oversight of all low-level concerns to ensure consistency, identify trends and strengthen safeguarding practice. Julie Bettany, Principal Social Worker at NEL, Polly Bancroft, CEO of GTFC/GTF, SSM of GTFC and Head of Community of GTF have approved the contents of this policy.

This policy will be reviewed annually or sooner if:

- Legislation changes;
- FA, EFL or safeguarding guidance is updated;
- Learning from incidents indicates amendments are required.
- Regular safeguarding training and induction will include information about this policy, reporting procedures and professional boundaries.

Key Safeguarding Contacts

Adam Smith, Senior Safeguarding Manager	Adamsmith@gtfc.co.uk
Vikki Harries, Safeguarding Manager	07498 926776 safeguarding@gtfc.co.uk
Oliver Cowling, Academy Safeguarding Officer	oliver@gtfc.co.uk
Tara Lawson, Safeguarding & Incident manager EFL Trust	07964 905652 tlawson@efltrust.com
Sarah Boyer, Regional Safeguarding Manager, EFL	07583 138032 sboyer@efl.com
NEL Local Authority Safeguarding Officer	01472 326118
Ben Pearce, Lincolnshire County FA DSO	01522 596580 Ben.Pearce@lincolnshirefa.com
FA/NSPCC Safeguarding	0808 500 5000 (24 hrs)
FA Safeguarding Management Team	0800 169 1863 #6300

Additional Key Contacts

- North East Lincolnshire Safeguarding Childrens Board www.safernel.co.uk
- Local authority children's social care team 01472 326292 (option 2)
- Local authority Designated Officer (LADO) 01472 326118
- Local Authority referral team 01472 326292
- Local Authority Out of Hours Team 01472 326292 (option 2)
- Local Safeguarding Children Partnership 01472 326292 (option 2)
- Local Early Help services 01472 326292 (option 2)
- NSPCC 0808 800 5000
- Ofsted 0300 123 1231
- Emergency police 999
- Non-emergency police 101
- Government helpline for extremism concerns 020 7340 7264
- Local authority PREVENT duty officer Prevent@humberside.pnn.police.uk
- Child exploitation and Online protection command (CEOP)
<https://www.ceop.police.uk/safetycentre/>
- North East Lincs advice for staff or volunteer- LADO-Dealing-with-Allegations-Guidance-supportingstaff-and-volunteers-CA-Dec-20.pdf (safernel.co.uk)
- North East Lincs LADO information- LADO-Guidance-for-Teachers-other-staff-dealing-withallegations-against-education-staff-CA-Dec20.pdf (safernel.co.uk)
- North East Lincs Lado information for dealing with allegations- LADO-Dealing-with-Allegations-MASHCASS-CA-Dec20.pdf (safernel.co.uk)

Signed:



(Senior Safeguarding Manager)

Dated: 19/09/2026

Signed:



(Safeguarding Manager)

Dated: 10/09/2026

Signed by: 
Signed: Polly Bancroft
(Chief Executive Officer)

9/21/2026

