

British Orienteering Lower-Level Concerns Policy and Procedures

Purpose

This policy sets out how lower-level safeguarding concerns should be identified, managed, recorded and reported within British Orienteering and its affiliated Clubs and Associations.

It supports and complements the existing BO Safeguarding Children and Adults at Risk Policies by ensuring that behaviours which fall below expected standards are recognised early, addressed appropriately, and recorded to prevent escalation or risk to welfare and culture.

It's important that an organisation challenges all concerns, including those thought of as lower level, as it discourages any further rule breaking or escalating behaviour from taking place. When lower-level concerns are left unchallenged it creates the environment for more serious rule breaks and even abuse to occur.

This policy and procedure should be read in conjunction with the British Orienteering [Safeguarding Children Policy](#), [Safeguarding Adults Policy](#) and [Codes of Conduct](#).

Scope

This policy applies to:

- All British Orienteering staff, coaches, officials, volunteers and athletes.
- All Clubs and Associations affiliated to British Orienteering.
- Any events or activities under British Orienteering sanction, including training, competition, races, social events, travel, online interaction.

Definition: Lower-Level Concerns

A lower-level concern is any behaviour, incident or pattern of conduct that:

- Falls short of British Orienteering's [Codes of Conduct](#) or safeguarding expectations but does not meet the threshold for referral to statutory agencies; and
- May still pose a risk to welfare, safety or the culture of the club if repeated or unaddressed.

Lower-level concerns can be early signs of bigger problems. They can be summarised as more general welfare concerns or minor breaches of the code of conduct and can also be referred to as “[poor practice](#)”.

Behaviour that might be considered as inappropriate often depends on the circumstances. A lower-level concern may not be seen as immediately dangerous or intentionally harmful to a child, but it can soon escalate and become a serious safeguarding concern. Some examples of lower-level concerns include:

- inadvertent or thoughtless behaviour that raises doubts around the ability, skill, or motivation to work with young people, such as showing aggressiveness or swearing in front of children, not paying due care and attention to all participants.
- a team leader enforcing a humiliating team bonding activity, persistent use of sarcasm, shouting, or humiliating language
- inappropriate or overly familiar communication between adults and athletes, e.g. an official/volunteer verbally complimenting an athlete whilst giving their arm a squeeze
- boundary-blurring behaviour (excessive personal disclosure, private messaging), e.g. a coach using a social media account to interact with young athletes, for instance, liking their posts or direct messaging to discuss one on one coaching
- a young leader walking through the changing rooms whilst children in the club are changing
- a coach/official offering a child a lift home or waiting alone with a child for their parent to arrive
- favouritism or exclusion of individuals.

[Examples of safeguarding issues – inside sport](#)

Inside-sport concerns include those relating to a coach, official, participant, spectator, or another volunteer. They may include individuals working or volunteering within other sports organisations. This list is not exhaustive:

- complaint from parent about a coach or another parent about minor behaviour concerns
- disagreement between adults that can be resolved through mediation
- peer-on-peer quarrel that can be resolved through mediation
- a single incident of bad language

- minor breaches of the code of conduct by coach, volunteer, referee or participant
- low-level bullying of a child by a peer, such as an incident of name-calling

Examples of safeguarding issues – outside sport

Outside-sport concerns include those relating to issues arising at home, in school, in the wider community or online.

- child attending session when unwell
- parent late collecting child after session
- minor wellbeing concerns that require a conversation with the parent or carer
- child lacks social skills and has few friends
- disagreement between adults that can be resolved through mediation
- peer-on-peer quarrel that can be resolved through mediation

This list of examples is not exhaustive and lower-level concerns can arise from various forms of behaviour.

It can be useful to consider safeguarding concerns as existing on a scale. At one end of this scale are what can be termed ‘lower level’ concerns, this is when small rules are broken. At the opposite end, is persistent poor practice or serious breaches of the code of conduct, and abuse. A situation may initially be considered at one point of the scale of concern but move when further investigation or action is taken, or additional information is received.

Adults working or volunteering with children in sport are often able to recognise the signs of a safeguarding concern or even hear about something of concern directly from a young person, even if the concern is from outside sport.

It's essential that concerns coming to light from outside sport are still acted on in the child's interests and reported in line with organisational safeguarding policy and procedures.

This usually means reporting concerns to the relevant club or organisational safeguarding lead or in urgent situations referring directly to local statutory agencies.

Refer to [CPSU guidance](#) for further information and specific examples of safeguarding issues both inside and outside of Orienteering and possible actions.

Threshold Framework (as per CPSU)

The [CPSU guidance](#) sets out a three-level threshold model:



Level	Characteristics	Typical management
Level 1 Lower level Concerns	Safeguarding or welfare concern, or minor breach of code of conduct.	Managed by Club/Association Notification to British Orienteering for monitoring purposes.
Level 2 Moderate concern	Moderate breach of code of conduct, behaviour raising concerns about safety or suitability.	Managed by Club/Association Guidance from British Orienteering and Case Management Team
Level 3 Serious concern	Serious breach of code of conduct, behaviour raising risk of significant harm or meets statutory threshold for referral.	Immediate escalation to statutory agencies and British Orienteering Safeguarding Team.

Implication: This policy is primarily concerned with Level 1 concerns (lower level), but also includes guidance on when to escalate into Level 2 or Level 3.

Managing Lower-Level Concerns

To ensure that children and young people are kept safe, it is important that lower-level concerns are responded to appropriately by the organisation or club.

For this to happen, it is essential for all those involved in sport to understand that all concerns need to be challenged as soon as possible. By creating a safer culture, staff and volunteers are likely to feel comfortable and confident in recognising and acting on lower-level concerns about behaviour.

This culture and awareness allow organisations to act as soon as lower-level concerns arise. This might involve correcting the behaviour and educating individuals, and on occasion, it may require a person's removal from their role because of failure to comply with codes of conduct that the club have put in place.

The risk of an organisation not receiving reports of lower-level concerns or failing to effectively manage them is that behaviour cannot be addressed as soon as possible. This can allow the situation to escalate and adversely impact those involved. Although

some lower-level concerns occur due to a misunderstanding or lack of awareness, some behaviour may be intended to enable abuse at a later stage.

It's vital that all of those involved in sport can raise and address lower-level concerns or underlying doubt, no matter how big or small the concern.

Responsibilities

Club Welfare Officers (CWOs)

- Receive and respond to lower-level concerns raised within the club.
- Respond to any lower-level concern with the same empathy as a report of abuse or harm.
- Deal with the concern in a confidential manner
- Consult with British Orienteering if unsure whether concern is Level 1 or higher.
- Where relevant, escalate concerns to British Orienteering if they meet Level 2 or Level 3 thresholds or involve repeat/pattern issues.
- Provide guidance to club personnel on recognising lower-level concerns and use of this policy.
- Notify British Orienteering all Lower Levels concerns so that they can be maintained in a central log.
- Where a concern involves the Club Welfare Officer or there is a conflict of interests, it must be reported directly to British Orienteering

Club Committees

- Foster a culture of openness where concerns can be raised without fear of reprisal.
- Ensure all club employees, volunteers and members know this policy and understand applicable procedures.
- Support CWOs in local resolution and follow-up of concerns.
- Clubs must NOT conduct formal interviews, seek explanations for potential abuse or promise confidentiality.
- Refer to the [Safeguarding reporting procedures flowchart](#) for further clarity of when issues must be escalated to British Orienteering.

British Orienteering

- Maintain a central Lower-Level Concerns Register of all reports submitted by clubs.
- Provide advice, training and oversight to clubs dealing with lower-level concerns.
- Ensure policy aligns with CPSU threshold guidance and statutory safeguarding frameworks.
- Provide feedback and updates to Clubs and Associations on trends and common issues and any training, education gaps identified.

Reporting Process

1. Identification of concern

Any person (e.g. coach, official, volunteer, athlete, parent, member of public) may raise a concern with the CWO about any behaviour that feels unprofessional, inconsistent with British Orienteering's Codes of Conduct or potentially risky.

2. Recording

The CWO should log the following information:

- Date the concern was raised and date of incident (if known)
- Person raising the concern (if known) and their role
- Subject of concern (name, role)
- Nature of concern (brief factual description)
- Initial assessment of whether it is potentially Level 1, Level 2 or Level 3
- Immediate action taken (conversation, supervision, monitoring, training)
- Decision whether to seek guidance from British Orienteering or to manage locally
- Date of closure or follow-up review.

Records of lower-level concerns are confidential safeguarding records and must not be shared except on a need-to-know basis

3. Local Action (if concern if level 1)

- The Club/Association addresses it locally, e.g. reminding an individual of appropriate boundaries, arranging reflective coaching conversations, monitoring behaviour.
- Emphasising non-punitive learning where appropriate
- Review effectiveness of action and monitor for recurrence.
- If the behaviour repeats or escalates, re-assess and escalate accordingly.
- Refer to the British Orienteering Lead Safeguarding Officer for guidance if needed.

- Notify British Orienteering of concern, action taken and outcome without delay.

4. Escalation to British Orienteering

Escalation is required immediately if:

- The concern appears to meet Level 2 or Level 3 threshold.
- The behaviour is repeated or shows a pattern.
- The person involved has significant access to children or vulnerable adults and the behaviour reflects risk.
- The concern involves the CWO, a club committee member, or multiple club members.
- The club is unsure how to manage the concern effectively.

Reporting to British Orienteering

For immediate concerns (Level 2 or Level 3), the club should use the existing British Orienteering [Incident Report Form](#) or to notify the Lead Safeguarding Officer without delay (call 07891 091 662 or email safeguarding@britishorienteering.org.uk)

British Orienteering logs the report in the central register, monitors trends and decides on oversight or intervention.

Data Protection and Confidentiality

- All log entries must be objective, factual, and stored securely
- Data will be retained for **six years**, or according to British Orienteering's Data Retention Schedule (whichever is longer).
- Sharing or transfer of data beyond club and British Orienteering must follow GDPR and [British Orienteering's Privacy Policy](#).
- When escalation occurs, relevant information may be shared with statutory agencies or the British Orienteering Case Management Group as required, with confidentiality maintained.

Support and Training

- CWOs should complete their safeguarding training as per the [British Orienteering safeguarding training requirements](#).
- Clubs should consider how they inform members of the policy and procedures so that all members are actively aware of them.
- British Orienteering will provide guidance, case studies and resources to clubs on how to identify, record and respond to lower-level concerns.
- Further guidance can be found in the [CPSU guidance](#)

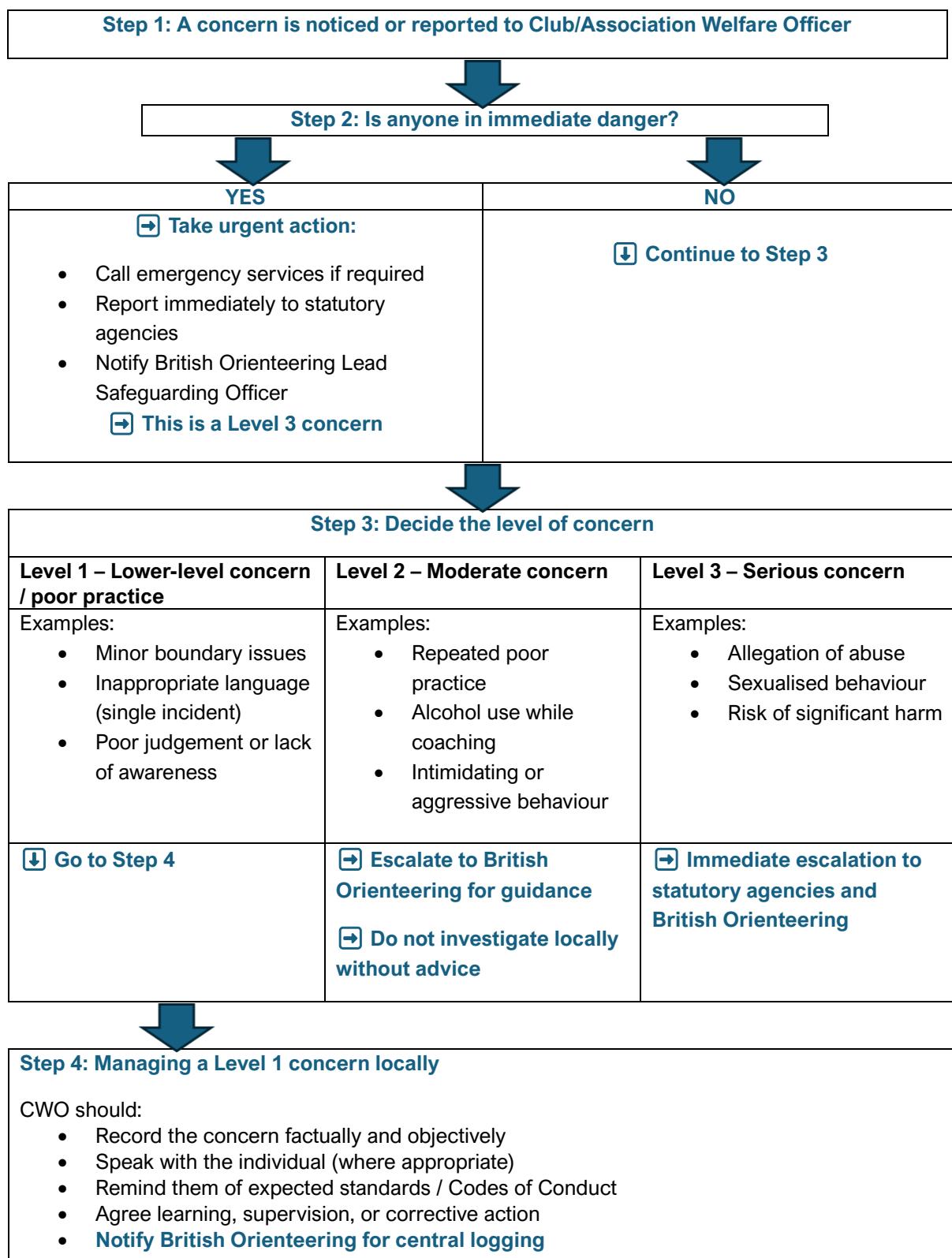
Monitoring and Review

British Orienteering will analyse the central register for trends, repeat behaviours, or club-wide issues and report these findings to the Case Management Group and Board.

The policy will be reviewed annually, or sooner if legislative changes, CPSU updates, or significant safeguarding events occur.

Lower-Level Safeguarding Concerns – Flowchart

Use this flowchart to decide how to respond when a concern about behaviour or welfare arises.



Step 6 – Monitor and review

- Has the behaviour improved?
- Has the concern been repeated?
- Are additional concerns emerging?

YES – behaviour repeats or escalates	NO – concern resolved
<input checked="" type="checkbox"/> Reassess level and escalate to British Orienteering	<input checked="" type="checkbox"/> Close record and retain securely

Key Principles

- When in doubt, escalate
- Do not promise confidentiality
- Do not investigate potential abuse locally
- All concerns must be recorded and logged
- Patterns matter as much as single incidents