



MANAGING LOWER-LEVEL CONCERNS WITHIN CLUBS AND LEAGUES

FOR CLUBS AND LEAGUES



NSPCC

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FOR ALL



ABOUT THIS DOCUMENT

This document has been created by The FA in collaboration with the NSPCC, County FAs, Leagues, Clubs, Parents / Carers and Young People. It provides guidance for Clubs and Leagues on identifying, recording, and managing lower-level safeguarding concerns early, ensuring fair investigations, clear reporting processes, appropriate outcomes, and escalation when necessary, to prevent harm and maintain safer, person-centred football environments.

GLOSSARY

CFA DSO	County FA Designated Safeguarding Officer
Lower-level concerns	A lower-level concern is any concern, doubt, or sense of unease, no matter how small, that someone may have acted in a way that is inconsistent with an organisation's code of conduct. This includes inappropriate behaviour outside of work, volunteering, or being an athlete.

MANAGING LOWER-LEVEL CONCERNS WITHIN CLUBS AND LEAGUES

WHAT ARE LOWER-LEVEL CONCERNS?

A lower-level concern is any concern, doubt, or sense of unease, no matter how small, that someone may have acted in a way that is not in line with the expectations of The FA/County FA or the standards you require as a club/league. While these behaviours may not be seen as immediately dangerous or intentionally harmful, they can soon escalate and become a serious safeguarding concern if no action is taken. Lower-level concerns left unchallenged can create an environment for more serious rule breaking and even abuse to occur.

The early identification and prompt management of lower-level concerns is critical to keeping children and adults safe from more serious harm. Learning from survivors with lived experience of non-recent abuse within sport, including football, has shown that often the abuse started as a lower-level concern.

Lower-level concerns may include (but are not limited to):

- Having favourites and not treating all children fairly and equitably;
- Allowing rough and dangerous play, bullying, the use of bad language or inappropriate behaviour by players;
- Using punishments to humiliate players;
- Drinking alcohol, smoking or vaping while supervising children;

- Inappropriate use of social media, e.g. communicating with children online.

NOTE - any sexualised communication in any medium MUST be referred to The County FA Safeguarding Team immediately. The FA Policies on social media usage can be found [here](#).

- Allowing others (players, clubs/team officials) to discriminate on the grounds of religion, race, gender, sexuality, socio-economic status, or disability;
- Not adhering to FA guidance when transporting children, including travel abroad;
- Not holding FA-mandated requirements/qualifications for the role being carried out (i.e. DBS Check/safeguarding education);
- Providing one-to-one coaching without any supervision or the presence of other adults (context of this will need to be considered);
- Failure to challenge lower-level concerns in others;
- Failure to record incidents or accidents;
- First aid being administered without others being present (other than in an emergency);
- Not informing parent/carer of medical incidents and/or not referring to medical professionals;
- Allowing confidential information to be shared inappropriately;

- Failure to provide required supervision of adult/child ratios for coaching sessions;
- Putting performance over the wellbeing and safety of players;
- Lack of respect for other individuals, such as match officials, opposition coaches, players, managers and spectators, including failing to accept a match official's decision (this may be dealt with by way of on field disciplinary proceedings but may also amount to lower-level concern);
- Overtraining and exerting undue pressure and influence over players;
- Condoning rule violations by players and not adhering to the laws and spirit of the game;
- Adults taking part in training/match play with children or children training in the wrong age banding (NB. Coaches may, where age appropriate and beneficial to skill acquisition, development/learning, demonstrate activity/skills outside of matchplay situations).

TAKING ACTION

Clubs and Leagues should manage all reports of lower-level concerns with **empathy, impartiality and integrity**.

Any response should be prompt with action taken as soon as clubs/leagues become aware of a lower-level concern. It is not appropriate to ignore concerns that may initially seem minor. Prompt resolution of issues can ensure that concerns do not escalate to something more serious.

In the first instance, all lower-level concerns should be reported to the Club/League Welfare Officer. The Club/League Welfare officer should then raise the concern with the Club/League Committee (which depending on the club/league constitution could be the Chair, Secretary and Welfare Officer). It is imperative that the matter is investigated and dealt with in a timely manner and in accordance with the **Club/League Complaints Policy** and **Club/League Safeguarding Policy**.

Where a third separate lower-level concern is raised about an individual to the club/league, the County FA **MUST** be informed. It should be noted that this means three separate lower-level concerns, where the club/league have dealt fully or are dealing with the previous two incidents (i.e. not three reports regarding the same incident).

Clubs/leagues do not have to wait for a third occasion to seek advice/guidance from the County FA; advice may be sought **at any time**. There may be occasions where support from the County FA is required due to escalating concerns, e.g. a second reported concern within 12 months of the first.

To support the gathering of evidence for an investigation, clubs should have a **concern/incident reporting form** that should be sent to the person reporting a concern (and any other relevant parties) for their completion at the earliest opportunity. Whilst the form is a helpful tool in gathering information, non-completion of the form should not prevent action being taken. Younger children and children/adults with additional learning needs, or where English is not their first language, may need support in completing the form.

Clubs/leagues MUST keep detailed records of any lower-level concerns reported, including what action was taken and what the outcome was and store these securely.



CONDUCTING AN INVESTIGATION

All lower-level concerns investigations should follow a clear, documented and transparent procedure that includes the voice of the child or victim wherever possible. The aim of the investigation is to gather evidence and information, which is documented and informs the decision-making process.

Investigations will vary widely in their scale and complexity depending on the nature of the concern but wherever possible should involve:

- Direct communication with the alleged victim/victims and/or parents/carers;
- Direct communication with any witnesses;
- Direct communication with the individual the concern has been raised about;
- Any other relevant parties.

As part of any lower-level concerns investigation directly involving a child, the child's voice should be considered as a priority. Children should be provided with the opportunity to give their account/view of what has happened in an age-appropriate manner.

To help ensure that any investigation is effective and accepted by all concerned, it is important to follow the below principles:

- Be fair and consistent – treating people in the same way regardless of their position in the club.
- Follow a transparent process which allows people to know when they have breached a code of conduct and provides them with an opportunity to explain their actions.
- Take action that is proportionate to the incident.
- Keep secure records of reported concerns, investigations and outcomes.
- Keep all communication professional.

It is important to remember that many lower-level concerns will be minor in nature and will not result in further reported concerns, therefore concerns should be managed sensitively and proportionately.





POSSIBLE OUTCOMES

There are a range of possible outcomes that may be reached when investigating concerns. Each case will need to be considered individually to assess the most suitable outcome.

Possible outcomes include (not an exhaustive list):

1. Unsubstantiated/no further action.
2. Discussion with individual – e.g. reinforcement of the code of conduct.
3. Management guidance/mentoring/supervision for a time stated period.
4. Education or training.
5. Mediation.
6. Formal warning.
7. Concern more serious than anticipated and escalated to the County FA Safeguarding Team.
8. Suspension/removal from role within the club.

While volunteers are not covered by employment law in the same way as paid staff, removing a volunteer from their role still requires a robust process to be followed which is open, transparent and clearly documented.

Where a coach/club volunteer leaves a club during or as a result of a lower-level concern investigation taking place. The club/league should contact the County FA to alert them of the resignation. Contacting the County FA Safeguarding Team will ensure that any relevant information is retained should they join another club/league in the future.

REMINDER: Where an individual is removed from their role by the club/league or a third separate concern is raised about an individual to the club/league, the County FA MUST be informed.

A flowchart of the process for clubs/leagues to follow when managing concerns is outlined in **Appendix 1** – this flowchart contains some expected timeframes for the management of concerns. Whilst it is acknowledged that concerns will be being managed by volunteers, it is important that concerns are managed in a timely manner. If timeframes are going to be longer than anticipated, this should be communicated to all parties as soon as possible to avoid frustrations and escalations to the County FA about delays in the process.

SETTING THE STANDARD WITH CLEAR CODES OF CONDUCT

For clubs/leagues to be able to take action in respect of a reported concern, they must have in place robust club/league codes of conduct that reflect best practice. These codes should be widely promoted and easily accessible for all club personnel, children, and families.

Codes of conduct should reflect best practice by stating clearly the acceptable behaviours which the club wishes to promote. Specific codes of conduct should be written for coaches/managers, club officials, parents/carers, spectators, players and club members so everyone knows what is expected of them and what will happen if their behaviour falls below the required standard.

FA codes of conduct for all roles can be found [here](#).

Guidance on how to address breaches of the Code of Conduct, including a sample complaints process can be found [here](#)

SELECTION OF PLAYERS

The FA, individual County FAs and clubs/leagues receive many concerns relating to the recruitment and selection of young players each season. To reduce the time spent managing these types of concerns, clubs need to be explicit in their approach to player recruitment, selection, and game time from the outset and communicate this clearly to all parents when they are thinking of joining a club. Clubs should therefore have a clear **Selection and Game Time Statement /Policy** in place that is promoted to potential and existing club members. The statement/policy should be owned by the club and not determined by individual club coaches/managers.

Clubs/leagues should be mindful that The FA promotes football for all and encourages equal game time in youth football, especially for younger age groups, and that the maximum playing time requirements in place are followed when selection policies are being developed.

Note: Complaints around recruitment, selection and playing time should be dealt with internally by clubs in line with the above and would not, on their own, be seen as a lower-level or safeguarding concern.

WHEN TO REFER CONCERNS TO THE COUNTY FA?

Clubs/leagues should ensure that they are actively promoting the reporting processes outlined within this document to provide clarity to all parties about the role of clubs/leagues and the County FA.

The Club/League Welfare Officer (C/LWO) can contact the County FA Safeguarding Team to discuss a lower-level concern and the appropriate course of action they are planning to take if they would like reassurance, or they require further support, or should the concerns develop into a more serious safeguarding matter than was first identified or anticipated.

It would **not** be appropriate for a club/league to manage a concern where:

- **Child/Adult at Risk** is at risk of harm;
- An incident involves a statutory agency (e.g. Police, Social Services, LADO);
- There is a conflict of interest between the club/league and the person subject of the concern;
- The concern has been reported as a discipline matter to the Local County FA.

In these situations the club/league should seek support from the County FA Safeguarding Team as soon as possible to determine an alternative, appropriate investigative process.

INFORMATION-SHARING

Clubs must ensure that any information shared in relation to lower-level concerns is handled lawfully, fairly and securely. Personal data should only be shared where it is necessary for safeguarding purposes, proportionate to the risk, and relevant to the concern being managed. All information sharing must comply with the UK GDPR and Data Protection Act 2018, and should follow the principles of accuracy, confidentiality and "need-to-know" access. Clubs should never share more information than required and must ensure that any data they share with a governing body or external agencies is transmitted and stored securely. These safeguards help protect individuals' privacy while ensuring that safeguarding concerns can be addressed effectively and responsibly.

Clubs/leagues should be aware that under data protection laws an individual has the right to request all of their personal data, which is any information which relates to them (sometimes termed a Subject Access Request or Data Subject Access Request). It is important therefore that all communications are professional in language/tone.

For further detail on this topic, visit the Information Commissioner's Office website: <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/helping-you-find-subject-access-request-resources/>



RETENTION OF RECORDS

Clubs/leagues are required to have in place a process for recording concerns about a child or young person's welfare or safety. Whether the concern records are electronic or paper-based, they should be kept confidential and stored securely, following the principles below:

- Electronic files should be password protected and stored on computers with protection against hackers and viruses.
- If you need to share records (within your own club/league or externally), make sure they are kept confidential and only shared where it's considered necessary or legally required. Use passwords and encryption when sharing electronic files.
- If volunteers use their personal computers to make and store records, you should have guidance and protections in place to ensure the records are being stored securely.
- If the person responsible for managing your child protection records leaves your club/league, make sure you appoint somebody to take over their role and arrange a proper handover (including the full deletion of records from their personal devices).

If concerns have been raised about an adult's behaviour around children, the general rule is that you should keep the records at least until the subject of the allegation reaches their normal retirement age or for 10 years from the date of the allegation, whichever is later.

Clubs/leagues should keep records for the same amount of time regardless of whether the allegations were unfounded.

Information should be retained even if the person stops working or volunteering for the club/league.

SUPPORTING DOCUMENTS

If you have questions about dealing with lower-level concerns within your club/league, you can contact your County FA Designated Safeguarding Officer for support and advice at any stage of an investigation.

To support the implementation of a timely and robust process for managing lower-level concerns all clubs and leagues should have the following policies in place:

1. **Safeguarding policy.**
2. **Anti-bullying policy.**
3. **Complaints procedure.**
4. **Concern/incident Report form.**
5. **Selection and Game Time Statement/Policy (or game-time policy).**
6. **Codes of conduct for all members including coaches, parents and young people.**

It is imperative that clubs and leagues actively promote these policies to club members to ensure understanding of expectations and prompt management of concerns.

The FA provide good practice guidance, resources and templates to support clubs/leagues.

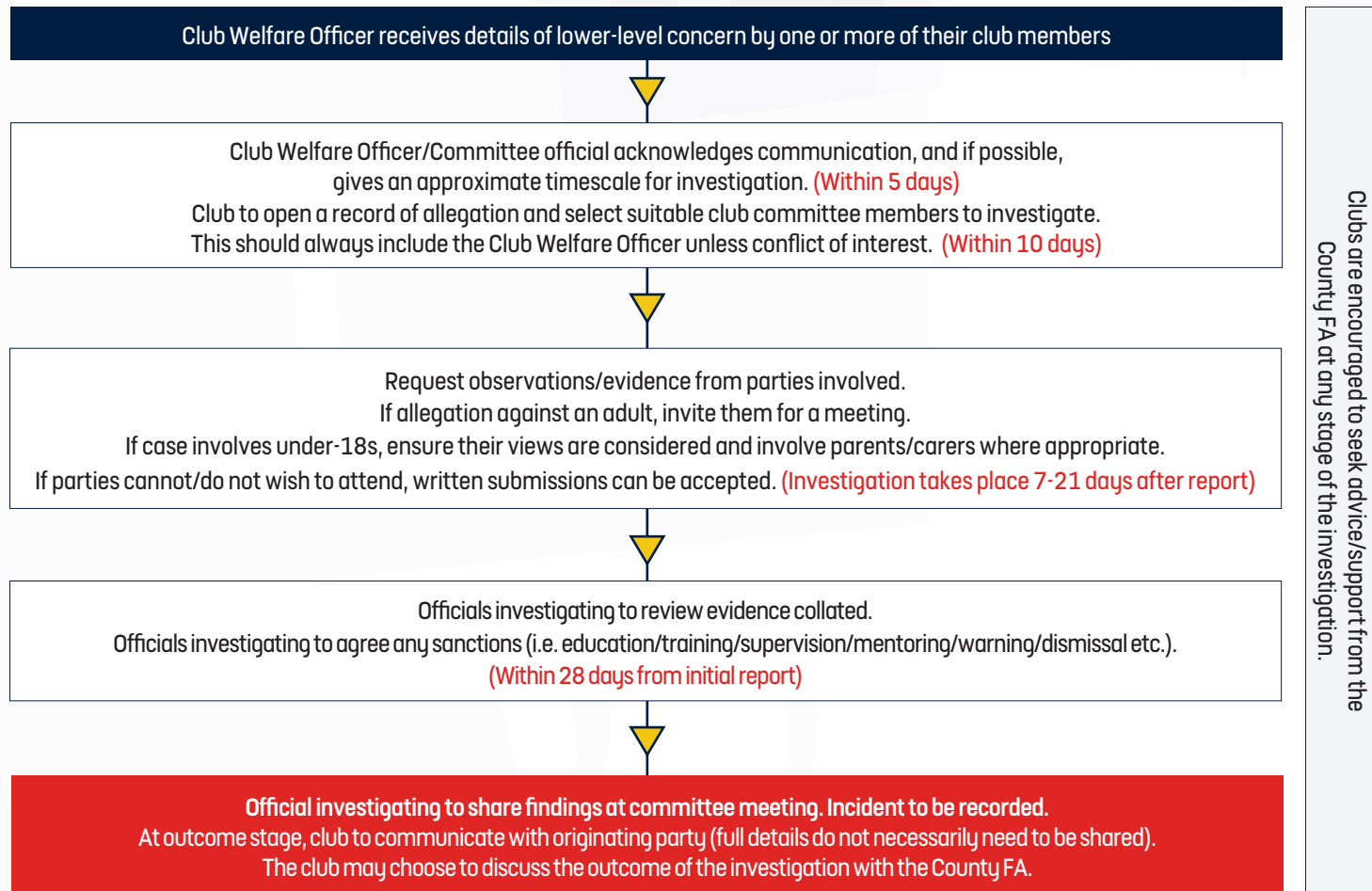
Safeguarding resources and templates can be found [here](#)

Resources and templates related The Grassroots Code can be found [here](#).

Managing lower-level concerns within Clubs and Leagues

APPENDIX 1 – CLUB/LEAGUE CONCERN MANAGEMENT FLOWCHART

Please remember any allegation of abuse must be reported to the Designated Safeguarding Officer at the County FA.



Note: If the expected timeframes outlined in the flowchart are unachievable, it is imperative that this is communicated to the person raising the concern at the earliest opportunity.



APPENDIX 2 – CLUB/LEAGUE LOWER-LEVEL CONCERNS MANAGEMENT CHECKLIST

To support a positive environment that addresses lower-level concerns, clubs/leagues should have the following in place:

- A clearly communicated process for **reporting** concerns for all involved at the club/league – including information for young people.
- A process for **managing** concerns within the club – including clarity on who will support an investigation and agreed timescales for conducting investigations.
- **Knowledge** of who the County FA Designated Safeguarding Officer is and how/when to contact them.
- **Codes of conduct** for all – including club coaches, club officials, parents/carers and players.
- A process for **recording** concerns/incidents.
- A **child-centred** approach which enables young people to have an input into processes and puts the welfare of the child at the forefront of any decision-making.
- A **Safeguarding Policy**.
- An **Anti-Bullying Policy**.
- A **Complaints Procedure**.
- A **Selection and Game Time Statement/Policy**.

APPENDIX 3 – SCENARIOS

1. You receive a concern from a parent about their 12-year-old daughter only receiving 10 minutes playing time each week.

EXAMPLE ACTION REQUIRED

- Concern logged and acknowledged with parent/carer.
- Concern reviewed in line with club policies on recruitment, selection and game time.
- If concern reported is not in line with the club policies, then an investigation should commence to understand the facts and reason behind the concerns raised, i.e. are there any other mitigating aggravating factors or reason for his happening?
- If the concern reported is found to breach the club policy on game time and there are no other factors to consider, then a suitable outcome should be determined and actioned, e.g. potentially for a supported conversation with the parties concerned and mentoring put in place, advice/guidance or instruction given and further monitoring.
- Action taken logged within the club.

2. You receive concerns from a coach who states that he has noticed that another coach at the club (under-10s) is getting increasingly frustrated with some of the children, especially if they're messing around and has been observed kicking a water bottle and heard swearing at them on more than one occasion.

EXAMPLE ACTION REQUIRED

- Concern logged and acknowledged with coach who has reported concerns.
- Club decides who is best placed to lead the investigation avoiding any conflicts of interest.
- Course of action may be discussed with the County FA Safeguarding Team.
- Coach subject of the allegation is invited for a meeting and account taken.
- Names of potential supporting witnesses gathered, and accounts taken – ensuring young people are given the opportunity to share their account where possible/ appropriate.
- Club officials investigating the concerns to review all evidence and suitable outcome determined (based on seriousness, frequency (is this their first lower-level concern?) their acceptance/understanding of their lower-level concern behaviour).

- Appropriate actions taken, e.g. further training, formal warning, mentoring or dismissal.
- At outcome stage, club to communicate with originating party (full details do not necessarily need to be shared).
- The club to inform the County FA Safeguarding Team of the outcome of the investigation where concerns remain around their suitability and/or where there have been two lower-level concerns previously dealt with by the club.

If during the course of the investigation concerns appear more serious than anticipated or the conclusion of the investigation is removal from the role at the club, then this should be reported to the County FA Safeguarding Team immediately.





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