

Allegations of Abuse Against Staff and Low Level Concerns Policy



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Approved/ Ratified:	Pat Hunt
Review Dates:	September 2027

Document Version Control Log

Version	Modification Date	Synopsis of Changes
1.0	September 2025	
2.0	September 2026	Updated with Keeping Children Safe in Education 2026, CPOMS Staffsafe and historical allegations.

Scope

This policy applies to all adults working in or on behalf of Lighthouse Multi Academy Trust, including employees, agency and supply staff, volunteers, governors, trustees, contractors, apprentices, students on placement and any other individual working with children on behalf of the Trust.

For the purposes of the policy, a 'staff member' is a person whose work brings them into contact with children in an education setting.

It applies to all staff who are paid, or anyone working in a voluntary capacity (including supply teachers) on or off Academy premises and sites.

It includes Trustees and Governors who are volunteers. The DfE statutory guidance for managing cases of allegations is set out in 'Keeping Children Safe in Education'.

Aims and principles

The Trustees of the Lighthouse Multi Academy Trust are committed to taking their responsibility of care for its children, young people, and staff seriously. All staff have a responsibility to safeguard and promote the welfare of all children.

The Trust and its academies will ensure that all decisions relating to allegations and low-level concerns are child-centred and based on what is in the best interests of the child. Staff should maintain an attitude of "it could happen here", exercise professional curiosity and act promptly where concerns arise.

All allegations, regardless of the source, made against a member of staff, will be treated seriously by each Academy, Central Team, Governors and Trustees within the Lighthouse Multi Academy Trust.

The management of the allegation will become a clear priority and will be dealt with fairly and consistently to the benefit of all concerned. Any unnecessary delays should be avoided. This policy sets out the procedure to be taken in respect of all cases in which it is alleged that a member of staff or volunteer has:

- Behaved in a way that has harmed a child, or may have harmed a child,
- Possibly committed a criminal offence against or related to a child,
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

It applies regardless of whether the alleged abuse took place in the school. This policy applies regardless of whether the alleged abuse took place within the academy, on Trust business or elsewhere.

Historic Allegations

Allegations relating to incidents that are alleged to have occurred in the past will be taken as seriously as allegations relating to recent events. Where an allegation meets the harm threshold,

the Academy Case Manager will consult with the Local Authority Designated Officer (LADO) to determine the appropriate course of action, regardless of when the alleged incident took place.

Where the individual remains employed by Lighthouse Multi Academy Trust, the allegation will be managed in accordance with this policy, taking account of any police investigation, children's social care involvement and internal employment procedures.

Where the individual no longer works for the Trust or is no longer engaged in regulated activity, the Academy will still report the matter to the police where appropriate and seek advice from the LADO. The Trust will cooperate fully with any enquiries and provide relevant records where legally permitted.

The Academy will notify the Trust using the Trust Notification Form following consultation with the LADO so that appropriate safeguarding advice, guidance and oversight can be provided throughout the management of the case.

Historic allegations will be managed in a child-centred manner, recognising that disclosures of abuse may be made many years after an incident occurred.

Where a historic allegation relates to safeguarding practice in another organisation, the Trust will also consider whether information should be shared with that organisation or any relevant regulatory body where appropriate and lawful.

We will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension

Suspension will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the academy so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the academy so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative Academy within the Lighthouse Multi Academy Trust

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis that supports the allegation being made

Procedures for dealing with allegations

In the event of an allegation that meets the criteria above, the Executive Headteacher or Headteacher will normally act as the Case Manager. Where the allegation concerns the Executive Headteacher/Headteacher or the Central Team, the Chief Executive Officer will act as Case Manager. Where the allegation concerns the Chief Executive Officer, the Chair of Trustees will assume the role of Case Manager.

- Immediately discuss the allegation with the designated officer at the Local Authority. (LADO) This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer– for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- The Academy remains responsible for managing the allegation as Case Manager. The Trust will be notified using the Trust Notification Form once contact has been made with the LADO in order that appropriate advice, guidance and oversight can be provided throughout the process
- The Trust's role is to provide advice, guidance, challenge and safeguarding oversight. Responsibility for managing the allegation, liaising with the LADO and undertaking any internal management action remains with the Academy Case Manager
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of

the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details

- If it is decided that no further action is to be taken regarding the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- Where it is determined that the allegation does not meet the harm threshold or does not require referral to the LADO, the rationale for that decision will be clearly recorded by the Case Manager.
- If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Ensure the individual is advised to contact their professional organisation and offer, if appropriate, any welfare counselling support contact numbers. Inform HR, to support where necessary.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers/support staff (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence) if appropriate.
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

Procedures for Allegations Against Supply Agency Staff

If there are concerns or an allegation is made against someone not directly employed by The Lighthouse Multi Academy Trust, such as supply staff provided by an agency, we will take the additional actions to our standard procedures set out in this policy.

- We will not decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with our Local Authority Designated Officer to determine a suitable outcome.
- The Headteacher/Governing Body/CEO will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, while the school carries out the investigation

- We will involve the agency fully, but the Academy/Trust will take the lead in collecting the necessary information and providing it to the Local Authority Designated Officer as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)
- Agencies will be expected to be fully involved and co-operate with any enquiries from the LADO, police and/or local authority children's social care. Our Multi Academy Trust will usually take the lead because agencies do not have direct access to children or staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process.
- Supply teachers, whilst not employed by the academy or the Multi Academy Trust, are under the supervision, direction and control of the governing body or proprietor whilst working within our academies. They will be advised to contact their trade union representative if they have one, or a colleague for support.

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Trust Governance and Reporting

The Academy Case Manager is responsible for managing allegations in accordance with this policy and statutory guidance. Following consultation with the Local Authority Designated Officer (LADO), the Academy will notify the Trust using Forms through the Lighthouse MAT Landing Page to ensure appropriate safeguarding advice, guidance and oversight.

The Chief Executive Officer and Trust safeguarding lead will maintain oversight of allegations and ensure that appropriate safeguarding procedures are being followed. This oversight does not replace the responsibilities of the Academy Case Manager.

The Board of Trustees will receive safeguarding assurance through regular safeguarding reports. These reports will be appropriately anonymised and will include information on safeguarding trends, allegations, low-level concerns, referrals to the LADO and any emerging themes where appropriate. Individual cases will only be reported to Trustees where necessary to enable them to discharge their statutory governance responsibilities or where the seriousness of the matter requires Board oversight.

Concerns that do not meet the harm threshold

All concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 of part 4 in the document Keeping Children Safe In Education.

Concerns may arise through, for example:

- Suspicion
- Complaint Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern– no matter how small– that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

Examples of such behaviour could include, but are not limited to:

- Being overly 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
- Inappropriate use of social media or digital communication with pupils.
- Misuse of AI or other digital technologies which may place children at risk
- Failure to maintain appropriate professional boundaries when communicating electronically
- Failing to maintain appropriate professional boundaries with pupils or families

Concerns should be recorded as soon as reasonably practicable after the event. Delays in recording can affect the quality of evidence and reduce the Trust's ability to identify emerging patterns of behaviour.

The Trust will undertake appropriate safeguarding oversight of low-level concerns recorded on CPOMS. This oversight is intended to provide advice, support and assurance to academies and does not replace the Headteacher's responsibility for managing the concern.

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust, and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as noted above
- Empowering staff to self-refer

- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in our safeguarding systems
- All low-level concerns will be recorded on CPOMS using the Trust's Low-Level Concern category. Recording concerns centrally supports effective safeguarding oversight, enables patterns of behaviour to be identified and ensures concerns are managed consistently across the Trust.
- Only the Headteacher/Executive Headteacher and authorised Trust safeguarding staff will have access to low-level concern records held on CPOMS. Access will be limited to those with a legitimate safeguarding need to know.

All adults working within or on behalf of the Trust have a responsibility to report concerns about the behaviour of another adult without delay. Staff should never assume that another person has reported a concern or that a concern is too minor to report.

Organisations or Individuals using the academy premises

Our academies may receive an allegation relating to an incident that happened when an individual or organisation were using our premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, our academies should follow their safeguarding policies and procedures, including informing the LADO.

Where safeguarding concerns relate to an individual employed by another organisation, the Academy will ensure that the employer is informed promptly whilst continuing to fulfil its own safeguarding responsibilities.

Responding to low-level concerns

If the concern is raised via a third party, the Executive Headteacher or Headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses The Executive Headteacher or Headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the Lighthouse Multi Academy Trust.

The Headteacher/Executive Headteacher will ensure that the concern is recorded on CPOMS together with all actions taken, the rationale for decisions made and the final outcome.

If, during enquiries, further information indicates that the harm threshold may have been met, the concern will immediately be managed in accordance with the allegations procedures contained within this policy, including consultation with the Local Authority Designated Officer (LADO).

Record keeping

All low-level concerns will be recorded on CPOMS using the Trust's agreed recording procedures. The record will include the nature of the concern, the context in which it arose, the actions taken, discussions held, decisions reached and the rationale for those decisions.

CPOMS records will form the Trust's central safeguarding record for low-level concerns and will enable the identification of recurring themes, repeated behaviours or patterns which may require escalation.

CPOMS records will be reviewed by the Trust as part of safeguarding quality assurance activity to ensure consistency, identify themes and support academy leaders.

Records will be:

- Stored securely within CPOMS, with access restricted to the Headteacher/Executive Headteacher and authorised Trust safeguarding staff only, in accordance with the Data Protection Act 2018, UK GDPR and the Trust's information governance arrangements.
- Reviewed regularly by the Headteacher/Executive Headteacher and Trust safeguarding leads to identify patterns of concerning, problematic or inappropriate behaviour which may indicate that the harm threshold has been met.
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the Designated Officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

References will be provided in accordance with KCSIE and statutory guidance in force at the time they are issued.

For Early Years only

OFSTED will be informed of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations.

This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the Lighthouse Multi Academy Trust is made aware that the Secretary of State for Education has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the Lighthouse Multi Academy Trust will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the Academy's disciplinary process, should this be required at a later point.

Timescales

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, the Lighthouse Multi Academy Trust will institute appropriate action within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, the Lighthouse Multi Academy Trust will hold this within 15 working days

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority designated officer (LADO) whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the academy ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and HR will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If the individual concerned is a member of teaching staff, the case manager and HR will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this. The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the academy.

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the Executive Headteacher or Headteacher, or other appropriate person in the case of an allegation against the Executive

Headteacher or Headteacher, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

Confidentiality

The academy will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The case manager will take advice from the local authority designated officer, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared.
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Information relating to allegations and low-level concerns will only be shared on a strict need-to-know basis and in accordance with safeguarding, employment law and data protection legislation.

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the academy will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.

Where records contain information about allegations of sexual abuse, they will be preserved for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. All other records will be retained at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer. The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

Access to low-level concern records will be restricted to those with a legitimate safeguarding need to know. Information will only be shared more widely where necessary to safeguard children, meet statutory duties or support formal employment processes.

References

When providing employer references, personnel will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning lessons

After any cases where the allegations are substantiated, the Lighthouse Multi Academy Trust will review the circumstances of the case with the Local Authority designated officer and HR to determine whether any improvements can be made to the academy procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. The Lighthouse Multi Academy Trust will consider how future investigations of a similar nature could be carried out without suspending the individual

Learning arising from allegations and low-level concerns will, where appropriate, be shared anonymously across the Trust to strengthen safeguarding practice and reduce the likelihood of similar incidents occurring.

Learning may inform future safeguarding training, policy reviews, supervision arrangements and quality assurance activity across the Trust.

This policy does not form part of the contract of employment. This policy will be kept under review in order to keep it in line with relevant legislation and modifications authorised.



Low Level Concern Form

Low-level concerns should normally be recorded directly on CPOMS using the Trust's agreed Low-Level Concern category. This appendix should only be used where CPOMS is unavailable. Any paper record must be uploaded to CPOMS as soon as reasonably practicable.

The record should be signed, timed and dated.

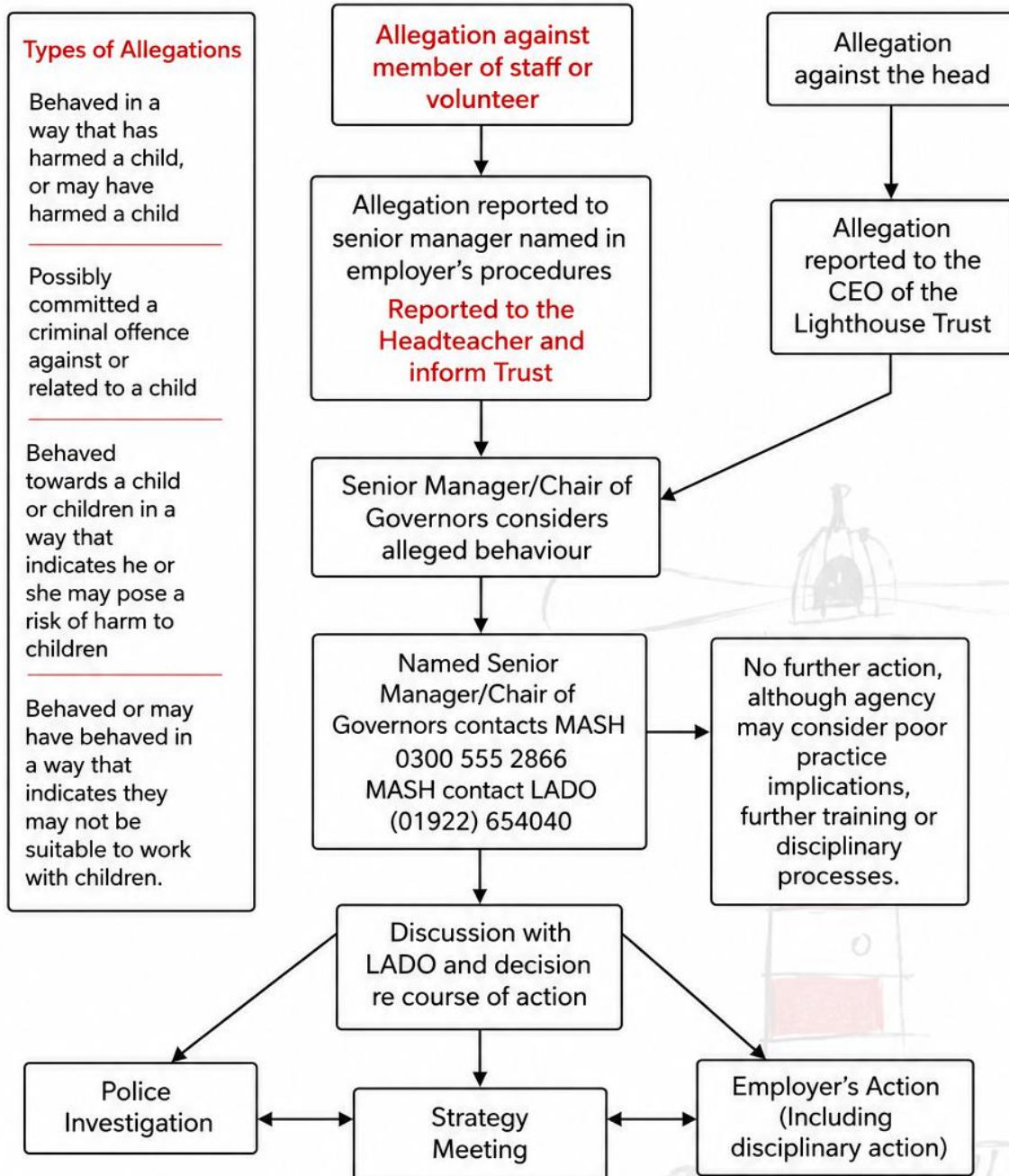
Details of Concern

Name of individual raising the concern: <i>Leave blank if concern was raised anonymously or the individual wishes to remain anonymous</i>	
Date the concern was raised:	
Name and role of individual about whom concern has been raised:	
4. Details of the concern(s) reported (give description and context) <i>A 'low level' concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that is inconsistent with the staff code of conduct but does not meet the allegations threshold set out in Section 1 of Part 4 Keeping Children Safe in Education.</i>	
Signed: Date:	
Headteacher/Executive/Central Team to Complete	
Details of steps have been taken to investigate this concern <i>Steps should include speaking to the individual who raised the concern, the individual about whom the concern is raised and any witnesses. You will need to review the Code of Conduct and safeguarding policies, to determine if there has been a breach.</i>	
Set out the Individual's response to the concern	

7. Is this concern 'low level' or should it be treated as an allegation against staff <i>To reach this decision, consider the information set out in 5 and 6 above. If you are unsure, seek advice from LADO and inform HR. Set out your reasons for reaching your conclusion, including the advice provided by your advisors and any discussions with your LADO.</i>	
8. Have 'low level' or other concerns been raised about this individual previously? <i>If so, please provides dates, brief details, and relevant file/document reference for the concern(s). Also consider whether previous concern(s) raised coupled with this new concern meet the threshold of harm</i>	Yes [] No []
Details of further action required <i>Action could range from no action or a conversation to discuss the concern, to being clear why the behaviour is concerning and formal disciplinary action.</i>	



Managing Allegations Against Staff and Volunteers



Assessment by Children's Services e.g. s47 Child Protection Enquiry



LADO tracks progress, monitors outcomes and reports to Walsall Safeguarding Partnership and DfE