

POLICY

MANAGING ALLEGATIONS POLICY AND PROCEDURES FOR UNIVERSITY COLLEGIATE SCHOOL



November 2024
Review November 2025

CONTENTS

Introduction	5
Duty placed upon Local Safeguarding Children Board	5
Duty placed upon organisations	5
What is an allegation?	5
Principles	5
What do we mean by 'professional'?	5
Who is the procedure for?	5
Key Roles	6
The Process	6
The criteria for referral to the LADO	6
When to contact the LADO	6
Initial considerations with the LADO	6
When immediate action is required	7
Initial Consideration Meetings	7
Professional Strategy Meeting	7
Who attends the meeting?	8
What happens at the meeting?	8
Burden of Proof required	8
Confidentiality	8
Data Protection	8
Information sharing	8
Confidentiality Agreement	8
Requests for minutes of meetings	8
Record Keeping	9
Purpose of records	9
What records should Senior Managers make?	9
What records should the employer keep?	9
What records does the LADO keep?	9
What is included in PSM minutes?	9
How long are records retained?	9
Consideration of Suspension	9
The duty of the employer	10
What should be recorded?	10
Actions on Conclusion of the Case	10
Categorising the Allegation	10
Disciplinary Proceedings	10
Referral to professional/regulatory body or DBS	11
Specialist assessments	11
Lessons learned	11
Challenging Practice	11
Historical Abuse	11
Appendix A Links to Other Documents	12
Appendix B BSCB Contacts	13
Appendix C Process Flowchart	14
Appendix D Managing Allegations: first steps (BSCB)	15
Appendix E Professional Strategy Group	16
Appendix F Guidance for staff attending ICM (BSCB)	17
Appendix G Consideration of Alternatives to Suspension	19
Appendix H Definitions	20
Appendix I Allegations against Teachers and School Staff	22
Appendix K Low level concerns	24

INTRODUCTION

Most adults who work with children act professionally and aim to provide a safe and supportive environment that secures the well-being and very best outcomes for children and young people in their care; however, children can be subjected to abuse by those who work with them in any setting.

It is also the case that some professionals may feel vulnerable to false allegations. The length of time taken to deal with cases, plus the widespread publicity some cases attract can have very damaging effects on children, the adults involved, their families and their carers. It is in everyone's interest to have a rigorous, fair and timely system for dealing with allegations of abuse.

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2024) ,[Working Together to Safeguard Children \(Updated Feb 2024\)](#) [Teachers' Standards \(2012\)](#) and Bolton LSCB Managing Allegations Procedures (2019). This document provides practice guidance for Bolton UCS when allegations are made. It does not replace or take priority over any aspect of employment law and will be used in conjunction with Bolton Safeguarding Children Board procedures. Further guidance can be found here: <https://www.boltonsafeguardingchildren.org.uk/managing-allegations>

1.1 Duty Placed Upon Local Safeguarding Children Boards

The Children Act (2004) places a duty on the [Local Safeguarding Children Board \(LSCB\)](#) to have a clear policy for managing allegations against those who work with children and young people in line with that of the LSCB.

1.2 Duty Placed Upon Organisations

All organisations that provide services for children; or provide staff or volunteers to work with or care for children are required to operate a procedure for handling such allegations and identify a senior manager, in the case of the UCS this is the Headteacher or his/her nominee, to whom all allegations or concerns are reported. The CEO of the Trust will handle the allegations if the Headteacher is the subject of the allegation themselves.

1.3 What is an Allegation?

An allegation may relate to a person who works with children who has:

- Behaved in a way that has harmed, 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 they may pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may be unsuitable to work with children (Working together 2024)

2 PRINCIPLES

UCS believes, as does Bolton Safeguarding Children Board, that the welfare of the child is paramount and that allegations against professionals should be investigated with the same thoroughness as allegations against parents and carers. This is intended as a policy document that complements existing professional procedures, protocols and guidance which relate to specific roles, responsibilities or professional practices. These procedures need to be applied using common sense and reasoned judgement and should be read in conjunction with other Safeguarding- related policies of the UCS ([Appendix A](#)).

2.1 What do we mean by 'professional'?

The term 'professional' is used throughout to refer to people acting on behalf of an agency whether in a paid, professional or voluntary capacity, this includes foster carers.

2.2 Who is the procedure for?

It is important to remember that statutory guidance and legislation relating to managing allegations is directed at the employer, i.e. the UCS Headteacher and CEO of the Trust. It is the employer's duty to adhere to the guidance and to seek the advice of the LADO.

KEY ROLES

Case Manager

Each agency is required to have a Senior Manager at local level or designated Case Manager who is acting on behalf of the most senior manager. In the case of the UCS the Deputy Headteacher will act as Case Manager on behalf of the Headteacher.

Senior Nominated Officer (SNO)

All LSCB member organisations are required to have a named Senior Officer with overall responsibility for ensuring that their organisation operates procedures for dealing with allegations.

In the UCS this will be James Inman, Headteacher. If the allegation is against the Headteacher, the SNO will be Marc Doyle, CEO.

Local Authority Designated Officer (LADO)

Bolton LSCB has in place a LADO who is involved in the management and oversight of individual cases. The LADO provides advice and guidance to the UCS, liaises with the Police and other agencies and monitors the progress of cases to ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process. The LADO role covers any individual working with children in Bolton and from all agencies and sectors.

Child Protection Unit

The Child Protection Unit has officers, who may advise and/or deputise for the LADO in his/her absence.

Bolton Safeguarding Children Board (BSCB)

The BSCB is a statutory partnership responsible for making sure that children and young people in Bolton are safe. BSCB members include representatives from Bolton Council, Health agencies, Police, Probation, local Schools, Academies, Children and Family Court Advisory Support Service (CAFCASS), the faith and voluntary sector. Contacts for BSCP partners can be found at [Appendix B](#).

THE PROCESS

4.1 The Criteria for Referral to LADO

All those involved in the management of allegations are required to be familiar with the process (see [Appendix C](#) for Process Flowchart). All staff should be aware of the 'First Five Minutes' process ([Appendix D](#)) and should **immediately** inform their line manager when a concern arises where an adult working with children may have:

- Behaved in a way that has harmed or may have harmed a child.
- Possibly committed a criminal offence against or related to a child.
- Behaved towards a child in a way that indicates they may 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 (Working together 2024).

The line manager will immediately inform the SNO.

4.2 When to Contact the LADO

The LADO should be informed within one working day of all allegations that come to the attention of the Headteacher, or CEO of the Trust if the allegation is against the Headteacher, which appear to meet the criteria.

4.3 Initial Considerations with the LADO

The LADO should first establish, in discussion with the Headteacher or CEO that the allegation is within the scope of these procedures and may have some foundation. The LADO will where necessary, obtain further details of the allegation and the circumstances in which it was made. Any tasks to gather information such as statements etc. are then under advice from the LADO, who is independent of the organisation and objective. Once all relevant information is gathered the Headteacher or CEO, if the allegation is against the Headteacher, and LADO would consider whether the allegation is, on the balance of probability, false or unfounded and would therefore require only a single agency response i.e. no other agencies need become involved. (See [Appendix D](#) 'First Five Minutes').

Recommendations may be made to the Headteacher or CEO if the allegation is against the Headteacher, at this stage regarding their next steps. All information would be recorded, and the case would be filed as a 'no further action' for the LADO i.e. one that does not require a professional strategy meeting.

4.4 When Immediate Action is Required

Some allegations are so serious as to require immediate referral to Social Care and to the Police for investigation. Others are much less serious, and at first sight may not seem to warrant consideration of a Police investigation or enquiries by Children's Social Care. However, it is important to ensure that even apparently less serious allegations are seen to be followed up, and that they are examined objectively by someone independent of the organisation concerned.

4.5 Initial Consideration Meetings

Occasionally an allegation/concern is referred which is complex in nature and many agencies are involved in providing information, however, it has not been established that the criteria for a professional strategy meeting has been met i.e. it is not known if harm was caused by a particular professional. In simpler cases, as above, this could be resolved by the LADO and employer, however, in complex cases it is beneficial to bring all those who may be able to add information or further investigate the case together. In these cases the LADO may call an 'Initial Consideration Meeting'. This meeting would often be able to establish information, generate discussion and would make recommendation and decisions about who would gather what information. If information is established that the allegation then meets the criteria, a professional strategy meeting would then be called.

4.6 Professional Strategy Meeting (PSM)

A Professional Strategy Meeting will be arranged by the LADO and professionals will be invited who can provide information, in respect of the subject of the allegation or the alleged victim, or may be able to action any recommendations, this would normally include Police, Social Care, Headteacher or Case Manager. In the case of an allegation against the Headteacher this would be the Chair of Trustees. All those invited form part of the Strategy Group (See [Appendix E](#)).

The Strategy Meeting Group (SGM) will be chaired by the LADO and will discuss the allegation and cover the following areas:

- Consider whether a Section 47 Enquiry, Children Act (1989) has been carried out or is required and/or Police investigation and consider the implications.
- Ensure that arrangements are in place to protect the child/ren involved and any other child/ren affected.
- Review any previous concerns or allegations regarding the conduct of the subject of the allegation.
- Consider what support should be provided to all children who may have been affected directly and indirectly.
- Make arrangements to inform the child's parents/carers or the parents/carers of any other children involved and consider how to provide them with support and information during enquiries.

- Consider what support should be provided to the subject of the allegation and others who might have been affected. Where the allegation is against a foster carer independent support should be offered. Where the allegation is for physical contact the group should take into account legislation relating to reasonable restraints and the use of reasonable force.
- Review the case against three criteria:
 - Criminal;
 - Child protection;
 - Disciplinary;
- Consider whether any parallel disciplinary process can take place;
- Determine what information can be shared, with whom and when;
- Make recommendations to the employer, where appropriate, regarding suspension, or alternatives to suspension;
- Agree protocols for reviewing and consider the need to share information with the employer or voluntary organisation;
- Formulate actions in regard to the above.

4.7 Who Attends the Meeting?

This would normally include the Police, Social Care, Headteacher or Case Manager. In the case of the Headteacher this would be CEO. See guidance for staff attending a Professional Strategy Meeting (see Appendix F).

4.8 What Happens at the Meeting?

It is imperative that any child who is the subject of an investigation is interviewed by identified members of the investigation team, in line with BSCB procedures. It is not expected that the professional who is subject of the allegation nor the child/family making the allegation attend the PSM.

4.9 Burden of Proof Required

It is important that all agencies understand that action to protect children or disciplinary proceedings is not dependent upon a Police prosecution (as 'beyond reasonable doubt'). The group will consider all information available on 'the balance of probability'.

5. CONFIDENTIALITY

5.1 Data Protection

Information sharing is vital to safeguarding and protecting the welfare of children and young people. The Data Protection Act (1988) and the Human Rights Act (1998) are the two main legislative frameworks governing how and what and in what circumstances information may be shared.

However, disclosure of any confidential information should always be appropriate for the purpose and only to the extent necessary to achieve that purpose.

5.2 Information Sharing

[Keeping Children Safe in Education DfE \(2023\) Updated May 2024](#) provides guidance for those who have to make decisions about information sharing on a case-by-case basis.

Professional Strategy Meetings are held under strict confidentiality agreements between the group, and the meeting is held on behalf of Bolton Safeguarding Children's Board.

The information being discussed is of a highly confidential nature and reports will not be copied without the prior consent of the author of the report or the Chair. Any information discussed verbally will not be passed onto anybody outside the meeting without first obtaining the permission of the person who provided that information, or the Chair.

5.3 Confidentiality Agreement

All those invited to the PSM will receive minutes, which also carry this confidentiality agreement. All information relating to the subject of the allegation and the alleged victim will be shared at the PSM. Police and Social Care WILL seek permissions to share statements etc., where relevant.

5.4 Requests for Minutes of Meetings

The minutes of the PSM are extremely confidential. Agencies and regulatory bodies may request a copy of the minutes but these may not be shared without the permission of the Chair.

For Disclosure and Barring Services (DBS) purposes this may be requested under Section 40 of the Safeguarding Vulnerable Groups Act (SVGA) (2006) and the SVGA Regulations (2008) and falls within Schedule One. Advice should be first sought from LADO or legal team before sharing.

Where a request is submitted under Subject Access Request under GDPR and the Data Protection Act (1998) or Freedom of Information request to the Local Authority this would not be provided.

A redacted version, prepared by the employer or relevant member of the PSM, may be shared under certain circumstances, only after approval by LADO.

6. RECORD KEEPING

6.1 Purpose of Records

The purpose of keeping records of allegations managed is to enable accurate information to be given in response to future requests for references. It will provide future clarification where DBS disclosures reveal information from the Police about an allegation that did not result in a criminal conviction and it will help prevent unnecessary reinvestigation if, as sometimes happens, an allegation resurfaces after a period of time.

6.2 What Records should Senior Managers Make?

The Case Manager or Headteacher should ensure that a factual account of the allegation is initially recorded, dated and signed. A chronology of events initiated, and key information should be identified.

6.3 What Records should the Employer Keep?

It is important that the Headteacher, or CEO, in the case of allegations against the Headteacher, keep a clear and comprehensive summary of any allegations made, details of how the allegations were followed up and resolved and of any action taken and decisions reached. These should be kept in the subject's confidential personnel file and a copy given to them.

6.4 What Records does the LADO Keep?

The LADO should keep an accurate record of all referral discussions, recommendations made and any outcome's which are resolved at Initial Consideration Stage (i.e. resolved by a single agency without the need for a PSM). The LADO records and retains all relevant information on behalf of BSCB.

6.5 What is Included in PSM Minutes?

For all Professional Strategy meetings, a comprehensive set of minutes is produced. The minutes will include a record of discussions, together with professional opinions, events leading to the allegation, with context of any incidents and a clear rationale for decisions and recommendations made. The LADO case file should record actions taken and final outcomes.

Following the meeting, the LADO will forward the draft minutes to all attendees, who should provide any amendments within 14 days from the date on which the minutes were sent. If amendments are not received within 14 days, it will be assumed that the minutes are approved.

The LADO will confirm that the minutes have been finalised, whereupon all agencies/individuals in possession of the draft minutes will destroy and/or delete the same.

The final approved minutes will be retained by the LADO only. Agencies/Individuals in attendance at the meeting may retain a copy of the Decisions and Recommendations only.

6.6 How Long are Records Retained?

Records should be retained at least until the subject has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer. The LADO should report managing allegations data to BSCB quarterly and annually. This includes identifying themes and making recommendations to further safeguard children.

7. CONSIDERATION OF SUSPENSION

The possible risk of harm to children posed by the subject of an allegation should be evaluated and managed in respect of the child/ren involved in the allegations. In some cases that will require the Headteacher or Case Manager to consider suspending the subject of the allegation until the case is resolved.

In cases where the UCS is made aware that the Secretary of State has made an interim prohibition order in respect of an individual at the school or college, it will be necessary to immediately suspend that person from teaching pending the findings of the Teaching Regulation Agency investigation.

However, suspension must not be an automatic response. Suspension should be considered only in a case:

- Where there is cause to suspect a child or other children is/are at risk of significant harm.
- The case is so serious that it might be grounds for dismissal.

A person should not be suspended automatically. The Headteacher or Case Manager must consider carefully whether the circumstances warrant suspension from contact with children or until the allegation is resolved and may wish to seek advice from their personnel adviser and the LADO. The PSM will seek advice from the Police and Social Care colleagues; however, the group can only make recommendations. The decision to suspend the Headteacher lies with the CEO.

7.1 Duty of Employer

The Headteacher or CEO, in the case of allegations against the Headteacher should also consider whether the result that would be achieved by immediate suspension could be obtained by alternative arrangements. (See Appendix G).

7.2 What should be Recorded?

If immediate suspension is considered necessary, the rationale and justification for such a course of action should be agreed and recorded by both Headteacher or Case Manager or CEO, in the case of allegations against the Headteacher, and the LADO. This should also include what alternatives to suspension have been considered and why they were rejected.

8 ACTIONS ON CONCLUSION OF THE CASE

Whilst guidance urges that cases are resolved as quickly as possible, some cases which require protracted Police investigation and /or Court proceedings can become lengthy. The LADO should review the case at regular intervals and update the group on any progress. It is vital therefore that the group has access to all information and are involved/informed of the resolution of the case. The group or LADO may make recommendations to support the subject of the allegation should they return to work from any suspension.

8.1 Categorising the Allegation

The Professional Strategy Group will be asked to consider and give a rationale to categorise the allegation as:

- Substantiated;
- False;
- Malicious;
- Unfounded;
- Unsubstantiated. (See Appendix H for definitions of categories)

It is not the role of the LADO to make decisions but the PSG as a whole to make recommendations relating to the case.

8.2 Disciplinary Proceedings

Any Police investigation would normally take precedent and the LADO will liaise with the Police to ensure that any disciplinary does not breach rules of sub-judice (see [Appendix H](#)).

The LADO would seek Police consent to run parallel proceedings where possible. The LADO would seek permissions for the Police to share information with disciplinary hearings.

8.3 Referral to Professional/Regulatory body or DBS

The UCS has a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult; where the harm test is satisfied in respect of that individual; where the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence; and that the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

The DBS will consider whether to bar the person. Referrals should be made as soon as possible after the resignation or removal of the individual.

8.4 Specialist Assessments

Very rarely a specialist assessment is required of an adult's behaviour which is deemed inappropriate and would be commissioned by the UCS in order to assess any risk posed to children.

8.5 Lessons Learned

At the conclusion of a case, the LADO will review the circumstances with the UCS. This is to determine whether there are any improvements to be made to procedures or practice to help prevent similar events or allegations in the future. This would also include consideration of suspension, whether this was justified, and whether any lessons can be learned for future practice.

9 CHALLENGING PRACTICE

The managing allegations process and the role of the LADO is statutory within WT2023 and sits within the BSCB framework.

Information under these procedures is gathered on behalf of and retained by the BSCB; information is given voluntarily and is retained by the agencies and professionals providing it.

Any complaints regarding the conduct of an individual should be referred to the relevant agency.

In the event the subject or any Professional wishes to complain in relation to either the process or the outcome of any Professional Strategy Meeting, the complaint should be referred in writing, in the first instance, to Head of Service, Child Protection Unit, Westhoughton Town Hall. Complaints should be made within 6 months of the date of the Professional Strategy meeting. The Head of Service of Child Protection Until will investigate the complaint and if necessary escalate the matter to the Chair of Bolton Safeguarding Children Board, who will Review the process followed and/or the outcome of any Professional Strategy Meeting. The Chair may take the following action:

- (i) Arrange for any meeting to be re-convened in order that consideration may be given as to

- whether the process has been followed.
- (ii) Arrange for any meeting to be re-convened in order that any decision may be further considered and if appropriate a different outcome substituted.

10 Historical Abuse

Historical allegations should be responded to in the same way as contemporary concerns. In these cases, it is important to find out if the subject of the allegation is still working with children, in a paid or voluntary role. Often historical allegations are complex and require protracted Police and/or Social Care investigations.

This policy has been reviewed with due regard to the Equality Act 2010 and approved by Trustees during the Autumn Term 2024.

Signed by: C Pailing
Chair of Trustees

APPENDIX A

Links to Other Documents

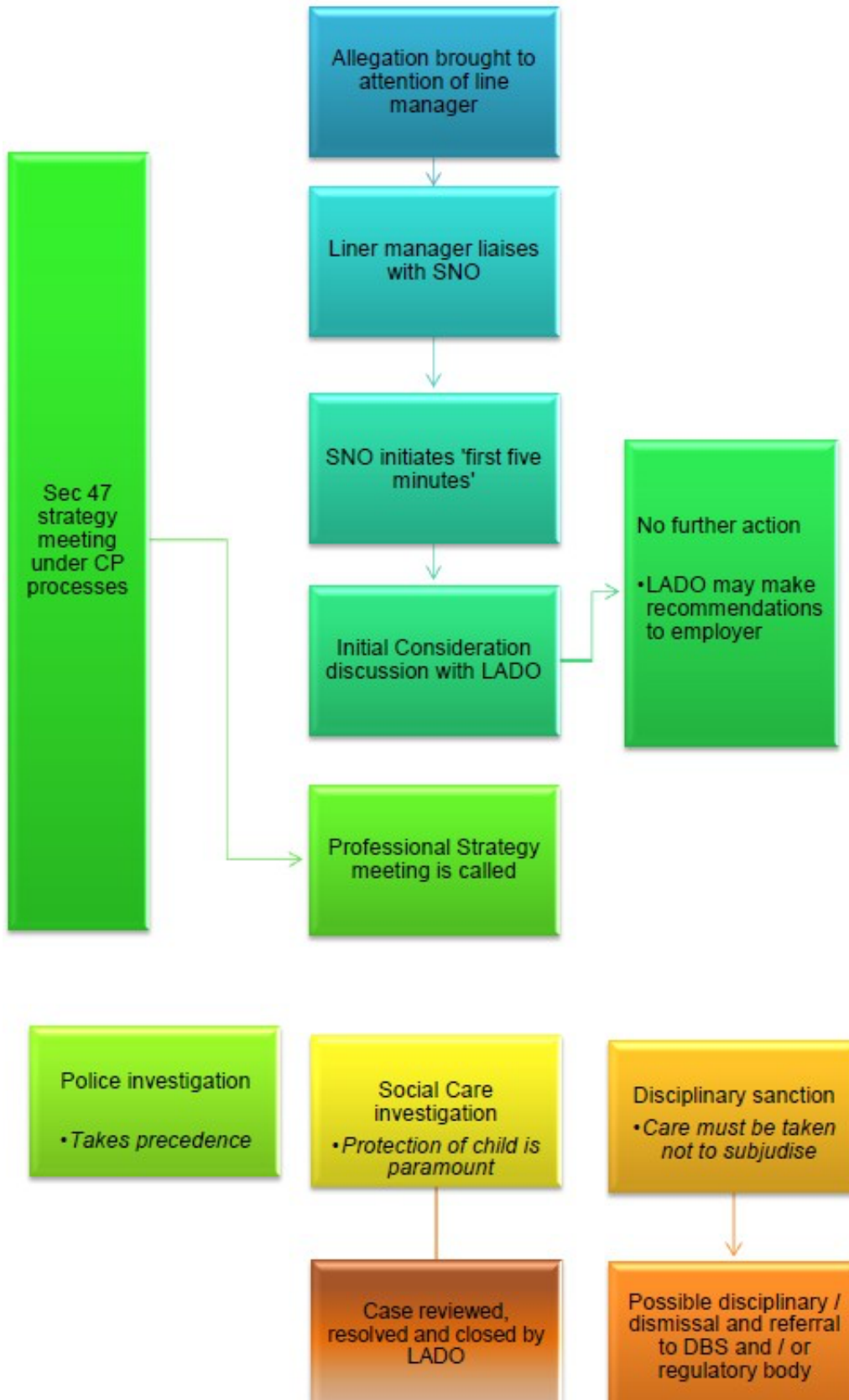
1. [Working Together to Safeguard Children \(Updated 2024\)](#)
2. [Keeping Children Safe in Education \(2024\)](#)
3. [Bolton Safeguarding Children Board Procedures and Protocols](#)
4. [The Children Act \(2004\)](#)
5. [Education Act \(2011\)](#)
6. [Information Sharing: guidance for practitioners and managers \(2018\)](#)
7. [Disclosure and Barring Service](#)
8. UCS Safeguarding, Child Protection and Early Help Policy (2024)

APPENDIX B
BSCB Contacts

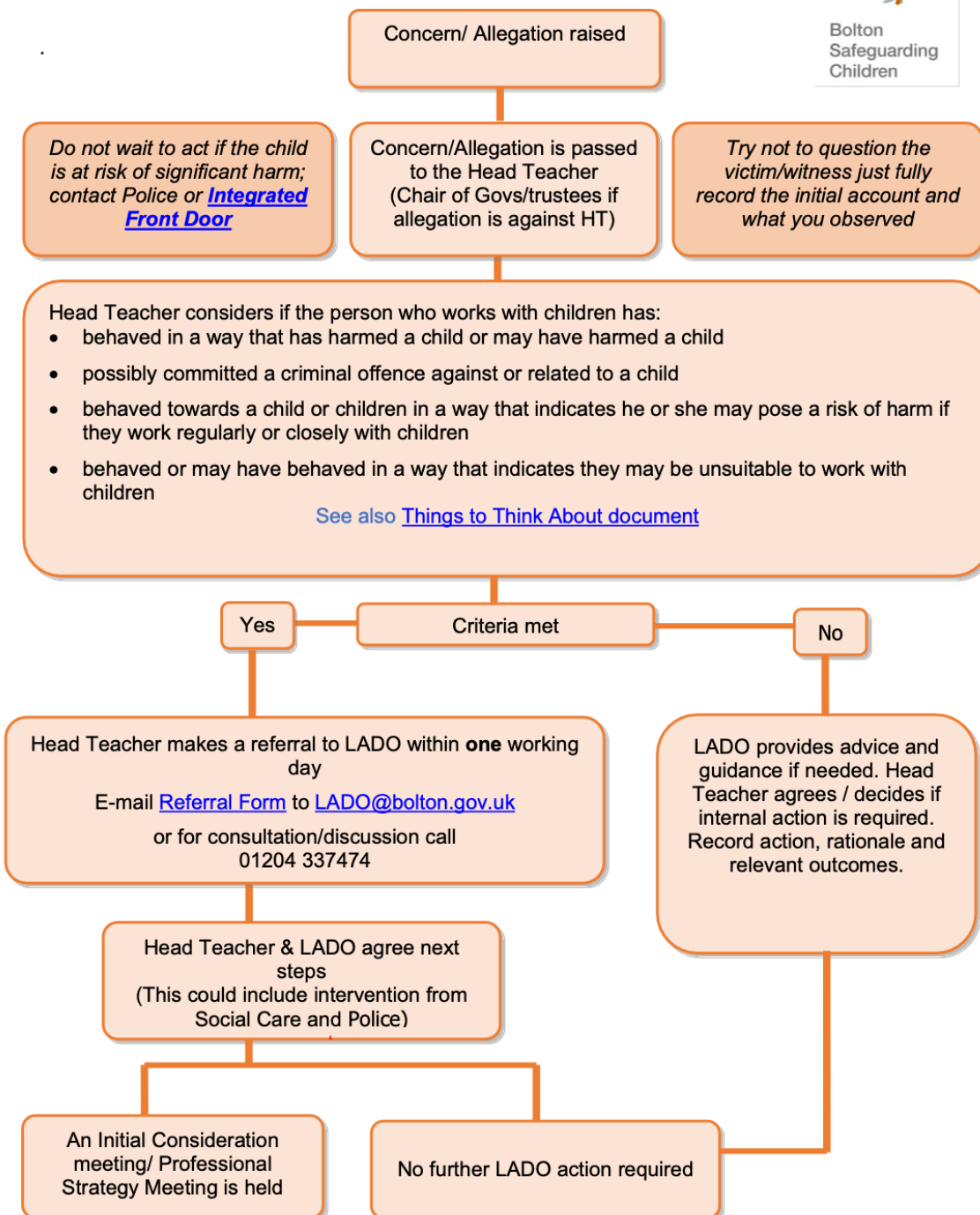
Key Agency	Role	Contact
LADO	Lisa Kelly, LADO Child Protection Bolton Safeguarding Children Board	01204 337474
Bolton Referral and Assessment Teams		01204 331500
Bolton Children’s Services	Head of Service Child Protection Unit	01204 337470
Bolton Integrated Front Door	Castle Hill Centre, Castleton Street, Bolton	01204 337408 01204 331505
Bolton Council of Mosques- Bolton Together		07341089467
Greater Manchester Police	Public Protection and Investigations Unit (PPIU)	0161 8567949

Process Flowchart

Appendix C



**Managing Professional Allegations
 Local Authority Designated Officer (LADO)
 'First Steps' (for schools & colleges)**



Bolton LADO - Lisa Kelly
 01204 337474 LADO@bolton.gov.uk
[LADO Webpage](#)



APPENDIX E

The Professional Strategy Group

The LADO considers which professionals, agencies, employers and regulators to invite to the Professional Strategy Group and takes advice on who would be able to bring information to the meeting and /or action any recommendations and further support the process. These would make up the Professional Strategy Group.





Managing Professional Allegations (LADO)



Guidance for staff attending an Initial Consideration meeting or Professional Strategy meeting

The vast majority of adults who work with children act professionally and aim to provide a safe and supportive environment that secures the wellbeing and very best outcomes for children and young people in their care; however children can be subjected to abuse by those who work with them in any and every setting.

We also know that some professionals may feel vulnerable to false allegations. The length of time taken to deal with cases, plus the widespread publicity some cases attract can have very damaging effects on children, the adults involved, their families and their carers. It is in everyone's interest to have a rigorous, fair and timely system for dealing with allegations of abuse.

Occasionally an allegation may be so serious that child protection concerns will need to be addressed by a Section 47 enquiry by police and social services prior to an Initial Consideration or Professional Strategy meeting.

When might an Initial Consideration Meeting (ICM) be convened?

Sometimes, it is not clear whether a situation meets LADO threshold and it is necessary to call a multidisciplinary meeting to consider this. Often during an ICM, it is agreed that the LADO threshold is met and the status of the meeting changes to a Professional Strategy meeting.

What happens at a Professional Strategy meeting (PSM)?

The Strategy Meeting Group will discuss the allegation and cover the following areas:-

- Review the case against three criteria: criminal, disciplinary or Child Protection.
- Review any previous concerns or allegations regarding the conduct of the accused person.
- Consider whether a Section 47 Enquiry (Children Act 1989) has been carried out or is required and/or police investigation and consider the implications.
- Consider whether any parallel disciplinary process should take place.
- Determine what information can be shared, with whom and when.
- Ensure that arrangements are in place to protect the child/ren involved and any other child/ren affected.
- Consider what support should be provided to all children who may have been affected directly and indirectly.
- Make arrangements to inform the child's parents/carers or the parents/carers of any other children involved, and consider how to provide them with support and information during enquiries.
- Make recommendations, where appropriate, regarding suspension, or alternatives to suspension.



- Agree protocols for reviewing and consider the need to share the statements and evidence with the employer or voluntary organisation.
- Consider what support should be provided to the subject of the allegation and others who might have been affected.
- Formulate actions in regards to the above

Checklist for staff attending an Initial Consideration or Professional Strategy meeting

If you are invited to attend one of these meetings in respect of the subject of the allegation or the alleged victim, you will be part of a multi-disciplinary professional group. This checklist is aimed to assist and offer support about what information to provide when invited to an Initial Consideration or Professional Strategy meeting. It is important that attendees are able to participate fully.

	Ask yourself	X / ✓
	Am I able to bring along relevant information?	
	Am I able to action or feedback tasks?	
	Is this person known to my service?	
	Am I familiar with the case notes?	
	Do I feel there may be a conflict of interest? Do I know the subject personally/work closely with the subject?	
	Has a section 47 enquiry been carried out? Is one required prior to the Professional Strategy meeting?	
	If you can please bring along (where appropriate):	
1	Name, address, DOB of alleged victim(s)	
2	Name, address, DOB of subject(s)	
3	Chronology of recent events	
4	What you know about the incident	
5	What you know about the victim	
6	What you know about the subject(s) of the allegation	
7	Any record/ notes of interviews	
8	Any record/ notes of assessments	
9	Historical information about the alleged victim	
10	Historical information about the subject(s) of the allegation	

LADO can be contacted on LADO@bolton.gov.uk

Tel: (01204) 337474



APPENDIX G

Consideration of Alternative to Suspension Name:

Date:

Alternatives discussed with and advice sought from:

Recommendation made:

To:

Date/Time:

Re-deployment within the UCS 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:

Re-deploying to alternative work so the individual does not have unsupervised access to children:

Moving the child or children to a place where they will not come into contact with the member of staff, making it clear that this is not a punishment and parents/carers have been consulted:

Temporarily redeploying the member of staff to another role in a different location eg. to an alternative school or college or work for the Local Authority.

#

APPENDIX H

Definitions

Adult:

Refers to anyone who has attained the age of 18 years and who is employed on a paid or unpaid voluntary basis or contracted to work with or on behalf of children and young people.

Allegation:

Information which comes to light which suggests an employee, volunteer or contractor may have behaved in a way that has harmed, or may have harmed, a child, possibly committed a criminal offence against or related to a child or behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

BCSB:

Bolton Safeguarding Children Board.

Case Manager:

This term was introduced by the 'Dealing with Allegations against Teachers and School Staff' Guidance (2012). It is used throughout this policy to describe the senior manager nominated by the employer to manage an allegation on their behalf.

Children and Young People:

These terms refer to children who have not yet reached their 18th birthday.

DBS Disclosure and Barring Service:

Previously ISA and CRB which combined in December 2012.

Employer:

Refers to the organisation which employs, contracts, uses services of or in the absence of an employer the regulatory body. **In this policy QUEST is the employer.**

LADO:

Local Authority Designated Officer for managing allegations against those who work with children in Bolton.

PPIU:

Public Protection and Investigations Unit (Police).

Professional:

The term professional is used throughout to refer to people acting on behalf of an agency whether in a paid, professional or voluntary capacity, this includes foster carers.

PSG:

Professional Strategy Group.

PSM:

Professional Strategy Meeting.

Redacted:

To edit or revise something in preparation for publication.

Regulatory Body:

Body who is responsible for the regulation of an organisation or profession such as Ofsted, Charities Commission.

Safeguarding Children:

The action we take to promote the welfare of children and protect them from harm.

Sub Judice:

Under judicial consideration and therefore prohibited from public discussion elsewhere.

Categories of Allegations:

Substantiated - There is sufficient identifiable evidence to prove the allegation.

False - There is sufficient evidence to disprove the allegation.

Malicious - There is clear evidence to prove there has been a deliberate act to deceive and the allegation is entirely false.

Unfounded - There is no evidence or proper basis which supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the incident or was mistaken about what they saw. Alternatively, they may not have been aware of all the circumstances.

Unsubstantiated - This is not the same as a false allegation. It means that there is insufficient evidence to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.



Managing Professional Allegations (LADO)



Things to think about before making a LADO referral/contacting the LADO.....

A reminder about the four LADO Criteria:

That someone who works with children may have:

- Behaved in a way that has harmed, or may have harmed a child
- Possibly committed a criminal offence against children, or related to a child
- Behaved towards a child or children in a way that indicates they may pose a risk to children
- Behaved or may have behaved in a way that indicates they may be unsuitable to work with children

(‘Working Together to Safeguard Children’ – 2018 – Chapter 2:Section 4)

[Working Together to Safeguard Children 2018 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69026/working-together-to-safeguard-children-2018.pdf)

You are **strongly** encouraged to make contact with the LADO if you are uncertain about a situation or wish to seek some advice. However, it is important that managers who have lead responsibility for Safeguarding ensure that they spend time considering the issues and risks when they are concerned about the behaviour of an adult who works with children and young people, before a referral or contact is made. Safeguarding Leads/managers should make an initial evaluation – whenever possible – as to whether the concern **could** meet one of the four LADO criteria outlined above. It may assist you to think about the points below prior to contacting the LADO or submitting a referral. Not all the points will be relevant to your situation and there may be additional things to think about:

1. Has there been some basic fact finding to understand what has happened and who was involved? Do you have sufficient understanding of the situation?
2. Without unduly pressing the child/young person for information, do you have a basic idea of what the child/young person is saying?
3. Could it be helpful to consult a Human Resources advisor to discuss the situation and gather their view on risk/harm? Have there been previous concerns about the person against whom an allegation is made?
4. If it is appropriate to do so, do you need to consult your line manager and establish their view about evidence of risk/harm?
5. Is the child/young person at immediate risk of harm? Is there a need to refer to Police or/and Social Care first?

If after considering the points above, you are still concerned or are uncertain as to whether you should be concerned, *please* contact the LADO.



Consulting the LADO

If you want to discuss a case but don't think there is necessarily evidence of harm you do not have to share non-relevant personal details of the professional involved. Personal details would only be required if there is need for LADO involvement. Following discussion of the situation, we may conclude that the threshold for LADO involvement has not been met. However, you may find it helpful to consider these questions in relation to the presenting concern prior to consulting the LADO:

1. What *specifically* is happening that is causing you concern? What has triggered your concern?
2. Is this something you've been concerned about in the past? Is there something that causes this concern to recur? Is there a pattern emerging?
3. If things don't change, are you worried about what could happen in the future?
4. Are there any relevant challenges/vulnerabilities for the child or/and member of staff?
5. What are the strengths/positives for the child and/or staff member?

You may have some additional points to consider which are relevant to your situation, but hopefully the above questions are a starting point.

LADO can be contacted on LADO@bolton.gov.uk

Tel: (01204) 337474



Dealing with Allegations against Teachers and School Staff

Clarification of actions regarding references.

What information can and should be retained and by whom.

Category Recorded	HR/ Personnel Files	References	LADO/CPU Files	Sanctions which can be applied to student	
Substantiated	A clear and comprehensive summary of the allegation, how this was followed up and resolved, what action was taken and how this was resolved	Should appear	All allegations should be recorded and retained for 25 years		
Unsubstantiated		Should not appear			
Unfounded		Should not appear			
False		Should not appear			
Malicious	Should not appear	Should not appear			May consider whether disciplinary action is appropriate (if this appears in Behaviour Policy)
Record Keeping	All allegations should be recorded and retained for 25 years				

Appendix K

Concerns that do not meet the harm threshold

This section of the policy has been reviewed with due regard to the Equality Act 2010, Keeping Children Safe in Education 2023 and approved by Trustees during the Spring Term 2024. Governing body Boards and proprietors should have policies and processes to deal with concerns (including allegations) which do not meet the harm threshold set out above. Concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

This process has been developed to manage and record any such concerns and take appropriate action to safeguard children within our schools.

Low Level Concerns

As part of our approach to safeguarding, we will ensure that we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the schools (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

QUEST schools should create a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately. These policies should encourage an open and transparent culture; enable the Headteacher/DSLs to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of our schools are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the Trust – see Safeguarding, Child Protection and Early Help Policy and Staff Code of Conduct.

What is a low-level concern?

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out in sections 424-430 of [KCSIE 2024](#) and as detailed within this policy.

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 working in or on behalf of the school or college 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 LADO.

Examples of such behaviour could 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, where this would not normally be a regular expectation as part of the individual's role, for example, as a School Counsellor.
- using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. It is crucial that any such concerns, including those which do not meet the harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of our Trust from potential false allegations or misunderstandings.

Staff code of conduct and safeguarding policies

The information contained within this policy sits alongside the staff code of conduct, behaviour and safeguarding policies. Together these documents outline the expected high level of professional behaviour required by employees and ensures that appropriate action is taken, in a timely manner, to safeguard children and facilitate a trust-wide approach to dealing with any concerns.

This will be achieved by:

- ensuring their 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 safeguarding concerns.
- 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; and,
- helping identify any weakness in the school safeguarding system.

Sharing Low Level Concern

Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported following the procedures below. Reports regarding supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

QUEST schools will create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Recording low-level concerns

All low-level concerns should be recorded in writing – see [Appendix A](#). The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Any recorded allegations should be held in the school's safeguarding file/staff personnel file. This will ensure that it is held securely to comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

All concerns should be discussed with the Trust's DCEO and records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO.

Consideration should also be given to whether there are wider cultural issues within our organisation that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again.

The information will be retained while the member of staff remains in employment with the Trust and until the person's normal retirement age or 10 years from the date of the concern whichever is the longer, in line with the retention of safeguarding records.

References

We will only provide substantiated safeguarding allegations within references. Low level concerns will not be included unless they relate to issues which would normally be included in a reference and are appropriate to do so under employment law policies, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

Responding to low-level concerns

It is important to respond to all reports of low-level concerns. If the concern has been raised via a third party, the Headteacher should collect as much evidence as possible (unless the allegation concerns the Headteacher then the Whistleblowing policy should be followed) by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously.
- to the individual involved and any witnesses.

The Headteacher should acknowledge the concern in writing. Any written particulars should be quality assured by the Trust's BDD Department, alongside any required information regarding retaining and sharing this information.

The information collected will help the Headteacher to categorise the type of behaviour and determine what further action may need to be taken. All this needs to be recorded along with the rationale for their decisions and action taken.

The [General Data Protection Regulations 2018](#) allows even the most personal data and information to be shared in order to safeguard children. All low-level concerns should be shared with the CEO, Chief Finance Officer and DCEO to reduce any potential risk posed by an individual, both within and across settings within Quest Trust.

More detailed guidance and case studies on low-level concerns can be found in [Developing and Implementing a low-level Concerns Policy](#) (farrer.co.uk).



Low-level Concern Report

Name of Staff Member	Address	School

Date	Concern

Signed: _____ Date: _____

Print Name: _____

Action Taken by DSL

Signed (DSL)	Date:
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