Education Learning Trust Multi Academy Trust

Safeguarding Concerns and Allegations made about Staff, Supply Staff, Contractors and Volunteers policy

2026/2027

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1. Introduction

1.1 The Trust takes the safeguarding of its pupils very seriously and recognises that it is extremely important that any safeguarding concerns or allegations made against a member of staff, supply staff, contractors or volunteers is managed quickly and effectively. It is also important that low level safeguarding concerns are recognised and reported so behaviours can be appropriately managed.

1.2 This policy sets out how the Trust will manage safeguarding concerns and allegations made about a member of staff, supply staff, contractors or volunteers at our Trust schools, together with allegations relating to incidents that happened when an individual, or organisation was using any of the Trust premises for the purposes of running activities for children. It meets the requirements of the Department for Education statutory guidance for managing allegations set out in Part 4 of Keeping Children Safe in Education 2026.

1.3 This policy is set out in two parts.

The first part deals with allegations made against members of staff, including supply staff, contractors or volunteers together with allegations relating to incidents that happened when an individual, or organisation was using any of the Trust premises for the purposes of running activities for children.

The second part deals with low level concerns raised in relation to members of staff, including supply staff, contractors or volunteers.

2. Part One: Managing allegations made against members of staff, supply staff, contractors, or volunteers

2.1 This part of the policy will be followed when managing such allegations and may be adapted to each case as required. Whilst it will be used in all cases, Part 4 of Keeping Children Safe in Education 2026. requires that it is followed in any case where it is suspected or alleged that a member of staff, including, supply staff, contractors or a volunteer has:

- behaved in a way that has harmed a child or may have harmed a child (see the ELT safeguarding and child protection policy for what is meant by 'harm');
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates that 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

2.2 The fourth bullet point above includes behaviour that may have happened outside the Trust that might make an individual unsuitable to work with children. This is known as transferable risk.

2.3 This policy will be also be used where allegations are made relating to incidents that happened when an individual, or organisation was using the Trust premises for the purposes of running activities for children.

2.4 This policy will be used alongside the ELT Complaints Policy and Safeguarding and Child Protection policies, all of which can be accessed from the respective School/Trust websites, and on the 'Every Compliance' documents matrix.

3. Reporting an allegation

3.1 The safety and welfare of pupils is of paramount importance therefore all staff must report their allegations immediately.

3.2 Allegations made against a member of staff, supply staff, contractors or a volunteer should be reported to the Headteacher/Principal. If the allegation is against the Headteacher/Principal, the CEO of the Trust should be contacted and they should then liaise with the Chair of Trustees immediately who will seek advice from the Local Authority Designated Officer (LADO). If the allegation is against both Headteacher/Principal and Chair, then the CEO and Chair of Trustees should be contacted directly who will contact the LADO. If the allegation is against the CEO or a member of the Trust Executive Team, the Chair of Trustees should be contacted directly. The Headteacher/Principal/CEO, or Trustee contacting the LADO will then act as the case manager.

3.3 In the event that a member of staff receives, or becomes aware of, an allegation, their sole responsibility is to report it immediately to the Headteacher/Principal, CEO, or Chair of the Trust. Under no circumstances should the staff member attempt to investigate the matter themselves or engage in any discussion with the individual against whom the allegation has been made. Where appropriate, professionals may choose to contact the Local Authority Designated Officer (LADO) directly.

3.4 When an allegation is made, the Headteacher/Principal/CEO/Trustee will consider two aspects:

- looking after the welfare of the child
- investigating and supporting the person subject to the allegation

3.5 In each case, the Headteacher/Principal/CEO/Trustee will:

- apply common sense and judgement
- deal with allegations quickly, fairly and consistently
- provide effective protection for the child and support the person subject to the allegation

3.5 Before contacting the LADO, the HeadTeacher/Principal/CEO/Trustee should conduct basic enquiries in line with local procedures to establish the facts and to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. For example, whether:

- the individual was in the school at the time of the allegations
- the individual did or could have come into contact with the child
- there were any witnesses, and
- there is any CCTV footage

3.6 The HeadTeacher/Principal/CEO/Trustee will contact the LADO and an initial discussion will take place to consider the nature, content and context of the allegation and agree a course of action. The Designated Safeguarding Lead may also be involved in this discussion. This discussion may include that:

- no further action is required
- more information is required to determine a course of action
- a strategy discussion should take place
- police or social care should be involved

3.7 The School/Trust will share relevant information with the LADO about the allegation, the child, and the person against whom the allegation has been made. If it is decided that a strategy discussion should take place because there is cause to suspect a child is suffering, or is likely to suffer significant harm, then the School/Trust will always attend that meeting. Representatives from other agencies such as health, social care and police may also be invited to the meeting.

3.8 Where an allegation is made, or becomes known to the School/Trust relating to incidents that happened when an individual, or organisation was using any of the Trust premises for the purposes of running activities for children, the HeadTeacher/Principal/CEO/Trustee will inform the LADO in accordance with paragraph 3.7 of this policy.

4. Investigating an allegation

4.1 An investigation into the allegation should normally be undertaken by a senior member of the school's leadership team, as appointed by either the HeadTeacher/Principal, the CEO or Chair of Trustees. Where no suitable staff are available, or the nature or complexity of the allegation requires it, the School/Trust may appoint an independent investigator.

4.2 When determining the outcome of an investigation, Part 4 of Keeping Children Safe in Education 2026 states that the following definitions should be used when determining the outcome of the investigation:

- **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 or cause harm to the to the person subject to the allegation

- **False:** there is sufficient evidence to disprove the allegation

- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence

- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

4.3 In no circumstances would the School/Trust cease to use a member of supply staff due to safeguarding concerns without finding out the facts and liaising with the LADO to determine a suitable outcome. Whilst the School/Trust is not the employer of supply teachers, we will ensure allegations are dealt with properly and involve the supply staff agency in the process.

5. Supporting those involved

5.1 Parents/carers of the child(ren) involved

5.1.1 Parents or carers of the child involved will be informed of the allegation if they do not already know of it. Where a strategy discussion is required, or police or children's social care need to be involved, the school/Trust will not tell the parents or carers until it has been agreed with those agencies what information can be shared.

5.1.2 The school will keep parents or carers informed about the progress of the investigation. Parents and carers will be reminded of the legal restrictions regarding the publication of information about allegations made against teachers during the course of an investigation. In accordance with Section 141F of the Education Act 2002, there must be no reporting that could lead to the identification of a teacher who is the subject of an allegation while the allegation is being investigated. Where there is no criminal prosecution the school will tell parents or carers the outcome of the investigation. The deliberations of any disciplinary hearing, and the information considered in reaching a decision, will not normally be disclosed but the parents or carers of the child will usually be told the outcome **in confidence**.

5.2 The member of staff or volunteer

5.2.1 The school has a duty of care to its employees and will act to minimise the stress inherent in the investigation process.

5.2.2 The person who is the subject of the allegation will be informed as soon as possible, usually after the initial discussion with the LADO. The person will be advised of the likely course of action unless the police or children's social care raise an objection. In those circumstances the school will work with children's social care and the police to agree what information can be disclosed and when.

5.2.3 The HeadTeacher/Principal/CEO/Trustee (as appropriate) will appoint a named representative as a Contact Officer to keep the person who is the subject of the allegation informed of the progress of the case and up to date on other school related matters. The Headteacher/Principal/CEO/Trustee (as appropriate) will also consider what other support may be appropriate for the individual. The school will advise the individual to contact their

trade union representative, or a colleague for support. They will also be given access to support services provided by the Trust.

5.2.4 The person who is the subject of the allegation will be advised to contact their trade union representative, or a colleague for support.

5.2.5 Where an allegation is made against a member of supply staff, the supply agency should provide an additional support to that member of supply staff.

6. Suspension

6.1 Suspension is not an automatic response to an allegation being made. The school will only suspend a member of staff following careful consideration of whether there is cause to suspect the child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In many cases, it may be possible for alternative arrangements to be made so that the individual can continue working.

6.2 The decision to suspend any person employed by the Trust must first be reviewed by the CEO.

6.3 The decision to suspend an employee can be made according to the Trust's Scheme of Delegation. The lines of authority are the same as those for dismissal.

6.4 Where the police or children's social care are involved in the case, the school will listen to their views regarding suspension.

6.5 The School/Trust has no authority or jurisdiction to suspend a member of supply staff where an allegation is made against them. Instead, ELT will immediately cease to use the services of that member of supply staff.

6.6 Where the member of staff is suspended, they will receive written confirmation within one working day *(dependent on the timeline of suspension)* and will be informed of the reason for the suspension.

6.7 Suspension of this kind is not a disciplinary penalty and does not imply that any decision has already been made about the allegations. Employees will continue to receive normal salary and benefits during the period of suspension.

6.8 After the suspension, if it is decided that the employee can return to the school, measures will be put in place to support their return to work. This could include a phased return or offering another member of staff as a support system.

7. The Role of a Contact Officer

7.1 Where an allegation is made against a member of staff, a Contact Officer will be appointed to provide support to the employee throughout the process. The Contact Officer plays a key role in offering personal and professional support while maintaining a position of neutrality.

7.2 The responsibilities of the Contact Officer include:

Providing Emotional and Practical Support:

- Acting as a named point of contact for the employee to help reduce feelings of isolation and stress during the investigation

Clarifying Processes:

- Offering general information about the procedure being followed, including the expected stages and timelines. The Contact Officer will not give legal or procedural advice.

Maintaining Confidentiality:

- Ensuring that all conversations with the employee remain confidential unless disclosure is required by safeguarding protocols or legal obligation.

Signposting to Additional Support:

- Directing the employee to further sources of support, such as occupational health services, counselling, trade unions, or employee assistance programmes.

Liaising Where Appropriate:

- Facilitating appropriate communication between the employee and the School/Trust (e.g., regarding suspension arrangements or access to professional advice), without discussing the details of the allegation or investigation.

Remaining Impartial:

- The Contact Officer must remain neutral and must not act as an advocate for the employee or become involved in any aspect of the investigation.

At the outset, the Contact Officer and employee will agree on the preferred method of communication (e.g., email, phone) and the frequency of contact, to ensure consistent and supportive engagement. The Contact Officer's role is supportive, not advisory or representative. They are not responsible for the outcome of the investigation or any decisions made as part of the process.

8. Resignation

8.1 If the individual resigns or the supply staff member, contractor or volunteer ceases to provide their service, the investigation into the allegation will still be followed up and completed. The individual will be given the opportunity to engage with the investigation.

9. Action on conclusion of the case

9.1 If the allegation is substantiated and:

- the employee is dismissed or resigns
- the School/Trust ceases to use the supply staff member's services as a result of the

allegation

- the School/Trust ceases to use the contractor's services as a result of the allegation
- the School/Trust ceases to use the volunteer's services as a result of the allegation

the school will consider whether a referral to the DBS and/or to the TRA is required.

9.2 Where an allegation is found to be false, the school may refer the case to children's social services to determine whether the child needs support and/or to understand if there is a safeguarding reason why the false allegation was made.

9.3 The School's Behaviour Policy sets out the action that may be taken against individuals who are found to have made malicious allegations.

9.4 Where an allegation is made against a member of supply staff, the outcome of the investigation will be shared with the supply agency and the LADO.

10. Post incident review

10.1 It is good safeguarding practice for schools to review incidents upon their conclusion so they can learn from them and continue to improve standards of safeguarding. Where allegations are made against staff, supply staff, contractors or volunteers, the school may carry out a review at the conclusion of the case.

11. Timescales

10.1 Investigations into allegations against staff, including agency staff or volunteers will be concluded as quickly and efficiently as possible to ensure that any risks to the child or other children and stress to the individual is minimised as far as possible.

11. Record keeping

11.1 Allegations found to be false or malicious will be removed from the employment record of the individual. For all other allegations, a clear and comprehensive summary of the allegation, how it was followed up and resolved, a note of actions taken and decisions reached and a declaration on whether the information will be referred to in any future reference will be retained on the employment file. A copy will also be provided to the individual.

11.2 The record will be kept, including for people who leave ELT, at least until the person reaches normal pension age or for 10 years if that will be longer, from the date of the allegation.

11.3 Details of any allegation made by a pupil will be kept in the confidential section of their record.

12. Confidentiality

12.1 The school will make every effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated.

12.2 The Education Act 2002 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher in a school who has been accused by, or on behalf of, a pupil from the same school. This applies to parents and carers as well as the press.

13. Non-recent allegations

13.1 Where an adult makes an allegation to the School/Trust that they were abused as a child, that adult will be advised to report the allegation to the police.

13.2 Non-recent allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations.

14. Part Two: Managing low level concerns

14.1 This part of the policy will be followed when dealing with low level concerns raised in relation to members of staff, including supply staff, contractors or volunteers and may be adapted to each case as required. It will be used alongside the ELT's/Schools **Complaints Policy, Safeguarding and Child Protection Policy, Code of Conduct and Disciplinary Policy.**

14.2 ELT promotes a culture in which all concerns about all adults working in or on behalf of the Trust (including supply teachers, contractors and volunteers) are addressed appropriately.

14.3 This policy is designed to:

- promote and support a culture of openness and trust where staff are clear about the behaviours expected of themselves and their colleagues;
- ensure staff are comfortable to raise low-level concerns; and
- provide for efficient and proportionate handling of those concerns

15. Recognising low level concerns

15.1 This policy will be used to manage 'low-level' concerns, defined in Part 4 of Keeping Children Safe in Education 2026 as 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 Trust Staff Code of Conduct, including inappropriate conduct outside of work
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the Local Authority Designated Officer (LADO)

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

- being over friendly with children
- having favourites

- taking photographs of children on their personal mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- humiliating children

16. Sharing low level concerns

16.1 For the ELT culture of openness and trust to prevail, all staff should share any low level concerns they have. Serious Case Reviews and Safeguarding Practice Reviews have often evidenced how low level concerns expressed by staff relating to individuals, who were later found to have sexually abused children at a school, were not recorded. When they are not recorded, they cannot be reviewed, or studied for patterns of behaviour.

16.2 To minimise and hopefully eradicate the risk of those opportunities being missed, it is critical that staff understand their role in identifying and reporting low level concerns.

16.3 All staff are encouraged to immediately report low level safeguarding concerns as defined in this policy so that the identified behaviours can be investigated and managed appropriately.

16.4 All low level concerns in relation to staff, supply staff, contractors or volunteers should be reported immediately to the Headteacher/Principal/CEO or may initially be shared with the DSL who will inform the Headteacher/Principal (where the concern is not about the Headteacher/Principal) in a timely fashion according to the nature of each particular low-level concern. If the concern is in relation to the Headteacher/Principal, the CEO should be contacted and they will liaise with the Chair of Trustees. If the concern is in relation to both Headteacher/Principal or CEO, then the Chair of Trust should be contacted directly. If the concern is in relation to the CEO or a member of the Trust Executive Team, the Chair of Trustees should be contacted directly.

16.5 The procedure for reporting low level concerns is consistent with that for reporting allegations of abuse as set out in part one of this policy. Staff do not need to determine whether their concern meets the threshold set out in part one of this policy or is a low level concern. The Headteacher/Principal or CEO/Trustee (as appropriate) will make this determination once the staff member has reported the issue.

17. Responding to low-level concerns

17.1 The HeadTeacher/Principal or CEO/Trustee (as appropriate) will review the concern to confirm that it is not a more serious issue that should be dealt with under part one of this policy. An issue reported as a low level concern would be dealt under part one of this policy where it meets the threshold set out in part one or there is a pattern of low level concerns expressed about the individual or wider staff practices generally. If necessary, the HeadTeacher/Principal or CEO/Trustees (as appropriate) will discuss the concern with the LADO to determine whether it should be dealt with under part one of this policy.

17.2 The HeadTeacher/Principal or CEO/Trustee (as appropriate) will discuss the concern with the individual who raised it and will investigate it as appropriate.

17.3 Most low-level concerns are likely to be minor and can be dealt with by means of management support or additional training. Where necessary, action may be taken in accordance with the Trust's Code of Conduct and the Trust Disciplinary Procedure.

17.4 If the concern has been raised via a third party, the HeadTeacher/Principal or CEO/Trustee (as appropriate) will collect evidence by speaking directly to the person who raised the concern (unless it has been raised anonymously), the individual involved and any witnesses.

17.5 Where a low level concern is raised about a member of supply staff, or a contractor, the concern will be shared with the supply agency so they can take appropriate steps in accordance with their own policies and statutory guidance.

18. Recording low-level concerns

18.1 All low-level concerns will be recorded in writing and will include details of the concern, the context and action taken. The records will be kept confidential and held securely in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation.

18.2 Records of low-level concerns will be reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified. If patterns are identified, the School/Trust will decide on an appropriate course of action and will refer the matter to the LADO where the behaviour moves from a concern to meeting the threshold set out in the first part of this policy.

The record of the low-level concern will be kept at least until the person leaves the School/Trust.

19. References

19.1 Low level safeguarding concerns will not be included in references except where they have met the threshold for referral to the LADO and found to be substantiated, in which case they should be referred to in references.

Appendix 1 - Low Level Concerns Form

This document should be used when 'low level' concerns are defined in Section 2 of Part 4 of Keeping Children Safe in Education 2026 are reported. This document not replace suspension/formal disciplinary investigations in the event that concerns are either categorised as more serious than low level, or when formal disciplinary procedures are required in relation to the

low level concern.

1. Name of individual raising the concern ***Leave blank if concern was raised anonymously or the individual wishes to remain anonymous***	
2. Date the concern was raised	
3. Name and role of individual about whom the concern has been raised	
4. Details of the concern(s) reported (give description and context) ***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.***	
5. Details of steps that have been taken to investigate this concern ***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 Trust Code of Conduct and safeguarding policies to determine if there has been a breach.***	
6. 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 and	

managed in accordance with Section 1 of Part 4? ***To reach this decision, consider the information set out in 5 and 6 above. If you are unsure, seek advice from HR and/or safeguarding advisors and/or discuss the matter with your LADO. Set out your reasons for reaching your conclusion, including the advice provided by your advisors and any discussions with your LADO***		
7. Have 'low level' or other concerns been raised about this individual previously? ***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 set out in Section 1 of Part 4.***	**Yes** ☐ ☐	
Details of further action required ***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.***		
Completed by:	**Name**	
	Position	