



**EVERYTHING
EDUCATION**

ALLEGATIONS AGAINST STAFF POLICY

Including Low-Level Concerns | 2026–2027

OWNERSHIP	Everything Education School
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Everything Education School | Birmingham

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1.0 Purpose, scope and legal framework

Everything Education School is committed to safeguarding children while ensuring that concerns or allegations about adults are handled promptly, fairly, consistently and in accordance with statutory guidance and local safeguarding procedures.

This policy applies to all adults working in or on behalf of the school in a paid or unpaid capacity, including employees, supply staff, trainee teachers, agency workers, volunteers, contractors and proprietors.

It should be read alongside the Safeguarding and Child Protection Policy, Staff Code of Conduct, Whistleblowing Policy, Safer Recruitment procedures, Disciplinary Policy and Data Protection arrangements.

The principal framework is Keeping Children Safe in Education (KCSIE) 2026, particularly Part Four, together with Working Together to Safeguard Children, the Education (Independent School Standards) Regulations 2014, the Children Act 1989 and 2004, the Safeguarding Vulnerable Groups Act 2006, the Data Protection Act 2018 and UK GDPR.

2.0 Immediate reporting routes

All concerns about an adult's conduct must be reported without delay, however small the concern may appear. Staff must not investigate the matter themselves or promise confidentiality to a child or other person raising the concern.

- Concerns or allegations about a member of staff, supply teacher, trainee teacher, volunteer or contractor must be reported to the Headteacher, M Hussain.
- Where the concern or allegation is about the Headteacher, it must be reported to the Chair of the proprietor body or another proprietor who is not implicated.
- Where the Headteacher is also the sole proprietor, or there is a conflict of interest in reporting to the Headteacher or proprietor, the concern must be reported directly to the Local Authority Designated Officer (LADO).
- If there is immediate risk to a child, staff should take immediate safeguarding action and contact emergency services where necessary, while also informing the DSL, Alexander Lee.

Birmingham LADO contact: 0121 675 1669 | ladoteam@birminghamchildrenstrust.co.uk. Where there is doubt about whether the harm threshold is met, the school will seek LADO advice.

3.0 Section 1 – concerns or allegations that may meet the harm threshold

The harm-threshold procedure applies where it is alleged that an adult working in or on behalf of the school 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 they may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children, including conduct outside school.

A case manager will be identified at the earliest opportunity. Ordinarily this will be the Headteacher. If the allegation concerns the Headteacher, the case manager will be the Chair of the proprietor body or another proprietor not implicated. The case manager will work with the LADO and, where relevant, police, children's social care and appropriate employment/HR advisers.

3.1 Initial action

1. Ensure the immediate safety and welfare of the child or children concerned and make any necessary safeguarding referral.
2. Conduct only such basic enquiries as are necessary to establish the facts and determine whether there is any foundation to the allegation, without compromising a police or social care investigation.
3. Contact the LADO promptly and agree the next steps, including whether police or children's social care involvement is required.
4. Agree with the LADO and other agencies what information may be shared with the person who is the subject of the allegation, the child and parents/carers.

5. Make a clear contemporaneous record of the concern, decisions, advice received, actions and rationale.

4.0 Managing an allegation and suspension

4.1 Support and information

The school will provide effective support to the person who is the subject of an allegation and will identify a named contact to keep them informed, subject to any restrictions agreed with the LADO, police or children's social care. The child and family will also be supported and kept appropriately informed.

4.2 Suspension

Suspension is not the default response. It will be considered only where there is cause to suspect that a child or other children are at risk of harm, or where the allegation is so serious that there may be grounds for dismissal and no reasonable alternative will adequately manage the risk.

Before suspension, the case manager will consider proportionate alternatives, which may include:

- redeployment so there is no direct contact with the child or children concerned;
- additional supervision or another adult being present;
- alternative duties that do not involve unsupervised access to children;
- adjusting arrangements so that the child and adult do not come into contact, ensuring the child is not made to feel punished; or
- temporary redeployment to another role or location where appropriate.

If suspension is used, the rationale and alternatives considered will be recorded. Written confirmation will be provided promptly, and the arrangement will be kept under regular review.

4.3 Investigation and timescales

The school will seek to resolve allegations as quickly as possible while allowing a fair and thorough process. Any indicative timescales will be agreed with the LADO and relevant agencies; statutory or agency investigations take priority over internal disciplinary processes where necessary.

5.0 Outcomes, action and referrals

The outcome of an allegation will be recorded using the following definitions:

Outcome	Meaning
Substantiated	There is sufficient evidence to prove the allegation.
Malicious	There is sufficient evidence to disprove the allegation and evidence of a deliberate act to deceive or cause harm.
False	There is sufficient evidence to disprove the allegation.
Unsubstantiated	There is insufficient evidence to prove or disprove the allegation; this does not imply guilt or innocence.
Unfounded	There is no evidence or proper basis supporting the allegation.

5.1 Action at the conclusion of a case

The case manager will agree next steps with the LADO. This may include no further action, internal management action, disciplinary action, dismissal, ending the use of services, referral to the Disclosure and Barring Service (DBS), referral to the Teaching Regulation Agency (where relevant), or other safeguarding action.

A resignation, ceasing to provide services or a settlement agreement will not prevent the school from completing the safeguarding process. Where the legal threshold for a DBS referral is met, the school will make the referral even if the person has resigned or the school has stopped using their services.

Where an allegation is found to be deliberately invented or malicious, the school will consider appropriate action. This will never be used to deter a child or adult from raising a genuine safeguarding concern.

6.0 Supply teachers, contractors, volunteers and agency staff

Where the person is not directly employed by Everything Education School, the school will not simply cease to use their services without establishing the facts and liaising with the LADO. The school will take the lead in collecting the information required for the safeguarding process and will involve the employing agency or organisation fully.

- The agency/employer will be notified promptly and invited to participate as appropriate.
- The school and agency/employer will share relevant information lawfully, including previous concerns where appropriate.
- Decisions about suspension or redeployment will be discussed with the agency/employer and informed by LADO advice.
- Where the legal threshold is met, the appropriate organisation will make the DBS referral; the school will ensure that this responsibility is clear and completed.

7.0 Confidentiality, records, references and learning lessons

7.1 Confidentiality and information sharing

The school will make every reasonable effort to maintain confidentiality and guard against unwanted publicity while an allegation is being considered or investigated. Information will be shared on a need-to-know basis in accordance with safeguarding requirements and data protection law. The case manager will take advice from the LADO, police and children's social care where appropriate.

7.2 Record keeping

For allegations that meet the harm threshold, the school will keep a clear and comprehensive summary, details of how the matter was followed up and resolved, decisions and actions taken, the outcome, and whether information should be referred to in a future reference. Records will be kept securely on the individual's confidential personnel file in accordance with KCSIE and data protection requirements.

Records of allegations found to be malicious or false will be removed from the personnel file unless there is a lawful reason and agreement to retain them. Other allegation records will be retained at least until the individual reaches normal pension age or for 10 years from the date of the allegation, whichever is longer, subject to current statutory guidance.

7.3 References

Employer references will not include allegations that were found to be false, unfounded, unsubstantiated or malicious. Substantiated safeguarding allegations may be included where appropriate, with factual and accurate information. Low-level concerns will not normally be included unless they have met the LADO threshold and been substantiated, or concern matters that would ordinarily be included in a reference, such as misconduct or poor performance.

7.4 Learning lessons

At the conclusion of a case, the Headteacher/proprietor will review the circumstances with the LADO where appropriate and identify any improvements to practice, culture, supervision, safer recruitment, staff training, risk assessment, suspension decisions or safeguarding systems. Learning will be acted on and recorded.

8.0 Non-recent allegations

Abuse can be reported no matter how long ago it occurred. Non-recent allegations made by a child will be referred to the LADO in line with local procedures. Where an adult reports that they were abused as a child, the school will support them to report the matter to the police and will seek safeguarding advice where appropriate.

9.0 Section 2 – low-level concerns

9.1 Definition

A low-level concern is any concern, no matter how small and even if it causes only a sense of unease or a “nagging doubt”, 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 work; and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples may include being overly friendly with children, favouritism, taking photographs on a personal device contrary to policy, one-to-one contact in a secluded area or behind a closed door without justification, humiliating pupils, or other conduct that appears inconsistent with professional boundaries.

9.2 Reporting and self-referral

Everything Education School promotes a culture of openness, trust and transparency. Staff are expected to report low-level concerns about others and are encouraged to self-refer where they recognise that their own conduct may have fallen below expected standards. Concerns should be shared with the Headteacher; concerns about the Headteacher should be shared with the Chair/proprietor or, where there is a conflict, directly with the LADO.

9.3 Responding to low-level concerns

The Headteacher will gather sufficient information to understand the concern, including speaking with the person who raised it (unless anonymous), the individual concerned and relevant witnesses where appropriate. The Headteacher will determine whether the behaviour is a low-level concern, should be managed under another procedure, or may meet the harm threshold and therefore requires LADO consultation.

Responses will be proportionate and may include clarification of expectations, advice, supervision, training, management guidance, disciplinary action where appropriate, or safeguarding escalation. Alexander Lee, DSL, may be consulted where this assists safeguarding decision-making, but the Headteacher remains responsible for the management decision unless conflicted.

9.4 Low-level concern records and patterns

All low-level concerns will be recorded in writing, including the context, action taken, decisions made and rationale. Records will be kept confidentially and securely in accordance with the Data Protection Act 2018 and UK GDPR, reviewed for patterns and retained at least until the individual leaves employment, or longer where justified by applicable policy or legal requirements.

Where a pattern of concerning, problematic or inappropriate behaviour is identified, the school will consider whether disciplinary action, additional support or LADO referral is required. For supply staff or contractors, the individual's employer will be informed so that patterns across settings can be identified.

10.0 Monitoring, training and review

The Headteacher and proprietor body will monitor implementation of this policy and ensure that all staff understand how to report allegations and low-level concerns. Staff will receive safeguarding induction and updates consistent with KCSIE 2026. The policy will be reviewed at least annually and sooner following significant statutory change, local safeguarding advice, a serious incident or identified learning.

The DSL for 2026–2027 is Alexander Lee. This policy should operate alongside the school's Safeguarding and Child Protection Policy and Staff Code of Conduct.

Appendix 1 – Quick response flowchart

Step	Action	Required response
1	Concern about an adult	Report immediately. Do not investigate yourself.
2	Who receives it?	Headteacher. If about Headteacher: Chair/proprietor. If conflict/sole proprietor: LADO directly.
3	Immediate danger?	Protect the child, contact emergency services if needed, and alert DSL.
4	Threshold decision	If harm threshold may be met or there is doubt, consult Birmingham LADO promptly.
5	Low-level concern	Record, assess proportionately, review for patterns and escalate if threshold is crossed.
6	Outcome	Record decisions and rationale; complete any DBS/TRA/disciplinary or safeguarding action required.

Birmingham LADO: 0121 675 1669 | ladoteam@birminghamchildrenstrust.co.uk