

St Margaret Mary's Catholic Junior School

Allegations Management Policy for Knowsley Schools and Education Settings

September 2026

Education Safeguarding Officer

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Useful contacts and links

Agency/service		Link or contact information
NSPCC	Reporting Historic Abuse	Non-recent abuse | NSPCC
Knowsley LADO	Local Authority Designated Officer **Safeguarding and Quality Assurance (Children)**	Diane Kitcher LADOinbox@knowsley.gov.uk 07385420432
School Safeguarding Knowsley		Schoolsafeguarding@knowsley.gov.uk
DBS	A person satisfies the harm test if they may harm a child or vulnerable adult or put them at risk of harm. It is something a person may do to cause harm or pose a risk of harm to a child or vulnerable adult.	The Harm Test
DBS	Advice about when employers and volunteer managers can make a barring referral to the Disclosure and Barring Service (DBS).	DBS Referral Guidance
DBS		DBS Online Referral Form
Education Improvement	Education Safeguarding Officer	Vicki Clements 0151 443 2969

		Vicki.clements@knowsley.gov.uk

Introduction

All schools and education settings have a duty to promote and safeguard the welfare of children in their care.

All staff members in school are made aware and reminded of this policy as part of their induction. As part of the annual safeguarding training staff will be asked to revisit this policy and refresh their awareness and understanding, this may be recorded as part of the annual Section 175 audit.

The procedure documented within this policy **must** be followed in any case where there is an allegation made about a teacher, supply staff member, or other member of staff, volunteers or contractors at the school and,

- allegations **may** meet the harms threshold
- allegations/concerns that do **not meet** the harms threshold- referred to in Keeping Children Safe in Education, 2026 as 'low level concerns.'

For the purpose of this policy and procedure guidance, allegations that may meet the Harm Threshold are covered in **Part One,** and those not meeting the Harm Threshold, referred to in Keeping Children Safe in Education, 2026 as 'low level concerns', are covered in **Part Two** of this document.

How concerns arise

Concerns about possible abuse of children by staff will usually arise in one of two ways, either,

- a direct allegation by a pupil or third party, for example a parent
- an observation by a member of staff that the behaviour of a colleague is inappropriate or potentially or actually abusive.

In either case the concern **must** be recorded and reported to the Head Teacher immediately unless the allegations are about the Head Teacher, in which case, it **must** be reported to the Chair of Governors, or equivalent in Multi Academy Trusts. Contact details of the Chair of Governors will be available via the school office. If the Head Teacher is absent, the allegation, will be reported to the teacher in charge.

As this is a **statutory duty**, the expectation is that all members of staff in school, when they have concerns, will report them in accordance with this policy.

Staff should also consider the school child protection procedures and if a child has been harmed a referral should be made into the Multi Agency Safeguarding Hub (MASH) and, where necessary, the police.

Once an allegation is made, the Allegations Management Process should be followed. (See Allegations Management Process flow chart **Appendix 1)**

1. Part One Levels of Concern

Allegations that meet the harm threshold

Governing bodies and proprietors should ensure there are procedures in place to manage concerns/allegations, against staff (including volunteers) that might indicate they would pose a risk of harm to children. The Harm Test

Para 434

Behaved in a way that has harmed a child, or may have harmed a child and/or

Possibly committed a criminal offence against or related to a child, and/or

Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or

Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Keeping

The last bullet point includes behaviour that may have happened outside of school or college, that may indicate an individual is unsuitable to work with children. This is known as Transferrable Risk. An assessment of transferable risk to children, with whom the person works, should be undertaken where appropriate. If in doubt seek advice from the local authority designated officer. (LADO)

This applies to members of staff, supply staff, trainee teachers, volunteers, and contractors who are currently working in any school regardless of whether the current setting is where the alleged abuse took place.

1.1 Initial Action following an allegation where a child has been harmed.

Should the school identify a child has been harmed, or that there may be an immediate risk of harm to a child or if the situation is an emergency, they should contact children's social care via Knowsley MASH 0151 443 2600, and as appropriate the Knowsley Vulnerable Persons Unit (VPU) in the police immediately.

The Head Teacher or Chair of Governors will ensure that they have a full understanding of the nature of the allegation using the template initial record of concern sheet (see **Appendix 2**)

Following an allegation, the Head Teacher or Chair of Governors will ensure that they give consideration to;

- **Looking after the welfare of the child -**The Designated Safeguarding lead (or deputy) will be responsible for ensuring the child is not at risk and referring cases of suspected abuse to Knowsley MASH
- **Investigating and supporting the person subject to the allegation-** The Head Teacher/ Chair of Governors should discuss the case with the LADO, including the nature, content, and context of the allegation, and agree a course of action.

In order to proceed the Head Teacher / Chair of Governors must have a full understanding of the nature of the allegation made by a member of staff or third party, only speaking to the child if it is unavoidable or it is the child making the allegation.

Para. 440

When dealing with allegations, schools and colleges should:

• apply common sense and judgement

• deal with allegations quickly, fairly and consistently, and

• provide effective protection for the child and support the person subject to the allegation.

Those schools that purchase the Knowsley Schools Safeguarding Service Level Agreement (SLA) may choose to seek advice and support from the Local Authority Education Safeguarding Officer.

No one in the school should investigate the incident. Interviewing either, those directly involved or any witnesses, as this could jeopardise any future police investigation and potentially prejudice a fair hearing at a later date.

Before contacting the **LADO**, The Head Teacher or Chair of Governors, in line with local guidance, will simply establish that:

- an allegation has been made,
- who was involved? – including their full name, address, and date of birth,
- if the individual was in school at the time of the allegation
- if the individual did, or could have, come into contact with the child,

- the general nature of the allegation - What happened?
- if there were any witnesses – if so who were they?
- when and where the incident is alleged to have occurred
- if there is any CCTV footage?

This information can be recorded on the template initial record of concern sheet (See **Appendix 2**)

Para 443

When to inform the individual of the allegation should be considered carefully on a case-by-case basis, with guidance as required from the LADO, and if appropriate local authority children's social care and the police.

Keeping Children Safe in Education, September 2026

At this stage advice should be sought from the LADO with regards to informing the person subject to the allegation, that an allegation has been made.

Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations, where an adult makes an allegation to the school or college that they were abused as a child should also be referred to the police. Where a child makes an allegation of non-recent abuse, this should be reported to the LADO. Further information regarding reporting Non-Recent Abuse is available on the NSPCC website. Non-recent abuse | NSPCC

Abuse can be reported no matter how long ago it happened

Where the Head Teacher/ Chair of Governor's is concerned about the welfare of other children in the community or the member of staff's family, they should discuss these concerns with the Designated Safeguarding Lead (DSL) and make a risk assessment of the situation. It may be necessary for the DSL to make an additional referral into the Knowsley MASH in regard to these children.

1.2 Consultation and Referral

Once the nature of the allegation has been established the Head Teacher or Chair of Governors (Case Manager) should determine if it meets any of the criteria set out in **Paragraph 359 Keeping Children Safe in Education, September 2026,** detailed above. If so, the Case Manager should immediately discuss the allegation with the Local Authority Designated Officer (LADO) on the same day.

In Knowsley the LADO (Diane Kitcher) can be contacted on **07385420432** or E-mail **LADOinbox@knowsley.gov.uk**

It is important to ensure any allegation is taken seriously and advice can be sought by contacting the Education Safeguarding Officer. Additional support may be available via the schools safeguarding SLA.

Should the nature and complexity of the allegation, or the lack of appropriate resources in the school require it, the allegation may be dealt with by an independent investigator.

Para 449

Where there is a lack of appropriate resource within the school or college, or the nature or complexity of the allegation requires it, the allegation will require an independent investigator. Many local authorities provide for an independent investigation of allegations for schools that are maintained by the local authority, often as part of the HR/personnel services that schools and colleges can buy in from the authority. It is important that local authorities ensure that schools and colleges in that area have access to an affordable facility for independent investigation where that is appropriate.

eeping Children Safe in Education, 2026

1.3 Initial consideration of the allegation

The purpose of the initial discussion is for the LADO and the case manager to consider the nature, content and context of the allegation and agree a course of action. This will include a discussion to determine whether police involvement is necessary.

If the parents/carers of the child concerned are not already aware of the allegation the LADO will also discuss how and by whom they should be informed.

There may be some circumstances where the school may advise the parents/carers of an incident involving their child straight away, for example, if the child has been injured while at school or in a school related activity and requires medical treatment.

The case manager will usually inform the individual who is the subject of the allegation. However, informing them of the allegation should be considered carefully on a case-by-case basis. The case manager should discuss and take guidance as required from the LADO, and if appropriate children's social care and the police.

Once the individual has been informed of the allegation, and if they are a member of a union or a professional association, they will be advised to contact that organisation.

Para 444

If the allegation is about physical contact, for example restraint, the strategy discussion or initial evaluation with the LADO should take into account that teachers and other school and college staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour.

Keeping Children Safe in Education, September 2026

Further information about the use of reasonable force can be found at paragraph 203-205 in Part 2 of Keeping Children Safe in Education, 2026, and Use of reasonable force in schools - GOV.UK (www.gov.uk)

1.4 Strategy Meeting /Evaluation with the Police

If the allegation is not demonstrably false or unfounded, a formal referral will be made to the LADO and in accordance with 'Working Together to Safeguard Children, 2026' a meeting and strategy discussion will be convened.

There may be up to three strands in the consideration of an allegation:

- a police investigation of a possible criminal offence
- enquiries and assessment under section 47 of the Children Act 1989 if a child is in need of protection or under section 17 of the Children Act 1989 if the child appears to be in need of services.
- consideration by the employer of disciplinary action in respect of the individual

The case manager will attend any strategy meeting, unless there are good reasons not to do so, and provide details about the circumstances and context of the allegation and the pupil and member of staff concerned.

1.5 Suspension

An assessment of the possible risk of harm to children posed by a person about whom an allegation has been made must be undertaken and managed. This should be considered in relation to the child or children involved in the allegation, and any other children in the accused individual's home, work or community life.

Suspension will be considered in any case where;

- there is cause to suspect a child is at risk of significant harm
- the allegation is so serious that it might be grounds for dismissal

In cases where suspension is considered necessary, the case manager will;

- record the rational and justification for such action
- what alternatives to suspension where considered and why they were rejected.

- give written confirmation within one working day, giving as much detail as appropriate for the reasons for the suspension
- ensure the person who has been suspended is fully supported, including the contact details of their named contact within school

Suspension should **no**t be an automatic response when an allegation is reported, all options to avoid suspension should be considered prior to taking that step.

The case manager **must** consider carefully whether the circumstances of a case warrant a person being suspended from contact with the children until the allegation is resolved. Children's social care or the police may give their view to the LADO, but they cannot require the case manager to suspend a member of staff or a volunteer, although the case manager should give appropriate weight to their views.

In many cases, an inquiry can be resolved quickly and without the need for suspension. The employer will decide on whether the individual should continue to work at the school or college, based on consultation with the LADO who will provide relevant information received from the police or local authority children's social care on whether they have any objections to the member of staff continuing to work during the investigation of the case.

Para. 462

Based on advice from the school or college's HR provider and /or a risk analysis drawn up with the LADO, the following alternatives should be considered by the case manager before suspending a member of staff:

redeployment within the school or college 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 to alternative work in the school or college so the individual does not have unsupervised access to children.

moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes accounts of their views. It should be made making it clear that this is not a punishment and parents have been consulted; or

temporarily redeploying the member of staff to another role in a different location, for example to an alternative school or college or work for the local authority or academy trust.

Keeping Children Safe in Education, September 2026

Such alternatives allow time for an informed decision regarding possible moves to suspension, however this will depend on the nature of the allegation.

1.6 Supporting those involved

Employers have a duty of care to their employees. They should act to,

- manage and minimise the stress caused by the allegation
- inform the individual as soon as possible, explaining the likely course of action, guided by the LADO, and the police where necessary
- advise the individual to contact their trade union representative, or a colleague for support
- appoint a named representative to keep the person informed about progress of the case
- provide access to counselling or medical advice where appropriate. For staff in schools maintained by the local authority this may include support via the local authority's occupational health arrangements; and
- not prevent social contact with work colleagues and friends, when staff are suspended, unless there is evidence to suggest this may prejudice the gathering of evidence

Parents or carers of the child or children involved should be:

- formally told about the allegation as soon as possible. The case manager should consult the LADO and, where involved, children's social care and/or the police on what information can be disclosed
- kept informed about the progress of the case, only in relation to their child - no information can be shared regarding the staff member; and
- made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in schools whilst investigations are in progress as set out in section 141F of the Education Act 2002

1.7 Confidentiality and information sharing

In order to manage an allegation made against a member of staff effectively the agencies involved should share all relevant information they have about the person who is the subject of the allegation, as well as about the alleged victim.

Any investigation is undertaken in confidence. Every effort is made to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

No one in the school may provide any information to the press or media that might identify an individual who is under investigation, unless and until the person is charged with a criminal offence.

No one in the school may disclose any information to anyone about the details of an investigation, as this may prejudice the right of the person under investigation to a fair hearing.

School will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

Para. 476

The legislation prevents the "publication" of material by any person that may lead to the identification of the teacher who is the subject of the allegation. "Publication" includes "any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public." This means that a parent who, for example, published details of the allegation on a social networking site would be in breach of the reporting restrictions (if what was published could lead to the identification of the teacher by members of the public). In circumstances where schools need to make parents aware about an allegation, they should make parents and others aware that there are restrictions on publishing information.

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The case manager should take advice from the LADO, Police and Children's Social Care to agree who needs to know, and importantly, what information can be shared. How to manage speculation, rumour, leaks and gossip and what, if any information, can be reasonably given to the wider community in order to reduce speculation. In addition, consideration should be given regarding how to manage press interest if, and when it should arise.

Following the outcome of any criminal case the case manager from school may wish to seek advice from the Local Authority communications team in order to manage any media coverage at this time.

1.8 Allegations Outcomes

There are five defined terms used when determining the outcome of allegation investigations.

Para. 479

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 person subject of the allegation;

False: there is sufficient evidence to disprove the allegation;

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

- If the allegation is substantiated and:
    - the person is dismissed; resigns, or otherwise ceases to provide his or her services; or
    - the employer ceases to use the person's services,

then the employer has **a legal duty** to make a referral to the **Disclosure and Barring Service** (**DBS)** for consideration of whether an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child inclusion on the barred lists is required.

In the case of a member of teaching staff at a school or sixth form college, the case manager must consider whether to refer the matter to the Teaching Regulation Agency (TRA) to consider prohibiting the individual from teaching. (paragraph 350-353 Keeping Children Safe in Education, 2026)

Following a police investigation or a prosecution the police should inform the LADO immediately of the outcome. The LADO will then discuss with the case manager whether any further action, including disciplinary action is appropriate, and if so how to proceed. Information provided by the police should also be used to inform the decision.

If the allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO and the case manager should consider whether the child and/or the person who has made the allegation is in need of help may have been abuse by someone else and this is a cry for help. In such circumstances, a referral to local authority Children's Social Care (CSC) may be appropriate.

Where an allegation is shown to be deliberately invented or malicious, the school or college should consider whether any disciplinary action is appropriate against the individual who made the allegation, in line with the setting's behaviour policy.

1.9 Referral to DfE – Disclosure and Barring Service

If the allegation is substantiated and the person is dismissed, the school ceases to use the persons services, the person resigns, or otherwise ceases to provide his or her services, the LADO should discuss with the Case Manager and their Human Resource (HR) advisor whether a referral will be made to the DBS for consideration of inclusion on the barred list is required. If the substantiated allegation is in relation to a member

of teaching staff whether to refer the matter to the Teaching Regulation Agency (TRA) to consider prohibiting the individual from teaching.

Para 351

There is a legal requirement for schools and colleges to make a referral to the DBS where they remove an individual from regulated activity (or would have removed an individual had they not left), and they believe the individual has:

engaged in relevant conduct in relation to children and/or adults, and/or

satisfied the harm test in relation to children and/or vulnerable adults, and/or

been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence.

DBS referrals will be made as soon as possible, when an individual is removed from regulated activity. This may also include when they have been,

- suspended
- redeployed to work that is not regulated activity.
- dismissed, or
- have resigned

1.10 Resignations and settlement agreements

Where a person under investigation tenders his or her resignation, or ceases to provide their services, the investigation into the allegation will still need to be completed in accordance with the guidance.

It is important that every effort is made to reach a conclusion in all cases of allegations concerning the safety or welfare of children, including anywhere the person concerned refused to cooperate with the process.

Where there is an allegation that indicates a person is a risk or poses a risk of harm to children, or is deemed not suitable to work with children, the school will **not** enter into

“settlement agreements” by which if a person agrees to resign, the school agrees not to pursue disciplinary action and both parties agree a form of words to be used in any future reference.

Schools should not cease their investigations if the person leaves, resigns or ceases to provide their services. Every effort should be made to reach a conclusion in all cases of allegations that have bearing on the safety or welfare of children.

1.11 Record Keeping

Details of allegations, following an investigation that are found to have been malicious or false, should be removed from personnel records, unless the individual, subject to the investigation, gives consent to retention of the information.

For all other allegations that result in an outcome of either, substantiated, unfounded or unsubstantiated it is important the following information is kept on the file of the person accused.

The Head Teacher/ Chair of Governors will ensure that;

- a clear and comprehensive summary of any allegations made (See **Appendix 2**)
- details of how the allegation was followed up and resolved
- a note of any actions taken, decisions reached, and the outcomes i.e. substantiated, unfounded or unsubstantiated
- a copy provided to the person concerned, where agreed by children’s social care or the police; and
- a declaration on whether the information will be referred to in any future reference

The purpose of the record is to enable accurate information to be given in response to any future request for a reference. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.

Records should be retained at least until the accused has reached normal pension age, or for a period of 10 years from the date of the allegation if that is longer.

Cases in which an allegation was found to be false, unfounded, unsubstantiated or malicious should not be included in employer references. Any repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious should also not be included in any reference.

1.12 Oversight and monitoring

The school will work closely with the LADO who has overall responsibility for oversight of the procedures for dealing with allegations.

The school will cooperate in supplying statistical information required by the LADO for Department for Education (DfE) returns and Knowsley Safeguarding Children Partnership monitoring purposes.

1.13 Action on the conclusion of a case

In cases where it is decided, in the conclusion of the case, that the person who has been suspended can return to work, the school will consider how best to facilitate that**.** Guidance and advice are usually provided via HR or the LADO. Most people will benefit from some help and support to return to work after a stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The case manager should also consider how the person's contact with the child or children who made the allegation can best be managed if they are still attending the school or college.

1.14 Actions in respect of malicious allegations

In the rare event that an allegation is shown to have been deliberately invented or malicious the Head Teacher will consider whether any disciplinary action is appropriate against the person who made it, if they are part of the school community.

The case manager should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

The police will be asked to consider whether any action might be appropriate against the person responsible if they are outside the school community.

1.15 Allegations concerning supply staff, trainee teachers and contractors not directly employed by the school.

In some cases, the school will need to consider an allegation against an individual, not directly employed by them, and where the school disciplinary procedures do not fully apply. For example, **supply teachers** provided by an employment agency or business.

In these cases, the school should ensure that although not the employer, all allegations are dealt with properly.

Para 453

Whilst schools and colleges are not the employer of supply teachers, they are still responsible for ensuring that allegations are dealt with properly. **In no circumstances** should a school or college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. Governing bodies and proprietors should discuss with the supply agency or agencies where the supply teacher is working across a number of schools of colleges, whether it is appropriate to suspend the supply

In managing allegations made against **supply staff, trainee teachers and contractors** the following should be considered;

- agencies should be fully involved and co-operate in any enquiries from the LADO, Police or Children's Social Care
- school will usually take the lead as they have direct access to children or other school staff
- supply staff, trainee teachers and contractors although not employed by the school, are under the supervision, direction and control of the governing body when working in a school
- supply staff, trainee teachers and contractors should be advised to contact their trade union representative if they have one, or a colleague for support
- the allegations management meeting, arranged by the LADO, should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the school during the investigation.

It is imperative that when using an agency for supply staff, schools should inform the agency of its process for managing allegations. This may also include inviting the agencies human resource manager to the meetings so they can be kept up to date with information regarding its policies.

1.16 References

Cases in which an allegation was found to be false, unfounded, unsubstantiated or malicious should not be included in employer references. Any repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious should also not be included in any reference. Further information on references can be found in Part 4 of Keeping Children Safe in Education, 2026.

Substantiated safeguarding allegations that meet the harm threshold should be included in references, provided that the information is factual and does not include opinions.

1.17 Non recent allegations

Where an adult makes an allegation to a school or college that they were abused as a child, the individual should be advised to report the allegation to the police. Non recent allegations made by a child, should be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with the local authority's children social care team and the police. Abuse can be reported no matter how long ago it happened.

Part Two. Level of Concern

Concerns that do not meet the harm threshold.

Keeping Children Safe in Education, September 2026, is clear that school governing bodies should ensure there is a response to 'low-level' concerns, that is in line with the school ethos. This policy details the process for dealing with concerns that **do not** meet the Harm Threshold as detailed in **Part One** of this document.

The aim of addressing concerns that do not meet the harm threshold is to encourage an open and transparent culture in school where early identification of inappropriate, problematic and concerning behaviour can be addressed in order to minimise the risk and opportunity of abuse.

Such concerns may arise in a number of ways and be reported by different 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.

Keeping Children Safe in Education, 2026 refers to these incidents as 'low level concerns'.

Para 560

The term 'low-level' concern does not mean that it is insignificant. 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 harm threshold or is otherwise not 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, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating pupils.

Once incidents are reported they should be addressed on a case-by-case basis with consideration given to the context, experience and training of the member of staff.

In order to prevent incidents of 'low level concerns' school will promote an open and transparent culture where,

- there are clear professional boundaries set in line with the school ethos and values
- information regarding concerns is shared appropriately and with either the DSL, head Teacher or Chair of Governors.
- appropriate records are made and include decisions and outcomes when such incidents are addressed.

As good practice the school staff Code of Conduct document should reference low level concerns and give staff at the school a clear understanding of the definition of 'low level concerns' and what action they should take to address their concern.

2.1 Process of reporting 'low level' concerns

Behaviour which is not consistent with the standards and values of our school and does not meet the organisational expectations set out in the Code of Conduct can lead to 'low level' concerns.

Such incidents should be reported by the individual witnessing the to;

- the Designated Safeguarding Lead, or
- the Head Teacher

If the concern is in relation to a supply teacher or contractor, once the concern has been reported to either the Designated Safeguarding Lead or Head Teacher, the individual's employer should also be notified.

2.2 Recording 'low level' concerns

Reports of 'low level' concerns should be recorded in writing and include;

- the details of the behaviour/concern. Including chronological and concise details which are as precise and accurate as possible.
- the context in which the behaviour/concern took place.

- details of the individual reporting the concern (unless they wish to remain anonymous)
- the record should be signed, timed and dated.

These records will be kept confidentially and secure in line with the Data Protection Act 2018, and General Data Protection Regulation (GDPR).

These records should be regularly reviewed in order for potential patterns of concerning behaviour to be identified.

If patterns of concerning behaviour are identified, the Designated Safeguarding Lead or Head Teacher will decide on the course of action. Should these concerns now meet the Harm Threshold, a further discussion will take place with the LADO.

It is recommended that these records of 'low level' concern are retained until the individual leaves the employment of the school.

2.3 Responding to 'low level' concerns.

Low Level concerns should be responded to in a sensitive and proportionate way. Maintaining confidence that such concerns, when raised will be handled promptly and effectively whilst, protection staff from any false allegations or misunderstandings.

In most cases low level concerns will simply require a conversation with the individual about whom the concerns have been raised. The most useful approach is one that is values based, for example,

> *"I am sure you subscribe to our school values, so help me understand how you came to behave in a way which is not in keeping with those, so that we can understand what actions or support you might need so that we can both be confident that it will not happen again...;*

In responding to reports of 'low level' concerns the Designated Safeguarding Lead or Head Teacher should;

- collect as much information as possible relating to the concern raised.
- speak directly to the person raising the concern, if possible,
- speak to the individual involved and any witnesses.

The aim if this is to clarify the behaviour and also the context in which the behaviour occurred.

The Designated Safeguarding Lead or Head Teacher will then review and categorise the behaviour, checking to see if it meets the 'Harm Threshold' or not.

If the Designated Safeguarding Lead or Head Teacher is in any doubt as to whether the Harm Threshold is met, they can contact the Knowsley Education Safeguarding Officer, or LADO for further advice.

If it is clear the behaviour **does not** meet the Harm Threshold, consideration should be given regarding the actions to be taken. The Designated Safeguarding Lead or Head Teacher should,

- if they have been contacted, record all conversations including advice given, with the Knowsley Education Safeguarding Officer or LADO
- record any actions to be taken following the report of the 'low level' concern
- record the rational for any decisions/actions taken

2.4 Next Steps

The process of reporting 'low level' concerns is included in the induction of all new staff into the school.

All staff will revisit annually of the following:

- the school Whistle Blowing Policy
- the school Code of Conduct for staff
- the process of reporting concerns about adults who work with children, including the process for reporting 'low level' concerns

In addition, the Designated Safeguarding Lead will regularly inform the School Governing Body about the implementation of the 'low-level' concerns reporting process and any evidence of its effectiveness.

The Governing Body may also review an anonymised sample of low-level concerns at regular intervals, to ensure that these concerns have been responded to promptly and appropriately.

2.5 References

Schools and colleges should only provide substantiated safeguarding concerns/allegations (including a group of low-level concerns about the same individual) that meet the harm threshold in references.

Low-level concerns should not be included in references unless they relate to issues which would normally be included in a reference, 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.

3. Monitoring and Review

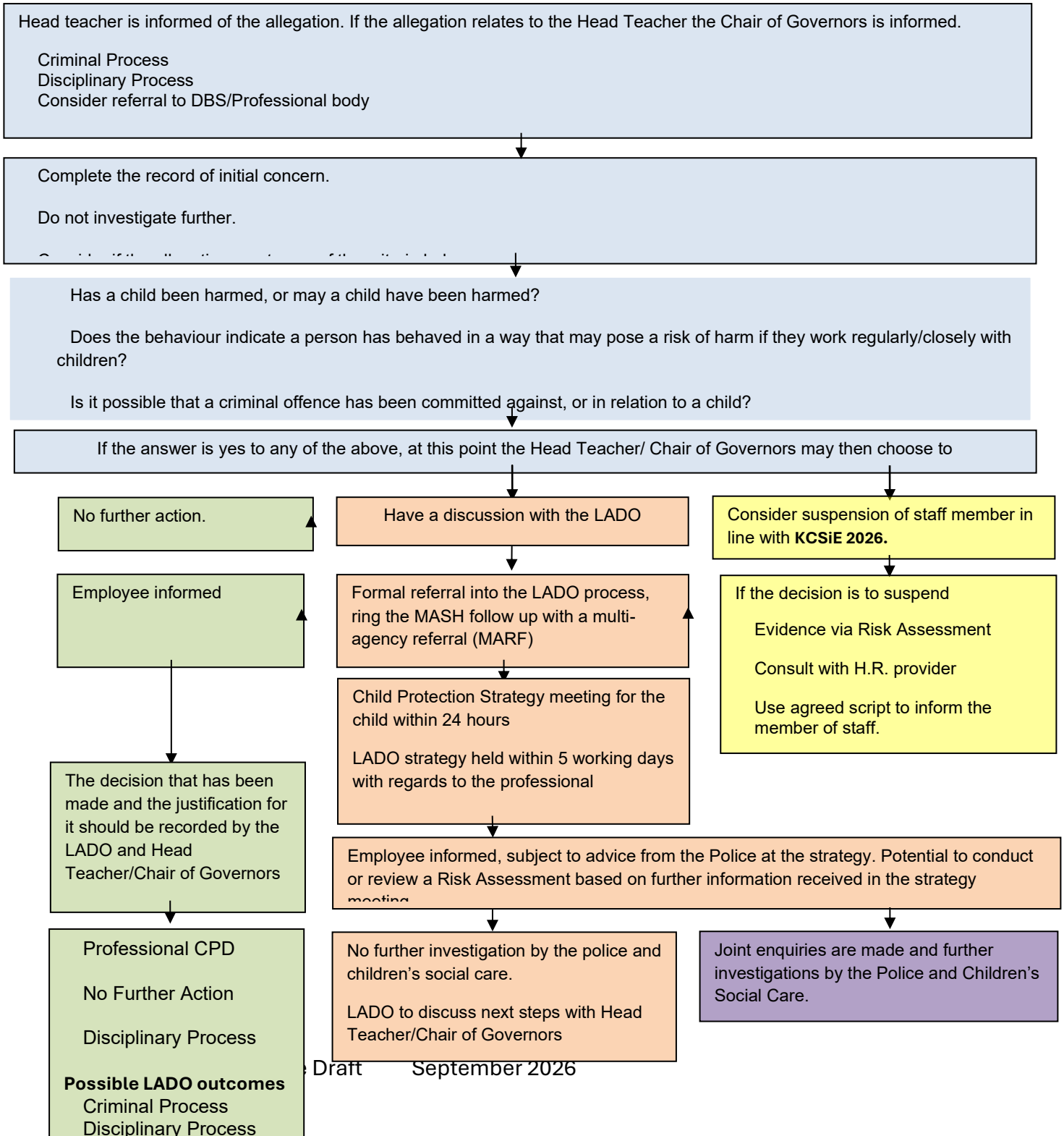
This policy document will be monitored and reviewed annually in accordance with best practice or in the following circumstances:

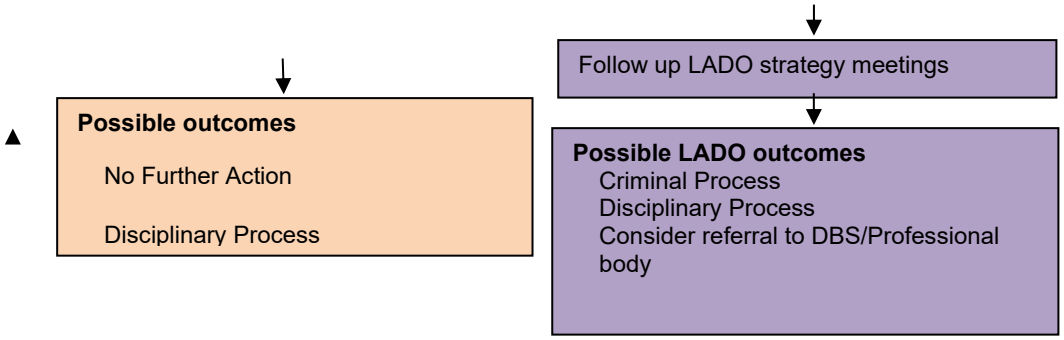
- changes in legislation and/or government guidance
- as required by the Local Safeguarding Children Partnership, and Ofsted
- as a result of any other significant change or event

In the interests of safeguarding and protecting the welfare of children and young people it is suggested that all staff receive a copy of the settings Allegations Management Policy and sign a safeguarding checklist to say they have read and understood the content

Appendix 1

Allegations Management Process





Appendix 2

ALLEGATIONS AGAINST STAFF: Record of Initial Concern

School **Name of Head Teacher or Chair of Governors**		**Date of incident** **Date Reported**	
Information about the member of staff against whom the allegation has been made.			
Name			
Role/Position in school **Length of service**		**DOB**	
Home Address **Telephone Number**			
Details of any children who may reside in the same home as this person (If Known)			
Details of any previous concerns/conduct issues/ allegations			
Information about the pupil(s) concerned. **(Complete a separate document for each pupil)**			

Name			
Year Group		**DOB**	
Home Address **Telephone Number**			

Information about the person reporting the concern			
Name			
Role /Position in school		**Tel No**	
Nature of Allegation			

– **Has a child been harmed, or may a child have been harmed?**
– **Does the behaviour indicate a person has behaved in a way that may pose a risk harm if they work regularly / closely with children?**
– **Is it possible that a criminal offence has been committed against, or in relation to child?**
If you have answered yes to any of the above please seek further advice from the LADO (Local Authority Designated Officer)
Please record below the decision and rational following the discussion with LADO and personnel advisor

Allegation Management REFERRAL FORM

STRICTLY CONFIDENTIAL

Knowsley Council

Form to be completed in detail and emailed to: Knowsley LADO at LADOinbox@Knowsley.gov.uk within 24 hours of allegation being made.

NATURE AND DETAILS OF ALLEGATION

DATE ALLEGED INCIDENT OCCURRED **IF THE ABOVE DATE IS APPROXIMATE, PLEASE GIVE DETAILS?**	
DATE EMPLOYING AGENCY BECAME AWARE OF CONCERN? **DETAILS OF ANY DELAY IF APPROPRIATE**	

PLEASE INDICATE THE NATURE OF THE ALLEGATION (please select)	Physical	Sexual	Emotional	Neglect	Suitability

Allegation Details

Please provide a factual, detailed chronology about the allegation including all your involvement to date.

This should include who has reported the allegation; where and when it occurred, who has witnessed (potential witness to be included) the incident and what has been alleged.

If the adult's behaviour related to their behaviour outside of their workplace, please state where the alleged behaviour occurred.

ADULT DETAILS AGAINST WHOM THE ALLEGATION HAS BEEN MADE

FULL NAME/ALIAS	
GENDER	
DATE OF BIRTH	
ETHNICITY	
CURRENT ADDRESS	
HAS THE ADULT BEEN INFORMED OF THE REFERRAL?	
DOES YOUR AGENCY HOLD DETAILS OF ANY PREVIOUS COMPLAINT, CONCERN OR ALLEGATION AGAINST THIS ADULT? Please provide details if yes.	
ORGANISATION EMPLOYING AGENCY (Example -Education/Health etc)	
JOB TITLE OF ADULT	
HOW LONG IN POST / EMPLOYMENT	
PLACE OF WORK	
DIRECT / INDIRECT CONTACT WITH CHILDREN?	

PREVIOUS HR RECORD/ANY DISCIPLINARIES, PLEASE GIVE DETAILS	
DBS CERT NUMBER and DATE OF CLEARANCE if known	

CHILD'S DETAILS

NAME		
DATE OF BIRTH		
GENDER		
ETHNICITY		
CURRENT ADDRESS		
PARENT/CARER NAME AND ADDRESS		
WHEN WAS THE PARENT OR ADULT WITH PR INFORMED?		
HAS A REFERRAL BEEN MADE TO INTERGRATED FRONT DOOR? **IF YES PLEASE GIVE DATE AND REFERRERS NAME.** **IF NO PLEASE ADVISE WHY**	YES / NO	
IS THE CHILD KNOWN TO KNOWSLEY SOCIAL CARE? **IF YES, PLEASE INDICATE IN WHAT CAPACITY FROM LIST**	YES / NO / UNKNOWN	
	Early Help	
	Child In Need	
	Child Protection Plan	
	Child Looked After	
SOCIAL WORKER/ KEY WORKER/ ALLOCATED TO CHILD / FAMILY?		
HAS THE CHILD'S SOCIAL WORKER/ KEY WORKER BEEN INFORMED?	YES / NO / UNKNOWN	
SOCIAL WORKERS/ KEY WORKER EMAIL ADDRESS:		
IS THE CHILD PLACED IN KNOWSLEY BY ANOTHER AUTHORITY?	YES / NO / UNKNOWN	
CHILDS RELATIONSHIP TO ADULT CONCERNED?		

ARE THERE ANY OTHER CHILDREN, TO INCLUDE CHILD WITNESSES INVOLVED IN THE ALLEGATION? YES / NO
(If YES Please provide details below)

NAME	
DATE OF BIRTH	
ADDRESS & CONTACT DETAILS	
PARENTS DETAILS IF KNOWN	
RELATIONSHIP TO ADULT CONCERNED?	

REFERRER DETAILS

REFERRER NAME	
JOB TITLE	
ORGANISATION	
ADDRESS	
TELEPHONE NUMBER	
EMAIL ADDRESS	
Date referral made:	

Please submit this form to:

Form to be completed in detail and emailed to: Knowsley LADO at **LADOinbox@Knowsley.gov.uk** within 24 hours of allegation being made.

The contents of this report are not to be reproduced, copied, or divulged in any way.

Information is not to be discussed with, or revealed to, persons who are not required in the interests of the child to have such information.

All enquiries for the use of any such information should be made to the Local Authority Designated Officer.