



Barnett Wood Infant School

Managing Allegations Against Staff (including Low Level Concerns) Policy

Barnett Wood Infant School

Policy Impact Statement and Updates

Policy:	Managing Allegations Against Staff (including Low Level Concerns) Policy
Date of review:	March 2026
Governor/s responsible:	Guy Bailey / Beth Warren
Status / date of next review:	Annual - March 2027
How well has the policy achieved its purpose and outcomes?	
<p>The primary purpose of this policy is to ensure the safety and well-being of all pupils. By effectively managing allegations and low-level concerns, we create a safer environment for children, minimising the risk of abuse and inappropriate behaviour.</p> <p>In conjunction with the Staff Code of Conduct, the policy outlines clear expectations regarding staff conduct, helping to establish professional boundaries. This clarity ensures that all staff understand what constitutes acceptable behaviour and what does not.</p> <p>The policy also ensures that the school complies with statutory guidance, such as the Keeping Children Safe in Education (KCSiE) framework, thereby fulfilling legal obligations related to safeguarding.</p>	
Updates and/ or changes to policy:	
March 2026	Updated in line with Keeping Children Safe in Education (KCSiE) 2025 . There are no changes to requirements.
March 2025	Updated links to Keeping Children Safe in Education 2024 Updated KCSiE 2024 paragraph numbers in reference to Low Level Concerns No other changes to policy

We have carefully considered and analysed the impact of this policy on equality and the possible implications for pupils and or staff with protected characteristics, as part of our commitment to meet the Public Sector Equality Duty (PSED) requirement to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations.

Barnett Wood Infant School
Managing Allegations Against Staff (including Low Level Concerns) Policy

Contents

Introduction	2
Legal Framework	2
Section 1 – Managing Allegations Against Staff	3
Suspension of the accused until the case is resolved	3
Definitions for outcomes of allegation investigations	4
Procedure for dealing with allegations	4
Additional considerations for supply staff	5
Timescales	6
Specific Actions	6
Conclusion of a case where the allegation is substantiated	6
Individuals returning to work after suspension	6
Unsubstantiated or malicious allegations	6
Confidentiality	7
Record Keeping	7
References	7
Learning Lessons	7
Non-recent allegations	8
Section 2 – Low Level Concerns	8
Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct	9
Sharing low-level concerns	9
Responding to low level concerns	10
Record keeping	10
References	10
Process to follow when a Low-Level Concern is raised	11
Key Reference Documents	12
Contacts	12
Appendices:	
Low Level Concern Form	13
LADO Pathway	14

Introduction

At Barnett Wood Infant School, we take safeguarding very seriously. This includes ensuring that adults who work with children do so in a way that is in accordance with the ethos and policies set out by the school, including the Safeguarding and Child Protection Policy and Staff Behaviour (Code of Conduct) Policy.

Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- DfE (2025) [‘Keeping children safe in Education 2025’](#)
- DfE (2023) [Working together to safeguard children 2023: statutory guidance \(publishing.service.gov.uk\)](#)

Barnett Wood Infant School

Managing Allegations Against Staff (including Low Level Concerns) Policy

- Surrey Safeguarding Children Partnership Guidance [3.2 Managing allegations against people that work or volunteer with children | Surrey Safeguarding Children Partnership \(procedures.org.uk\)](https://procedures.org.uk)

This policy operates in conjunction with the following school policies:

- Safeguarding and Child Protection Policy
- Staff Code of Conduct
- Positive Handling Policy
- Whistleblowing Policy
- Data Protection Policy

Section 1 – Managing allegations made against/concerns raised in relation to staff

This section of this policy applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, or
- Possibly committed a criminal offence against or related to a child, or
- Behaved towards a child or children in a way that indicates he or she 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

It applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

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

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

Suspension of the accused until the case is resolved

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

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted

Barnett Wood Infant School

Managing Allegations Against Staff (including Low Level Concerns) Policy

- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the local authority.

Definitions for outcomes of allegation investigations

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

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the headteacher (or chair of governors where the headteacher is the subject of the allegation) – the ‘case manager’ – will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority (***contact the LADO service via phone/email: Phone: 0300 123 1650 (option 3) Email: LADO@surreycc.gov.uk***) This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children’s social care services, where necessary). Where the police and/or children’s social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children’s social care services, as appropriate
- If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

Barnett Wood Infant School

Managing Allegations Against Staff (including Low Level Concerns) Policy

- If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child
- We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the governing board /local authority will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as supply staff provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with our local authority designated officer to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the local authority designated officer as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

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

Barnett Wood Infant School
Managing Allegations Against Staff (including Low Level Concerns) Policy

Timescales

Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week.

If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days.

If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days.

Specific actions

Action following a criminal investigation or prosecution:

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

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If they think that the individual has engaged in conduct that has harmed (or is likely to harm) a child, or if they think the person otherwise poses a risk of harm to a child, they must make a referral to the DBS.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the headteacher, or other appropriate person in the case of an allegation against the headteacher, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

Confidentiality

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

Barnett Wood Infant School

Managing Allegations Against Staff (including Low Level Concerns) Policy

The case manager will take advice from the local authority's designated officer, police and children's social care services, as appropriate, to agree:

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

Record-keeping

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

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

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

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

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

Learning lessons

After any cases where the allegations are substantiated, we will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

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

Barnett Wood Infant School

Managing Allegations Against Staff (including Low Level Concerns) Policy

Non-recent allegations

Abuse can be reported, no matter how long ago it happened. We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations. Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2 – Low Level Concerns

This section of the policy sets out the detail and processes for allegations against staff and procedures for staff regarding low-level concerns they may have.

It may be possible that a member of staff acts in a way that does not cause risk to children, but is however inappropriate. A member of staff who has a concern about another member of staff should inform the Head Teacher about their concern using a Low-Level Record of Concern Form (see Appendix). If the Head Teacher cannot be contacted, the Chair of Governors should be contacted instead.

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

Keeping Children Safe in Education September 2025

The following is taken from Keeping Children Safe in Education September 2025:

431. As part of their whole school or college approach to safeguarding, schools and colleges should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

432. Creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should:

- enable schools and colleges to identify inappropriate, problematic or concerning behaviour early*
- minimise the risk of abuse, and*
- ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.*

What is a low-level concern?

433. 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:

Barnett Wood Infant School

Managing Allegations Against Staff (including Low Level Concerns) Policy

- *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 children.*

434. *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.*

435. *Low-level 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.*

436. *It is crucial that all low-level concerns are shared responsibly 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 schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings.*

Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

Allegation

Behaviour which indicates that an adult who works with children 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.

Low-Level Concern

Any concern – no matter how small, even if no more than a 'nagging doubt' – that an adult may have acted in a manner which;

- is not consistent with an organisation's Code of Conduct, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

Appropriate Conduct

Behaviour which is entirely consistent with the organisation's Code of Conduct, and the law.

Sharing low-level concerns

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

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

Barnett Wood Infant School

Managing Allegations Against Staff (including Low Level Concerns) Policy

- Empowering staff to self-refer.
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage.
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised.
- Helping to identify any weakness in the school's safeguarding system.

Responding to low-level concerns

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

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

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's Staff Code of Conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Record keeping

All low-level concerns will be recorded electronically using CPOMs Staff Safe. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken. Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

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

References

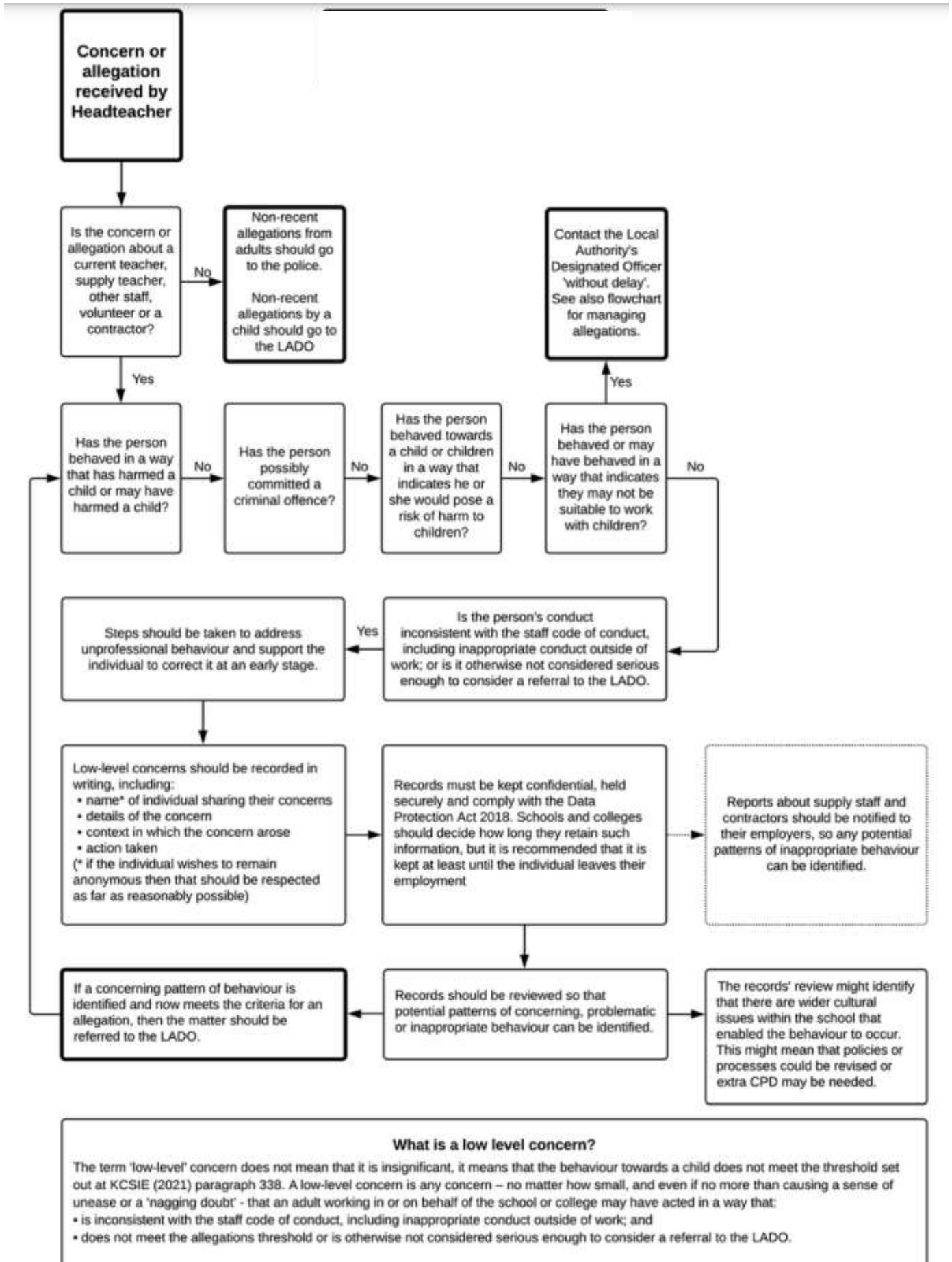
We will not include low-level concerns in references unless:

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

Barnett Wood Infant School

Managing Allegations Against Staff (including Low Level Concerns) Policy

Process to follow when a Low-Level Concern is raised



Barnett Wood Infant School

Managing Allegations Against Staff (including Low Level Concerns) Policy

Key Reference Document

Read this document for further information about Low-Level Concerns, which is referenced in KCSIE 2025 - Developing and implementing a low-level concerns policy: a guide for organisations which work with children <https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/developing-and-implementing-a-low-level-concerns-policy.pdf>

Low-Level Concern Form

This form will be available to staff via:

- The Polices sharepoint drive on the school system.
- The Office
- DSLs
- The Senior Leadership Team

Contacts:

Contact the Surrey County Council LADO service via phone/email: Phone: 0300 123 1650 (option 3)

Email: LADO@surreycc.gov.uk

Chair of Governors: Guy Bailey chair@barnett-wood.surrey.sch.uk

Barnett Wood Infant School

Managing Allegations Against Staff (including Low Level Concerns) Policy

Appendix A: LLC Form: Low-Level Record of Concern Regarding a Staff Member

Please use this form to share any concern – no matter how small, and even if no more than a ‘nagging doubt’ – that an adult may have acted in a manner which:

- is not consistent with Barnett Wood Infant School’s Staff Code of Conduct Policy, and/or;
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult’s suitability to work with children.

Where possible please speak with the Head Teacher as soon as possible. It is also helpful to document your concerns, which can be done using this form and then passed to the Head Teacher. When completed, please pass this form to the Head Teacher. If the concern is about the Head Teacher, please pass it onto the Chair of Governors or email them at chair@barnett-wood.surrey.sch.uk

Remember, a low-level concern is different to an allegation (which uses a different form). See the table below for a definition:

Allegation

Behaviour which indicates that an adult who works with children 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.

Low-Level Concern

Any concern – no matter how small, even if no more than a ‘nagging doubt’ – that an adult may have acted in a manner which:

- is not consistent with an organisation’s Code of Conduct, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult’s suitability to work with children.

Appropriate Conduct

Behaviour which is entirely consistent with the organisation’s Code of Conduct, and the law.

Name of adult writing this concern:

Name of adult whom this concern is about:

Date written:

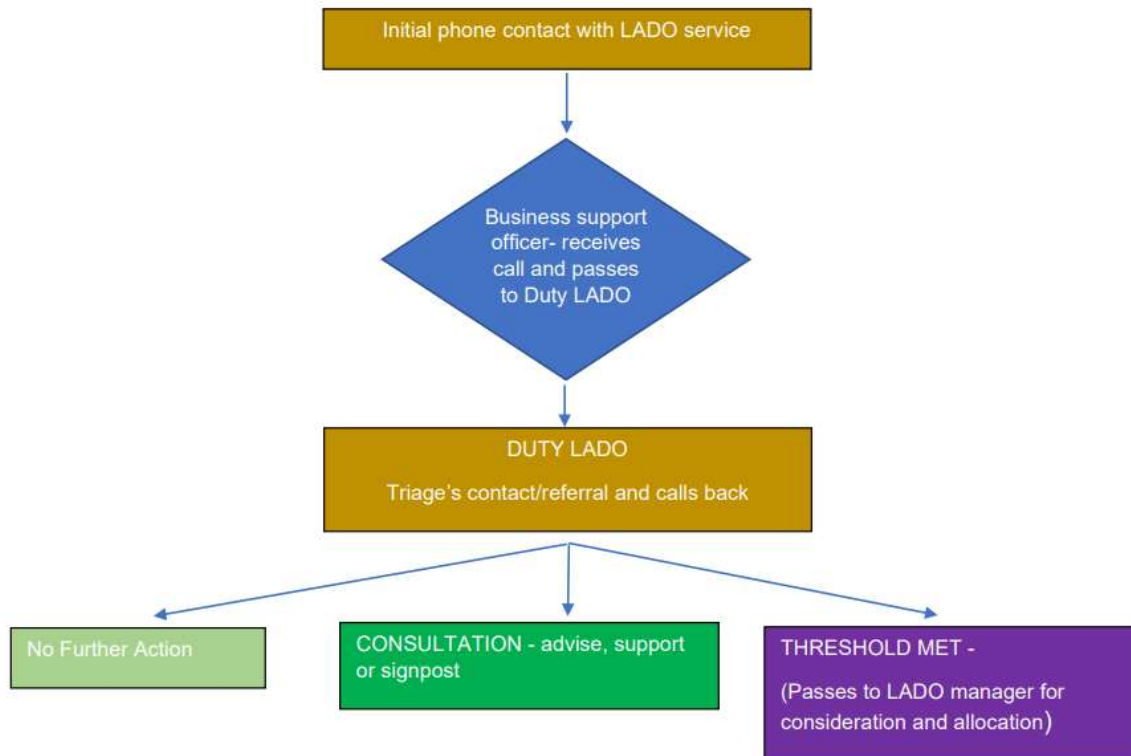
Signature:

Please write your concerns below (continue overleaf) You should provide a concise record – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s) (and please use a separate sheet if necessary). Consider any contextual information that may be appropriate to know.

Barnett Wood Infant School
Managing Allegations Against Staff (including Low Level Concerns) Policy

Appendix B: LADO Pathway

LADO SERVICE CONTACT AND PATHWAY



Please note:

- The initial phone contact with the LADO service goes directly to the LADO business support officer whose responsibility it is to pass the callers details to the DUTY LADO who will then call back where required.
- The business support officer **will not advise on threshold or safeguarding matters**. Where the caller states that the reason for their contact is to discuss/ make a LADO referral, the business support officer will advise them to complete a referral form which will then be passed to the DUTY LADO to triage/assess.
- **Completing a referral form does not determine threshold for LADO involvement**. However, completing a referral form will provide the DUTY LADO with the relevant safeguarding concern/allegation detail which they need to read, review and respond to via the referral form. Responding on the referral form is beneficial for the referrers record keeping and allows the LADO to be accountable for advice given.
- Following the triage process, the DUTY LADO will inform the referrer of the outcome of the LADO contact which could be NFA, advise/support and or threshold met. Where threshold is met, the case will be passed to the LADO manager for allocation consideration after which a named LADO will be allocated manage/monitor the case.

You can contact the LADO service via phone/email:
Phone: 0300 123 1650 (option 3)
Email: LADO@surreycc.gov.uk