Diocese of Norwich Education and Academies Trust

Statement of procedures for dealing with allegations made against / low-level concerns raised in relation to staff, including supply teachers, volunteers and contractors

Policy Type:	**Trust Policy**
Date Issued by MAT:	**01/10/2025**
Approved By:	**Trust Board (Joint Policy Development Committee)**
Approval Date:	**04/09/2025**
Review Date:	**September 2026**
Person Responsible:	**Head of Safeguarding**

Our Christian Ethos and Values

All policies within the Diocese of Norwich Education and Academies Trust (hereafter referred to as "the Trust"), whether relating to an individual academy or the whole Trust, will be written and implemented in line with our Christian ethos and values.

We have high ambition for all, and we truly value the wider educational experience.

We walk and talk our Christian values. We put people at the centre of the organisation and want to see them flourish and grow. Our schools are inclusive, welcoming those of all faiths and none.

Overall accountabilities and roles

The Trust has overall accountability for all its academies and staff. Through a Scheme of Delegation it sets out the responsibilities of the Trust, its Executive Officers, the Local Governance Committee and the Principal / Headteacher. The Principal / Headteacher of each academy is responsible for the implementation of all policies of the Trust.

All employees of the Trust are subject to the Trust's policies.

Contents

Statement purpose 3

1. Allegations which may meet the harm threshold 3

2. Low level concerns 3

3. What is required of all staff and volunteers? 4

4. Reporting information / an allegation or low-level concern 4

5. How an allegation will be managed 5

6. How a low-level concern will be managed 6

7. Record keeping and monitoring 6

8. Whistleblowing 6

Appendix 1 - Low Level Concerns / Allegations Record: Adult working or volunteering with children/young people 7

Appendix 2 - Part four: Safeguarding concerns or allegations made about staff, including supply teachers, volunteers and contractors 9

This statement will be reviewed in line with any revisions to the statutory guidance 'Keeping Children Safe in Education' September 2025.

Safeguarding children and young people is the responsibility of everyone

The Trust is committed to safeguarding and expects all staff, volunteers and contractors to share this commitment. The Trust will provide appropriate guidance and training for all staff and volunteers and will ensure that contractors have received relevant guidance and training.

Between them, this statement and Appendices 1 and 2 provide for the effective protection of children and young people, and for both allegations that may meet the harm threshold and concerns that do not meet the harm threshold, (known as low-level concerns) to be managed fairly, consistently and without delay.

Statement purpose

1. Allegations which may meet the harm threshold

This statement sets out the action to be taken in the event that information comes to light, which indicates that a member of staff, a person with permission to be on the premises or carrying out any activity on behalf of the Trust or a volunteer may have:

- *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;* this includes behaviour outside of work. This is known as transferrable risk.
- This applies to any child the member of staff or volunteer has contact with in their personal, professional or community life.

2. Low level concerns

This statement also describes the action to be taken in the event that a low-level concern arises, which may not meet the threshold set out above, but may indicate that an adult working in or on behalf of the Trust may have acted in a way that:

Is inconsistent with the staff and volunteer code of conduct, including the requirements of Guidance for Safer Working Practice for those working with children and young people in education settings 2022 (including inappropriate conduct outside of work)

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

- Being over friendly with children;
- Having favourites;
- Taking photographs of children on their mobile phone;
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or
- Using inappropriate sexualised, intimidating or offensive language.

3. What is required of all staff and volunteers?

If you have seen or heard something which makes you feel uncomfortable, 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 Trust may have acted in a way that:

- May meet the harm threshold; or
- Is inconsistent with the staff and volunteer code of conduct, including the requirements of Guidance for Safer Working Practice for those working with children and young people in education settings 2022 (including inappropriate conduct outside of work)

The Trust encourages staff, volunteers and contractors to self-refer if they find themselves in a situation that could be misinterpreted, and if you are unsure as to whether information or observed behaviour would be deemed a low-level concern, we encourage you to report it.

You must report it immediately and make a record using the form in Appendix 1

All staff and volunteers must be aware of and act in accordance with the above code of conduct and incorporated guidance, the requirements of this statement and Appendix 2, and the content of 'Keeping Children Safe in Education Part One: Information for all school and college staff', which is regularly communicated and is readily available on https://www.gov.uk/government/publications/keeping-children-safe-in-education--2, and from the school office or HR Team.

Staff and volunteers who do not work directly with children may be provided with Annex A of Keeping Children Safe in Education in place of Part One, if the Headteacher or service area considers it will provide a better basis for those staff to promote the welfare of and safeguard children.

4. Reporting information / an allegation or low-level concern

If you have information, which indicates that a member of staff or volunteer may have behaved in a manner which meets the harm threshold, or in a manner which has given rise to a low-level concern:

You must:

- ✓ Report the information, allegation or low-level concern immediately and without delay to the Headteacher. In the absence of the Headteacher report to the Designated Safeguarding Lead (DSL). In the absence of either party report to the next most senior member of staff in the school.
- ✓ Where the Headteacher is the subject of the information, allegation or low-level concern, to the CEO. The CEO may speak to the Chair of Governors for contextual information.
- ✓ Where the Central Team is the subject of the information, allegation or low level concern this is reported to their line manager, when it is the CEO it must be reported to the Chair of Trustees.
- ✓ Using the form in Appendix 1, make an accurate written record of the information, allegation or low-level concern, what you have witnessed or have been told. Give a

copy of the dated and signed record to the person to whom you have reported your concerns.

- ✓ Maintain strict confidentiality.

All concerns will be listened to and managed appropriately; do not withhold information however trivial it may seem.

You must not:

- × Attempt to deal with or investigate the allegations or concerns yourself.
- × Keep information to yourself or promise confidentiality where information is disclosed to you or you witness anything of concern.
- × Make assumptions or judgements about what you have witnessed or been told; any relevant information or concerns must be reported, it is the responsibility of people in clearly defined roles to consider the information and determine the action to take.
- × Take any action which may undermine any investigation such as discussing disclosures or information with alleged victims, witnesses, parents or carers, asking people to provide statements or alerting the person in respect of whom concerns have come to light.

5. How an allegation will be managed

Part four of Keeping Children Safe in Education 'Safeguarding concerns or allegations made about staff, including supply teachers, volunteers and contractors', sets out the statutory framework for managing allegations and concerns. (Appendix 2) It is the responsibility of all Senior Leadership Teams and DSLs to be fully familiar with and act in accordance with Appendix 2.

The Headteacher will normally undertake the role of 'Case Manager' and will immediately inform the Trust Chief Executive Officer (CEO) and the Head of Safeguarding or in their absence the Deputy CEO of the allegations or concerns arising.

Where there is an immediate risk to a child or children, or evidence of a criminal offence, a decision may be taken to contact children's social care and as appropriate the Police directly in the first instance.

Where there is a need to refer to the Local Authority Designated Officer (LADO) the contact details below should be used:

Procedures for Norfolk LADO:

If you work in Education and your concern relates to Education Service contact NCC Education Quality Assurance and Intervention Service on 01603 307797 is a triage service provided by Norfolk County Council who provide advice on whether a referral to the LADO service is required. EQAIS is not part of the LADO service. If EQAIS recommends a referral to LADO is appropriate, the LADO will consider whether the threshold has been met for a formal safeguarding LADO process.

LADO referral forms can be found here https://norfolklscp.org.uk/people-working-with-children/how-to-raise-a-concern

Procedures for Suffolk LADO:

Local Authority Designated Officers can be contacted for advice and consultation via email on: LADO@suffolk.gov.uk Or via the LADO central telephone number: 0300 123 2044.

Referral forms can be found here: https://www.suffolksp.org.uk/local-authority-designated-officers-lado#gsc.tab=0

Staff, volunteers or contractors who may be the subject of an allegation will receive appropriate support, and all requirements in Appendix 2 will be observed including those in respect of confidentiality and record keeping.

6. How a low-level concern will be managed
All reports will be handled in a responsive, sensitive and proportionate way.

Any required investigation will be undertaken, and any member of staff, volunteer or contractor who is the subject of a low-level concern will be supported and provided with an opportunity to respond.

Low-level concerns which are shared about supply staff and contractors will be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

Unprofessional behaviour will be addressed, and the member of staff, volunteer or contractor supported to correct it at an early stage.

This creates and embeds a culture of openness, trust and transparency in which our values and expected behaviour are constantly lived, monitored and reinforced by all staff volunteers and contractors, while minimising the risk of abuse.

7. Record keeping and monitoring
Records of allegations and low level-concerns will be kept in the Academy will be reviewed and monitored by the Headteacher. If required, the Headteacher will seek advice, from the Head of Safeguarding, HR Director and CEO. All records will be managed in accordance with the statutory guidance 'Keeping Children Safe in Education', the Data Protection Regulations 2018, and the General Data Protection Regulation. Local Governance Committees and Trustees will maintain oversight to ensure that allegations and low-level concerns are being reported, managed, recorded and monitored appropriately.

8. Whistleblowing
Should circumstances arise where staff or volunteers have concerns in relation to poor or unsafe practice, or potential failures within a school's or the Trust's safeguarding regime, whereby that immediate referral to the Police or LADO is not required to safeguard children or young people, the Trust Speak Up Policy provides channels for them to raise their concerns. In addition to this the NSPCC offers a Whistleblowing Advice Line if you are worried the organisation might be putting children at risk. The contact number for this is 0800 028 0285.

Staff and volunteers have a duty to raise any such concerns and are encouraged to do so.

Appendix 1 - Low Level Concerns / Allegations Record: Adult working or volunteering with children/young people

Part A

Name of adult at centre of concern/allegation		**Role**	
Name of person completing form		**Role**	
Date of concern/allegation		**Date record Made**	
Name of child /children involved if applicable:			
Has concern/allegation arisen during the adult's time on school site or outside of school?			
Details of the concern/ allegation			
Is the adult aware of the concern/allegation?			
Action taken by person(s) completing the form:			
Who has the concern/allegation been shared with? (Headteacher/DSL/Head of Safeguarding/ CEO)			
Signature of person completing: …….			
Part B: To be completed by Headteacher or Head of Safeguarding or CEO			
Name of person completing form		**Role**	
Date record in Part A received			

Does the information provided suggest that the adult has *(please tick all that apply)***: -**	
• behaved in a way that has harmed a child, or may have harmed a child;	
• possibly committed a criminal offence against or relating to a child;	
• behaved towards a child or children in a way that indicates that they may pose a risk of harm to children	
• behaved or may have behaved in a way that indicates they may not be suitable to work with children.	

- **has the LADO been contacted?** **Yes / No**

If yes has a local authority referral form been completed and submitted? **Yes/ No**

- **has advice been taken from any other professionals?** **Yes / No**

Include details of professionals spoken to

Details of decisions and actions taken
Include here details of
• strategy discussion
• allegations management meeting
• no involvement by LADO – low level concern to be dealt with internally
• disciplinary procedures
• no further action as applicable

Include here any safeguards which have been put in place in response to the report
Include here details of
• additional adult supervision implemented
• risk assessment required
• additional staff training required
• duties away from children
• suspension during investigation

If a child or children has been involved, have parents/carers been informed? Yes / No
If Yes, what action would they like to see?

Outcome determined by LADO (Substantiated/ Malicious/ False/ Unsubstantiated/ Unfounded)

Outcome determined by Trust

Response to outcome/s *Including whether or not the concern/allegation will be recorded in any future reference in accordance with KCSIE*

Signature of person completing: …….

Appendix 2 - Part four: Safeguarding concerns or allegations made about staff, including supply teachers, volunteers and contractors

https://www.gov.uk/government/publications/keeping-children-safe-in-education--2