



Love Learning, Love Life.

The shared vision for our trust is to “create schools that ‘stand out’ at the heart of their communities.” Our trust has four core beliefs; Family, Integrity, Teamwork and Success that are integral to everything we do. The purpose is to enable everyone to be able to ‘Love Learning, Love Life.’

Our policies are underpinned by our vision, beliefs and purpose

Allegations and concerns (including low-level) raised about staff, supply staff, contractors and volunteers policy

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Policy Accountability and Implementation

Policy Title:

Allegations and concerns (including low-level) raised about staff, supply staff, contractors and volunteers policy.

Policy Author / Reviewers:

Embark Safeguarding Lead, Embark People and Culture Lead

Policy Owner:

Embark Safeguarding Lead, Embark People and Culture Lead

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Embark Trust Board

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Embark Schools website

Embark central policy portal

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4	Embark Safeguarding Lead/Embark People and Culture Lead	Added reference to low level concerns central embark Record	Embark Safeguarding Committee	September 2024
5	Embark Safeguarding Lead/Embark People and Culture Lead	- Updated weblinks throughout the document - Page 14 Added reference to the use of <i>My Concern Staff Safeguarding</i> recording system (new process for 2025/2026 academic year) - Updated the Management Plan - Added Appendix 4 <i>Staff Guide: Recording Concerns About Staff Behaviour</i>	Embark Safeguarding Committee	September 2025

Introduction

The EMBARK Federation is committed to providing the highest level of care for both its pupils and its staff. It is extremely important that any allegations or concerns, including low-level, raised about a teacher, any other member of staff, including supply staff, contractors or volunteers in our school are dealt with thoroughly and efficiently. We will maintain the highest level of protection for the child whilst also giving support to the person who is the subject of the allegation or concern. Our policy is in line with statutory guidance from the Department for Education and complies with the statutory guidance, Keeping Children Safe in Education.

This policy is designed to ensure that all staff, pupils and parents or carers are aware of the procedure for the investigation and management of allegations and concerns, including low-level concerns so that all complaints are dealt with consistently and as efficiently as possible.

This policy is in two parts. The first part deals with allegations made against teachers, and any other members of staff, including supply staff, contractors or volunteers. The second part of the policy deals with low-level concerns raised about teachers and any other members of staff, including supply staff, contractors or volunteers.

Responsibilities

Any allegations or concerns about staff, supply staff, contractors and volunteers working in or on behalf of Embark schools will be reported to the Headteacher immediately or to a member of the school senior leadership team with Designated Safeguarding Lead responsibility (if they are not the subject of the concern/allegation).

Any allegations or concerns about a Headteacher will be reported immediately to the chair of governors of the school.

Any allegations or concerns about a chair of governors or any governor will be reported immediately to the Trust Leader of the Embark Federation, and or to a member of the Embark Federation senior leadership team.

Any allegations or concerns about the Embark Trust (whistleblowing based on the possibility of endemic child abuse) or against a specific member of its central leadership team, the Department for Education needs to be contacted and or Ofsted

<https://www.gov.uk/government/publications/complain-about-an-academy/complain-about-an-academy>

<https://www.gov.uk/government/publications/complain-about-an-academy/complain-about-an-academy#contacting-dfe>

<https://www.gov.uk/government/organisations/ofsted/about/complaints-procedure>

All concerns/ allegations will be taken seriously and investigated immediately.

PART ONE: Allegations against staff, supply staff, contractors and volunteers

The procedure for dealing with allegations against staff, supply staff, contractors (including self-employed) and volunteers depends on the situation and circumstances surrounding the allegation.

This policy must be followed when dealing with allegations but may be adapted to each case. This policy will be used alongside the school's **complaints policy**, the school's **child protection and safeguarding policy on the school's website**, and the **local authority safeguarding children's partnership arrangements for managing allegations**:

<https://www.ddscp.org.uk/staff-and-volunteers/info-and-resources/allegations/>

Schools may receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extracurricular activities). As with any safeguarding allegation, schools will follow their safeguarding policies and procedures, including informing the Local Authority Designated Officer (LADO) and in compliance with Keeping Children Safe in Education.

This policy will refer to the allegations threshold as described in Keeping Children Safe in Education statutory guidance and in local safeguarding children partnership arrangements and this will be used in any case where it is suspected or alleged that a member of staff, volunteer or contractor at the school has:

- behaved in a way that has harmed a child or may have harmed a child (our child protection policy outlines what it means to harm a child)
- 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.
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The fourth bullet point above includes behaviour and conduct that may have happened outside of school that might make an individual unsuitable to work with children. At any point, a headteacher/or member of the senior leadership team can contact the Embark People and Culture Lead for advice and support. The Embark Federation also reserves the right to seek legal advice if necessary and proportionate.

Timescale

It is imperative that allegations against staff are dealt with as quickly as possible to:

- minimise the risk to the child
- minimise the impact on the child's academic progress
- minimise stress to the employee concerned
- ensure a fair and thorough investigation for all parties.

To enable this to happen, all staff, parents, and students should be aware of the procedures set out in this policy.

Procedure

Reporting an allegation

All allegations made against staff, supply staff, contractors and volunteers should be reported immediately to the headteacher. Complaints about the headteacher should be reported to the chair of governors who will then contact the LADO. The headteacher/chair of governors will then act as the case manager.

Staff who are concerned about the conduct of a colleague towards a pupil are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation, and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount and must report their concerns immediately.

When an allegation is made the headteacher or chair of governors will consider two aspects:

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

In each case, the headteacher or chair of governors will:

- 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.

The local authority has a function to receive all allegations and concerns that may have met an allegation threshold. The local authority has a LADO (Local Authority Designated Officer) whose role it is to investigate all allegations and concerns when raised with them. Before contacting the LADO, the headteacher or chair of governors will conduct basic enquiries to establish the facts to help determine whether there is any foundation to the allegation. The headteacher or chair of governors will contact the designated officer at the local authority and a discussion will take place to decide whether:

- more information is required; or
- no further actions are needed; or
- a strategy discussion should take place; or
- there should be immediate involvement of the police or social care.

The school will share available information with the LADO about the allegation, the child, and the person against whom the allegation has been made and consider whether a police investigation or a strategy discussion is needed. Representatives from other agencies may be invited to the discussion and could include representatives from health, social care and police.

Relevant and local contact details, procedures & forms for this are located in appendix 1 and 2.

Dealing with Allegations against Adults Working within the Trust Investigations

There are three types of investigation:

- by Social Care and the Police;
- by the Police under criminal law; or
- by the Embark Federation Trust in line with staff disciplinary procedures.

If an allegation is made against an adult working within the Trust, the quick resolution of that allegation should be a clear priority to the benefit of all concerned. At any stage of consideration or investigation, all unnecessary delays should be eradicated. In cases where concerns must be discussed with the LADO (see Appendix 1), an internal investigation cannot be initiated into an allegation against the adult until consultation has taken place with the LADO.

When an allegation of abuse is made against an adult working within the Trust there must be an immediate consideration of whether a child is at risk of significant harm and in need of protection with appropriate referrals to social care or the police made through local referral pathways. All allegations or concerns must be immediately reported to the headteacher who will act as the Case Manager but can delegate the investigation. If the headteacher is the subject of the allegation you must notify the governor.

All information regarding any concern will be shared immediately with the Embark Safeguarding Lead for advice and support. The Case Manager will apply common sense and judgement, deal with allegations quickly, fairly and consistently and provide effective protection for the child and support for the person subject to the allegation whilst also seeking support from the People and Culture Lead. The Case Manager will also be responsible for contacting the LADO to share the information about the allegation and to discuss the next steps and;

- recording decisions (including the rationale behind them);
- informing all parties of next steps.
- discussing options for the person against whom the allegations are made with the Safeguarding Lead and People and Culture Lead.
- attending, with the support of the Trust's Safeguarding Lead and People and Culture Lead, any appropriate strategy meeting
- sharing any additional concerns relating to the welfare of other children in the community or the member of staff's family with the LADO and ensuring risk assessment is undertaken regarding the situation
- ensuring that all involved parties are updated with progress of the investigation, case progress and outcomes The discussions with the LADO will help the Case Manager to know the best options to deal with the allegations.

If the matter is to be dealt with internally within the school, the Case Manager will, with the necessary support from the Trust People and Culture Lead, make very clear plans for managing the allegations, the impact on others and the preventative steps needed to avoid such a situation occurring again. If the LADO feels that the matter needs a formal investigation external to the school or the Trust this will take the form of a strategy meeting with clear multi-agency discussions and plans taking place. Agreement must be reached with the LADO (and the Police / Children's Social Care if appropriate) and the People Directorate as to how information is shared and maintained with the adult concerned throughout the investigative process. The Case Manager will keep a record of all agreed actions and the strategies used including the rationale behind them throughout the investigation process.

An investigation into the allegation is normally carried out by children's social services or by the school. This will be agreed at the initial evaluation stage. Where the school is not conducting the investigation, it will cooperate with investigative agencies.

Internal investigations must be second to any safeguarding investigation and may need to be delayed until the external investigation is complete or had enough evidence to start an internal investigation.

Very few allegations including low-level concerns are deemed malicious or false.

A school must also consider any risks following an allegation been made. This may mean undertaking a risk assessment and managing any potential risks:

- if the individual remains in the school and or has contact with pupils during an investigation
- If the individual is distressed or exhibiting behaviour that may cause harm to self
- If the victim/s are in school

A risk assessment template and management plan is located in **appendix 3**.

The following definitions should be used when determining the outcome of the investigation.

- **Substantiated:** there is sufficient evidence to prove the allegation.
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the to the person subject to the allegation.
- **False:** there is sufficient evidence to disprove the allegation.
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

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

Supporting those involved

The person(s) who makes the allegation and their parents/carers

Parents and carers will be notified if their child makes or is involved in an allegation against staff if they do not already know. However, if the police or social services are to be involved, they will be contacted first and will advise as to what information may or may not be disclosed to the parents. There will be a staff member designated to the role of liaising with the parents and child about the case and ensuring that they are fully informed as far as is possible. Parents and carers will be made aware of any progress in the investigation, and where there is no criminal prosecution, the outcome will be explained to them. This may be a disciplinary outcome. During a disciplinary hearing the deliberations and information used for making a decision are confidential, but parents will be offered feedback to give assurance the measures are in place to ensure safety measures are in place.

Social services and the police may be involved and will provide the school with advice on what type of additional support the child may need.

Duty of care for employees

The Embark Federation has a duty of care to its employees and will take steps to minimise the stress of any allegation and the investigation process.

The person who is the subject of the investigation will be informed as soon as possible and usually after the initial discussion with the LADO. The employee will then be advised on what the next course of action will be. However, if the police or social services are to be involved, they will be contacted before the employee and will advise as to what information may be disclosed to the person under investigation.

The school will allocate a named representative who will keep the employee informed of the progress of the case and any other work-related issues.

The employee will be advised to contact their trade union representative, or a colleague for support. The employee may need additional support, and the school will consider what might be appropriate to best accommodate this. If it is a criminal investigation and the police are involved, they may provide this additional support.

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

The school also provide the employee with an information leaflet provided by Derby and Derbyshire Safeguarding Childrens Partnership (DDSCP), which explains the LADO process.

[derbyshire-managing-allegations-information-leaflet-june-2025-.pdf](#)

Confidentiality

The school will make every effort to guard the privacy of all parties during and after an investigation into an allegation. It is in everyone's best interest to maintain this confidentiality to ensure a fair investigation with minimum impact for all parties.

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

A breach of confidentiality will be taken seriously and may warrant its own investigation.

Considering Suspension

The possible risk of harm to children posed by an accused person should be evaluated and managed in respect of the child(ren) involved in the allegations. In some rare cases that will require the Case Manager to consider suspending the accused until the case is resolved. Suspension should not be an automatic response when an allegation is reported; all options to avoid suspension should be considered prior to taking that step. Based on an assessment of risk, alternatives must be considered by the Case Manager including those below, and advice must be sought People and Culture Lead:

- redeployment so that the individual does not have direct contact with the child(ren) concerned.
- providing another adult to be present when the individual has contact with children.
- redeployment to alternative work so the individual does not have unsupervised access to children.

If immediate suspension is considered necessary, the rationale and justification for such a course of action should be agreed and recorded by the Case Manager in consultation with the People and Culture Lead. This should also include what alternatives to suspension have been considered and why they were rejected. Where it has been deemed appropriate to suspend the person, written confirmation should be sent within one working day explaining the reasons for the suspension. This should include details of who the member of staff's named contact is within the Trust and their contact details.

It is important to note that suspension is a neutral act which can protect the interests of both parties and is not a presumption of guilt. Particular care will be taken where the person is suspended to ensure they are kept informed of both the progress of their case and current work-related issues. The Trust cannot/will not prevent social contact with colleagues and friends unless such contact is likely to be prejudicial to the gathering and presentation of evidence in which case this will be made known to the individuals involved.

It is important to note that the decision to suspend can be taken at any point during the investigation. A referral to the Disclosure and Barring Service (DBS) must be considered for any staff member for whom it is decided that they should be deployed to another area of work that is not regulated activity, or they are suspended through this policy.

Resignations

If an employee resigns when the allegation is made against them or during an investigation, the investigation will continue and every effort will be made to reach a conclusion, with or without the employee's cooperation. The employee will be given the full opportunity to answer the allegations. In any event of a resignation, the procedures will still be followed and may include consultation with external agencies e.g.- the threshold for reporting to DBS/Teacher Regulation TRA (TRA).

Record keeping

Every allegation and action taken including referral to LADO must be recorded on My Concern, Staff Safeguarding system. (see guide in **Appendix 4**)

Any allegation whether upheld or found to be false or malicious, will be recorded as such in the form of an outcome in the personnel record of the employee concerned.

Records will be subject to the usual school record retention procedures as set out nationally and locally. This includes for people who leave the organisation, at least until the person reaches normal pension age or for 10 years if that will be longer, from the date of the allegation. If the allegation is of a sexual nature, the record will be kept for as long as the national enquiry into historical sexual abuse stays active and when all agencies receive any notification of any outcome. Details of any allegation made by a pupil or pupils will be kept in the confidential section of their record. These details will be transferred as part of a school's transfer process.

The records will be kept confidential and held securely in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation. Any records concerning allegations will be held centrally by the Embark Federation.

Action on conclusion of the case

If the allegation is substantiated and the employee is dismissed or resigns, or we cease to use the volunteer's services, the supply staff member's services or the contractor's services as a result of the allegation, the school will consider whether a referral must be made to the DBS and/or to the TRA as appropriate.

If it is decided that the employee may return to school after a suspension, then provisions will be put in place by the school to ensure that the transition is as smooth as possible. This may involve a phased return for a trial period or the use of another member of staff as a support system in the short term. If the child who made the allegation is still at the school, the school will consider what needs to be done to manage the contact between employee and child.

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

Action in the case of false or malicious allegations

Where an allegation is proved to be false, the headteacher and chair of governors may refer to social services to determine whether the child needs support or has been abused by someone else.

The school's **behaviour policy** sets out the disciplinary action that may be taken against pupils who are found to have made malicious allegations against school staff. The headteacher may consult the school governors when considering what action to take.

If the claim has been made by a person who is not a pupil, the school may pass the information to the police who may take further action against that person.

After the case

No matter what the outcome is of an allegation of abuse against staff, including supply staff, the school will review the case to see if there are any improvements that can be made in its practice or policy that may help to deal with cases in the future.

Non-recent (historical) allegations

Where an adult makes an allegation to [name of school] that they were abused as a child, that adult will be advised to report the allegation to the police.

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

PART TWO: Low-level concerns

Purpose

The procedure for dealing with low-level concerns raised in relation to teachers, any other members of staff, including supply staff, contractors or volunteers depends on the situation and circumstances surrounding the concern.

This part of the policy must also be followed when dealing with low-level concerns but may be adapted to each case. A low-level concern is referred to in the statutory guidance, Keeping Children Safe in Education and the Embark Federation will act in compliance with this and the school's child protection and safeguarding policy where it is relevant.

The Embark Federation promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. This is designed to:

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

Self- Referral

The Embark Federation will ensure they create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe

they have behaved in such a way that they consider falls below the expected professional standards.

Recognising low-level concerns

A 'low-level' concern is defined as any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school 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 allegations threshold or is otherwise not considered serious enough to consider a referral to the Local Authority Designated Officer (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 phones.
- 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

The importance of sharing low-level concerns

For our culture of openness, trust and transparency to prevail, all staff including those who work on behalf of a school should share any low-level concerns they have. Serious case reviews and safeguarding practice reviews have all too often evidenced how low-level concerns felt and/or expressed by staff relating to individuals were not acted upon, and who were later found to have sexually abused children at a school were not recorded. When a low-level concern is not recorded, it cannot be reviewed or studied for patterns of behaviour.

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

How to share low-level concerns

All staff are encouraged to report low-level safeguarding concerns including conduct and behaviour regarding colleagues so that the identified behaviours can be investigated and managed appropriately. The welfare of the child is paramount and so concerns must be reported immediately.

The procedure for reporting low-level concerns is deliberately the same as that for reporting allegations of abuse as set out in part one of this policy. Therefore, staff do not need to concern themselves with whether their concern meets the threshold set out in part one of this policy or is a low-level concern. The headteacher or chair of governors (if not the subject of the concern) will make this determination once the concern has been reported.

Responding to low-level concerns

The headteacher or chair (as appropriate) will review the concern to confirm that it is not a more serious issue that should be dealt with under part one of this policy.

If necessary, the headteacher or chair (as appropriate) will discuss the concern with the LADO to determine whether it should be dealt with under part one of this policy and or whether to clarify if the LADO has information to share.

The headteacher or chair (as appropriate) will discuss the concern with the individual who raised it and will investigate it.

Most low-level concerns can be dealt with by means of management support or additional training. Where necessary, action may be taken in accordance with the school's staff discipline, conduct and grievance policy. Very few allegations whether determined low-level concerns are malicious or false.

If the concern has been raised via a third party, the headteacher will collect as much evidence as possible by speaking directly to the person who raised the concern (unless it has been raised anonymously), to the individual involved directly and any witnesses.

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

Recording low-level concerns

Every low-level concern and action taken including referral to Lado must be recorded on My Concern, Staff Safeguarding system. (see guide in **Appendix 4**)

Any allegation whether upheld or found to be false or malicious, will be recorded as such in the form of an outcome in the personnel record of the employee concerned.

Records will be subject to the usual school record retention procedures as set out nationally and locally. This includes for people who leave the organisation, at least until the person reaches normal pension age or for 10 years if that will be longer, from the date of the allegation. If the allegation is of a sexual nature, the record will be kept for as long as the national enquiry into historical sexual abuse stays active and when all agencies receive any notification of any outcome. Details of any allegation made by a pupil or pupils will be kept in the confidential section of their record. These details will be transferred as part of a school's transfer process.

The records will be kept confidential and held securely in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation. Any records concerning allegations will be held centrally by the Embark Federation.

References

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

Materials and resources to support managing an allegation are available, and the school will provide this and guidance to any individual where an allegation has been made:
<https://www.ddscp.org.uk/staff-and-volunteers/info-and-resources/allegations/>

Appendices

Appendix 1. LADO Flow Chart

Appendix 2. LADO Referral Form

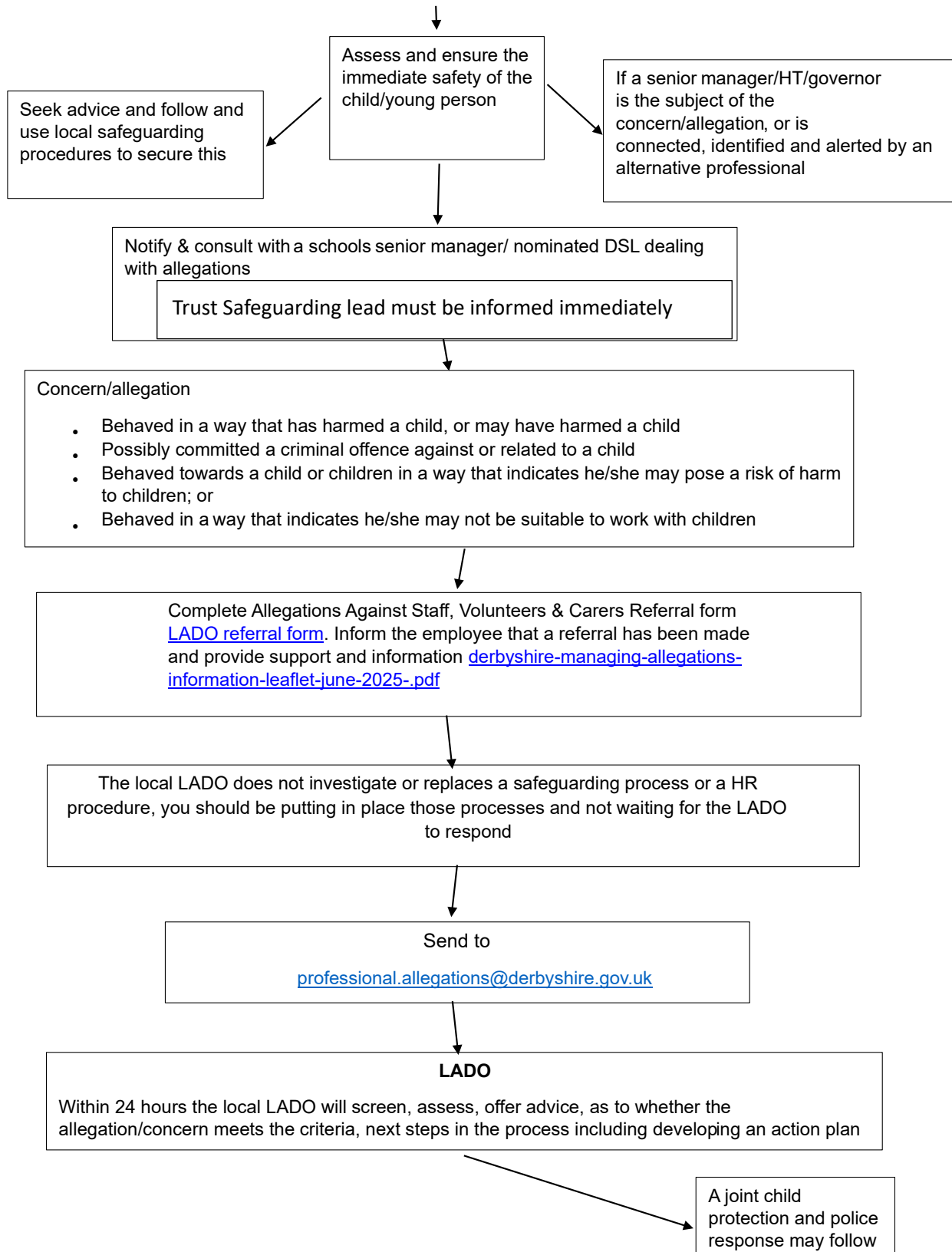
Appendix 3. Management Plan Template

Appendix 4: Staff Guide: Recording Concerns About Staff Behaviour in My Concern Staff Safeguarding

Appendix 1. Embark LADO Flow Chart

Allegations against Staff, Volunteers & Carers

LADO Process



Appendix 2. Seeking advice/making a referral to LADO



ALLEGATIONS AGAINST STAFF, VOLUNTEERS & CARERS REFERRAL TO LOCAL AUTHORITY DESIGNATED OFFICER (LADO) FORM

You should make a referral to the LADO if there is reasonable cause to believe that any person who works or volunteers with children, in connection with their employment, (including supply staff) or voluntary activity 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 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.

See DDSCP's Safeguarding Children [Allegations against Staff, Carers and Volunteers procedure](#), and KCSIE

Once completed please return your form marked 'for the attention of the Duty LADO via secure email: (the Duty LADO will respond to any written referrals)

- For Derby email: CPMduty@derby.gov.uk
- For Derbyshire email: professional.allegations@derbyshire.gov.uk

NAME OF PERSON COMPLETING REFERRAL:	
DATE OF REFERRAL:	
WORK ROLE:	
ORGANISATION:	
TELEPHONE NUMBER/S:	
EMAIL ADDRESS:	

DETAILS OF PERSON OF CONCERN /SUBJECT (if the allegation is about a Head Teacher, please refer immediately to the Chair of Governors)	
FULL NAME:	
DOB:	
HOME ADDRESS:	
WORK ROLE:	
EMPLOYER & WORK ADDRESS:	
TELEPHONE NUMBER:	
WHAT HAS BEEN ALLEGED? Include dates, times, witnesses (where known) etc.	

WHAT IN YOUR OPINION IS THE NATURE OF THE ALLEGED HARM? Please tick which one applies			
• Physical	☐	• Inappropriate Behaviour (in Work)	☐
• Sexual	☐	• Grooming	☐
• Neglect	☐	• Sexual Images	☐
• Conduct (outside work)	☐		

DOES THE SUBJECT LIVE WITH OR HAVE OTHER CONTACT WITH CHILDREN?
Yes ☐ No ☐ Unknown ☐ • Details:

DOES THE SUBJECT HAVE ANY OTHER OUT OF HOURS, PART TIME PLACE OF EMPLOYMENT/ VOLUNTEERING ROLE WITH RESPONSIBILITY FOR CHILDREN?
Yes ☐ No ☐ Unknown ☐ • Details:

ANY PREVIOUS LADO OR CONCERN? Please put dates and outcome if known
Yes ☐ No ☐ Unknown ☐ • Details:

ANY OTHER PROFESSIONALS/VOLUNTEERS INVOLVED IN THIS ALLEGATION?
Yes ☐ No ☐ Unknown ☐ • IF YES, AND FOR DATA PROTECTION PURPOSES, PLEASE COMPLETE SEPARATE REFERRAL

IF APPLICABLE, FULL DETAILS OF CHILD VICTIM/COMPLAINANT	
NAME:	
DOB:	
ANY DISABILITY?	Yes ☐ No ☐ If yes, what is the nature of the disability?

HAS THE CHILD BEEN DISCUSSED BEFORE AS A VICTIM UNDER ALLEGATIONS AGAINST STAFF, CARERS AND VOLUNTEERS PROCEDURES? (Has the child made complaints about staff before?)

Yes ☐

No ☐

• If yes, when and brief details:

HOME ADDRESS OF CHILD:

IS THE CHILD/YOUNG PERSON LOOKED AFTER?

Yes ☐

No ☐ If

Yes:

- Name of IRO and contact details:
- Placing Authority
- Name of Social Worker and contact details:
- Has the Social Worker/ IRO been informed? Yes ☐ No ☐

If No:

- Who has Parental Responsibility?
- Are the child's parents aware of the allegation? Yes ☐ No ☐
- What do they know?

INITIAL CONTACT TO BE MADE VIA THIS REFERRAL FORM IF YOU FEEL THE CRITERIA IS MET.

WHAT ACTION HAVE YOU TAKEN SO FAR TO MANAGE THE IDENTIFIED RISK?

1. HAVE YOU REFERRED TO CHILDREN'S SOCIAL CARE/CHILDREN'S SERVICES? (In Derby via Initial Response Team via 01332 641172 or in Derbyshire via Starting Point 01629 533190)

Yes ☐ No ☐

• If no, give reasons:

• If yes, referred to:

Date:

• Agreed action:

2. HAVE YOU REFERRED TO POLICE? Urgent 999 or non-urgent 101

Yes ☐ No ☐
• If no, give reasons: • If yes, date you referred? Incident Number: • Agreed Action:
3. HAVE YOU INFORMED YOUR HR/PERSONNEL DEPARTMENT?
Yes ☐ No ☐
• If no, give reasons: • If yes, name of your HR person: Date you referred: • Agreed Action:
4. HAVE YOU INFORMED ANY REGULATORY BODY or OFSTED/CCG/CQC?
Yes ☐ No ☐
• If no, give reasons: • If yes, who informed and date you referred: • Agreed actions: • Case number, if referral appropriate:
IS THE SUBJECT AWARE OF THE REFERRAL?
Yes ☐ No ☐
THANK YOU FOR COMPLETING THIS REFERRAL FORM. THE LADO WILL SEEK TO RESPOND WITHIN 24 HOURS OF RECEIPT OF YOUR REFERRAL.

How is your information used?

Information contained within this form will be used by the LADO during the management and oversight of allegations against people who work with children. The legal basis for processing is compliance with a legal obligation to safeguard and promote the welfare of children (s. 11 Children Act 2004), and duties imposed by the Working Together to Safeguard Children statutory guidance 2018.

Who will your information be shared with?

The information provided may be shared with other departments within the Council as appropriate, for example HR. It may also be shared with relevant third party organisations including Health, Police, Schools, educational settings or voluntary groups. Sharing will only be carried out where necessary and proportionate, and where there is an identifiable legal basis for doing so.

Information may also be shared with the Department for Education, Ofsted, DBS and HCPC as required by law and in certain circumstances the information will be shared with the subject in line with Subject Access Request.

Further information about how your personal information will be used please visit for Derby cases [Derby City Council](#) or for Derbyshire cases [Derbyshire County Council](#), where you can see a full copy of our privacy notices. Alternatively, you can request a hard copy from Derby Child Protection Admin Team by phoning 01332 642376 or emailing cypsafeguarding@derby.gov.uk or from Derbyshire Professional Allegations Team by phoning 01629 531299 or emailing Professional.Allegations@Derbyshire.gov.uk.

Appendix 3. Management Plan Template



This is a management plan under allegations against professionals, carers, and volunteers (including contractors, supply, self-employed, using school premises and who are employees/ who work on behalf of the school/ are on school premises)

This management plan complies with the DFE statutory guidance Keeping Children Safe In Education and current local safeguarding procedures; [Allegations against Staff, Carers and Volunteers procedure](#) This form is used in line with the Embark Trust Allegations and Concerns in relation to Staff policy, which is updated annually.

This form can be completed for individuals where allegations may/have met the harms threshold, or where there are concerns that do not meet the harms threshold (low level concerns). It is a tool, to guide through the process, ensuring consistent and thorough approach is taken.

This management plan can be discussed with the individual and reviewed as necessary until required.

1 Details

School

Name of the individual

Job Title

Employed by the school Yes/No

Is this individual supply/agency/contractor/self-employed/works on the premises Yes/No

Name of senior lead completing this form **Position:**

2. Details of the nature of the allegation/concern and who reported this and when

3. Details of any immediate actions taken (include if the individual is not an employee actions taken here e.g.- informing the agency, proprietor of the schools club etc)

4. Brief outline of the statements collected as part of the investigation and where these are stored

5. Threshold is met/not met

Threshold met, referral into LADO Yes/No Date submitted..... (form on personnel record?)

Threshold not met Yes/NO

Details of rationale of why threshold not met (therefore, defined to be a low-level concern)

6. Safety of child/ren and risks (duty of care)

Referral to the police Yes/No

Details and point of contact

Referral to children's social care for child/ren/case open to children's services Yes/No **Details and point of contact**

Referral to children's social care as employee is living in a household with children under 18/or a vulnerable adult is at risk

Yes/No Details

Paid/voluntary employment elsewhere where employee is in contact with children? Yes/No

Actions taken (if yes)

7. Embark HR informed Yes/No

Details and preliminary outcome

8. Independent investigator required Yes/No

Reasons for and details

9. Safety of Employee (duty of care)

Nominated point of contact for employee (to report on the progress of the case) Yes/No

Name:

Outline the support plan and including medical advice given and on emotional health and wellbeing and monitoring

10. Independent representative (emotional support and wellbeing) Yes/No

Name and points of contact agreed

11. Further Outcomes

Suspension Yes/No

Reasons and rationale for the decision taken

External investigation agreed- police/social care/ strategy meeting Yes/No Details

Risk Assessment agreed (consider possible ongoing contact to children and if in work, and not suspended, the risks around regulated activity, details of plan for working onsite/offsite) Details

Ongoing management plan agreed (the work schedule/ weekly timetable for employee and any adjustments, sources of support, external counselling)

Signature of senior lead completing the form

Date

Shared with:

Appendix 4. Staff Guide: Recording Concerns About Staff Behaviour in My Concern Staff Safeguarding



Staff Guide: Recording Concerns About Staff Behaviour

Aligned with Freedom to Speak Up, KCSIE and the Embark Allegations and Concerns Policy

Introduction: Building a Culture of Trust, Openness and Real-Time Action

At Embark Federation, safeguarding isn't just about compliance it's about culture.

We are committed to creating a climate where all staff feel supported to speak up if they see or sense something that feels wrong no matter how small. This is not about blame or bureaucracy. It's about living our values of integrity and teamwork by ensuring that concerns are raised early and handled well.

This guidance aligns with the principles of the Freedom to Speak Up movement, which encourages openness where concerns are welcomed, not feared. Psychological safety and speaking won't result in retaliation or judgement. Real-time response, concerns are acted on promptly not ignored or buried. Shared responsibility, everyone has a role to play in safeguarding, culture, and conduct.

Whether the concern is about tone, behaviour, professional boundaries or more serious safeguarding issues, it is vital that we log, explore and respond to them consistently. Every concern, big or small, is an opportunity to protect children, support colleagues, learn and improve practice and spot patterns before harm occurs

We use My Concern Staff Safeguarding (TES) to log all staff-related concerns across our Trust, so that nothing is missed, and everything is addressed. This digital system enables local action with central oversight, helping ensure we remain a transparent, accountable, and values-led organisation.

The Three Categories to Log in My Concern Staff Safeguarding (TES)

Category	Definition	Policy Reference
1. Allegation Against Staff	Any concern that breaches professional conduct, raised by any party (staff, pupils, parents, member of the public) for example: physical violence or threats against a member of staff, theft, use of prohibited items, etc Or that meet harm against children threshold. For example: • behaved in a way that has harmed a child or may have harmed a child (our child protection policy outlines what it means to harm a child); • possibly committed a criminal offence against or related to a child or adult. • behaved towards a child or children in a way that indicates he or she 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.	Allegations & Concerns Policy KCSIE Embark Staff Code of Conduct Professional Standards
2. Low-Level Concern	A minor breach of the staff code of conduct, for example: making staff feel uncomfortable, minor misconduct, inappropriate comments/banter, uncivil behaviour. Or meets low level concerns criteria against children for example: • being over-friendly with children; • having favourites; • taking photographs of children on their mobile phones; • 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	Allegations & Concerns Policy – KCSIE

Category	Definition	Policy Reference
3. LADO-Referral Allegation	When a referral is made to LADO.	KCSIE & LADO Protocol

What You Need to Do (All Staff)

1. Recognise it.

If you feel uneasy, unsure or witness something inconsistent with the code of conduct report it. **You don't need to decide which category it is.**

2. Report it.

- You can log concerns directly onto My Concern Staff Safeguarding (TES system)
- To your **Headteacher** or **DSL**
- If your concern is about the Headteacher or DSL, speak to the Chair of Governors, Trust Safeguarding Lead or Trust People and Culture Lead.
- Self-referrals are also permitted

3. Record it (My Concern Staff Safeguarding).

- All staff will have basic access to My Concern Staff Safeguarding to report concerns
- DSL, Headteacher or relevant lead will ensure concerns are logged in My Concern Staff Safeguarding, the trust-wide digital safeguarding system
- Entries must include key details, category, actions taken, and outcomes
- Self-referrals can also be logged in collaboration with the DSL

My Concern Staff Safeguarding Logging Protocol

- **All concerns must be recorded** including:

- Informal conversations
- Anonymous disclosures
- Allegations by parents, pupils, colleagues or third parties
- The category (Allegation / Low-Level / LADO) will be reviewed and determined by the DSL/Headteacher
- Central Safeguarding and HR Teams have **overview access** to ensure:
 - Patterns are spotted
 - Repeat allegations against individuals are identified
 - Training and risk mitigations are triggered

How Concerns Are Handled

Category	Handled By	Next Steps
Allegation	Headteacher or DSL	Managed through fact finding and meaningful conversations before determining next steps.
Low-Level	Headteacher or DSL	Management support, training or informal action. Reviewed for emerging patterns
LADO Referral	Headteacher/DSL or LADO → LADO (within 24hrs)	Follows LADO process. Case manager appointed. External agencies involved

Key Roles & Responsibilities

Role	Responsibility
All Staff	Report any concern without delay.
DSL / Headteacher	Receive concern, assess threshold, log in My Concern Staff Safeguarding, follow investigation pathway

Role	Responsibility
Chair of Governors	Receives concerns about Headteachers
Trust Safeguarding Lead	Supports with oversight, complex cases, or escalation
People & Culture Lead	Supports all investigations and HR implications.
Headteacher/ Embark central Team	Monitors all concern types, analyses trends, informs policy and training

What Will Be Recorded in My Concern Staff Safeguarding

- Date and time reported
- Summary of incident/concern
- Type: Allegation, Low-Level or LADO Referral
- Reporter (if not anonymous)
- Staff member involved
- Actions taken and rationale
- Outcome and review notes
- Whether a referral to external agencies was made

All records in My Concern Staff Safeguarding will be retained in line with data protection law, and held in personnel files

At a Glance: “SEE IT – SAY IT – REPORT IT”

Scenario	What to Do
Heard a pupil say a colleague made them uncomfortable	Log on My Concern Staff Safeguarding, tell your DSL or Headteacher

Scenario	What to Do
Colleague treating you unfairly Saw a teacher shouting aggressively at a child	Log on, My Concern Staff Safeguarding tell your line manager or Headteacher
Noticed a colleague engaging in overfamiliar behaviour	Log on My Concern Staff Safeguarding, tell your DSL or Headteacher
Realised you may have behaved inappropriately	Self-refer to DSL/Head
Received an anonymous tip from a parent	Record via DSL

Key Documents & Links

- Embark Allegations & Concerns Policy
- Embark Child Protection & Safeguarding Policy (School)
- Embark Overarching Child Protection and safeguarding Policy
- [KCSIE](#)
- [LADO Referral Forms and Flowcharts](#)