SAFEGUARDING CONCERNS AND ALLEGATIONS MADE ABOUT STAFF, INCLUDING SUPPLY TEACHERS/STAFF, TRAINEE TEACHERS, VOLUNTEERS AND CONTRACTORS

Version 1.1

Working Together ▲ Enjoying Learning ▲ Celebrating Difference ▲ Being Brave

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Director of Safeguarding and FASST

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Version History

Version	Date Approved	Amendments (Briefly Detail Changes and section/page number)	Substantive or Operational Amendment	Approved By: Substantive – Trust Board Operational – Head of Function/CEO
Example 1.0	*06.01.2026*	*Page 4 – update to the relevant legislation* *Page 6 – update to the role holder in the Trust*	*Operational*	*CEO*
1.0	15 07 26	New Policy		
1.1	7/9/26	Title Page and throughout – inclusion of 'trainee teachers' and 'providers'. 7 – clarity on referrals to TRA / DBS in event of resignation	Operational	CEO

Contents

1 Introduction 4
2 Part One: Managing allegations made against members of staff, including supply teachers/staff, trainee teachers, volunteers and contractors 4
3 Reporting an allegation 5
4 Investigating an allegation 6
5 Supporting those involved 6
6 Suspension 7
7 Resignation 8
8 Action on conclusion of the case 8
9 Post incident review 8
10 Timescales 8
11 Record keeping 9
12 Confidentiality 9
13 Non recent allegations 9
14 Part Two: Managing low-level concerns 9
15 Recognising low-level concerns 10
16 Sharing low-level concerns 10
17 Responding to low-level concerns 11
18 Recording low-level concerns 11
19 References 11
20 Contacts 12

1 Introduction

The Trust takes the safeguarding of its pupils very seriously and we recognise that it is extremely important that any safeguarding concerns or allegations made against a member of staff, including supply teachers / staff, trainee teachers, volunteers and contractors is managed quickly and effectively. It is also important that low-level safeguarding concerns are recognised and reported so behaviours can be appropriately managed.

This policy sets out how the Trust will manage safeguarding concerns and allegations made about a member of staff, including supply teachers / staff, trainee teachers, volunteers and contractors at our Trust, together with allegations relating to incidents that happened when an individual or organisation was using the Trust premises for the purposes of running activities for children. It meets the requirements of the Department for Education statutory guidance for managing allegations set out in Part 4 of Keeping Children Safe in Education 2026.

This policy is set out in two parts. The first part deals with allegations made against members of staff, including supply teachers / staff, trainee teachers, volunteers and contractors, together with allegations relating to incidents that happened when an individual or organisation was using the Trust premises for the purposes of running activities for children. The second part deals with low-level concerns raised in relation to members of staff, including supply teachers, trainee teachers, volunteers and contractors.

Leadership structures look different across the Trust. Where this Policy refers to “headteacher”. This includes the roles of head of school, headteacher and executive headteacher, unless explicitly stated as otherwise within the policy. The term ‘Trust’ is used to describe all academies and the Central Team within Esteem MAT.

2 Part One: Managing allegations made against members of staff, including supply teachers/staff, trainee teachers, volunteers and contractors

This part of the policy will be followed when managing such allegations and may be adapted to each case as required. Whilst it will be used in all cases, Part 4 of Keeping Children Safe in Education 2026 requires that it is followed in any case where it is suspected or alleged that a member of staff, including supply teachers / staff, trainee teachers, volunteers and contractors has:

- behaved in a way that has harmed a child or may have harmed a child (see our child protection and safeguarding policy for what we mean by ‘harm’);
- 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.

The fourth bullet point above includes behaviour that may have happened outside of the Trust that might make an individual unsuitable to work with children. This is known as transferable risk.

This policy will also be used where allegations are made relating to incidents that happened when an individual or organisation was using the Trust premises for the purposes of running activities for children.

This policy will be used alongside our complaints policy and child protection and safeguarding policy, both of which can be accessed on Esteem MAT website.

3 Reporting an allegation

The safety and welfare of our pupils is of paramount importance and so all staff must report their allegations immediately.

Allegations made against:

- a member of staff, including supply teachers / staff, trainee teachers, volunteers and contractors should be reported to the headteacher or head of school.
- A head of school should be reported to the executive headteacher
- the headteacher, executive headteacher or a member of the Central Team should be reported to the Esteem Chief Executive Officer (CEO).
- The CEO should be reported to the Esteem Chair of Trustees (COT).

The headteacher, the CEO or the COT (as appropriate) will then contact the local authority designated officer (LADO) and inform the Trust Director of Safeguarding. The headteacher, CEO or the COT will then act as the case manager. Whilst the headteacher (or CEO/COT, as appropriate) retains overall responsibility for managing allegations, the Designated Safeguarding Lead (DSL) will provide safeguarding oversight, including advising on risk, supporting referrals to children's services, and ensuring that safeguarding considerations remain central throughout the process.

When an allegation is made the headteacher, CEO or COT 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, CEO or COT 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.

Before contacting the LADO, headteacher, CEO or COT will conduct basic enquiries to establish the facts to help determine whether there is any foundation to the allegation. The headteacher, CEO or COT will contact the LADO and an initial discussion will take place to consider the nature, content and context of the allegation and agree a course of action. The Trust Director of Safeguarding may also be involved in this discussion. This discussion may include that:

- no further action is required; or
- more information is required to determine a course of action; or
- a strategy discussion should take place; or
- police or social care should be involved.

The academy will share relevant information with the LADO about the allegation, the child, and the person against whom the allegation has been made. If it is decided that a strategy discussion should take place, then the academy will always attend that meeting. Representatives from other agencies such as health, social care and police may also be invited to the meeting.

Where an allegation is made or becomes known to the Trust relating to incidents that happened when an individual or organisation was using the Trust premises for the purposes of running activities for children the headteacher will inform the LADO in accordance with paragraph 3.6 of this policy.

4 Investigating an allegation

An investigation into the allegation should normally be undertaken by a senior member of staff at the Trust. Where no suitable staff are available or the nature or complexity of the allegation requires it, the Trust may appoint an independent investigator or request the support of a member of the Central Team.

When determining the outcome of an investigation Part 4 of Keeping Children Safe in Education 2026 states that 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 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

Where an allegation is made against an individual not directly employed by the Trust, such as supply teachers, trainee teachers or contracted staff provided by an employment agency or business, the Trust will remain responsible for gathering the facts and managing the safeguarding process, while working closely with the employment agency, business or provider. In no circumstances would the Trust cease to use such an individual due to safeguarding concerns without finding out the facts and liaising with the LADO to determine a suitable outcome.

5 Supporting those involved

Parents/carers of the child(ren) involved

Parents or carers of the child involved will be told about the allegation if they do not already know of it. Where a strategy discussion is required, or police or children's social care need to be involved, the academy will not tell the parents or carers until it has been agreed with those agencies what information can be shared.

The academy will keep parents or carers informed about the progress of the investigation. Where there is no criminal prosecution, the academy will tell parents or carers the outcome of the investigation. The deliberations of any disciplinary

hearing, and the information taken into account in reaching a decision, will not normally be disclosed but the parents or carers of the child will usually be told the outcome **in confidence**.

The member of staff or volunteer

The Trust has a duty of care to its employees and will act to minimise the stress inherent in the investigation process.

The person who is the subject of the allegation will be informed as soon as possible, usually after the initial discussion with the LADO. The person will be advised of the likely course of action unless the police or children's social care raise an objection. In those circumstances the academy will work with children's social care and the police to agree what information can be disclosed and when.

The headteacher, CEO or COT (as appropriate) will appoint a named representative to keep the person who is the subject of the allegation informed of the progress of the case and up to date on other school related matters. The headteacher, CEO or COT (as appropriate) will also consider what other support may be appropriate for the individual. The academy will advise the individual to contact their trade union representative or a colleague for support. They may also be given access to support services provided by the Trust.

The person who is the subject of the allegation will be advised to contact their trade union representative, or a colleague for support.

Where an allegation is made against a member of supply staff, a trainee teacher or a contractor, the employment agency, business or provider should provide an additional support to that member of supply staff.

6 Suspension

Suspension is not an automatic response to an allegation being made. The academy will only suspend a member of staff following careful consideration of whether there is cause to suspect the child or other children is/are at risk of harm or the case is so serious that it might be grounds for dismissal. In many cases, it may be possible for alternative arrangements to be made so that the individual can continue working.

The Trust makes the decision whether or not to suspend a member of staff. Where the police or children's social care are involved in the case, the academy will listen to their views regarding suspension.

The Trust has no authority or power to suspend a member of supply staff where an allegation is made against them. Instead, the Trust will immediately cease to use the services of that member of supply staff.

Where the member of staff is suspended, they will receive written confirmation within one working day and will be informed of the reason for the suspension.

After the suspension, if it is decided that the employee can return to the Trust, measures will be put in place to support their return to work. This could include a phased return or offering another member of staff as a support system.

The Trust will not prevent social contact with work colleagues and friends unless there is evidence to suggest such contact may prejudice the gathering of evidence.

7 Resignation

If the individual resigns or the supply staff member, trainee, contractor or volunteer ceases to provide their service, the investigation into the allegation will be completed, and if deemed necessary a referral to the Teacher Regulation Agency and / or the DBS will still be made. The individual will be given the opportunity to engage with the investigation, but refusal to do so will not prevent the investigation from being completed.

8 Action on conclusion of the case

If the allegation is substantiated and:

- the employee is dismissed or resigns; or
- we cease to use the supply staff member's or trainee teachers services as a result of the allegation; or
- we cease to use the contractor's services as a result of the allegation; or
- we cease to use the volunteer's services as a result of the allegation;

the Trust will consider whether a referral to the DBS and/or to the TRA is required.

Where an allegation is found to be false, the academy may refer the case to social services to determine whether the child needs support and/or to understand if there is a safeguarding reason why the false allegation was made.

The academy's behaviour policy sets out the action that may be taken against pupils who are found to have made malicious allegations.

Where an allegation is made against a member of supply staff or a trainee teacher the outcome of the investigation will be shared with the supply agency / provider and the LADO.

9 Post incident review

It is good safeguarding practice for schools and academies to review incidents upon their conclusion so they can learn from them and continue to improve standards of safeguarding. Where allegations are made against staff, supply staff, trainee teachers, contractors or volunteers, the academy may carry out a review at the conclusion of the case.

10 Timescales

Investigations into allegations against staff, including supply staff, trainee teachers, volunteers or contractors will be concluded as quickly and efficiently as possible to ensure that any risks to the child or other children and stress to the individual is minimised as far as possible.

11 Record keeping

Allegations found to be false or malicious will be removed from the employment record of the individual. For all other allegations, a clear and comprehensive summary of the allegation, how it was followed up and resolved, a note of actions taken and decisions reached and a declaration on whether the information will be referred to in any future reference will be retained on the employment file. A copy will also be provided to the individual.

The record will be kept, including for people who leave the Trust, at least until the person reaches normal pension age or for 10 years if that will be longer, from the date of the allegation.

Details of any allegation made by a pupil will be kept in the confidential section of their record.

12 Confidentiality

The Trust will make every effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated.

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.

13 Non recent allegations

Where an adult makes an allegation to Trust that they were abused as a child, that adult will be advised to report the allegation to the police.

Non recent 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.

14 Part Two: Managing low-level concerns

This part of the policy will be followed when dealing with low-level concerns raised in relation to members of staff, including supply teachers / staff, trainee teachers, volunteers and contractors and may be adapted to each case as required. It will be used alongside the Trusts **complaints procedure, child protection and safeguarding policy, code of conduct** and **disciplinary procedure**.

The Trust promotes a culture in which all concerns about all adults working in or on behalf of the Trust (including supply teachers / staff, trainee teachers, volunteers and contractors) are addressed appropriately.

This policy is designed to:

- promote and support a culture of openness and trust where staff are clear about the behaviours expected of themselves and their colleagues

- ensure staff are comfortable to raise low-level concerns; and
- provide for efficient and proportionate handling of those concerns

15 Recognising low-level concerns

This policy will be used to manage 'low-level' concerns, defined in Part 4 of Keeping Children Safe in Education 2026 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 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 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 is 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
- humiliating children.

16 Sharing low-level concerns

For our culture of openness and trust to prevail, all staff should share any low-level concerns they have. Serious Case Reviews and Child Safeguarding Practice Reviews have often evidenced how low-level concerns felt and/or expressed by staff relating to individuals who were later found to have sexually abused children at a school were not recorded. When they are not recorded, they 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.

All staff are encouraged to immediately report low-level safeguarding concerns as defined in this policy so that the identified behaviours can be investigated and managed appropriately.

All low-level concerns in relation to staff, supply teachers/ staff, trainee teachers, contractors or volunteers should be reported immediately to the headteacher and DSL via Confide. Concerns about the DSL or head of school should be reported to the headteacher via email and concerns about the headteacher or executive headteacher should be reported to the CEO via email.

If staff are unsure whether their concern meets the threshold set out in part one of this policy or is a low-level concern, the headteacher, CEO or the COT (as appropriate) will make this determination. If unsure the staff member must report the concern following the reporting requirements in part one initially and may be redirected to Confide.

17 Responding to low-level concerns

The headteacher, CEO or the COT (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. An issue reported as a low-level concern would be dealt under part one of this policy where it meets the threshold set out in part one or there is a pattern of low-level concerns expressed about the individual or wider staff practices generally. If necessary, the headteacher, CEO or the COT (as appropriate) will discuss the concern with the LADO to determine whether it should be dealt with under part one of this policy.

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

Most low-level concerns are likely to be minor and can be dealt with by means of management support or additional training. Where necessary, action may be taken in accordance with the Trust code of conduct and disciplinary procedure.

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

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

18 Recording low-level concerns

All low-level concerns will be recorded in writing on Confide and will include details of the concern, the context and action taken. The records will be kept confidential and held securely in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation.

Records of low-level concerns will be reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified. If patterns are identified, the Trust will decide on an appropriate course of action and will refer the matter to the LADO where the behaviour moves from a concern to meeting the threshold set out in the first part of this policy.

The record of the low-level concern will be kept at least until the person leaves the Trust.

19 References

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

20 Contacts

Headteacher Email addresses and Contact Numbers	Nicola Price - Executive Headteacher nprice@fountains.staffs.sch.uk Laura Kobylanski - Head of School lkobylanski1@fountains.staffs.sch.uk
CEO Email address and Contact Number	ceo@esteemmat.co.uk 01623 859749 – main office number. Ask for Karen Hayes and state it is urgent. Do not share any further details with anyone else
COT email address and Contact Number	kboulton@esteemmat.co.uk 01623 859749 – main office number. Ask for Katheryn Boulton's phone number and state that it is urgent. Do not share any further details with anyone else