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Author:	Kim Webster-Marsh (CEO)

Signed -

Allegations Against Staff / Low-Level Concerns Policy – Building SEND Castles Ltd

1. Policy Statement

Building SEND Castles Ltd is committed to safeguarding and promoting the welfare of all children. We take all allegations of abuse or concerns about staff conduct seriously and ensure they are dealt with promptly, fairly, and in accordance with statutory guidance.

This policy outlines procedures for managing:

- Allegations of harm or risk of harm by adults working with children
- Low-level concerns that do not meet the threshold of harm but indicate behaviour inconsistent with professional expectations

2. Scope

This policy applies to all:

- Staff (permanent, temporary, or agency)
- Volunteers
- Students or trainees
- Contractors or anyone working on behalf of Building SEND Castles Ltd

3. Legal Framework and Guidance

This policy is based on:

- *Keeping Children Safe in Education* (KCSiE 2025)
- *Working Together to Safeguard Children* (2023)
- Suffolk Safeguarding Partnership Procedures
- Children Act 1989 and 2004
- Education Act 2002
- Rehabilitation of Offenders Act 1974

4. Definition of an Allegation

An allegation may relate to an adult who has:

- Behaved in a way that has harmed, or may have harmed, a child
- Possibly committed a criminal offence against, or related to, a child
- Behaved in a way indicating they may pose a risk of harm to children
- Behaved in a way that raises concerns about their suitability to work with children

5. Low-Level Concerns

KCSiE 2025 requires all organisations to have clear routes for reporting low-level concerns, i.e., behaviour that:

- Does not meet the harm threshold but is inconsistent with professional expectations
- Could indicate a risk of escalating behaviour if not addressed

Examples include: over-familiarity with children, inappropriate use of social media, minor breaches of professional boundaries.

All staff must report low-level concerns to the DSL or via the whistleblowing policy. These will be recorded, monitored, and addressed through coaching, training, or other proportionate measures.

6. Designated Officers

- **DSL:** Kim Webster-Marsh
- **Deputy DSL:** Jane Sparrow
- **Local Authority Designated Officer (LADO) for Suffolk:** To be contacted via Suffolk County Council Children and Young People's Services
- **If any allegation concerns the DSL/Director,** this will be referred immediately to the Local Authority Designated Officer (LADO).

7. Procedure for Managing Allegations

1. Immediate action

- Do not investigate internally at this stage.
- Inform the DSL immediately. If the allegation concerns the DSL, contact the Chair of Trustees or LADO directly.
- Record the allegation in writing, including dates, times, and details.

2. LADO consultation

- DSL contacts the LADO within **one working day** to discuss the allegation and agree on next steps.
- LADO assesses whether the allegation meets the threshold for formal investigation and decides on immediate action (suspension, alternative duties).
- A strategy meeting may be convened if required.

3. Suspension

- Suspension is not automatic; it is used only where necessary to protect children or the investigation.

4. No contact with accused

- Do not discuss the allegation with the individual at the centre until agreed with LADO or police.

8. Support for Involved Parties

- The person making the allegation will be supported and kept informed.
- The accused staff member will be treated fairly, offered support, and kept informed about the process and outcomes.
- Emotional support and access to external counselling will be offered where appropriate.

9. Confidentiality

- Allegations and low-level concerns will be handled with sensitivity and confidentiality.
- Information is shared strictly on a **need-to-know basis** in line with safeguarding and data protection legislation.

10. Outcomes

Following an investigation, outcomes may be:

- **Substantiated:** sufficient evidence to prove the allegation
- **Unsubstantiated:** insufficient evidence to prove or disprove
- **Unfounded:** no evidence or basis for the allegation
- **Malicious:** allegation made to cause harm
- **False:** allegation proven to be untrue

Records will be kept regardless of outcome and retained according to our Records Management Policy.

11. Learning from Allegations

Where allegations are substantiated, the organisation will:

- Review policies, procedures, and practices
- Provide further staff training
- Consider whether disciplinary action is necessary

12. Referral to Disclosure and Barring Service (DBS)

- If a person is dismissed, removed from working with children, or would have been had they not left voluntarily due to safeguarding concerns, a referral will be made to the DBS in accordance with legal duties.

13. Links to Other Policies

- **Whistleblowing Policy:** Provides guidance for staff to raise concerns internally or externally.
- **Safer Recruitment Policy:** Ensures pre-employment checks mitigate risk of unsuitable individuals being employed.
- **Safeguarding Policy:** Outlines wider safeguarding responsibilities and procedures.

Key Contacts

- **DSL / CEO:** Kim Webster-Marsh – buildingsendcastles@gmail.com / 07879 793763
- **DSL:** Jane Sparrow - adminbuildingsendcastles@gmail.com
- **Suffolk LADO:** lado@suffolk.gov.uk / 0300 123 2044
- **NSPCC Whistleblowing Helpline:** 0800 028 0285 / help@nspcc.org.uk