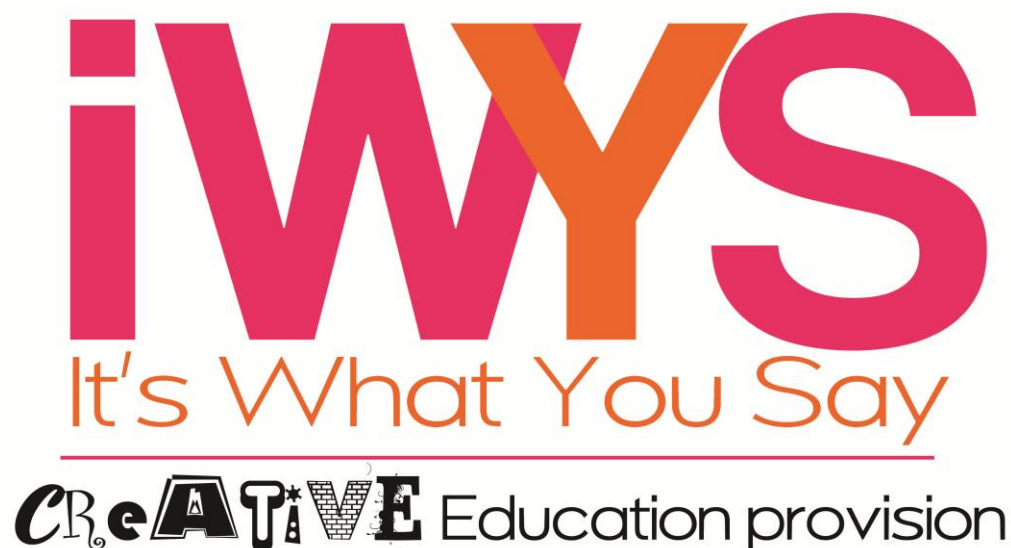




IWYS

ALTERNATIVE EDUCATION PROVISION

Allegations Against Staff and Low-Level Concerns Policy

Organisation	IWYS Alternative Education Provision
Location	Stoke-on-Trent, Staffordshire
Policy status	Safeguarding / Child Protection
Guidance	Keeping Children Safe in Education 2026
Effective from	September 2026
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1. Policy Statement

IWYS Alternative Education Provision is committed to safeguarding and promoting the welfare of every child and young person attending or receiving education and support from the provision.

The purpose of this policy is to ensure that all allegations, safeguarding concerns and low-level concerns about adults working with children are recognised, reported, recorded and managed promptly, fairly, consistently and in accordance with statutory guidance.

IWYS recognises that children and young people attending alternative provision may have additional vulnerabilities and may have experienced previous trauma, disrupted education, exploitation, abuse or difficulties trusting adults. Staff therefore have a particular responsibility to maintain clear professional boundaries and to respond appropriately to concerns.

This policy applies to permanent staff; temporary and agency staff; supply teachers and other supply workers; tutors; peripatetic and visiting tutors; volunteers; contractors; self-employed individuals working directly with students; students or trainees undertaking placements; visitors where appropriate; governors, proprietors or management members; and any other adult working in a position of trust with children.

2. Legislative and Guidance Framework

This policy should be read alongside IWYS's Child Protection and Safeguarding Policy; Staff Code of Conduct; Safer Recruitment Policy; Whistleblowing Policy; Guidance to Visitors; Managing Allegations Procedure; Disciplinary Policy; Online Safety Policy; Behaviour Policy; Staff Acceptable Use Policy; Complaints Policy; and DBS Policy.

The policy takes account of Keeping Children Safe in Education 2026 (KCSIE 2026); Working Together to Safeguard Children 2026; relevant safeguarding legislation; employment and disciplinary procedures; Disclosure and Barring Service requirements; Stoke-on-Trent Safeguarding Children Partnership procedures; and Stoke-on-Trent Local Authority Designated Officer (LADO) arrangements.

KCSIE 2026 came into force on 1st September 2026. All staff must follow their school's safeguarding policies and procedures.

3. Purpose of the Policy

1. Protect children from harm.
2. Take every allegation seriously.
3. Respond immediately to safeguarding concerns.
4. Distinguish appropriately between allegations and low-level concerns.
5. Refer matters to the LADO when the relevant threshold is met.
6. Protect the welfare of the child throughout the process.
7. Treat staff fairly and proportionately.
8. Maintain confidentiality.
9. Keep accurate and secure records.
10. Identify patterns of concerning behaviour.
11. Learn from concerns and allegations.
12. Support a culture where staff feel able to speak up.

4. Key Principles

The welfare of the child is paramount.

Concerns must never be ignored. A concern that appears minor may form part of a wider pattern.

All concerns must be taken seriously, regardless of the adult's reputation or the apparent lack of evidence.

An allegation is not proof of wrongdoing. Allegations must be investigated appropriately and fairly.

Confidentiality is essential. Information must only be shared with people who have a legitimate need to know.

Professional curiosity must be maintained. Repeated incidents, boundary concerns or apparently minor behaviours must be considered collectively where appropriate.

5. Roles and Responsibilities

The Proprietor/Management is responsible for ensuring that this policy is implemented; appropriate safeguarding arrangements are in place; the DSL ([Charmaine Baines/Proprietor](#)) has sufficient authority and resources; allegations are managed appropriately; the LADO is contacted where required; records are securely maintained; staff receive safeguarding training; and lessons are learned from concerns and allegations.

6. Designated Safeguarding Lead

The DSL is responsible for receiving safeguarding concerns; ensuring immediate protective action is taken; consulting the LADO where appropriate; ensuring referrals are made promptly; maintaining safeguarding records; monitoring low-level concerns; identifying patterns of behaviour; ensuring concerns are escalated where necessary; supporting staff through the process; and ensuring relevant safeguarding information is shared appropriately.

KCSIE 2026 requires staff to report safeguarding concerns to the [DSL \(Charmaine Baines\)](#) or ([deputy \(Joy Baines\)](#)) without delay and emphasises appropriate safeguarding records, including concerns, actions, decisions, rationale and outcomes.

7. Concerns About the DSL

If the concern relates to the DSL, it must be reported directly to the Proprietor/Head of Provision or another senior person nominated by IWYS. The DSL must not investigate a concern about themselves.

If the concern relates to the DSL who is also the Proprietor/Head of Provision, staff must use the Whistleblowing Procedure and/or seek advice directly from the LADO or appropriate safeguarding authority.

8. What is an Allegation Against a Staff Member?

An allegation is a concern that an adult working with children may have: behaved in a way that has harmed a child, or may have harmed a child; possibly committed a criminal offence against or related to a child; behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or behaved, or may have behaved, in a way that indicates they may not be suitable to work with children.

An allegation may concern physical abuse; sexual abuse; emotional abuse; neglect; online abuse; grooming; inappropriate communication; inappropriate physical contact; discriminatory behaviour; intimidation; inappropriate

use of social media; inappropriate relationships with students; sharing personal contact details; inappropriate photographs; inappropriate gifts; favouritism; or breaches of professional boundaries.

9. Allegations Relating to Conduct Outside Work

An allegation does not have to arise from an incident at IWYS. A concern about an employee's behaviour outside the workplace may require consideration if it raises questions about their suitability to work with children. The matter should be discussed with the LADO where the relevant threshold may be met.

10. What is a Low-Level Concern?

A low-level concern is a concern about an adult working with children that does not meet the threshold for an allegation requiring referral to the LADO, but which nevertheless causes a concern about the adult's behaviour or professional boundaries.

Examples include:

- Excessive familiarity with a student
- Having favourites
- Unnecessary one-to-one contact
- Giving gifts without an appropriate reason
- Communicating with a student through personal social media
- Using a personal mobile phone inappropriately
- Unnecessary physical contact
- Inappropriate jokes or comments
- Regularly seeking out particular students
- Taking students outside normal professional boundaries
- Breaching professional expectations.

11. Low-Level Concerns Must Not Be Ignored

IWYS will maintain an open and transparent safeguarding culture in which staff are encouraged to report concerns.

The purpose of recording low-level concerns is not to create a culture of suspicion or to unfairly penalise staff. The process allows IWYS to identify patterns, provide support, clarify expectations, address professional boundaries, provide additional training and prevent escalation.

12. Difference Between an Allegation and a Low-Level Concern

A low-level concern does not meet the LADO threshold, but it must still be recorded, considered and managed. An allegation may meet one of the LADO criteria, may involve possible harm or a criminal offence, and may require LADO, police or children's social care involvement.

Important: the DSL or senior manager must not assume that a concern is 'only low-level' without considering whether the LADO threshold is met.

13. Reporting an Allegation

Any member of staff who receives or becomes aware of an allegation must report it immediately to [the DSL Charmaine Baines \(Proprietor/manager\) – Tel: 07341 214173 – Email – \[charmaine@iwys.co.uk\]\(mailto:charmaine@iwys.co.uk\)](#) or Deputy DSL - Joy Baines – [Tel: 07341 213170 Email: \[joy@iwys.co.uk\]\(mailto:joy@iwys.co.uk\)](#) or appropriate senior manager.

Staff must not investigate the allegation themselves; question the child repeatedly; interview the member of staff; promise confidentiality; attempt to establish whether the allegation is true; discuss the matter with colleagues; or confront the person concerned.

14. Immediate Action

Where a child may be at immediate risk, call 999.

For safeguarding concerns in Stoke-on-Trent, professionals can contact the **Integrated Front Door on 01782 235100** during published office hours. Outside office hours, weekends and bank holidays, the **Emergency Duty Team can be contacted on 01782 234234.**

15. Stoke-on-Trent LADO Referral

IWYS will follow the Stoke-on-Trent Safeguarding Children Partnership procedures when managing allegations.

Where the LADO threshold is met, current Stoke-on-Trent arrangements state that a referral should be made within 24 hours.

The current local route is through the Integrated Front Door: 01782 235100. LADO consultation/referral information should be checked against the current Stoke-on-Trent Safeguarding Children Partnership arrangements before use. Local authority designated officer (LADO) CHAD 01782 235100 CHAD.Referral@stoke.gov.uk

16. Where the Concern Does Not Meet the LADO Threshold

Where advice confirms that the matter does not meet the LADO threshold, IWYS will consider whether the concern should be managed internally; disciplinary procedures are appropriate; additional training is required; supervision should be increased; professional boundaries need to be clarified; a risk assessment is required; the concern should remain on the low-level concerns record; or further safeguarding monitoring is required.

The fact that a matter does not meet the LADO threshold does not mean that no action is required.

17. Allegations Against Contractors and Visiting Tutors

Because IWYS uses external and visiting professionals, particular care must be taken with concerns involving visiting tutors, peripatetic tutors, agency workers, contractors, self-employed workers, work-experience providers and external education providers.

The same safeguarding principles apply. IWYS will protect the child, inform the DSL, seek LADO advice where required, inform the person's employing organisation where appropriate, cooperate with police, children's social care and the LADO, and maintain appropriate records.

18. Low-Level Concern Reporting Procedure

A low-level concern should be reported to the DSL or nominated senior manager as soon as reasonably possible.

The report should include date; time; location; name of adult concerned; name(s) of student(s), where necessary; factual description of what was observed/reported; names of witnesses; and immediate action taken.

The report should avoid speculation or personal opinions.

19. Recording Low-Level Concerns

IWYS will maintain a confidential Low-Level Concerns Record. Records should include the date of concern; date received; person raising concern; adult concerned; factual description; context; action taken; advice sought; decision; rationale; outcome; whether any previous concerns exist; and whether a pattern has emerged.

20. Pattern Recognition

The DSL will periodically review low-level concerns to determine whether there is a repeated concern involving the same member of staff; repeated concerns involving the same student; similar concerns involving several staff; a developing pattern; evidence of escalating behaviour; a need for additional training; a need for disciplinary action; or a need to reconsider whether the LADO threshold has been met.

Several low-level concerns, when considered together, may become more serious and may require referral to the LADO.

21. Anonymous Concerns

Where possible, staff should identify themselves when reporting a concern so that appropriate clarification can be obtained. However, anonymous concerns will not automatically be disregarded. The DSL will consider the nature of the information, potential risk, supporting information and whether immediate action is required.

22. Concerns Raised by Students

Students must be encouraged to report concerns about adults. Staff should listen carefully; remain calm; take the student seriously; avoid leading questions; avoid promising secrecy; explain that information may need to be shared to keep them safe; record the concern accurately; and report it immediately.

23. Support for the Child

Where an allegation is made, IWYS will consider the immediate and ongoing needs of the child. Support may include a trusted member of staff, safeguarding support, changes to staffing arrangements, changes to timetable or room allocation, emotional support, referral to external services, and communication with parents/carers where appropriate and agreed with safeguarding agencies.

24. Support for Staff Who Are the Subject of an Allegation

IWYS recognises that allegations can be stressful and potentially damaging to staff. Subject to safeguarding and investigation requirements, the member of staff will be treated fairly; informed of appropriate information when it is

safe to do so; given access to appropriate support; treated confidentially; and kept informed of progress where appropriate.

IWYS will not disclose information where doing so could compromise a police or children's social care investigation, place a child at further risk, or prejudice the safeguarding process.

25. Suspension

Suspension will not automatically follow an allegation. Any decision regarding suspension will be proportionate and based on the circumstances of the case, relevant safeguarding advice, employment considerations and risk assessment.

Alternative measures may include changes to duties, increased supervision, temporary changes to student contact, alternative working arrangements or redeployment where appropriate.

26. False or Malicious Allegations

IWYS recognises that allegations may sometimes be found to be unsubstantiated, unfounded, false or malicious. An allegation must not automatically be described as malicious simply because it is not proven. Any finding will follow appropriate investigation and safeguarding advice.

27. Confidentiality

Information relating to allegations and concerns will be treated as confidential. Information will only be shared where there is a legitimate safeguarding, legal or professional reason.

Staff must not discuss allegations in communal areas; discuss cases on social media; share screenshots; email confidential information unnecessarily; or discuss the identity of those involved with other staff.

28. Record Keeping

All records must be factual, dated, signed or attributable to the author, securely stored and accessible only to authorised personnel. Records should distinguish clearly between fact, allegation, observation, professional judgement and outcome.

29. Whistleblowing

IWYS recognises that staff may sometimes have concerns about the way another adult is behaving or about the way a safeguarding concern is being managed. Staff are expected to raise concerns.

If a staff member believes that a concern has not been appropriately addressed, they should escalate the matter to the DSL, Proprietor/Head of Provision, the appropriate safeguarding authority/LADO, or another appropriate external safeguarding or whistleblowing route.

KCSIE 2026 identifies the NSPCC Whistleblowing Advice Line as an option where staff feel unable to raise concerns internally. NSPCC Whistleblowing Advice Line: 0800 028 0285.

30. Staff Conduct and Professional Boundaries

All IWYS staff must maintain appropriate professional relationships; avoid favouritism; maintain appropriate physical boundaries; use professional communication systems; avoid private messaging with students unless specifically authorised; follow IWYS social media procedures; avoid unnecessary one-to-one situations; maintain appropriate visibility; follow recording and safeguarding procedures; and challenge inappropriate behaviour appropriately.

31. Online and Digital Concerns

Allegations and low-level concerns may involve WhatsApp, Snapchat, Instagram, TikTok, Facebook, gaming platforms, personal email, messaging applications, inappropriate photographs or video calls.

Staff must use approved IWYS systems and must not establish inappropriate private relationships with students through personal accounts. Digital evidence should not be deleted. Where relevant, advice should be sought before accessing, copying or distributing digital evidence.

32. Historical Allegations

IWYS will take historical allegations seriously. An allegation concerning behaviour that occurred in the past may still indicate current safeguarding risk, potential risk to other children, a requirement for LADO involvement or a requirement for police involvement. Historical allegations must therefore be referred to the DSL promptly.

33. Allegations Involving the Proprietor or Senior Leaders

Where an allegation concerns a senior member of IWYS, the person who is the subject of the allegation must not control the safeguarding response. The matter should be escalated appropriately, and the LADO should be contacted where the relevant threshold may be met.

34. Multi-Agency Working

IWYS will cooperate fully with Stoke-on-Trent City Council, Stoke-on-Trent Safeguarding Children Partnership, the Local Authority Designated Officer, Children's Social Care, Staffordshire Police, health professionals, other safeguarding partners and relevant regulatory bodies.

35. Information Sharing

Data protection must not prevent appropriate safeguarding information sharing. Information should be relevant, proportionate, accurate, secure and shared with appropriate professionals. KCSIE 2026 reminds staff that data protection is not a barrier to sharing information when necessary to protect a child.

36. Training

Relevant staff will receive safeguarding training that enables them to recognise allegations; identify low-level concerns; understand professional boundaries; report concerns promptly; understand the role of the DSL; understand the LADO process; understand whistleblowing; and maintain appropriate records.

Stoke-on-Trent Safeguarding Children Partnership provides specific Level 4 training for professionals with lead safeguarding responsibility, including training on managing allegations against staff and volunteers.

37. Monitoring and Review

The DSL will periodically review low-level concerns, allegations, safeguarding referrals, staff training, recurring themes, professional boundary concerns and lessons learned. The purpose of monitoring is to ensure that IWYS remains a safe environment and that concerns are identified before they escalate.

38. Equality and Fair Treatment

IWYS will ensure that allegations and concerns are managed fairly and without unlawful discrimination. No child should be treated less seriously because of disability, SEND, communication difficulties, behaviour, previous safeguarding history, care experience, vulnerability or background.

Similarly, allegations against staff must be handled objectively and fairly.

39. Allegations and Low-Level Concerns Decision Flowchart

CONCERNS RAISED

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Is a child at immediate risk?

YES → Take immediate protective action / contact emergency services where necessary.

NO → Report immediately to DSL.

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Does the concern meet one of the LADO thresholds?

YES / POSSIBLY → Contact Stoke-on-Trent LADO / Integrated Front Door and seek advice.

NO → Consider whether it is a low-level concern.

↓

Low-level concern?

YES → Record → assess → respond → monitor → review for patterns.

↓

Pattern or escalation identified?

YES → Reconsider LADO threshold and safeguarding action.

NO → Maintain appropriate record and management action.

40. Staff Quick Reference

IF YOU HAVE A CONCERN ABOUT ANOTHER ADULT:

DO: report it; report immediately; tell the DSL; record factual information; preserve relevant evidence; seek safeguarding advice.

DO NOT: investigate yourself; promise secrecy; gossip; confront the person; delete evidence; ignore something because it appears minor.

Remember: If in doubt, report it. A concern that initially appears low-level may become significant when combined with other information.

41. Stoke-on-Trent Safeguarding Contacts

- Stoke-on-Trent Integrated Front Door: 01782 235100 – safeguarding concerns and LADO referrals during published office hours.
- Local authority designated officer (LADO) CHAD 01782 235100 CHAD.Referral@stoke.gov.uk
- Emergency Duty Team: 01782 234234 – out-of-hours, weekend and bank-holiday safeguarding concerns.
- Police: 999 – immediate danger/emergency. 101 – non-emergency police contact.
- LADO consultation/referral arrangements should be checked against the current Stoke-on-Trent Safeguarding Children Partnership information before use.
- NSPCC Whistleblowing Advice Line: 0800 028 0285.

42. Policy Review

This policy will be reviewed at least annually and sooner where there are changes to KCSIE; changes to Working Together; changes to legislation; changes to Stoke-on-Trent LADO procedures; significant safeguarding incidents; or learning from local or national safeguarding reviews.

The next scheduled review is September 2027, or earlier if required.

Allegation vs Low-Level Concern – Quick Comparison

Allegation	Low-Level Concern
May meet one of the LADO criteria	Does not meet the LADO threshold
May involve possible harm	May indicate poor professional boundaries
May involve a criminal offence	Usually does not involve suspected criminal behaviour
May indicate risk of harm	May indicate poor professional boundaries
Requires immediate safeguarding consideration	Must still be recorded and considered
LADO may need to be contacted	LADO advice may be sought if uncertain
May involve police/social care	Usually managed internally

43. Approval

Policy	Allegations Against Staff and Low-Level Concerns
Approved by	Charmaine Baine/Proprietor / DSL/Management
Contact	Email – charmaine@iwys.co.uk Tel: 07341 214173
Signature	
Date	September 2026
Review date	September 2027