

LiHT Managing allegations of abuse against teachers, staff and volunteers

Case Management Procedure

September 2025

1. Introduction

1.1 This statement of procedures follows the DfE Statutory Guidance **Keeping children safe in education 2025, Part four: Allegations of abuse made against teachers and other staff**

It is about managing cases of allegations that might indicate that a person is unsuitable to continue to work with children in their present position, or in any capacity. It will be used in respect of all cases where it is alleged that an employee or volunteer, or a person with permission to be on the premises or carrying out any activity on behalf of the school or Trust 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 would pose a risk of harm if they work regularly or closely with children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

This will include allegations involving any type of abuse or neglect, including inappropriate relationships with pupils, grooming behaviour of any kind, possession of indecent photographs or images of children and other offences under the Sexual Offences Act 2003. This Policy applies regardless of whether the school is where the alleged abuse took place.

Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.

Any agencies used for staff should be informed of the process for managing allegations.

1.2 Any allegation of abuse will be dealt with as quickly as possible, in a fair, consistent and thorough way that provides effective protection for the child or children and at the same time deals fairly with the person who is the subject of the allegation.

1.3 Employers have a duty of care to their employees. They should act to manage and minimise the stress inherent in the allegations process. Support for the individual is vital to fulfilling this duty. Individuals should be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless there is an objection by the children's social care services or the police. The individual should be advised to contact their trade union representative, if they have one, or a colleague for support. They should also be given access to welfare counselling or medical advice where this is provided by the employer.

2. Procedure for managing an allegation

2.1 All staff are made aware of the boundaries of appropriate behaviour and conduct. These matters form part of staff induction and are outlined in the Staff Code of Conduct. The school works in accordance with statutory guidance in respect of allegations against an adult working with children (in a paid or voluntary capacity). There are two levels of allegation / concern:

1. Allegations that may meet the harm threshold.
2. Allegations/concerns that do not meet the harm threshold – referred to for the purposes of this guidance as ‘low level concerns’.

2.2 It is essential that the high standards of concern and professional responsibility adopted with regard to alleged child abuse by parents are similarly displayed when members of staff are accused of abuse. Guidance in KCSIE, Part Four should be followed for allegations that might indicate someone working in the school, including supply staff, volunteers and/or contractors pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school because they have:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

This will involve following local safeguarding procedures, including working with the LADO.

2.3 The school has processes in place for reporting any concerns about a member of staff (or any adult working with children including volunteers, contractors and supply staff). Any concerns about the conduct of a member of staff will be referred to the Head Teacher (or the Deputy Head Teacher in their absence). This role is distinct from the Designated Safeguarding Lead as the named person should have sufficient status and authority in the school to manage employment procedures. Staffing matters are confidential and the school must operate within statutory guidance around the General Data Protection Regulation. Where the concern involves the Head Teacher, it should be reported directly to the CEO or Deputy CEO, or the Chair of Trustees if the concern relates to the CEO.

2.4 Concerns that do not meet the harm threshold

Schools should ensure that 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.

The school and Trust actively promotes a culture of openness and transparency where all staff feel confident to report any concern, no matter how small, without fear of reprisal. Low-level concerns will be monitored over time to identify any patterns of behaviour that

may indicate a wider safeguarding issue. Where a pattern is identified, the Headteacher will reassess whether the cumulative concerns meet the harm threshold and consult the LADO as required.

A low-level concern is 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 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 phone;
- engaging with a child on a 1:1 basis in a secluded area or behind a closed door; or
- using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

If the school is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they will consult with their Local Authority Designated Officer.

2.4.1 STEP ONE

Low-level concerns about a member of staff should be reported to the Designated Safeguarding Lead (or deputy) who will liaise with the Headteacher. Where a low-level concern is raised about the Designated Safeguarding Lead, it should be shared with the Headteacher. Low-level concerns may also be self-reported by staff who recognise their own behaviour may have breached the staff code of conduct. Any situation that includes staff allegations should be discussed with the Trust Safeguarding Lead, whether it be the Headteacher or another.

2.4.2 STEP TWO

The Headteacher (or CEO or Deputy CEO if the concern is about the headteacher), while maintaining the confidentiality of the complainant, will ensure that any individual who is the subject of the allegation is given details of the allegations in order to respond. This may be delegated to an appropriate member of staff.

They will be responsible for ensuring that it is investigated properly. The nature of the investigation will depend upon the concern raised.

They will ensure the person raising the concern receives feedback on progress, subject to any issues of confidentiality that may be necessary to guarantee a conclusion. It may not be

possible to inform them of the precise action undertaken where this would infringe a duty of confidence owed by the Trust or school to another party.

2.4.3 Safeguards

The Trust recognises that the decision to report a concern can be a difficult one to make. The Trust/school will take appropriate action to safeguard the person raising the concern from recrimination or victimisation as a result of raising a genuine concern.

2.4.4 On conclusion of the investigation

The school should follow the Disciplinary Policy for any further action that needs to be taken for staff. For any other person subject to an allegation, the Headteacher will decide whether they require a risk assessment to continue their role within the school, as a result of the outcome of the investigation.

2.4.5 Informing parents

As a result of the investigation, the Headteacher will decide whether the parents need to be informed.

2.5 Concerns that do meet the harms threshold

Where an allegation against a member of staff has been received, which may meet the harm threshold, the Headteacher, senior leader, or the CEO (or their representative) must inform the **Local Authority Designated Officer** within one working day. Where the allegation is against the Headteacher, the CEO (or their representative) will consult with the Designated Officer. In either of these instances, the Trust Safeguarding Lead will be informed at the earliest available opportunity and included in the discussion.

2.5.1 Parents or carers of the child or children involved should be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or police or children's social care services need to be involved, the case manager should not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers.

Following consultation with the LADO, where involved, about what can be disclosed, parents or carers should be kept informed about the progress of the case, without any information about the staff member(s) being shared'.

2.5.2 The Designated Safeguarding Lead or deputy (depending on who the allegation was disclosed to) will immediately undertake an initial discussion with the Head Teacher. The following information will be discussed and recorded, a template is provided at [annex A](#):

- the nature, content and context of the allegation;
- any other relevant information such as:
 - previous history of the employee/volunteer,
 - similar allegations made by the same individual(s)
 - the individual's current contact with the children
 - any cause to suspect that a child is suffering or is likely to suffer significant harm
- an agreed course of action as set out below:

- No Further Action:
 - the decision and justification should be recorded by the case manager and the DSL (refer to 5.7 below);
 - agreement reached on what should be put in writing to the individual concerned and by whom;
 - agreement reached on what action should follow both in respect of the individual and those who made the allegation.
- Further action required:
 - If there is cause to suspect a child is suffering or is likely to suffer significant harm a strategy discussion should be convened in accordance with 'working Together to safeguard children'.
 - Contact with the LADO for advice and next steps.

2.5.3 Following the strategy discussion the following outcomes are possible:

- an investigation by the police or children's social care is unnecessary; or
- an investigation by the police or children's social care is NOT necessary.

2.5.4 Procedure where police or children's social care investigation is not deemed necessary following a strategy meeting:

- DSL and case manager, in conjunction with the Headteacher, agree how and whom will undertake an investigation, or the need to appoint an external independent investigator;
- DSL and case manager, in conjunction with the Headteacher, to agree who and how the individual will be advised of the allegation;
- DSL and case manager to agree what information can be disclosed to the parents and carers;
- Consideration of the need to suspend the employee, or volunteer, from duties;
- A named representative should be appointed to keep the person informed of progress with the case;
- The investigation into the allegation will be conducted following the Disciplinary Policy process, however if a disciplinary hearing is required and can be held without further investigation, the hearing should be held within 15 working days.
- If the nature of the allegation does not require formal disciplinary action then appropriate action should be taken within three working days.

2.5.5 Procedure where police or children's social care investigation is deemed necessary following a strategy meeting:

- the individual should be informed following agreement of all agencies with regards to what information can be disclosed to the accused;
- parents and carers should be informed following agreement of all agencies with regards to what information can be disclosed;
- school should consider the need to suspend the employee or volunteer;
- KCSIE proposes that the police should set a target date for reviewing the progress of the police investigation and consulting the Crown Prosecution Service about whether to: charge the individual; continue to investigate; or close the investigation. Ideally no later than four weeks after the initial evaluation/strategy discussion.

These timescales are consistent with KCSIE 2025 expectations that schools should aim to complete initial evaluations within one week and investigations as quickly as possible, ideally within four weeks of the initial strategy discussion.

2.5.6 Suspension, and alternatives to suspension

Consideration of the following information is essential:

- Police involvement does not make it mandatory to suspend a member of staff; this decision should be taken on a case-by-case basis.
- Suspension should be considered only in the following circumstances:
 - where there is cause to suspect a child or other children is/are at risk of harm;
 - where the case is so serious that it might be grounds for dismissal;
 - where the Secretary of State has made an interim prohibition order in respect of the individual
 - if the DSL, police or children's social care services object to the member of staff continuing to work during the investigation
- If immediate suspension is considered necessary, the rationale and justification for such a course of action should be agreed and recorded by both the case manager and the designated officer(s). This should 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, giving as much detail as appropriate for the reasons for the suspension, the named point of contact for the duration of the suspension and details of the Schools Advisory Service/other relevant support.
- Alternatives to suspension include:
 - redeployment within the school so that the individual does not have direct contact with the child or children concerned;
 - providing an assistant to be present when the individual has contact with children;
 - redeploying to alternative work in the school so the individual does not have unsupervised access to children;
 - moving the child or children to classes where they will not come into contact with the member of staff, making it clear that this is not a punishment and parents have been consulted; or
 - temporarily redeploying the member of staff to another role in a different location, for example to an alternative school within the Trust.

2.5.7 Resignations and settlement agreements

It is important that every effort is made to reach a conclusion in all cases of allegations, including any in which the person refuses to cooperate with the process.

Any settlement or compromise agreement that would prevent the school from making a DBS referral (as per the Safer Recruitment Policy), is likely to result in a criminal offence being committed. Any settlement or compromise agreement whereby a form of words is agreed in any future reference should not be used in cases of refusal to cooperate or resignation before the person's notice period expires.

If the accused person resigns, or ceases to provide their services, the investigation and follow up of the allegation should still continue as per this policy and a referral to DBS must be made if the criteria are met.

2.5.8 On conclusion of the case

The outcome of the investigation should be determined and recorded on the personnel file:

- Substantiated: there is sufficient evidence to prove the allegation.
- Malicious: there is sufficient evidence to disprove 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 does not imply guilt or innocence.
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

There is a legal requirement for an employer to make a referral to the DBS where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.

Where an individual that has been suspended is able to return to work, the case manager should consider how best to facilitate that, providing help and support, options for a phased return and if appropriate consideration of how the person's contact with the child or children can be best managed if they are still a pupil.

Once the case has concluded, the school will review the handling of the allegation to identify any lessons learned. This reflective practice will help inform updates to procedures, training, or staff guidance as appropriate.

2.6 Malicious or unsubstantiated allegations

If an allegation is deemed to be malicious or unsubstantiated, the DSL should refer the matter to the children's social care services to determine whether the child/children are in need of services, or may have been abused by someone else.

An allegation deemed to be deliberately inventive or malicious should be considered by the Headteacher for disciplinary action for the pupil who made it; or whether the police should be asked to consider if action might be appropriate against the person responsible, even if he or she were not a pupil.

2.7 References

Cases in which the allegation was proven to be false, unsubstantiated or malicious should not be included in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious should also not be included in any reference.

Malicious allegations should not be recorded on the personnel file.

Where allegations or safeguarding concerns have been substantiated, the outcome will be included in references and, where staff move schools, relevant safeguarding information will be shared with the new employer in line with statutory guidance and data protection law.

2.8 Record keeping

Details of allegations that are found to be malicious should be removed from personnel records. For all other allegations it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned.

The record should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

Low-level concerns that are not found to meet the harm threshold should still be recorded in writing and retained securely in accordance with data protection principles and the Trust's safeguarding record retention policy.

3. Handling allegations against supply staff

Any allegations, to the school, made against supply staff are reported to the supply agency as well as the LADO.

The headteacher, in conjunction with the CEO or Trust Safeguarding Lead, will liaise with the agency in order to decide if the teacher/worker should be suspended or redeployed. The decision to stop using a supply teacher/worker should be based on fact finding and liaising with the LADO.

The procedures, as laid out in section two, should be followed as far as possible, with the school leading the coordination of the investigation in liaison with the agency and LADO. The agency should be fully involved in the procedures, including inviting the agency's HR manager or equivalent to all meetings.

Where an agency is involved, the management meeting should address information sharing to ensure any previous concerns or allegations known to the agency are taken into account. The school remains responsible for ensuring that allegations are investigated properly and will not delegate safeguarding oversight solely to the agency.

- 3.1 Where an allegation is made against a contractor, whether self-employed or provided via an agency, the school will follow the same procedures as for supply staff. The school will liaise with the contractor's employer or agency and the LADO to determine appropriate action. The school retains responsibility for ensuring the allegation is investigated appropriately in accordance with Part Four of KCSIE 2025.

4. Handling allegations against organisations or individuals using the school premises

Any allegations received relating to an incident that happened when an individual or organisation was using the school premises (e.g. rentals to clubs or organisations) are reported to the organisation as well as the LADO.

The process will follow the same course as for supply staff.

Approved by the Trust Leadership Group: 1st September 2025

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Annex A: Confidential record of an allegation of abuse (example template)

General:

Employee / Volunteer name:	
Position:	
Date allegation reported to DSL:	

Designated safeguarding Lead / Deputy Name:	
Case Manager Name:	
Head Teacher Name:	
LADO Name:	

Initial discussion record

Date and time of initial discussion:	
Attendees at initial discussion:	
Notes:	● the nature, content and context of the allegation; ● any other relevant information such as: ○ previous history of the employee/volunteer, ○ similar allegations made by the same individual(s) ○ the individual's current contact with the children ● any cause to suspect that a child is suffering or is likely to suffer significant harm
Agreed next steps: Tick as necessary and record rationale: ☐ NFA ☐ Strategy meeting ☐ Disciplinary investigation due to	Rationale:

conduct (not abuse related) ☐ immediate suspension (record rationale) ☐ alternative to suspension ☐ malicious* ☐ unfounded (record on personnel file)	
If suspended: Agreed name of contact:	

*If the allegation is found to have been malicious this record should not be kept on the employees personnel file.

Designated safeguarding Lead / Deputy signature:	
Case Manager signature:	
Head Teacher signature:	
LADO signature:	

Strategy discussion record:

Date and time of strategy meeting:	
Attendees at strategy meeting:	
Notes:	Key points: • Individual should be informed following agreement of all agencies with regards to what information can be disclosed to the accused; • Parents and carers should be informed following agreement of all agencies with regards to what information can be disclosed; • School considers the need to suspend the employee with input from all agencies; • KCSIE proposes that the police should set a target date for reviewing the progress of the police investigation and consulting the Crown Prosecution Service about whether to: charge the individual; continue to investigate; or close the investigation. Ideally no later than four week after the initial evaluation/strategy discussion.

Agreed next steps: Tick all that apply: ☐ NFA for Police or social care ☐ Police investigation ☐ Disciplinary investigation due to allegation ☐ immediate suspension (record rationale) ☐ alternative to suspension	Rationale:
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Designated safeguarding Lead / Deputy signature:	
Case Manager signature:	
Head Teacher signature:	

Outcome

Tick	Outcome	Action taken:
☐	Substantiated: there is sufficient evidence to prove the allegation;	
☐	Malicious: there is sufficient evidence to disprove 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 does not imply guilt or innocence;	
☐	Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made	

Designated safeguarding Lead / Deputy signature:	
Case Manager signature:	
Head Teacher signature:	

