



Allen Edwards Managing Allegations Against Adults Policy

PROCEDURES FOR CONCERNS AND ALLEGATIONS
THAT MAY MEET THE HARM THRESHOLD

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Purpose and Scope

Allen Edwards Primary School will respond to every safeguarding concern or allegation about an adult promptly, fairly and in a child-centred way. The immediate priorities are to protect children, preserve evidence, obtain appropriate advice and ensure that no internal action compromises a police, children's social care or Local Authority Designated Officer (LADO) process.

This policy applies where a concern or allegation that may meet the harm threshold relates to anyone working in or on behalf of the school in a paid or unpaid capacity, including employees, supply and agency staff, trainee teachers, volunteers, governors, contractors, peripatetic staff and adults provided by another organisation. It also applies to relevant allegations arising from activities for children run by individuals or organisations using school premises.

Concerns that do not meet the harm threshold are managed under the Low-Level Concerns Policy. Allegations made by one pupil against another are managed under the Child Protection and Safeguarding Policy and Behaviour Policy, not this procedure.

Legal and Local Framework

This policy reflects Part four of Keeping Children Safe in Education 2026 (KCSIE), Working Together to Safeguard Children 2026, the Education Act 2002, Children Acts 1989 and 2004, the School Staffing (England) Regulations 2009, the Equality Act 2010, the Human Rights Act 1998, data-protection law, the London Safeguarding Children Procedures and Lambeth Safeguarding Children Partnership arrangements for allegations against staff and volunteers.

The school will follow current advice from Lambeth LADO, children's social care, police, Human Resources, the Disclosure and Barring Service (DBS) and Teaching Regulation Agency (TRA), as applicable. Where external advice differs from an ordinary school timescale or step, the external safeguarding or criminal-investigation direction takes priority.

The Harm Threshold

This procedure must be followed where it is alleged that an adult working in or on behalf of the school 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 they 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 final category includes relevant conduct outside school and is commonly described as transferable risk. It may include conduct involving an adult or another context where the circumstances could affect suitability to work with children. The case manager will seek LADO advice where there is any doubt; staff must not investigate in order to decide whether the threshold is met.

Immediate Reporting Routes

- An allegation about a member of staff, supply worker, trainee teacher, volunteer, contractor or other adult must be reported to the headteacher immediately and without delay.

- An allegation about the headteacher must be reported directly to the Chair of Governors. The headteacher must not be informed first.
- If the normal case manager is unavailable that day, report to the person formally acting as headteacher or the Vice-Chair of Governors, as appropriate. Do not delay.
- If a child is in immediate danger, has been harmed or a crime may be in progress, call 999 and contact children's social care as required, then inform the case manager and DSL.
- Where the normal route is unsafe, ineffective or presents a conflict of interest, contact Lambeth LADO, the Chair of Governors, children's social care, police or use the Whistleblowing Policy.

The current Lambeth LADO contact details used by the school are 020 7926 4679 / 07720 828 700 and lado@lambeth.gov.uk. Staff should check the current school safeguarding contacts and Lambeth Safeguarding Children Partnership page in case details change.

Initial Response and Child Welfare

The person receiving the information must listen, take the concern seriously and make a factual contemporaneous note. They must not promise confidentiality, ask leading questions, interview witnesses, confront the adult, seek explanations, alert others unnecessarily or attempt to establish proof.

- Ensure immediate safety and medical attention; preserve relevant documents, CCTV, messages, devices or other evidence without examining unlawful content.
- Report verbally to the case manager and DSL without delay. The DSL leads the child-welfare response; the headteacher or Chair leads the adult-allegation process.
- Record the child's words, context, date, time, place, people present and action taken. Separate observation, reported information and professional opinion.
- Consider the welfare and wishes of the child, support for other affected children and whether referrals to children's social care or police are required.
- Do not place confidential personnel detail on a pupil's CPOMS record. Record necessary child-welfare information on CPOMS and maintain the allegation file separately with restricted access.

Role of the Case Manager and LADO

The headteacher is the case manager for allegations about adults other than the headteacher. The Chair of Governors is the case manager for an allegation about the headteacher. The case manager will contact Lambeth LADO as soon as possible and within one working day, before conducting any investigation or informing the adult beyond immediate risk-management requirements.

- Share the available facts and follow advice on threshold, referrals, evidence, communication, risk management, support and investigation.
- Agree who will lead each strand and avoid parallel enquiries contaminating evidence or prejudicing criminal proceedings.
- Maintain a dated chronology of contacts, decisions, reasons, actions, reviews and outcomes.
- Attend and contribute to any Lambeth Allegations against Staff and Volunteers meeting and implement the agreed plan.
- Keep the matter under active review and challenge delay through the appropriate agency route.

Fact-Finding and Investigations

Initial fact-finding is limited to establishing the basic facts needed for LADO consultation and immediate safeguarding. A fuller school investigation begins only when agreed with the LADO and, where involved, police and children's social care. It will be conducted by a suitably independent person under the appropriate employment or disciplinary procedure.

The case manager will monitor progress so that cases are handled thoroughly and without avoidable delay. Where possible, the first review should be held no later than four weeks after the initial assessment; continuing cases should normally be reviewed fortnightly and no less often than monthly, in line with KCSIE.

Risk Management and Suspension

Suspension is a neutral risk-management measure, not a finding or disciplinary sanction, and must never be automatic. The case manager will consult the LADO and Human Resources, consider the child's views and welfare, and document why the chosen arrangement is necessary and proportionate.

- redeployment so the adult has no direct contact with the child concerned;
- working from another location or undertaking duties without contact with children;
- additional supervision or changes to duties, timetable, access or systems;
- temporary removal from regulated activity or from the premises; and
- suspension only where there is cause to suspect a child is at risk of harm, the allegation is sufficiently serious to justify dismissal, or police/social care enquiries would otherwise be impeded.

Risk arrangements will be reviewed regularly, kept no longer than necessary and adapted where circumstances change. The school will consider the safety and wellbeing of all children without implying guilt or exposing the identity of the adult.

Information for the Adult and Support

Subject to LADO, police and children's social care advice, the case manager will inform the adult of the allegation as soon as appropriate, explain the likely course of action and identify a named contact. The adult will be advised to seek trade-union or professional support and will be offered appropriate occupational-health or wellbeing support.

The adult must not contact the child, family or witnesses about the allegation, conduct their own enquiry, delete or alter records, discuss the matter publicly or breach agreed confidentiality. They will have a fair opportunity to respond when the investigating process permits.

Parents, Children, Witnesses and Confidentiality

The DSL and case manager will agree with the LADO and other agencies what the child and parents may be told, by whom and when. Parents will normally be informed as soon as appropriate unless doing so would place a child at risk or prejudice an investigation. The child's views will be heard and support adjusted to age, SEND, communication and cultural needs.

Information is shared strictly on a need-to-know basis. The school will protect confidentiality and comply with statutory restrictions on publishing material that may identify a teacher who is the subject of an allegation until the person is charged or the restrictions otherwise cease to apply. Media enquiries go to the headteacher or Chair, as applicable.

Supply Staff, Trainees, Contractors and Premises Users

The school retains responsibility for gathering the facts and managing safeguarding even where it is not the adult's employer. It will work closely with the agency, training provider, contractor or commissioning body, which will usually lead employment action. The organisation will be invited to relevant meetings and kept appropriately informed.

The school will not simply stop using a supply teacher, trainee or contracted worker because of a safeguarding concern without establishing the facts and liaising with the LADO. For an allegation connected with an external organisation using school premises for activities with children, the headteacher will report and cooperate with the LADO and the person's employer or commissioning body and take immediate steps to safeguard children using the site.

Outcomes and Further Action

The case manager will record the outcome category agreed through the LADO process: substantiated, malicious, false, unsubstantiated or unfounded. 'Unsubstantiated' means there is insufficient evidence to prove or disprove the allegation and does not imply guilt or innocence.

- Consider safeguarding and support needs even where an allegation is not substantiated, including whether it may be a cry for help or indicate harm by someone else.
- Consider disciplinary, capability, training, management, risk or no-further-action outcomes using the appropriate standard of proof and external-agency information.
- Where an allegation is deliberately invented or malicious, consider proportionate action only after safeguarding needs and LADO advice have been addressed.
- Where a suspended adult returns, agree a planned return, appropriate communication and support for the adult, child and wider team.
- Provide appropriate feedback to the person who raised the concern, while respecting confidentiality.

Resignations and Settlement Agreements

A resignation, termination of supply, refusal to cooperate or expiry of notice will not stop the safeguarding process. The school will make every effort to reach and record a conclusion and will fulfil referral duties. Settlement agreements must not be used to prevent appropriate investigation, disclosure, DBS or regulatory referral where an adult may pose a risk of harm or may be unsuitable to work with children.

Records, References and Retention

The case manager will maintain a clear, comprehensive summary of the allegation; how it was followed up; decisions and reasons; the outcome category; action taken; and confirmation that the adult received a copy where appropriate. The allegation record is confidential and retained on the adult's personnel file, with a copy provided to the adult, subject to legal and safeguarding restrictions.

Records of allegations are retained at least until the adult reaches normal pension age or for ten years from the date of the allegation, whichever is longer, unless current statutory guidance requires otherwise. Malicious or deliberately false allegation records are removed from personnel records in accordance with KCSIE, while necessary safeguarding and decision records are retained through the appropriate restricted route.

Employer references will not include allegations found to be false, unfounded, unsubstantiated or malicious, including repeated allegations with those outcomes.

Substantiated safeguarding findings will be included where relevant and in accordance with safer-recruitment law and guidance. Only the headteacher, or the Chair in relation to the headteacher, may provide a reference on behalf of the school.

DBS, TRA and Regulatory Referrals

The school must refer to the DBS where the legal referral conditions are met, including where an individual has been removed from regulated activity because they harmed or posed a risk of harm to a child, or would have been removed had they not resigned or otherwise left. The referral will be made as soon as possible after the conditions are met; leaving employment does not avoid the duty.

The school will consider referral to the TRA where a teacher is dismissed, or would have been dismissed had they not left, for serious misconduct. It will also consider referrals to any relevant professional regulator, agency, commissioning body or charity regulator, in consultation with the LADO and Human Resources. Separate police and children's social care referrals are made whenever required.

Learning, Monitoring and Review

At the conclusion of a case, the case manager and DSL will review whether policies, recruitment, induction, supervision, physical environment, reporting culture, training or support should change. Anonymised themes and assurance will be reported to governors without compromising confidentiality. This policy is reviewed annually and sooner following guidance changes, a serious case or identified learning.

Related Policies and Guidance

- Allen Edwards Child Protection and Safeguarding Policy; Staff Code of Conduct; Low-Level Concerns Policy; Whistleblowing Policy; Disciplinary Procedure; Complaints Procedure; Data Protection and Records Management policies.
- Keeping Children Safe in Education 2026, Part four; Working Together to Safeguard Children 2026; DBS barring-referral guidance; TRA teacher misconduct referral guidance.
- London Safeguarding Children Procedures and Lambeth Safeguarding Children Partnership: Allegations Against Staff, Volunteers and Foster Carers, referral form and ASV meeting guidance.

Appendix 1 - Immediate Reporting Pathway

Situation	Action
Immediate danger or emergency	Call 999 / children's social care, secure safety and inform DSL and case manager.
Allegation about any adult other than headteacher	Report immediately to headteacher. Do not investigate or confront.
Allegation about headteacher	Report directly to Chair of Governors. Do not inform headteacher first.
Normal route unavailable	Use acting headteacher or Vice-Chair as appropriate; do not delay.
Threshold uncertain	Case manager consults Lambeth LADO within one working day.
Concern clearly below harm threshold	Follow Low-Level Concerns Policy; consult LADO if doubt remains.
Unsafe route or concealment	Use Chair, LADO, police, children's social care or Whistleblowing Policy.

Appendix 2 - Case-Management Checklist

- Immediate child safety, medical need and evidence preservation addressed
- DSL child-welfare response and CPOMS child record completed
- Restricted allegation file and chronology opened
- LADO contacted within one working day and advice recorded
- Police, children's social care, HR, employer/agency or regulator contacted as advised
- Adult informed and supported at the agreed time
- Risk assessment completed; alternatives considered before suspension
- Child, parents and witnesses supported and communication agreed
- Reviews diarised and delay challenged
- Outcome category and reasons recorded; adult notified as appropriate
- DBS, TRA and other referral duties decided and completed
- Return-to-work or other outcome plan completed
- Learning review completed and governors assured