



OUR LADY OF LOURDES

CATHOLIC MULTI-ACADEMY TRUST

Protocol for dealing with Allegations of Abuse against a member of staff March 2026



Contents

Section one: Concerns or allegations that may meet the harm threshold (Linked to KCSIE)	5
1.0 If a staff member suspects that an adult has harmed, or may have harmed, a child or placed a child at risk of harm.	5
1.1 Introduction	5
2.0 Initial Response to an allegation	5
2.1 There are two aspects to consider when an allegation is made:	6
2.2 No Further Action (see KCSIE)	7
2.3 Supply Teachers and all contracted staff:	7
2.4 Organisations or Individuals using school premises	7
2.5 Governors	8
3.0 Suspension	8
3.1 Duty of Care	8
3.2 OLoL CMAT will:	10
3.3 Procedure for dealing with allegations	10
4.0 Confidentiality and Information Sharing (see also KCSIE)	13
4.1 Allegations Outcomes	14
4.2 Following a criminal investigation or a prosecution:	14
4.3 Unsubstantiated, unfounded, false or malicious allegations	15
4.4 Returning to work	15
4.5 Resignations & Agreement Settlements:	15
5.0 Record Keeping:	16
6.0 References:	17
7.0 Learning lessons	17
8.0 Non recent allegations	17
9.0 Timescales:	18
Section two: Concerns or allegations that do not meet the harm threshold	19
1.0 Low-level concerns	19
1.1 What a low-level concern is	19
1.2 Examples of such behaviour could include, but are not limited to:	19
1.3 Staff code of conduct and safeguarding policies	20
2.0 Sharing low-level concerns	21
13.7 The Local Authority Designated Officer (LADO) allegations against staff.	23
13.9 Whistleblowing and Safeguarding Concerns	24
13.10 Professional Disagreement and Escalation	24

Appendix A:	25
Appendix B Flow chart:	26

Our Lady of Lourdes Catholic Multi Academy Trust Mission Statement

We are a partnership of Catholic schools.

Our aim is to provide the very best Catholic education for all in our community and so improve life chances through spiritual, academic and social development.

By placing the person and teachings of Jesus Christ at the centre of all that we do, we will:

- Follow the example of Our Lady of Lourdes by nurturing everyone in a spirit of compassion, service and healing.
- Working together so that we can all achieve our full potential, deepen our faith and realise our God-given talents.
- Make the world a better place, especially for the most vulnerable in our society by doing 'little things with great love'. (*St Therese of Lisieux*)

Date Issued	March 2026
Governors' Committee Responsible:	OLoL Trust Standards Committee/Executive Board
Updated	20.5.26
Trust Safeguarding Foundation Director:	Sue Dryden
Trust Safeguarding Lead (DSL):	Moira Dales (DCEO)
Status & Review Cycle:	Statutory Annual
Next Review Date:	March 2027
Author	Moira Dales

Key Personnel

The CMAT Designated Safeguarding Lead (DSL) is: Moira Dales DCEO

Contact details: email: m.dales@ololcatholicmat.co.uk Telephone: 07852133114

The CMAT Safeguarding Manager is: Steve Akers

Contact details: email: Steve.Akers.s.akers@OLOLCATHOLICMAT.co.uk

The CMAT foundation director for safeguarding is: Sue Dryden

Contact details: email: admin@ololcatholicmat.co.uk

The School Designated Safeguarding Lead (DSL) is: Jessica Jackson

Contact details: email: jjackson@stbedesscunthorpe.org.uk Telephone: 01724 245151

The nominated child protection governor is: Jackie Kelly

Contact details: email: jkelly@stbedesscunthorpe.otg.uk Telephone: 01724 245151

The Headteacher is: Ryan Hibbard

Contact details: email: rhibbard@stbedesscunthorpoe.org.uk Telephone: 01724 245151

The Chair of Governors is: Jackie Kelly

Contact details: email: jkelly@stbedesscunthorpe.org.k Telephone: 01724 245151

Nottinghamshire County Designated Officer (LADO):

Contact details: email: LADO@nottsc.gov.uk

Telephone: 0115 8041272.

Nottingham City Designated Officer (LADO): Caroline Hose

Contact details: email: LADO@nottinghamcity.gov.uk

Telephone: 0115 876 4762

Derbyshire County Designated Officer (LADO):

Contact details: email: Professional.Allegations@derbyshire.gov.uk

Telephone: 01629 537430

Lincolnshire Designated Officer (LADO):

Contact details: email: LSCP_LADO@lincolnshire.gov.uk

Telephone: 01522 554674

North Lincolnshire Designated Officer (LADO):

Contact details: email: LADO@northlincs.gov.uk

Telephone: 01724 298293

North East Lincolnshire Designated Officer (LADO):

Contact details: email: david.palmer@nelincs.gov.uk

Section one: Concerns or allegations that may meet the harm threshold

(Linked to KCSIE)

1.0 If a staff member suspects that an adult has harmed, or may have harmed, a child or placed a child at risk of harm.

While HR, the Safeguarding Team and the Directors of Performance and Standards (DPS) Team are available to support and advise you, all staff must take immediate action if they suspect that an adult has harmed, or may have harmed, a child or placed a child at risk of harm. In such cases, concerns must be reported without delay to the Headteacher or directly to the Local Authority Designated Officer (LADO) in accordance with the school's safeguarding procedures and Part 4 of *Keeping Children Safe in Education (2025)*.

1.	Report any cases of immediate risk to the police
2.	Report the risk to Social Care
3.	Contact the LADO
4.	Finally contact HR and Steve Akers (Safeguarding Manager)

1.1 Introduction

This section is based on '**Section 1: Allegations that may meet the harm threshold**' in part 4 of *Keeping Children Safe in Education*. It should be read alongside the Our Lady of Lourdes Catholic Multi Academy Trust (OLOL CMAT) Safeguarding and Child Protection Policy 2025-26 and the Whistleblowing Policy.

2.0 Initial Response to an allegation

The guidance should be followed where it is alleged that any current member of OLOL CMAT staff, including a supply teacher, volunteer or contractor 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 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 – this includes behaviour taking place both inside and outside of school.

If the school is in any doubt as to whether a concern meets the harm threshold, the HR team will advise to consult with the local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A '**case manager**' will lead any investigation and be appointed at the earliest opportunity.

Allegation against	Case Manager
A member of staff	Person/s appointed by the safeguarding lead, HR and DPS normally the Headteacher.
Headteacher	Person appointed by the CEO.

Our procedures for dealing with allegations will be applied with common sense and judgement.

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

The protocols apply regardless of whether the alleged abuse took place in the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

OLoL CMAT will deal with any allegation of abuse against a member of staff, supply teacher, volunteer or contractor very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

2.1 There are two aspects to consider when an allegation is made:

- **Looking after the welfare of the child** - the designated safeguarding lead is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care as described in Part one of this guidance.
- **Investigating and supporting the person subject to the allegation** - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

When dealing with allegations, our school 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

Our school ensures that we understand the local authority arrangements for managing allegations, including the contact details and what information the LADO will require when an allegation is made. Before contacting the LADO, our school will conduct basic enquiries in line with local procedures to establish the facts and to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

For example whether:

- the individual was in the school at the time of the allegations?
- did the individual, or could they have, come into contact with the child?
- are there any witnesses? and,
- was there any CCTV footage?

These are just a sample of example questions. Schools and colleges should be familiar with what initial information the LADO will require. This information can be found in local policy and procedural guidance provided by the LADO service.

When to inform the individual of the allegation should be considered carefully on a case-by-case basis, with guidance as required from the LADO, and if appropriate local authority children's social care and the police.

2.2 No Further Action (see KCSIE)

Where the initial discussion leads to no further action, the case manager and the LADO should:

- record the decision and justification for it; and,
- agree on what information should be put in writing to the individual concerned and by whom.

2.3 Supply Teachers and all contracted staff:

In some circumstances OLoL CMAT academies will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not apply, for example, supply teachers or contracted staff provided by an employment agency or business.

Whilst OLoL CMAT academies are not the employer of supply teachers, where there is an allegation about a supply teacher, OLoL CMAT academies will ensure allegations are dealt with properly. In no circumstances will the school decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services.

OLoL CMAT academies will usually take the lead in any investigation because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process.

The case manager will discuss with the supply agency whether it is appropriate for the supply agency to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation. The supply teacher will be advised to contact their trade union representative if they have one, or a colleague for support.

Issues such as information sharing will be addressed at the allegations meeting set up by the LADO, to ensure that any previous concerns or allegations known to the agency are taken into account during the investigation.

When using an agency, OLoL CMAT academies will inform them of their process for managing allegations. This will include inviting the agency's HR manager to meetings and keeping them up to date with information about policies.

2.4 Organisations or Individuals using school premises

Our school may receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for

children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, we will follow our safeguarding policies and procedures, including informing the LADO.

2.5 Governors.

If an allegation is made against a governor, schools and college should follow their own local procedures. Where an allegation is substantiated, they should follow the procedures to consider removing them from office.

3.0 Suspension

Suspension should not be an automatic response when an allegation is reported, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal.

In such cases, OLoL CMAT will only suspend an individual, following advice from the Central HR Team and if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, OLoL CMAT will consider alternatives such as:

- Providing an assistant to be present when the individual has contact with children;
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children;
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the Academy Trust.

Where appropriate (in the circumstances described above), the school will carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the LADO, police and/or children's social care services, as appropriate.

If immediate suspension is considered necessary, the appointed case manager will agree and record the rationale for this with the LADO. Information about the alternatives to suspension that have been considered, and why they were rejected will be included in the record.

Written confirmation of the suspension will be provided to the individual facing the allegation or concern within one working day, and the individual will be given a named contact at the school and their contact details.

If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, details of all action taken and the justification for this decision will be recorded. The case manager will agree with the LADO, HR and the Safeguarding Lead, what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.

If it is decided that further action is needed, the case manager will take steps as agreed with the LADO to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate.

3.1 Duty of Care

OLoL CMAT as the employer has a duty of care to their employees. They will ensure they provide effective support for anyone facing an allegation and provide them with a named contact if they are suspended. OLoL CMAT academies are not the employer of an individual, however, they still have responsibility to ensure allegations are dealt with appropriately and

that they liaise with relevant parties (this includes supply teachers and volunteers, see paragraphs on supply teachers below). It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer in a school is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and, at the same time supports the person who is the subject of the allegation.

3.2 OLoL CMAT will:

- manage and minimise the stress caused by the allegation
- inform the individual as soon as possible, explaining the likely course of action, guided by the LADO, and the police where necessary
- advise the individual to contact their trade union representative, or a colleague for support
- appoint a named representative to keep the person informed about the progress of the case
- provide access to counselling or medical advice where appropriate.
- not prevent social contact with work colleagues and friends, when staff are suspended, unless there is evidence to suggest this may prejudice the gathering of evidence.
 - They will also be given access to welfare counselling:
 - Contact Vivup confidential helpline 0330 3800658

Parents or carers of the child or children involved should be:

- formally told about the allegation as soon as possible. The case manager with advice from the Safeguarding Lead will consult the LADO and where involved children's social care and/or the police on what information can be disclosed;
- kept informed about the progress of the case, only in relation to their child - no information can be shared regarding the staff member; and
- made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in schools whilst investigations are in progress as set out in section 141F of the Education Act 2002.

Action staff members must take if they are concerned or receive an allegation that a member of staff, supply teacher, volunteer or contractor poses a risk of harm to children.

- The staff member must report the concern or allegation to the Headteacher.
- If the concern/allegation is about the Headteacher, the staff member must report this to the Chief Executive Officer (CEO) of Our Lady of Lourdes Catholic Multi-Academy Trust: James McGeachie, j.mcgeachie@ololcatholicmat.co.uk
- The Headteacher/CEO will then follow the procedures set out below, as appropriate.

3.3 Procedure for dealing with allegations.

Where an allegation is made against a member of staff, including those working in EYFS, supply or agency staff, and staff working with sixth form pupils, the allegation should be reported immediately to the Headteacher. In all cases where an allegation may meet the threshold for referral to the Local Authority Designated Officer (LADO), the matter should first be discussed with HR and the Directors of Performance and Standards (DPS) team, unless the child is at immediate risk of harm or there is evidence that a criminal act may have taken place. In such cases, staff should follow the procedures set out below without delay.

Where an allegation is made against the Headteacher, it should be reported immediately to James McGeachie, CEO.

Any person may report a concern directly to the LADO where they believe an adult working with children may have harmed a child, may pose a risk of harm to a child, or where they believe the matter requires external consideration. Staff should be reminded that they do not need to wait for permission or the completion of internal processes before making a referral where they believe a child is at risk of harm.

Where the school receives an allegation relating to an incident in which an individual or organisation was using the school premises to run an activity for children, the school should report the matter to the Headteacher and inform the LADO, in line with paragraph 384 of Keeping Children Safe in Education.

A low-level concern is any concern, however small, that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, that does not meet the threshold for harm or risk of harm to a child, but nevertheless gives rise to concern about that adult's behaviour, integrity, or judgement.

Examples of behaviour which may give rise to a low-level concern include, but are not limited to, over-friendly behaviour with pupils, showing favouritism, spending time alone with a child in a secluded area or behind a closed door, using inappropriate or intimidating language, ridiculing a child in front of others, displaying aggression towards certain children, or behaving in a way towards parents or colleagues that causes unease or doubt about professional conduct.

The purpose of the low-level concerns procedure is to promote a culture of openness, trust and transparency, to encourage staff to share concerns however small, to enable issues to be addressed at an early stage before they escalate, and to ensure that staff behaviour remains consistent with the school's safeguarding ethos and the Teachers' Standards. All staff should understand that reporting concerns is an essential part of keeping children and colleagues safe.

All members of staff have a responsibility to report low-level concerns.

Concerns about a member of staff should be shared with the Headteacher either in person or through the school's low level concern reporting mechanism use this link

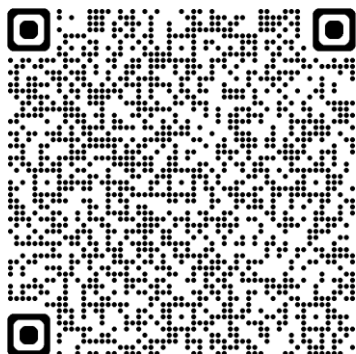
<https://tinyurl.com/4vur2e65>

Staff should use their school email address when making such a report electronically. Any records submitted without the correct email credentials will instead be received by the Trust Safeguarding Lead. All concerns should be handled with appropriate sensitivity, objectivity and confidentiality. Where there is any doubt as to whether the information meets the low-level concern threshold, staff should report it in any event.

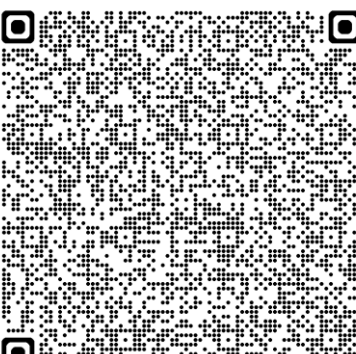
Concerns regarding the Headteacher should be reported directly to James McGeachie, CEO, at j.mcgeachie@ololcatholicmat.co.uk.

Where there is concern that an adult working with children may have harmed a child or placed a child at risk of harm, the school should follow the managing allegations against staff procedure. In such circumstances, staff should refer to the Local Authority Designated Officer (LADO) allegations process and take immediate action in accordance with Part 4 of Keeping Children Safe in Education.

The Headteacher should ensure that all low-level concerns are recorded and stored securely within the low-level concerns online recording.

QR code	Low Level concerns <u>recording form</u> for headteachers
	https://shorturl.at/gvrzx

Records should include the nature of the concern, the context in which it arose, any action taken, and the rationale for decisions made. Such records should be reviewed periodically in order to identify patterns or repeated concerns relating to an individual. Where a pattern of low-level concerns emerges, this may result in the matter being managed under disciplinary procedures or referred to the LADO.

QR code	Low Level concerns <u>spreadsheet</u> for headteachers to monitor all records.
	https://tinyurl.com/bdfmb3xk

The relevant contacts are as follows:

CEO	James McGeachie	j.mcgeachie@ololcatholicmat.co.uk
DCEO	Moir Dales	m.dales@ololcatholicmat.co.uk
HR	Gemma Tovey	g.tovey@ololcatholicmat.co.uk
DPS	Deborah Tibble	d.tibble@OLOLCATHOLICMAT.co.uk
DPS	Tracy Lane	t.lane@OLOLCATHOLICMAT.co.uk
DPS	Lisa Floate	l.floate@OLOLCATHOLICMAT.co.uk
Safeguarding Manager	Steve Akers	s.akers@OLOLCATHOLICMAT.co.uk

The school is committed to maintaining an open and transparent culture in which all staff feel able to raise concerns about poor or unsafe safeguarding practice. In line with the Whistleblowing Policy and Keeping Children Safe in Education, staff should ordinarily raise such concerns internally with the senior leadership team or the designated safeguarding lead. However, where concerns cannot be raised internally, or where staff believe they have not been properly addressed, staff may contact the NSPCC Whistleblowing Advice Line for confidential advice and support.

The NSPCC Whistleblowing Advice Line is available on 0800 028 0285 or by email at help@nspcc.org.uk. This service is intended to support professionals who do not feel able to raise safeguarding concerns through their own organisation. The school's Whistleblowing Policy is set out in the document titled *Whistleblowing Policy - July 2023.docx*.

Staff also have a professional duty to raise concerns and challenge decisions where they believe that a child may be at risk of harm, or where there is disagreement about the action required to protect a child. Constructive professional challenge is a necessary part of effective safeguarding practice and multi-agency working. Staff should feel confident to escalate concerns internally and externally through the school's safeguarding procedures. This may include raising concerns directly with the Designated Safeguarding Lead or senior leaders, using the Trust's whistleblowing procedures, or contacting children's social care directly where staff believe that appropriate action is not being taken. No member of staff should be prevented from speaking up by reason of seniority, role, or fear of consequences. The welfare and safety of the child must remain the paramount consideration.

4.0 Confidentiality and Information Sharing (see also KCSIE)

OLoL CMAT academies will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

In a strategy discussion or the initial evaluation of the case, the agencies involved should share all the relevant information they have about the person who is subject to the allegation, and about the alleged victim.

The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- who needs to know about the allegation and what information can be shared,

- how to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality,
- what, if any, information can be reasonably given to the wider community to reduce speculation; and
- How to manage press interest if, and when, it arises.

4.1 Allegations Outcomes

The following definitions should be used when determining the outcome of allegation investigations:

- **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 of 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.

If the allegation is substantiated and:

- the person is dismissed; resigns, or otherwise ceases to provide his or her services; or
- the employer ceases to use the person's services.

The employer has a legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

In the case of a member of teaching staff, the case manager must consider whether to refer the matter to the TRA to consider prohibiting the individual from teaching.¹

There is a legal requirement for employers to make a referral to the DBS² where they consider 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.

4.2 Following a criminal investigation or a prosecution:

The police should inform the LADO and the employer immediately when:

- a criminal investigation and any subsequent trial are complete
- it is decided to close an investigation without charge
- it is decided not to continue to prosecute after the person has been charged.

In those circumstances, during the joint assessment meeting the LADO should discuss with the Safeguarding Lead whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the police and/or local authority children's social care should also inform that decision. The options will depend on the circumstances of the case and the consideration should take into account the result of the

¹ Teacher Regulation Agency – [Report serious teacher misconduct - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/614443/Report_serious_teacher_misconduct_-_GOV.UK.pdf)

² Disclosure and Barring Service – [DBS barring referral form - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/614443/DBS_barring_referral_form_-_GOV.UK.pdf)

police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

4.3 Unsubstantiated, unfounded, false or malicious allegations

If an allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO, HR and the Safeguarding Lead (or appointed case manager) should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this was a cry for help. In such circumstances, a referral to local authority children's social care may be appropriate.

If an allegation is shown to be deliberately invented or malicious, our school, will consider whether any disciplinary action is appropriate against the individual who made it as per our behaviour policy and or staff code of conduct.

4.4 Returning to work

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the Safeguarding Lead and case manager will consider how best to facilitate that. Guidance and advice will be provided via HR or the LADO. Most people will benefit from some help and support to return to work after a stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The Safeguarding Lead and case manager will also consider how the person's contact with the child or children who made the allegation can best be managed if they are still attending the school or college.

4.5 Resignations & Agreement Settlements:

'Settlement agreements' (sometimes referred to as compromise agreements), by which a person agrees to resign if the employer agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference, should not be used in cases of refusal to cooperate or resignation before the person's notice period expires. Such an agreement will not prevent a thorough police investigation where that is appropriate.

OLOL CMAT will not cease their investigations if the person leaves, resigns or ceases to provide their services. It is important that every effort is made to reach a conclusion in all cases of allegations with a bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate.

Wherever possible, the accused will be given full opportunity to answer the allegation and make representations about it. The process of recording the allegation and any supporting evidence and reaching a judgement about whether it can be substantiated or otherwise on the basis of all the information available, will continue even if the accused does not cooperate.

It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record an outcome wherever possible. The person concerned should be notified of the conclusion of the allegations and sanctions that might be posed.

Other than where allegations are false, malicious, unsubstantiated, or unfounded, the outcome should be made clear when providing references to prospective employers. This is particularly important where the person moves into another position involving working with children.

It is not appropriate to reach a settlement/compromise agreement if the person subject to the allegation resigns or their services cease to be used. However, in limited circumstances schools sometimes use settlement agreements to end the employment relationship on agreed terms, but not where there is an allegation that the individual poses a risk to children.

Where a settlement/compromise agreement is used, OLOL CMAT will not let it prevent them from:

- fulfilling their legal duty to refer cases to the DBS where the referral criteria are met – see KCSIE ***Non-compliance of this duty is a criminal offence***,
- providing a reference to potential employers when requested,
- considering whether to make a referral to the TRA where the criteria are met – see KCSIE .

It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate with the process.

5.0 Record Keeping:

These can be recorded either in Staff Safe (CPOMS) or via the Low-Level Concerns form see the link below.

QR code	Low Level concerns <i>reporting form</i> for staff
	https://tinyurl.com/4vur2e65

Details of allegations following an investigation that are found to have been malicious or false should be removed from personnel records unless the individual gives their consent for retention of the information.

However, for all other allegations, i.e. substantiated, unfounded and unsubstantiated it is important that the following information is kept on the file of the person accused:

- a clear and comprehensive summary of the allegation

- details of how the allegation was followed up and resolved
- a note of any action taken, decisions reached, and the outcome i.e. substantiated, unfounded or unsubstantiated
- a copy provided to the person concerned, where agreed by local authority children's social care or the police, and
- a declaration on whether the information will be referred to in any future reference.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary reinvestigation if, as sometimes happens, an allegation re-surfaces after a period of time.

All other records 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.

6.0 References:

Cases in which an allegation was found to be false, unfounded, unsubstantiated or malicious should not be included in employer references. Any repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious should also not be included in any reference. Substantiated safeguarding allegations that meet the harm threshold should be included in references, provided that the information is factual and does not include opinions.

7.0 Learning lessons

Throughout the process in handling allegations and at conclusion of a case in which an allegation is substantiated, the LADO should review the circumstances of the case with the Safeguarding Lead and the case manager to determine whether there are any improvements to be made to our OLOL CMAT procedures to help prevent similar events in the future. This should include issues arising from any decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The LADO, Safeguarding Lead and case manager should consider how future investigations of a similar nature could be carried out without suspending the individual.

For all other cases, where the allegation concluded to be either, unfounded, false, malicious or unsubstantiated the Safeguarding Lead and case manager (and if they have been involved the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

8.0 Non recent allegations

Where an adult makes an allegation to our school that they were abused as a child, the individual should be advised to report the allegation to the police. Non recent allegations made by a child, should be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with local authority children social care and the police. Abuse can be reported no matter how long ago it happened.

9.0 Timescales:

Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved...	within 1 week
If the nature of an allegation does not require formal disciplinary action, the school will normally instigate appropriate action...	within 3 working days
If a disciplinary hearing is required and can be held without further investigation, wherever possible the Trust will hold this...	within 15 working days

The time taken to investigate and resolve individual cases depends on a variety of factors including the nature, seriousness and complexity of the allegation. It is expected that 80% of cases should be resolved within one month, 90% within 3 months and all but the most exceptional cases should be completed within 12 months.

Section two: Concerns or allegations that do not meet the harm threshold

OLOL CMAT has policies and processes to deal with any concerns or allegations which do not meet the harm threshold, referred to in this guidance as 'low-level' concerns. It is important that all our schools have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

Our school will follow the Low-Level concerns policy as published by the HR service for the Diocese of Nottingham Catholic Multi-Academy Trusts (from this point called the NRCDES policy).

1.0 Low-level concerns

As part of their whole school or college approach to safeguarding, our school follows our Trust safeguarding policy and ensures that we promote an open and transparent culture in which 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.

Creating this clear culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical.

This will:

- enable schools and colleges to identify inappropriate, problematic or concerning behaviour early
- minimise the risk of abuse,
- ensure adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of OLOL CMAT

1.1 What a low-level concern is

The term 'low-level' concern does not mean that it is insignificant. 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,
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

1.2 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, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door.

- humiliating

children.

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.

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

It is crucial that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools from becoming the subject of potential false low-level concerns or misunderstandings.

1.3 Staff code of conduct and safeguarding policies

OLOL CMAT sets out our low-level concerns policy within our staff code of conduct and safeguarding and child protection policies as set out in Part two of this guidance. We make it clear what a low-level concern is and the importance of sharing low-level concerns, and an explanation of what the purpose of the policy is – i.e. to create and embed a culture of openness, trust and transparency in which the school or college's values and expected behaviour set out in the staff code of conduct are lived, monitored and reinforced constantly by all staff.

OLOL CMAT achieves the purpose of our low-level concerns policy by:

- ensuring our staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from inappropriate, problematic or concerning behaviour, in themselves and others
- empowering staff to share any low-level safeguarding concerns (see below)
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- handling and responding to such concerns sensitively and proportionately when they are raised, and
- helping identify any weakness in the school or colleges safeguarding system.

2.0 Sharing low-level concerns

The NRCDES ensures that their low-level concerns policy contains a procedure for sharing confidentially such concerns which is clear, easy to understand and implement.

Our safeguarding policy is and follows the following:

1. **Allegation against a member of staff (inclusive of EYFS, supply/agency staff and 6th Form) report to the headteacher.**
 - **Ensure all LADO allegations are discussed with the HR and the DPS team first unless the child is at immediate risk of harm or if a criminal act has taken place – see the table below.**
2. **Allegation against the headteacher report to James McGeachie CEO.**
3. **Anyone can report any concern to their LADO.**
4. **When school receives an allegation relating to an incident where an individual or organisation was using your school premises for running an activity for children, you should report it to the Head Teacher and inform the local authority designated officer (LADO) (Paragraph 384 KCSIE)**

A **low-level concern** is any concern – **no matter how small** – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work;
- Does not meet the threshold for harm or risk of harm to a child;
- Nevertheless, raises concern about a staff member's behaviour, integrity, or judgement.

Actions by adults in your workplace that might make you have doubts or feel uncomfortable:

- A staff member's interactions with children of any age.
- The way a staff member behaves towards a parent.
- The way a staff member reacts to you or another staff member.
- Being over-friendly with students
- Showing favouritism
- Spending time alone with a child in a secluded area or behind a door
- Using inappropriate or intimidating language
- Ridiculing a child in front of others
- Displaying aggression towards certain children.

Purpose

- The purpose of having a robust low-level concerns process is to:
- Foster a culture of openness, trust and transparency;
- Encourage staff to share concerns no matter how small;
- Address issues early before they potentially escalate;
- Ensure behaviour is consistent with the school's safeguarding ethos and the Teachers' Standards.

Remember: reporting concerns keeps children and colleagues safe.

Reporting a Low-Level Concern

- All staff have a responsibility to report low-level concerns. Concerns about a member of staff will be:
 - Shared with the Headteacher via reporting concerns, either in person or through this link, <https://tinyurl.com/4vur2e65>.
 - Staff will report this using their **work email address** or in person to the headteacher.
 - Any records that are sent without the correct email; will be received by the Trust safeguarding lead.
 - Treated with sensitivity, objectivity, and confidentiality.
- **If in doubt about whether behaviour meets the “low-level” threshold, staff should still report it.**
- Concerns regarding the headteacher will be reported directly to James McGeachie (CEO) j.mcgeachie@lolcatholicmat.co.uk

QR code	Low Level concerns <i><u>reporting form</u></i> for staff
	https://tinyurl.com/4vur2e65

Record Keeping and Oversight

- All low-level concerns will be recorded and stored securely by the Headteacher.
- Records will include the nature of the concern, context, actions taken, and rationale.
- Records will be reviewed periodically to identify patterns or repeat concerns about individuals.
- If a pattern of low-level concerns emerges, this may trigger disciplinary procedures or a referral to the LADO.

13.7 The Local Authority Designated Officer (LADO) allegations against staff.

When you are concerned that an adult working with children may have harmed a child or placed a child at risk of harm, please refer to the managing allegations against staff protocol. This provides details about when to contact the LADO.

Anyone can contact the Local Authority Designated Officer (LADO) directly if they have concerns about an adult working with children. In line with Keeping Children Safe in Education (KCSIE), staff are reminded that they do not need to wait for permission or follow internal processes before making a referral if they believe a child is at risk of harm.

13.9 Whistleblowing and Safeguarding Concerns

Our school is committed to creating an open culture where staff feel confident to raise concerns about poor or unsafe safeguarding practices, in line with the Whistleblowing Policy and paragraph 74 of KCSIE 2025. Staff are encouraged to raise concerns internally with the senior leadership team or the designated safeguarding lead.

Where concerns cannot be raised internally or have not been adequately addressed, staff can contact the NSPCC Whistleblowing Advice Line for confidential support. This independent helpline is available for professionals who do not feel able to raise safeguarding concerns through their organisation. Staff can call 0800 028 0285 or email help@nspcc.org.uk. This service reinforces the school's commitment to transparency, accountability, and the highest safeguarding standards.

Our Lady of Lourds Whistleblowing policy is located:

[Whistleblowing Policy - July 2023.docx](#)

13.10 Professional Disagreement and Escalation

In line with *Keeping Children Safe in Education (KCSIE) 2025*, staff have a professional duty to raise concerns and challenge safeguarding decisions when they believe a child may be at risk or where there is disagreement over how best to protect a child. Constructive professional challenge is an essential part of effective multi-agency working and safeguarding culture.

All staff must feel confident to escalate concerns internally and externally, using the school's safeguarding escalation procedures. This includes:

- Raising concerns directly with the Designated Safeguarding Lead (DSL) or senior leadership team.
- Using the Trust's whistleblowing policy.
- Contacting children's social care directly if staff believe appropriate action is not being taken.

No staff member should be discouraged from speaking up due to hierarchy, role, or fear of repercussions. The child's safety must always come first.

Appendix A:

[The role of the LADO – national-lado-network.co.uk](http://national-lado-network.co.uk)

The role of the LADO (or Designated Officer) is set out in Working Together to Safeguard Children (2018) (Chapter 2 Paragraph 4) and is governed by the Local Authorities duties under section 11 of the Children Act 2004.

The Officer LADO is responsible for managing allegations against adults who work with children. This involves working with police, children's social care, employers and other involved professionals. The LADO does not conduct investigations directly, but rather oversees and directs them to ensure thoroughness, timeliness and fairness. Ordinarily, to ensure impartiality, the LADO will not have direct contact with the adult against who the allegation has been made, or the family of the child/children involved but will, as part of their role ensure that these have information regarding outcomes.

This guidance outlines procedures for managing allegations against people who work with children who are paid, unpaid, volunteers, casual, agency or anyone self-employed.

The LADO must be contacted within one working day in respect of all cases in which it is alleged that a person who works with children has:

- behaved in a way that has harmed, or may have harmed a child; (Criminal Threshold)
- possibly committed a criminal offence against or related to a child; (Harm Threshold)
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children. (Risk Threshold)
- Behaved in a way which raises concerns as to their suitability to work with children (Suitability Threshold)

There may be up to three strands in the consideration of an allegation:

- a police investigation of a possible criminal offence;
- enquiries and assessment by children's social care about whether a child is in need of protection or in need of services;
- consideration by an employer of disciplinary action in respect of the individual.

The LADO is responsible for:

- Providing advice, information and guidance to employers and voluntary organisations around allegations and concerns regarding paid and unpaid workers.
- Managing and overseeing individual cases from all partner agencies.
- Ensuring the child's voice is heard and that they are safeguarded.
- Ensuring there is a consistent, fair and thorough process for all adults working with children and young people against whom an allegation is made.
- Monitoring the progress of cases to ensure they are dealt with as quickly as possible.
- Recommending a referral and chairing the strategy meeting in cases where the allegation requires investigation by police and/or social care.

The LADO is involved from the initial phase of the allegation through to the conclusion of the case. The LADO is available to discuss any concerns and to assist you in deciding whether you need to make a referral and/or take any immediate management action to protect a child.

Appendix B Flow chart: Safeguarding concerns or allegations made about staff, including supply teachers, volunteers and contractors.

