



# MANAGING ALLEGATIONS AND LOW-LEVEL CONCERNS STATEMENT

VERSION 3

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(Chair of Trustees)

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## Esteem Managing Allegations Statement.

Esteem Muti Academy Trust aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues, including concerns relating to adults

This Statement complies with the [DfE Statutory Guidance Keeping Children Safe in Education 2024](#) Part four: Safeguarding concerns or allegations made about staff, including supply teachers, volunteers and contractors

### Raising The Concern.

All concerns about the behaviour or conduct (including outside of school) of a member of staff, an adult working on behalf of the school or an individual or organisation using the school premises will be initially raised to the headteacher via Confide. Confide is the confidential reporting tool that all Esteem schools use. The headteacher, with guidance and support from the Trust and their Designated Safeguarding Lead will consider whether the threshold for harm is met and ensure the appropriate initial action is taken.

If the concern relates to one of the 'Confide Case Managers', this concern must be passed on to the headteacher verbally and in writing. Confide Case Managers are displayed on the front page of Confide. If the concern relates to the headteacher, this must be passed to the CEO in writing (via email is acceptable [ceo@esteemmat.co.uk](mailto:ceo@esteemmat.co.uk))

### Record Keeping.

All concerns will be recorded on Confide by the person who is raising the concern. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR.
- Include copies of statements, discussions, meeting minutes, referrals and outcomes.
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our Esteem Disciplinary Procedures or, where a pattern of behaviour moves from a low-level concern (section 2) to meeting the harms threshold (section 1), we will refer it to the designated officer at the local authority (LADO).
- Retained at least until the individual leaves employment at the school.

Where a low-level concern relates to a supply member of staff, a contractor or an organisation or individual using our premises, we will notify the individual's employer so any potential patterns of inappropriate behaviour can be identified. The Confide recording system will be used to record these concerns and all subsequent actions taken.

## PART 1 Allegations that may meet the harm threshold.

This section is based on 'Section 1: Concerns that may meet the harm threshold' in part 4 of Keeping Children Safe in Education 2024'.

This section applies to all cases in which it is alleged that a member of staff, including a supply member of staff, volunteer or contractor, has:

- 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 they 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 includes behaviour taking place both inside and outside of school. This is known as transferable risk.

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our Esteem Director of Safeguarding and/or Esteem Head of HR. We will consult with our local authority designated officer (LADO) if their procedures allow this prior to referral.

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 (referred to as informal / formal investigating officer in the Esteem Disciplinary Policy). This will be determined by the headteacher, or the CEO where the headteacher is the subject of the allegation, or the Chair of the Trust where the CEO is the subject of the allegation. The case manager will be identified at the earliest opportunity. Support and Guidance will be provided by members of the Esteem Central Team.

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

## Non-recent allegations.

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

## Allegations against supply staff and all contractors, including organisations and individuals using our premises.

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply member of staff or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with the LADO.

The head teacher will discuss with the agency whether it is appropriate to suspend the individual or redeploy them to another part of the school while the school carries out the investigation.

We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required.

We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of an allegations management meeting or by liaising directly with the agency where necessary).

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

**For the Esteem procedures and processes, please see the Esteem Disciplinary Policy.**

## Learning lessons.

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This may include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff.
- The duration of the suspension.
- Whether or not the suspension was justified.
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual.

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

## PART 2 Concerns that do not meet the harm threshold.

This section is based on 'Section 2: Concerns or allegations that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education 2024'.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion.
- Complaint.
- Safeguarding concern or allegation from another member of staff.
- Disclosure made by a child, parent or other adult within or outside the school.
- Pre-employment vetting checks.

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

## Definition of low-level concerns.

The term '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, and

- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority.

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children.
- Having favorites.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- Humiliating pupils.
- Not adhering to school policy on use of mobile phones, including the use of social media.
- Behaviour outside of school that may impact on the academy or Trust reputation.

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.

## Sharing low-level concerns.

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.
- Empowering staff to share any low-level concerns using Confide.
- Empowering staff to self-refer using Confide, but also ensuring there is an open-door policy with the head teacher and DSL.
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage.
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised.
- Helping to identify any weakness in the school's safeguarding system.

If the low-level concern is related to a 'Case Manager' on the Confide system who is not the head teacher, this should be shared with the head teacher verbally and in writing. The response will continue as below, but the information will be uploaded to Confide upon completion.

## Responding to low-level concerns.

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- › Directly to the person who raised the concern
- › To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's Code of Conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

## Review.

This Statement will be reviewed annually, unless changes to legislation require otherwise.

## References to other policies and legislation.

[Keeping Children Safe in Education 2024](#)

[Working Together to Safeguard Children 2023](#)

[Guidance for Safer Working Practice 2022](#)

Esteem Disciplinary Policy

Esteem Complaints Policy

Esteem Grievance Policy

Local Safer Recruitment Policy