STOUR VALE ACADEMY TRUST

CONCERNS / ALLEGATIONS AGAINST ADULTS POLICY

COVERING CONCERNS /ALLEGATIONS THAT MAY MEET THE HARM THRESHOLD AND CONCERNS / ALLEGATIONS THAT DO NOT

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Section 1 - At a Glance

The purpose of this policy is to reinforce the safeguarding culture within Stour Vale Academy Trust (the Trust) in which the clear values and expected behaviours, set out in our Code of Conduct, are adhered to by all staff at all times.

All staff are clear that it is their overriding duty to share any concerns about colleagues, (whether low level or more serious), and are confident that these concerns will be shared responsibly, dealt with appropriately and recorded effectively.

This policy works alongside Trust safeguarding and employment policies and adheres to the following statutory Guidance and Legislation:

Children Act 1989 & 2004, Education Act 2002, Data Protection 2018, Keeping Children Safe in Education 2026, Working Together to Safeguard Children 2026

Linked policies: Safeguarding and Child Protection Policy, Staff Code of Conduct, Staff Disciplinary Policy, Whistleblowing Policy, Health and Safety Policy, Behaviour Policy.

In this policy, all references to 'staff' or 'members of staff' means all paid or unpaid staff, including supply teachers, trainee teachers, volunteers and contractors. Any reference to the Headteacher also includes the manager of non-school settings.

This policy also complies with our funding agreement and articles of association as well as adhering to the principles under data protection law. For further information please review each setting's data protection policy published on its website.

1.1 Statement of intent

By having an open and transparent culture, we are able to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that all staff are clear about professional boundaries and act within them, in accordance with the ethos of our settings. This will also help safeguard against malicious allegations.

The essence of good safeguarding is consistent vigilance and professional curiosity. We recognise the importance of addressing, recording and reporting all safeguarding concerns, regardless of their apparent severity. We understand that, even when a concern may be perceived as low-level, it could escalate over time to become a significant safeguarding issue.

All staff are expected to adhere to high standards of professional conduct and recognise there may be some crossover with conduct in their personal life. We are fully committed to responding to any concerns that may arise to ensure the safety of our pupils is prioritised and the risk of any potential harm is reduced.

1.2 Differentiation between an allegation that meets the harms threshold and a low-level concern

Behaviours can exist on a wide spectrum, from the unintentional or thoughtless, through to that which is ultimately intended to enable abuse.

Concerns should not be limited to safeguarding but could relate to behaviour which does not meet the Code of Conduct and professional standards expected from any individual working or visiting our settings.

Low-level concerns are differentiated from concerns that can cause harm. The harm threshold is the point at which a concern is no longer low-level and constitutes a threat of harm to a child. This threshold is defined as accusations that an adult 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 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.

An allegation can also relate to an adult's behaviour outside of work, and their relationships with others, if they have behaved in a way in their personal life that raises safeguarding concerns. These concerns do not have to directly relate to a child but could, for example, include:

- an arrest for the possession of a weapon;
- a drug-related incident;
- have, as a parent or carer, become subject to child protection procedures;
- are closely associated with someone in their personal lives (e.g., partner, member of the family or other household member) who may present a risk of harm to child/ren for whom the adult is responsible in their employment/volunteering.

N.B. There is a transferable risk with behaviours in the workplace, at home or in the community.

The term 'low-level' concern does not mean that it is insignificant; it means that the behaviour towards a child does not meet the threshold set above. Staff in our settings understands that many serious safeguarding concerns, such as child sexual abuse, can often begin with low-level concerns, e.g., being over friendly with a child.

We determine a low-level concern as any concern where an adult working in or on behalf of the school may have acted in a way that:

- is not consistent with our Code of Conduct; and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

N.B. A concern could be no more than causing a sense of unease, 'nagging doubt' or gut feeling.

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

Irrespective of the nature or seriousness of the concern or allegation, the reporting adult will follow the same process, as outlined in sections 2.2 and 2.3 of this policy.

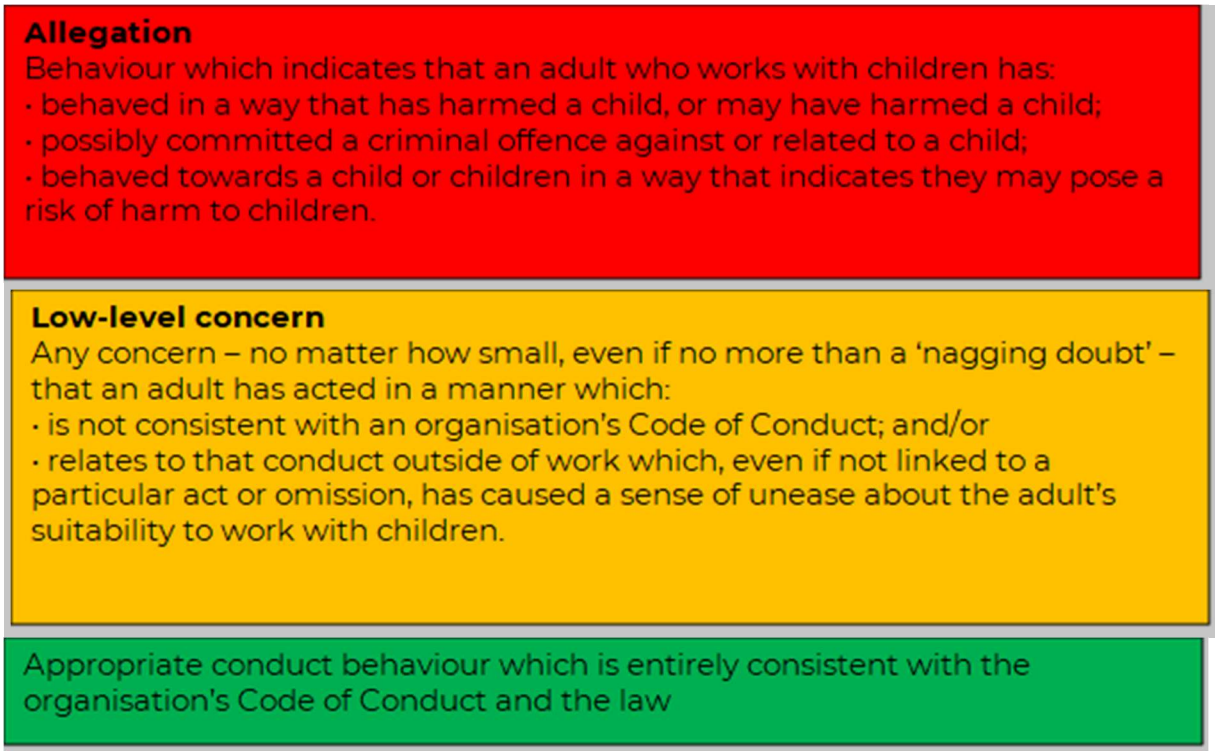

Figure 1 : Spectrum of Behaviour

Section 2 - Managing Low Level Concerns

2.1 Introduction

We promote a culture in which safeguarding pupils is the uppermost priority, ensuring that all staff are actively encouraged to report concerns, regardless of professional loyalties.

We ensure that all staff are aware of the importance of recognising concerns before they escalate from low-level to serious, wherever possible.

We ensure all staff on or sites feel comfortable with, and are clear about, the concept of low-level concerns, and know what to do if they have such a concern. It is not, however, the responsibility of staff or other staff to be able to determine in each case whether their concern is a low-level concern, or if it is in fact serious enough to consider a referral to the LADO, or meets the threshold of an allegation. Once a low-level concern is shared, that determination will be made by the Headteacher (unless it is about the Headteacher and then it will go to the Chair of the Local Governing Body, who will refer it to the CEO). If the concern is about a member of the central team, it will go to the CEO. If the concern is about the CEO, it will go to the Chair of the Trust Board. We may decide at this point to seek advice from the Local Authority Designated Officer (LADO).

Examples of inappropriate behaviour that could potentially constitute a low-level concern that should be reported to the Headteacher/CEO/Chair of the Trust Board may include (but not limited to):

• being over friendly with children – this could include, but is not limited to, communicating with a child through personal social media or allowing inappropriate conversations or enquiries to occur with pupils, e.g., conversations that are about a staff member's personal life or are of a sexual nature;

• having favourites – this could include, but is not limited to, calling pupils by pet names or terms of endearment or buying pupils gifts;

• taking photographs of children on their personal mobile phones or devices (that do not constitute abuse);

• engaging with a child on a one-to-one basis in a secluded area or behind a closed door;

• using inappropriate language in the presence of children.

Staff will be made aware that some of the above low-level concerns may meet the harms threshold depending on certain factors, e.g., the age or needs of the child or the type of contact.

They will be made aware that some of the above incidents may not be concerns in context, e.g., a pre-reported approved, one-to-one meeting with a child behind a closed door where a robust risk assessment has taken place.

N.B. The context for all low-level concerns will be considered when determining threshold.

Staff and other staff will also be made aware that behaviour which raises concerns **may not be intentionally inappropriate,** but that this does not negate the need to report the behaviour. The school will ensure that all staff members are aware of the standards of appropriate behaviour expected towards pupils which is detailed in our Code of Conduct.

Staff will ensure that they pay due regard to the fact that:

• they are in a unique position of trust, care, responsibility, authority and influence in relation to pupils;

• there is a significant power imbalance in the pupil-staff dynamic;

• there are more stringent expectations on their behaviour with regard to pupils, due to their professional position.

Staff will remain aware of the fact that all pupils under the age of 18, regardless of the phase and year group they are at within the school, are children by law – resultantly, staff will ensure that they do not assume maturity on behalf of a pupil and do not engage with pupils as they would with their own peers.

Staff will be aware that where there is any doubt regarding whether the behaviour of another adult is appropriate, this should be reported to the Headteacher (or if the concern relates to the Headteacher reported to the Chair of the Local Governing Body immediately).

In the case of the concern relating to the Headteacher, the Chair of the Local Governing Body will refer the concern to the CEO, who will consider it within context, seeking appropriate advice (e.g., LADO and/or HR).

A concern relating to a member of the central team should be reported to the CEO (or if it relates to the CEO reported to the Chair of the Trust Board).

Any staff members who engage in low-level inappropriate behaviour in relation to pupils will be made aware and supported to address this behaviour in line with the Staff Code of Conduct.

2.2 Self-reporting

In our settings, we ensure that an environment is maintained that encourages staff and other staff to self-report if they feel as though they have acted inappropriately or in a way that could be construed as inappropriate upon reflection.

On occasion, someone may feel as though they have acted in a way that:

• could be misinterpreted;

• could appear compromising to others; and/or

• falls below the standards set out in the Staff Code of Conduct.

The Headteacher/CEO/Chair of the Trust Board will, to the best of their ability, maintain a culture of approachability for staff and other staff, and will be understanding and sensitive towards those who self-report.

2.3 Reporting

Staff are required to report their concerns to the Headteacher/CEO/Chair of the Trust Board verbally, who will then record the concern in a standardised manner. When submitting concerns, staff will take care to ensure that they observe the **Staff Code of Conduct** with regard to confidentiality and the **Staff Disciplinary Policy**, and protect the identity of all individuals to whom the concern relates as far as possible.

Staff members may request anonymity when reporting a concern, and we will endeavour to respect this if possible. We will not, however, promise anonymity to staff members who report concerns in case the situation arises where they must be named, e.g., where it is necessary for a fair disciplinary hearing. In line with the Whistleblowing Policy, staff will be protected from potential repercussions caused by reporting a genuine concern. Where a concern relates to the Headteacher, the concern should be reported to the Chair of the Local Governing Body, who will refer it to the CEO.

Where a concern relates to a member of the central team, the concern should be reported to the CEO (or where it relates to the CEO reported to the Chair of the Trust Board).

Where a concern relates to a person employed by a supply agency or a contractor to work in the school, staff will also be required to report this to the Headteacher/CEO, who will, in turn, inform the employer of the subject of the concern.

When concerns are reported, the Headteacher/CEO will evaluate whether additional training would be beneficial for any staff members exhibiting concerning behaviour, or the staff as a whole, where concerning behaviour is seen more widely.

All concerns reported to the Headteacher/CEO will be documented in line with the Records Management Policy.

2.4 Responding to concerns (defensible decision making)

When the Headteacher/CEO/Chair of the Trust Board has received a low-level concern, they will use their professional judgement to determine if the concern is low-level or if it must be immediately escalated. To evaluate a concern, the Headteacher/CEO/Chair of the Trust Board will:

• speak to the person who raised the concern (unless it has been raised anonymously), regardless of whether a written summary or completed low-level concerns form has been provided;

- review the information and determine whether the behaviour: - is entirely consistent with the organisation's Code of Conduct and the law, - constitutes a low-level concern, - is serious enough to consider a referral to the LADO, or - when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the LADO/other relevant external agencies;

- where the Headteacher/CEO/Chair of the Trust Board is in any doubt regarding whether the threshold has been reached, they should seek advice the LADO – on a no-names basis if necessary;

- speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted);

- make appropriate records of:

- all internal conversations – including with the person who initially shared the low-level concern (where this has been possible)

- the adult about whom the concern has been shared (subject to the above), and any relevant witnesses

- all external conversations – for example, with the LADO/other external agencies (where they have been contacted, and either on a no-names or names basis)

- their decision and the rationale for their decision.

The Headteacher/CEO/Chair of the Trust Board may need to seek advice from an external source, which they will do whilst adhering to Data Protection protocols.

2.5 Where the concern is unfounded

If it is discovered upon evaluation that the low-level concern refers to behaviour that was not considered to be in breach of the Staff Code of Conduct, and the law, the Headteacher/CEO/Chair of the Trust Board will speak to the individual about whom the concern was made to discuss their behaviour, why and how the behaviour may have been misconstrued, and what they can do to avoid such misunderstandings in the future.

The Headteacher/CEO/Chair of the Trust Board will also speak to the individual who shared the concern, outlining why the behaviour reported is consistent with setting standards and the law.

The Headteacher/CEO/Chair of the Trust Board will take care to ensure that conversations with individuals who reported concerns that transpired to be unfounded do not deter that individual from reporting concerns in the future.

The Headteacher/CEO/Chair of the Trust Board will consider the information within its context and alongside any previous concerns to determine whether the behaviour, and the reporting of this behaviour, suggests some doubt in relation to setting policies and procedures, or the training it offers to staff.

Where such ambiguity is found, the Headteacher/CEO/Chair of the Trust Board will work together with appropriate personnel (e.g., People Services) to resolve this with input from other staff members, as necessary.

2.6 Where the concern is founded

Where the Headteacher/CEO/Chair of the Trust Board determines that a concern is low-level, they will respond to this in a sensitive and proportionate manner. The following procedure will be followed:

• the Headteacher/CEO/Chair of the Trust Board will consider whether the individual should receive guidance, supervision or any further training;

• where considered appropriate in the circumstances, the Headteacher/CEO/Chair of the Trust Board will develop an action plan, with input from the individual, that outlines ongoing and transparent monitoring of the individual's behaviour and any other support measures implemented to ensure the staff member's behaviour improves;

• where it is necessary to undergo an investigation into the behaviour, this will be done discreetly, and information will only be disclosed to individuals on a need-to-know basis;

• where any pupil or other individual has been made to feel uncomfortable by the individual's behaviour, they will be offered pastoral support, where appropriate;

• the Headteacher/CEO/Chair of the Trust Board will hold a meeting with the individual about whom the concern was reported.

During the meeting, they will:

- talk to the individual in a non-accusatory and sympathetic manner;
- inform them of how their behaviour was perceived by the individual who reported the concern (without naming them, where possible);
- clearly state what about their behaviour was inappropriate and problematic;
- discuss the reasons for the behaviour with the individual;
- inform the individual clearly what about their behaviour needs to change;
- discuss any support that the individual may require in order to achieve the proper standards of behaviour;
- allow the individual the opportunity to respond to the concern in their own words.

The Headteacher/CEO/Chair of the Trust Board may ask the individual to re-read the Staff Code of Conduct and/or the Safeguarding and Child Protection Policy.

The Headteacher/CEO/Chair of the Trust Board will ensure that all details of the low-level concern, including any resultant actions taken, are recorded and securely stored in line with the Data Protection Policy. The Headteacher/CEO/Chair of the Trust Board will ensure that these records are chronological and up to date, and that it is easy to refer back to them if any future concerns are reported about the same individual.

The specific approach to handling low-level concerns will be adapted on a case-by-case basis. It is unlikely that a low-level concern will result in formal disciplinary procedures being used, but further similar issues may result in formal disciplinary action being used to address behaviour.

2.7 Where the concern is evaluated as serious

The Headteacher/CEO/Chair of the Trust Board may decide on evaluation that a concern is more serious than originally thought, e.g., alongside previous concerns. Where this decision is made, the concern will be escalated, and dealt with as an allegation that meets the Harm Threshold (section 3).

2.8 Record keeping and data protection

The school will retain (in accordance with the Stour Vale Data Protection Policy and record retention scheme) all records of low-level concerns, including those that were found to be unfounded.

The Headteacher/CEO/Chair of the Trust Board will ensure that all records include the most accurate and up-to-date information and will store them in accordance with our record keeping protocols.

The Headteacher/CEO/Chair of the Trust Board will ensure that all low-level concerns are stored together, in an organised and consistent manner, to ensure they can be easily reviewed and analysed where necessary. These records will be held by the Headteacher/CEO/Chair of the Trust Board to enable oversight and highlight any patterns of behaviour.

Where the low-level concern is provided verbally, the Headteacher/CEO/Chair of the Trust Board will make an appropriate record of the conversation, either immediately following the discussion or as soon as possible afterwards. Sound professional judgement will be exercised in determining what information it is necessary to record for safeguarding purposes. The following information should be recorded:

- name of the individual sharing the low-level concern – if the individual wishes to remain anonymous, this will be considered;
- the name of the individual about whom the concern is being raised, and their role within the organisation at the time the concern is raised;
- who concerns have been reported to;
- a clear and comprehensive summary of the concern;
- the view of the person about whom the concern has been raised;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached, and the outcome;
- signed and dated by the person carrying out the enquiry.

Low-level concern forms/records and follow-up information, such as records of meetings and action plans, will be marked as confidential and stored securely within the school's safeguarding systems with due regard to data protection, with access only by the Headteacher or Chair of the Local Governing Body and HR.

Where the above forms/records and information relate to a member of the central team or the CEO, they will be marked as confidential and stored securely within the central team's online system with due regard to data protection, with access only by the CEO/HR or by the Chair of the Trust Board (if the concern is about the CEO).

The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the relevant personnel (Headteacher, Chair of the Local Governing Body, CEO, Chair of the Trust Board).

The Headteacher/CEO will periodically review the relevant recent low-level concerns log to ensure that they are being appropriately dealt with and to check for any concerning behaviour patterns amongst the staff cohort as a whole. The Headteacher/CEO will keep records of these reviews.

Staff will be informed of their right to make a Subject Access Request and of any entries made in this log which relate to them, unless sharing such information compromises the safeguarding of others or threatens the anonymity of the person who shared the concern.

Where there are multiple low-level concerns relating to the same individual these will be kept in chronological order as a running record. These records are kept confidential and held securely, with restricted access by the Headteacher/CEO/Chair of the Trust Board or HR as required.

Records of low-level concerns will not be kept in the personnel file of the individuals to whom the concerns pertain, unless there have been multiple low-level concerns made about the same individual that has resulted in formal disciplinary action. Where a concern is thought to be serious and is processed as an allegation, records of this will be kept in staff personnel files. Where multiple low-level concerns have been made about the same individual, these will be kept together, and in chronological order.

Where an allegation is made about an individual who has previously been subject to such allegations, or where a low-level concern is reclassified as a serious concern after meeting the harms threshold, all records of low-level concerns about that individual will be moved to the staff personnel file and kept alongside records of the allegation.

2.9 References

Low-level concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures. Allegations which are proven to be false, unsubstantiated or malicious, should not be included in employer references. Likewise, a history of repeated concerns which have all been found to be false, unsubstantiated or malicious should not be included in any reference.

Misconduct or consistent poor performance, where relevant, may be included. This would not normally include low-level safeguarding concerns unless the threshold is met for referral and found to be substantiated, where it should then be referred to in a reference. Where KCSIE does not apply, consideration must be given to legal obligations and duty of care in giving accurate references.

There is no statutory guidance on the retention period for records of low-level concerns. We will retain the information for the period of an individual's employment. When a staff member for whom we have any record of low-level concerns leaves, records will be reviewed and a decision will be made as to whether that information needs to be kept, the rationale for keeping it and the period of time for which it will be retained. (Normal data retention for such records is +6 years.) The same process will apply when a staff member for whom we have any record of low-level concerns leaves the central team.

Consideration will be given to: (a) whether some or all of the information contained within any record may have any reasonably likely value in terms of any potential historic employment or abuse claim so as to justify keeping it, in line with normal safeguarding records practice; or (b) if, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted accordingly.

2.10 Role of the Local Governing Body

Any concerns or issues relating to the Managing Low-Level Concerns Policy will be included in the regular safeguarding report provided by the Headteacher to each Local Governing Body meeting and will be anonymous.

Section 3 – Managing allegations that may meet the harm threshold

3.1 Introduction

This section applies to cases in which it is alleged that an adult working in or on behalf of a Trust setting in a paid or unpaid capacity, i.e. members of staff, including supply teachers, trainee teachers, volunteers and contractors. 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 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 includes behaviour taking place both inside and outside of school

Where appropriate, an assessment of transferable risk to children with whom the person works should be undertaken. If in doubt seek advice from the local authority designated officer (LADO).

3.2 Responding to an allegation

Our first priority is always the welfare of the children in our care. Where a setting identifies that a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, we will follow our standard safeguarding processes as set out in our Safeguarding and Child Protection Policy.

Alongside this, we will investigate and support the person subject to the allegation, in a fair and consistent way, applying common sense and judgement. In responding to an allegation, the headteacher (or CEO where the headteacher is the subject of the allegation) should seek advice from the named Executive Lead the Head of People Services and the Trust Safeguarding Lead and then follow the local authority arrangements for managing allegations.

3.3 Procedure for dealing with allegations

In the event of an allegation that meet the criteria in section 3.1, a case manager (likely to be the headteacher) will take the following steps:

- conduct basic enquiries (but not an investigation involving witness statements) in line with procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the LADO will be contacted as soon as practicably possible after contacting the police)
- inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case

manager will only share such information with the individual as has been agreed with those agencies

- where appropriate (in the circumstances described above), 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
- where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **if immediate suspension is considered necessary**, agree and record the rationale for this with the Head of People Services. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 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, record this decision and the justification for it and agree with the LADO 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**, 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
- provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate
- inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager officer with the DSL/headteacher will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- where agreed, conduct a formal investigation as quickly and effectively as possible, and in line with the **Trust Disciplinary Policy**
- make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

3.4 Early years providers

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

3.5 Additional considerations for supply teachers, trainee teachers, volunteers and contractors

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher, volunteer or contractor 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 our LADO to determine a suitable outcome.
- The headteacher/Local Governing Body 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 the 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.