



HOMEBROOK WOODS

Independent Special School

Ages 5–11 | Autism Spectrum Condition (ASC), Speech, Language and
Communication Needs (SLCN) and Associated SEND

MANAGING ALLEGATIONS AGAINST STAFF POLICY

Education (Independent School Standards) Regulations 2014 (as amended)
Keeping Children Safe in Education (KCSIE) 2026
Working Together to Safeguard Children (2023)

Document Control

Policy Title	Managing Allegations Against Staff Policy
Provision	Homebrook Woods
Policy Owner	Vonika Shelley
Role	Proprietor, Headteacher and Designated Safeguarding Lead
Approved by	Proprietor
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Related Policies

- Safeguarding and Child Protection Policy
- Staff Code of Conduct
- Safer Recruitment Policy

- Whistleblowing Policy
 - Complaints Policy and Procedure
 - Behaviour Regulation and Positive Support Policy
 - Disciplinary Policy (where applicable)
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1. Policy Statement

Homebrook Woods is committed to safeguarding and promoting the welfare of children. The school recognises that maintaining a safe culture depends upon robust procedures for responding to concerns or allegations about adults working with children.

All allegations and concerns will be managed promptly, fairly, consistently and in accordance with statutory guidance. The welfare of the child will always be the school's paramount consideration, whilst ensuring that staff are treated fairly and with appropriate support throughout any investigation.

The school promotes an open, transparent safeguarding culture in which all staff understand that safeguarding is everyone's responsibility and feel confident to report concerns about the behaviour or conduct of adults working with children.

2. Purpose

The purpose of this policy is to ensure that:

- allegations against adults working with children are managed fairly and consistently;
 - children are protected from harm;
 - staff understand how concerns should be reported;
 - low-level concerns are identified and addressed appropriately;
 - statutory safeguarding procedures are followed;
 - appropriate referrals are made to the Local Authority Designated Officer (LADO) where required.
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3. Scope

This policy applies to all adults working on behalf of Homebrook Woods, including:

- employees;
- agency staff;
- contractors;
- volunteers;
- governors or proprietors where applicable;
- students on placement;
- visitors undertaking regulated activity.

The policy applies regardless of whether the allegation relates to conduct within or outside the school.

4. Legal Framework

This policy has been developed with reference to:

- Keeping Children Safe in Education (KCSIE) 2026
 - Working Together to Safeguard Children (2023)
 - Children Act 1989
 - Children Act 2004
 - Education Act 2002
 - Education (Independent School Standards) Regulations 2014 (as amended)
 - Equality Act 2010
 - Data Protection Act 2018
 - UK GDPR
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5. Roles and Responsibilities

Proprietor

The Proprietor has overall accountability for ensuring that allegations are managed lawfully, fairly and in accordance with statutory safeguarding guidance.

Where an allegation concerns the Headteacher or Designated Safeguarding Lead, the Proprietor will ensure that appropriate external advice is sought immediately from the Local Authority Designated Officer (LADO).

Headteacher and Designated Safeguarding Lead

The Headteacher and DSL are responsible for:

- receiving reports of allegations or concerns;
 - ensuring the immediate safety of children;
 - consulting the LADO where appropriate;
 - maintaining accurate confidential records;
 - ensuring investigations are managed appropriately;
 - supporting staff and pupils throughout the process;
 - making referrals to external agencies where required.
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All Staff

All adults working at Homebrook Woods must:

- report concerns immediately;
 - never ignore safeguarding concerns;
 - maintain confidentiality;
 - cooperate fully with investigations;
 - understand their safeguarding responsibilities under KCSIE 2026.
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6. Definitions

Allegation

An allegation is one which suggests that an adult working with children has:

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

These allegations meet the statutory harm threshold and require immediate consideration under this policy.

Low-Level Concern

A low-level concern is any concern, no matter how small, about an adult working with children that does not meet the harm threshold but is inconsistent with the school's Staff Code of Conduct.

Examples may include:

- inappropriate professional boundaries;
- concerning language;
- poor judgement;
- behaviour creating a sense of unease;
- conduct that falls below expected professional standards.

Homebrook Woods encourages staff to report low-level concerns promptly so that emerging patterns can be identified and appropriate support or intervention provided.

7. Reporting Concerns

Any member of staff who becomes aware of an allegation or concern must report it immediately.

Staff should:

- listen carefully without investigating;
- reassure the child where appropriate;
- avoid asking leading questions;
- make an accurate written record;
- report the concern immediately.

Staff must never:

- promise confidentiality;
 - investigate allegations themselves;
 - discuss the allegation unnecessarily with colleagues.
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8. Allegations Against the Headteacher, DSL or Proprietor

At Homebrook Woods, the roles of Proprietor, Headteacher and Designated Safeguarding Lead are currently held by the same individual.

Where an allegation concerns the Proprietor, Headteacher or DSL, the concern must not be investigated internally.

Instead, the matter will be referred immediately to the Local Authority Designated Officer (LADO), who will advise on the appropriate course of action. Independent safeguarding advice will be sought where necessary to ensure transparency, impartiality and compliance with statutory guidance.

9. Initial Response

On receiving an allegation, the Headteacher (or the LADO where appropriate) will:

- ensure the immediate safety of any child involved;
- consider whether the allegation meets the harm threshold;
- preserve any available evidence;
- consult the LADO without delay where required;
- determine whether immediate action is necessary to protect children.

No internal investigation will begin before consultation with the LADO where the allegation meets the statutory threshold.

10. Referral to the Local Authority Designated Officer (LADO)

The LADO will be contacted immediately where an allegation indicates that an adult may have:

- harmed a child;
- committed a criminal offence against a child;
- behaved in a way that suggests they may present a risk of harm;
- behaved in a way that indicates they may be unsuitable to work with children.

The school will work fully with the LADO, Children's Social Care, the Police and any other relevant agencies throughout the management of the allegation.

11. Managing Low-Level Concerns

Homebrook Woods recognises that creating and maintaining a strong safeguarding culture requires all adults to remain professionally curious about behaviour that may fall below expected standards, even where it does not meet the statutory harm threshold.

Low-level concerns may include any behaviour that is inconsistent with the Staff Code of Conduct but does not indicate that a child has been harmed or is at immediate risk of harm.

Examples may include:

- over-familiar behaviour;
- inappropriate language or humour;
- failure to maintain professional boundaries;
- inappropriate use of social media;
- unnecessary physical contact;
- behaviour that causes a sense of unease or concern.

All low-level concerns will be reported to the Headteacher and Designated Safeguarding Lead without delay.

The school will:

- record the concern appropriately;
- consider whether a pattern of behaviour is emerging;
- provide advice, guidance or support where appropriate;
- determine whether the concern should be managed as an allegation meeting the harm threshold.

Homebrook Woods promotes an open and transparent safeguarding culture in which staff are encouraged to report concerns without fear of reprisal.

12. Internal Investigations

Following consultation with the LADO, the school will undertake any internal investigation only where advised that it is appropriate to do so.

Investigations will be:

- fair;
- proportionate;
- impartial;

- confidential;
- completed as promptly as reasonably possible.

The school will ensure that:

- the rights of all parties are respected;
- safeguarding remains the priority throughout;
- investigations do not compromise any Police or Children's Social Care enquiries.

13. Suspension and Alternative Arrangements

Suspension is a neutral act and will not be an automatic response to an allegation.

The Headteacher (or the LADO where the allegation concerns the Headteacher) will consider whether alternative arrangements can be implemented before suspension is considered.

Factors taken into account include:

- the nature of the allegation;
- potential risk to children;
- advice from the LADO;
- the welfare of all parties;
- operational requirements.

Where suspension is necessary, the school will ensure that appropriate welfare support is available for the member of staff concerned.

14. Support for Children, Families and Staff

Homebrook Woods recognises that allegations may be distressing for everyone involved.

Throughout the process, the school will ensure that:

- the welfare of the child remains paramount;

- parents or carers are kept appropriately informed where this does not prejudice investigations;
- appropriate pastoral support is available for pupils;
- staff are treated fairly and respectfully;
- staff have access to appropriate welfare or occupational support where required.

The school will work closely with external agencies to ensure that safeguarding needs are met.

15. Confidentiality

Information relating to allegations or low-level concerns will be handled in strict confidence.

Information will only be shared with those who have a legitimate professional need to know.

All parties are expected to maintain confidentiality whilst investigations are ongoing.

Homebrook Woods will comply with:

- Data Protection Act 2018;
 - UK GDPR;
 - statutory safeguarding guidance.
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16. Record Keeping

The Headteacher and Designated Safeguarding Lead will maintain secure records of:

- allegations received;
- low-level concerns;
- referrals made;
- advice received from the LADO;
- actions taken;
- investigation outcomes;
- support provided;
- lessons learned.

Records will be retained in accordance with statutory guidance and data protection requirements.

Where staff leave the school, safeguarding records relating to substantiated allegations will be retained in accordance with statutory requirements.

17. Referrals to External Agencies

Where appropriate, Homebrook Woods will make referrals to:

- the Local Authority Designated Officer (LADO);
- Children's Social Care;
- the Police;
- the Disclosure and Barring Service (DBS);
- the Teaching Regulation Agency (TRA), where applicable.

Referrals will be made in accordance with statutory guidance and legal requirements.

18. Resignation During an Investigation

Where a member of staff resigns or ceases to provide services before an investigation has concluded, the school will continue to consider whether referrals to the LADO, DBS or Teaching Regulation Agency remain appropriate.

Resignation will not prevent safeguarding concerns from being investigated or referred where necessary.

19. Learning Lessons

Following the conclusion of any allegation or investigation, Homebrook Woods will consider whether improvements can be made to:

- safeguarding practice;
- staff training;
- supervision arrangements;
- policies and procedures;
- risk assessments;

- recruitment processes.

Learning from incidents will be used to strengthen safeguarding arrangements and reduce future risk.

20. Relationship with the Complaints Policy

Where a concern is raised through the Homebrook Woods Complaints Policy and Procedure, the Headteacher or Designated Safeguarding Lead will first consider whether the matter constitutes:

- an allegation meeting the statutory harm threshold;
- a low-level concern; or
- a complaint requiring investigation under the Complaints Policy.

Where safeguarding procedures apply, these will take precedence over the school's complaints process to ensure that children remain appropriately protected. This approach aligns with the school's staged complaints procedures and commitment to fair, transparent investigations.

21. Monitoring and Review

The Proprietor will monitor the implementation of this policy through:

- safeguarding audits;
- review of allegations and low-level concerns;
- staff supervision;
- safeguarding training;
- annual policy review.

This policy will also be reviewed following:

- changes to legislation;
 - updates to **Keeping Children Safe in Education (KCSIE)**;
 - revisions to statutory safeguarding guidance;
 - significant safeguarding incidents;
 - recommendations from the Local Authority Designated Officer or safeguarding partners.
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Appendix A – Managing Allegations Process

