Pathway Trust

Safeguarding concerns and allegations made about staff, including supply teachers, volunteers and contractors

Policy effective from	1 September 2026
Policy owner	Director of Inclusion
Policy applies to	Berrow Church Primary School Burnham-on-Sea Infant School Castle Batch Primary School Charfield Primary School Cherry Garden Primary School Downend School East Huntspill Primary School Lyde Green Primary School Mangotsfield School Marlwood School Pawlett Primary School Priory Community School Severn Beach Primary School St Andrew's Church Junior School St Anne's Church Primary School The Castle School The King Alfred School Tortworth Primary School West Huntspill Primary School Worle Community School Pathway Partnership Teams
Policy changes since last version	New policy

1. Introduction

1.1 Pathway Trust takes the safeguarding of its pupils very seriously and we recognise that it is extremely important that any safeguarding concerns or allegations made against a member of staff, including supply teachers, volunteers and contractors is managed quickly and effectively. It is also important that low level safeguarding concerns are recognised and reported so behaviours can be appropriately managed.

1.2 This policy sets out how the trust will manage safeguarding concerns and allegations made about a member of staff, including supply teachers, volunteers and contractors at our trust, together with allegations relating to incidents that happened when an individual or organisation was using the school premises for the purposes of running activities for children. It meets the requirements of the Department for Education statutory guidance for managing allegations set out in part four of Keeping Children Safe in Education 2026.

1.3 This policy is set out in two parts. The first part deals with allegations made against members of staff, including supply teachers, volunteers and contractors, together with allegations relating to incidents that happened when an individual or organisation was using the school premises for the purposes of running activities for children. The second part deals with low level concerns raised in relation to members of staff, including supply teachers, volunteers and contractors.

2. Part one: Managing allegations made against members of staff, including supply teachers, volunteers and contractors

2.1 This part of the policy will be followed when managing such allegations and may be adapted to each case as required. Whilst it will be used in all cases, Part 4 of Keeping Children Safe in Education 2026 requires that it is followed in any case where it is suspected or alleged that a member of staff, including supply teachers, volunteers and contractors has:

- Behaved in a way that has harmed a child or may have harmed a child (see our Child Protection and Safeguarding Policy for what we mean by harm).
- 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.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

2.2 The fourth bullet point above includes behaviour that may have happened outside of the school that might make an individual unsuitable to work with children; this is known as transferable risk.

2.3 This policy will also be used where allegations are made relating to incidents that happened when an individual or organisation was using the school premises for the purposes of running activities for children.

2.4 This policy will be used alongside our Complaints Procedure, and Child Protection and Safeguarding Policy, both of which can be accessed on the trust website.

3. Reporting an allegation

3.1 The safety and welfare of our pupils is of paramount importance and so all staff must report their allegations immediately.

3.2 Allegations made against a member of staff, including supply teachers, volunteers and contractors should be reported to the Headteacher. Allegations involving the Headteacher should be reported to the Chief Executive. The Headteacher/Chief Executive will then contact the local authority designated officer (LADO). The Headteacher/Chief Executive will then act as the case manager.

3.3 When an allegation is made, the Headteacher/Chief Executive will consider two aspects:

- Looking after the welfare of the child.
- Investigating and supporting the person subject to the allegation.

3.4 In each case, the Headteacher/Chief Executive will:

- Apply common sense and judgement.
- Deal with allegations quickly, fairly and consistently.
- Provide effective protection for the child and support the person subject to the allegation.

3.5 Before contacting the LADO, the Headteacher/Chief Executive will conduct basic enquiries to establish the facts to help determine whether there is any foundation to the allegation. The Headteacher/Chief Executive will contact the LADO and an initial discussion will take place to consider the nature, content and context of the allegation and agree a course of action. The school Designated Safeguarding Lead may also be involved in this discussion. This discussion may include that:

- No further action is required.
- More information is required to determine a course of action.
- A strategy discussion should take place.
- Police or social care should be involved.

3.6 The school will share relevant information with the LADO about the allegation, the child, and the person against whom the allegation has been made. If it is decided that a strategy discussion should take place, then the school will always attend that meeting. Representatives from other agencies, such as health, social care and police, may also be invited to the meeting.

3.7 Where an allegation is made or becomes known to the school relating to incidents that happened when an individual or organisation was using the school premises for

the purposes of running activities for children, the Headteacher will inform the LADO in accordance with paragraph 3.6 of this policy.

4. Investigating an allegation

4.1 An investigation into the allegation should normally be undertaken by a senior member of staff at the school. Where no suitable staff are available or the nature or complexity of the allegation requires it, the school may appoint an independent investigator.

4.2 When determining the outcome of an investigation, part four of Keeping Children Safe in Education 2026 states that the following definitions should be used when determining the outcome of the investigation:

- **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 to 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.

4.3 Where an allegation is made against an individual not directly employed by the trust, such as supply teachers, trainee teachers or contracted staff provided by an employment agency or business, the school will remain responsible for gathering the facts and managing the safeguarding process, while working closely with the employment agency or business, or teacher training provider. In no circumstances would the school cease to use such an individual due to safeguarding concerns without finding out the facts and liaising with the LADO to determine a suitable outcome.

5. Supporting those involved

5.1 **Parents/carers of the child(ren) involved:**

- Parents or carers of the child involved will be told about the allegation, if they do not already know of it. Where a strategy discussion is required or police or children's social care need to be involved, the school will not tell the parents or carers until it has been agreed with those agencies what information can be shared.
- The school will keep parents or carers informed about the progress of the investigation. Where there is no criminal prosecution, the school will tell parents or carers the outcome of the investigation. The deliberations of any disciplinary hearing and the information taken into account in reaching a decision will not normally be disclosed, but the parents or carers of the child will usually be told the outcome **in confidence.**

5.2 **The member of staff or volunteer:**

- The school has a duty of care to its employees and will act to minimise the stress inherent in the investigation process.
- The person who is the subject of the allegation will be informed as soon as possible, usually after the initial discussion with the LADO. The person will be advised of the likely course of action, unless the police or children's social care raise an objection; in those circumstances, the school will work with children's social care and the police to agree what information can be disclosed and when.
- The Headteacher/Chief Executive (as appropriate) will appoint a named representative to keep the person who is the subject of the allegation informed of the progress of the case and up to date on other school-related matters. The Headteacher/Chief Executive (as appropriate) will also consider what other support may be appropriate for the individual. The school will advise the individual to contact their trade union representative or a colleague for support; they may also be given access to support services provided by the trust.
- Where an allegation is made against a member of supply staff, the supply agency should provide additional support to that member of supply staff.

6. Suspension

6.1 Suspension is not an automatic response to an allegation being made. The school will only suspend a member of staff following careful consideration of whether there is cause to suspect the child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In many cases, it may be possible for alternative arrangements to be made so that the individual can continue working.

6.2 The school makes the decision whether or not to suspend a member of staff. Where the police or children's social care are involved in the case, the school will listen to their views regarding suspension.

6.3 The school has no authority or power to suspend a member of supply staff where an allegation is made against them. Instead, the trust will immediately cease to use the services of that member of supply staff.

6.4 Where the member of staff is suspended, they will receive written confirmation within 1 working day and will be informed of the reason for the suspension.

6.5 After the suspension, if it is decided that the employee can return to the school, measures will be put in place to support their return to work; this could include a phased return or offering another member of staff as a support system.

6.6 The school will not prevent social contact with work colleagues and friends, unless there is evidence to suggest such contact may prejudice the gathering of evidence.

7. Resignation

7.1 If the individual resigns or the supply staff member, contractor or volunteer ceases to provide their service, the investigation into the allegation will be completed. The individual will be given the opportunity to engage with the investigation.

8. Action on conclusion of the case

8.1 If the allegation is substantiated and:

- The employee is dismissed or resigns.
- The trust ceases to use the supply staff member's services as a result of the allegation.
- The trust ceases to use the contractor's services as a result of the allegation.
- The trust ceases to use the volunteer's services as a result of the allegation.

The trust will consider whether a referral to the DBS and/or to the TRA is required.

8.2 Where an allegation is found to be false, the school may refer the case to social services to determine whether the child needs support and/or to understand if there is a safeguarding reason why the false allegation was made.

8.3 The trust's Behaviour Policy sets out the action that may be taken against pupils who are found to have made malicious allegations.

8.4 Where an allegation is made against a member of supply staff, the outcome of the investigation will be shared with the supply agency and the LADO.

9. Post-incident review

9.1 It is good safeguarding practice for schools and schools to review incidents upon their conclusion, so they can learn from them and continue to improve standards of safeguarding. Where allegations are made against staff, supply staff, contractors or volunteers, the school may carry out a review at the conclusion of the case.

10. Timescales

10.1 Investigations into allegations against staff, including agency staff or volunteers or volunteers, will be concluded as quickly and efficiently as possible, to ensure that any risks to the child or other children and stress to the individual is minimised as far as possible.

11. Record keeping

11.1 Allegations found to be false or malicious will be removed from the employment record of the individual. For all other allegations, a clear and comprehensive summary of the allegation, how it was followed up and resolved, a note of actions taken and decisions reached, and a declaration on whether the information will be referred to in any future reference will be retained on the employment file; a copy will also be provided to the individual.

11.2 The record will be kept, including for people who leave the school, at least until the person reaches normal pension age or for 10 years, if that will be longer, from the date of the allegation.

11.3 Details of any allegation made by a pupil will be kept in the confidential section of their record.

12. Confidentiality

12.1 The school will make every effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated.

12.2 The Education Act 2002 introduced reporting restrictions, preventing the publication of any material that may lead to the identification of a teacher in a school who has been accused by or on behalf of a pupil from the same school; this applies to parents and carers as well as the press.

13. Non-recent allegations

13.1 Where an adult makes an allegation that they were abused as a child, that adult will be advised to report the allegation to the police.

13.2 Non-recent allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations.

14. Part two: managing low-level concerns

14.1 This part of the policy will be followed when dealing with low level concerns raised in relation to members of staff, including supply teachers, volunteers and contractors and may be adapted to each case as required. It will be used alongside the trust's Complaints Procedure, Child Protection and Safeguarding Policy, Code of Conduct and Disciplinary Procedure.

14.2 Pathway promotes a culture in which all concerns about all adults working in or on behalf of the trust, (including supply teachers, volunteers and contractors) are addressed appropriately.

14.3 This policy is designed to:

- Promote and support a culture of openness and trust where staff are clear about the behaviours expected of them and their colleagues.
- Ensure staff are comfortable to raise low-level concerns.
- Provide for efficient and proportionate handling of those concerns.

15. Recognising low-level concerns

15.1 This policy will be used to manage low-level concerns, defined in part four of Keeping Children Safe in Education 2026 as 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 allegations threshold or is otherwise not considered serious enough to consider a referral to the Local Authority Designated Officer (LADO).

15.2 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.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- Humiliating children.

16. Sharing low level concerns

16.1 For our culture of openness and trust to prevail, all staff should share any low level concerns they have. Serious Case Reviews and Child Safeguarding Practice Reviews have often evidenced how low level concerns felt and/or expressed by staff relating to individuals, who were later found to have sexually abused children at a school, were not recorded. When they are not recorded, they cannot be reviewed or studied for patterns of behaviour.

16.2 To minimise and hopefully eradicate the risk of those opportunities being missed, it is critical that staff understand their role in identifying and reporting low level concerns.

16.3 All staff are encouraged to immediately report low level safeguarding concerns as defined in this policy so that the identified behaviours can be investigated and managed appropriately.

16.4 All low level concerns in relation to staff, supply staff, contractors or volunteers should be reported immediately to the Headteacher. Concerns about the Headteacher should be reported to the Chief Executive.

16.5 The procedure for reporting low level concerns is consistent with that for reporting allegations of abuse, as set out in part one of this policy. Staff do not need to determine whether their concern meets the threshold set out in part one of this policy or is a low-level concern; the Headteacher or Chief Executive (as appropriate) will make this determination once the staff member has reported the issue.

17. Responding to low-level concerns

17.1 The Headteacher or Chief Executive (as appropriate) will review the concern to confirm that it is not a more serious issue that should be dealt with under part one of this policy. An issue reported as a low-level concern would be dealt under part one of this policy where it meets the threshold set out in part one or there is a pattern of low-level concerns expressed about the individual or wider staff practices generally. If necessary, the Headteacher or Chief Executive (as appropriate) will discuss the concern with the LADO to determine whether it should be dealt with under part one of this policy.

17.2 The Headteacher or Chief Executive (as appropriate) will discuss the concern with the individual who raised it and will investigate it, as appropriate.

17.3 Most low-level concerns are likely to be minor and can be dealt with by means of management, support or additional training. Where necessary, action may be taken in accordance with the trust's Code of Conduct and Disciplinary Procedure.

17.4 If the concern has been raised via a third party, the Headteacher or Chief Executive (as appropriate) will collect evidence by speaking directly to the person who raised the concern (unless it has been raised anonymously), the individual involved, and any witnesses.

17.5 Where a low-level concern is raised about a member of supply staff or a contractor, the concern will be shared with the supply agency, so they can take appropriate steps in accordance with their own policies and statutory guidance.

18. Recording low-level concerns

18.1 All low-level concerns will be recorded in writing and will include details of the concern, the context, and action taken. The records will be kept confidential and held securely in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation.

18.2 Records of low-level concerns will be reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified. If patterns are identified, the school will decide on an appropriate course of action, and will refer the matter to the LADO where the behaviour moves from a concern to meeting the threshold set out in part one of this policy.

The record of the low-level concern will be kept at least until the person leaves the trust.

19. References

19.1 Low-level safeguarding concerns will not be included in references, except where they have met the threshold for referral to the LADO and found to be substantiated, in which case they should be referred to in references.