



EmpowerEd Managing Allegations & Low-Level Concerns Policy

Date adopted: 1st September 2025

Review date: 1st September 2026

1. Purpose

This policy outlines how EmpowerEd will manage and respond to allegations or concerns about adults working or volunteering with children, ensuring compliance with statutory guidance (Keeping Children Safe in Education 2024) and local safeguarding procedures. Our priority is to protect learners, maintain fairness for all parties, and uphold trust in our provision.

2. Scope

This policy applies to all:

- EmpowerEd staff, volunteers, contractors, supply staff, and visitors.
- Allegations or concerns about behaviour in or outside work that may present a safeguarding risk.
- Allegations about individuals from other organisations working with EmpowerEd learners.

3. Legal and Policy Framework

- Keeping Children Safe in Education (Sept 2024) – Part 4
- Working Together to Safeguard Children (Dec 2023)
- Children Act 1989 & 2004
- Local Safeguarding Children Partnership (LSCP) procedures for all Tyne and Wear local authorities
- EmpowerEd Safeguarding & Child Protection Policy
- EmpowerEd Code of Conduct

4. Definitions

Allegation (LADO threshold):

- Behaved in a way that has harmed, or may harm, a child.
- Possibly committed a criminal offence against, or related to, a child.
- Behaved in a way that indicates they may pose a risk of harm to children.
- Behaved in a way in their personal life that raises safeguarding concerns.

Low-level concern:

Behaviour inconsistent with the Code of Conduct but not meeting the LADO threshold (e.g., over-familiarity, inappropriate language, boundary-blurring).

5. Roles and Responsibilities

Designated Safeguarding Lead (DSL):

- Receives and records all allegations/concerns.
- Decides initial action.
- Liaises with the LADO.
- Maintains records.

Senior Leadership Team (SLT): Ensures policy implementation, supports staff, oversees disciplinary action if required.

All Staff: Must report all allegations or concerns immediately — they must not investigate themselves.

6. Reporting Process

For allegations meeting LADO threshold:

1. Report immediately to the DSL.
2. If allegation is against the DSL, report to another member of the management team..
3. DSL contacts the Local Authority Designated Officer (LADO) within 1 working day.
4. No action that could compromise investigations should be taken before LADO advice.

For low-level concerns:

1. Report immediately to the DSL.
2. DSL logs the concern in the Low-Level Concerns Register.
3. DSL considers whether pattern of concerns emerges and if escalation to LADO is required.

7. Initial Response

- Ensure immediate safety of any child involved.
- Avoid asking leading questions or taking statements beyond what is necessary for initial safeguarding.
- Maintain confidentiality — share only on a 'need to know' basis.

8. Actions Following LADO Consultation

The LADO will decide whether the allegation requires:

- Police investigation.
- Children's social care involvement.
- Internal investigation under disciplinary policy.

EmpowerEd will follow the LADO's advice at all stages.

9. Low-Level Concerns Process

- Purpose: to promote a culture of openness and self-correction.
- Examples: overly personal comments, social media contact with learners, occasional breaches of professional boundaries.
- DSL will keep confidential central log, monitor patterns, and review with SLT termly.
- Persistent low-level concerns may trigger disciplinary action.

10. Record-Keeping

- All allegations and low-level concerns recorded securely in line with UK GDPR and Data Protection Act 2018.
- Allegation records kept until the person reaches normal retirement age or 10 years, whichever is longer.
- Low-level concerns retained for duration of employment plus 6 years.

11. Support for All Parties

- For the child/young person: reassurance, safeguarding plan, DSL check-ins.
- For the adult: clear explanation of process, named contact, signposting to support (e.g., Employee Assistance).

12. Confidentiality and Media

- All matters handled confidentially.
- No public statements without advice from the LADO/police.

13. Learning and Review

- After each case, the DSL and SLT will review procedures to identify improvements.
- Patterns of concerns will be analysed to inform training.

14. Related Policies

- Safeguarding & Child Protection Policy
- Whistleblowing Policy
- Disciplinary Policy
- Code of Conduct
- Complaints Policy

15. Review

This policy will be reviewed annually or sooner if statutory guidance changes.