SPECIALIST EDUCATION SERVICES

The Management of Allegations and Concerns Regarding the Professional Conduct of Adults in Relation to Child and Vulnerable Young Adult Protection: Policy and Practice

Date created or revised: 1026
Date of next review: 0927

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1 INTRODUCTION

This document has been reviewed with reference to the updated DfE guidance, "Keeping children safe in education: Statutory guidance for schools and colleges".

SES shares the same objectives stated in the above guidance, to help keep children safe by contributing to:

- providing a safe environment for children, young people and young adults to learn and live

- identifying children, young people and young adults who are suffering or likely to suffer significant harm, and taking appropriate action with the aim of making sure they are kept safe both within the home and education setting.

It is important that this policy and practice document is therefore read in conjunction with the following SES Policies:

- Safeguarding and Child Protection Policy and Practice
- Complaints and Representations Policy and Practice
- Children's Welcome Guide
- Health and Safety Policy and Practice
- Positive Management of Behaviour Policy and Practice
- Policy and Practice for the Disclosure of Information in the Public Interest (Whistle Blowing)

SES is committed to safeguarding and promoting the welfare of children, young people and young adults, and expects all staff and volunteers to share this commitment.

2 RATIONALE

Allegations of abuse by members of staff must be investigated within the correct Multi Agency Safeguarding Hub (MASH) procedures, and when dealing with any allegation against staff, it is vital to keep the welfare of the young person as the central concern. However, as with all child and vulnerable young adult protection issues, a balance needs to be struck between supporting and protecting the young person and keeping the effects of possibly false allegations to a minimum.

Thus, it is essential that any allegation of abuse made against a member of staff, supply staff or volunteer is dealt with fairly, quickly, and consistently, in a way that provides effective protection for the child or young adult, and at the same time supports the person who is the subject of the allegation.

Procedures outlined in this policy and practice document should be used in respect of all cases in which it is alleged that an adult has:

- behaved in a way that has harmed a child or vulnerable young adult, or may

have harmed a child or vulnerable young adult;

- possibly committed a criminal offence against or related to a child or vulnerable young adult;

- behaved towards a child, children or vulnerable young adult in a way that indicates s/he would pose a risk of harm if they work regularly or closely with children or vulnerable young adult; or

- behaved or may have behaved in a way that indicates they may not be suitable to work with children or vulnerable young adults.

The procedures outlined in this policy and practice document will apply to allegations made against any adult working with or around children or vulnerable young adults from SES in whatever capacity.

An allegation or concern raised against a member of staff (including supply staff and volunteers) may not meet the harms threshold set out above; these are known as low level concerns. The process for responding to low level concerns is outlined in section 6.

2.1 PRINCIPLES

All allegations must be reported straight away. In practice the duty DCM is likely to be the most immediate senior manager available, however the Head of Education, Head of Care, Registered Manager or Registered Service Manager (RSM) should be contacted without delay and they will liaise with the Principal. Should the Principal be the person about whom allegations have been made, the Directors should be informed immediately. Where a member of staff has a concern about the duty DCM they should contact the first port of call directly in absence of any other senior manager.

The procedures need to be applied with common sense and judgement. It is imperative that everyone who deals with allegations of abuse maintains an open mind, but that allegations are taken seriously.

The rights of the child, young adult and member of staff must be considered. However, where there exists a conflict of interest between the adult and the child, then the child's interests and welfare must be paramount as required by the Children Act 1989.

In investigating allegations, actions should be conducted in a way that recognises the vulnerability of staff and seeks to protect them as far as possible from mistaken or false allegations.

Investigations must be dealt with quickly, fairly and impartially. The member of staff should be informed about the allegation as soon as possible, preferable in person, (in consultation where necessary with Local Authority Designated Officer (LADO) in respect of timing and content).

2.2 SAFEGUARDING CHILDREN AND YOUNG ADULTS

SES is committed to safeguarding children and young adults, creating and maintaining a safe environment, and through the work with children and young adults, promoting resilience, by helping them to stay safe from harm, and encouraging them to speak up if they have worries or concerns.

Through their day-to-day contact with children and young adults, adults have a crucial role to play in noticing indicators of abuse or neglect and in referring concerns to the Lead Designated Person for Child Protection (Registered Manager) or Lead Designated Person for Young Adult Protection (RSM).

In any environment where adults have intensive interactions with children and young adults, the opportunity to abuse them also exists. It is regrettably the case that, in rare circumstances, adults have been found to be responsible for child abuse. Given their daily contact with children and young adults in a variety of situations adults are also vulnerable to accusations of abuse. Their relationships with children and young adults may lead to allegations being made against them by children, parents/carers or other adults. Those allegations may be false, malicious or misplaced and may be either deliberate or innocent of such intent. Regardless of the motives underlying any allegations, they may also be well founded, and should always be taken seriously.

As some allegations can arise through ignorance or ill-advised behaviour, SES provides thorough induction, training and comprehensive guidance for all adults on appropriate behaviour and boundaries in relation to working with children, young people and young adults.

2.3 LISTENING TO CHILDREN AND YOUNG ADULTS

The person to whom an allegation is reported by a child or young adult must:

- Listen to the child or young adult
- Not interrupt a child or young adult when recalling significant events
- Not make assumptions or interpretations
- Avoid asking questions, particularly leading questions
- Record all the information using the child or young adult's own words and note the time, context, who was present and what was said
- Sign and date the record, printing their name

'Listened to' means just that, **on no account** should suggestions be made to children or young adults as to alternative explanations for their worries. They should not be interrogated, i.e. asked repeated questions, but must be listened to and the written record made of the initial conversation as soon as practicable.

Staff should not promise confidentiality to children or young adults who make allegations. They should inform the child or young adult that they have a duty to pass information on in order to protect children or young adults but information will only be passed on a "need to know" basis. They should also be reassured that support will be made available to them.

2.4 USE OF REASONABLE FORCE AND PHYSICAL RESTRAINT

Where an allegation or concern relates to the use of reasonable force or a restrictive intervention involving a child, this must be considered in accordance with *Restrictive interventions, including the use of reasonable force, in schools* (April 2026), *Keeping Children Safe in Education* (2026), the SES Positive Management of Behaviour Policy and Practice document, and SES safeguarding procedures.

The use of reasonable force or restraint does not in itself constitute inappropriate practice. However, any allegation or concern must be considered carefully, including whether the intervention was necessary, reasonable and proportionate, and whether the child experienced harm or was placed at risk of harm.

Where a concern does not meet the safeguarding harm threshold, it may be appropriate for the Principal to manage the matter at establishment level, with appropriate safeguarding oversight and in accordance with SES procedures.

Where an allegation meets, or may meet, the safeguarding harm threshold, the relevant safeguarding procedures must be followed, including referral to or consultation with the Local Authority Designated Officer (LADO), as appropriate. Decisions about the management of allegations must not be based solely on whether an intervention was described as reasonable force or restraint.

SES has established systems for the reporting, recording, monitoring, review and evaluation of restrictive interventions, including consideration of the child's experience, the actions of adults and any learning or improvements required.

3 ACTION TO BE TAKEN BY A MEMBER OF STAFF WHO HEARS AN ALLEGATION OR HAS CHILD / YOUNG ADULT PROTECTION CONCERNS RELATING TO STAFF (AND VOLUNTEERS WHO WORK WITH CHILDREN AND YOUNG ADULTS)

All staff have a responsibility to report if they believe a member of staff is harming, or using unacceptable behaviour towards a child or young adult. Information may come to light about behaviour off site that could indicate a breach of acceptable professional conduct. Children (or a parent, carer or other) or young adults who report to any member of staff an incident of abuse or harm by a member of staff or other concern must be listened to and taken seriously**. Staff must immediately report the concern or allegation (see 2.1 above).**

They **must not attempt to investigate the allegation**, but provide a full written account of what the child has said, this account should be dated and signed, and any original notes kept. Advice can be sought from the Lead Designated Person for Child Protection (Registered Manager) or Lead Designated Person for Young Adult Protection (RSM).

If the concern/allegation is against the Registered Manager the Principal must be informed immediately. For the RSM the Directors must be informed.

If the concern/allegation is against the Principal, the Directors must be informed

immediately.

4 PROCESS AND PROCEDURES FOR ANY ALLEGATION RELATING TO CHILDREN

4.1 INITIAL CONSIDERATIONS

The procedures need to be applied with common sense and judgement, dealing with allegations quickly, fairly and consistently whilst providing effective protection for the child and support to the person subject to the allegation.

In rare cases allegations will be so serious as to require immediate intervention by children's social care and/or police. Others may seem much less serious and on the face of it will not warrant consideration of a police investigation, or enquiries by children's social care. These may be classed as low level concerns, see section 6. The Principal must consider the allegation and determine the appropriate way forward. **Establishing whether an allegation warrants further investigation is not the same thing as deciding whether an allegation is well founded.**

Any allegation appearing to meet the criteria outlined in Section 2 and repeated below should be reported to the LADO the same day. That is in all cases in which it is alleged that an adult has:

- behaved in a way that has harmed a child, or may have harmed a child;
- 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, and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

As outlined in KCSIE, before contacting the LADO, the Principal should conduct basic enquiries to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. For example, is it possible that the individual member of staff could have come into contact with the child at the time stated? Are there any additional witnesses? This is not the same as an investigation.

The following definitions should be used when determining the outcome of allegation investigations:

a. ***Substantiated***: there is sufficient identifiable evidence to prove the allegation;

b. ***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 of the allegation;

c. ***False***: there is sufficient evidence to disprove the allegation;

d. ***Unsubstantiated***: there is insufficient evidence to prove or disprove the allegation; the term, therefore, does not imply guilt or innocence;

e. ***Unfounded***: there is no evidence or proper basis which supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the incident or was mistaken about what they saw. Alternatively they may not have been aware of all the circumstances.

These decisions are made in consultation with other professionals after the full investigation process.

There are some circumstances when an allegation may not require referral under child protection procedures, but if there is any doubt, the local authority designated officer (LADO) should be consulted. An allegation of this nature may be considered as a low level concern (see section 6).

If the allegation arises as a result of inappropriate behaviour or poor practice by a member of staff, this needs to be considered under SES disciplinary procedures and should be resolved without delay.

It is important to ensure that even allegations that appear less serious are seen to be followed up and taken seriously, and that they are examined via the formal complaints procedure. Again, an allegation of this nature may be recorded as a low level concern (see section 6).

The local authority designated officer (LADO) should be informed of all allegations that come to the Principal's attention and appear to meet the criteria outlined above, so that s/he can consult police and social care colleagues as appropriate.

The LADO should also be informed of any allegations that are made directly to the police (which should be communicated via the police force's designated officer) or to children's social care.

4.2 ACTION FOLLOWING INITIAL CONSIDERATION

Following a referral, full liaison with the assigned LADO will be required when dealing with the allegation; the LADO may decide to close the matter at consultation only, or proceed to a full process. All subsequent decision making will depend on actions agreed with the LADO as part of the process.

Where the initial consideration decides that the allegation does not involve a possible criminal offence, the employer must deal with the matter. If the nature of the allegation does not require formal disciplinary action, the Principal will institute appropriate action within 3 working days.

If a disciplinary hearing is required and can be held without further investigation, the hearing should be held within 15 working days.

Where further investigation is required to inform consideration of disciplinary action, the Principal will discuss with the LADO who will undertake the necessary action. In some circumstances it may be appropriate for the disciplinary investigation to be conducted by a person who is independent of SES. The LADO and case manager should monitor the progress of cases to ensure that they are dealt with as quickly as possible in a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals, depending on the complexity of the case.

The investigating officer should aim to provide a report to the employer within 10 working days. On receipt of the report of the disciplinary investigation, the Principal should consult with the LADO within 2 working days to decide whether a disciplinary hearing is needed. If such a hearing is required, it should be held within 15 working days.

Where Children's Social Care has undertaken enquiries to determine whether the child or children are in need of protection, the Principal should take account of any relevant information obtained in the course of those enquiries when considering disciplinary action. The LADO should continue to liaise with the to monitor progress of the case and provide advice/support when required/requested.

In the case of the allegation being made against a supply teacher, or a contractor, or a volunteer from a voluntary organisation, SES may not be involved in disciplinary procedures, but will ensure allegations are dealt with properly. SES will liaise with the LADO and be involved and cooperate in any investigation. This investigation will reach a decision whether to continue to use the person's services, or to provide the person for work with children in the future, and whether to report to the Department for Education. In no circumstances would SES cease to use a supply teacher, contractor or volunteer due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome.

The Principal may delegate ongoing liaison with the LADO to the Registered Manager or Head of Education, as appropriate. The Principal will retain overall oversight of the allegation and ensure that all required actions are completed.

4.3 RECORD KEEPING

It is important that a clear and comprehensive summary of any allegations made be retained in the member of staff's confidential personnel file. This summary should include:

- a clear and comprehensive summary of the allegation;
- details of how the allegations were followed up and resolved;
- a note of any action taken and decisions reached and the outcome as catagorised above;
- a declaration on whether the information will be referred to in any future reference.

A copy should be provided to the member of staff concerned. The summary should be retained at least until the member of staff has reached normal retirement age or

for a period of 10 years from the date of the allegation if that is longer.

Details of allegations that are found to have been malicious should be removed from personnel records, unless the subject of the allegation asks that records be retained in order to prevent unnecessary re-investigation if, as sometimes happens, allegations resurface after a period of time.

4.4 REFERENCES

Cases in which an allegation was proven to be false, unsubstantiated, unfounded or malicious should not be included in employer references. A history of repeated concerns or allegations which have all been found to be unsubstantiated, malicious etc. should also not be included in any reference. Substantiated allegations should be included in references, provided that the information is factual and does not include opinions.

4.5 SUSPENSION

The Principal, in consultation with the Lead Designated Person for Child Protection (Registered Manager), will make a decision whether or not the member of staff should continue to work with children during the investigation. SES is mindful of the need to safeguard and protect children's welfare whilst also protecting the adult's right to protection against false allegation.

Suspension will be considered in any case where:

- there is cause to suspect a child is at risk of 'significant harm'
- the allegation warrants investigation by the police, or is so serious that grounds for dismissal are being considered.

Suspension will not be automatic; consideration will be made as to whether the result that would by achieved by suspension could be obtained by alternative arrangements. The power to suspend is vested in the Principal.

Suspension should not be the default position: an individual should be suspended only if there is no reasonable alternative. Every case will be different and based on a risk assessment process considering a range of factors.

Children's social care services or the police cannot require the Principal to suspend a member of staff or a volunteer, although they should give appropriate weight to their advice. The power to suspend is vested in the Principal, in consultation with the Directors of SES.

4.6 SUPPORTING THOSE INVOLVED

SES has a duty of care to its employees. We will act to manage and minimise the stress inherent in the allegations process. Support for the individual is key to fulfilling this duty. Individuals should be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless there is an objection by the children's social care services or the police. The individual should be advised to contact their trade union representative, if they have one, or a

colleague for support. They should also be reminded of their access to welfare counselling and/or advice.

Any member of staff facing an allegation will be offered a named 'support person' who is impartial to the investigation, where this is possible, and who can keep them informed of the progress on the case and support appropriately. A schedule of contact will be drawn up for use by the named contact person(s) and made available to the line manager.

Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence. This decision sits with the Principal.

Parents or carers of a child or children involved should be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or police or children's social care services need to be involved, the investigating officer should not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers. Parent or carers should also be kept informed about the progress of the case, and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process.

The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed, but the parents or carers of the child should be told the outcome in confidence. Parents and carers should also be made aware of the prohibition on reporting or publishing allegations about teachers in section 141F of the Education Act 2002. If parents or carers wish to apply to the court to have reporting restrictions removed, they should be told to seek legal advice.

Any child/children making an allegation against a member of staff, will be offered a 'support person' from within SES who is impartial to the formal proceedings. Where the allegations are unfounded, the Principal will not necessarily take the view that the allegations were false. Behaviour may have been misinterpreted. In this case, the Principal will explore with the child's social worker whether there is a need for further discussion with the child. SES will continue to provide support to the child/children in these circumstances.

Where it is decided, on the conclusion of the case, that the person who has been suspended can return to work, the Principal should consider how best to facilitate that. Most people will benefit from some help and support to return to work after a very stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The Principal should also consider how the person's contact with the child or person who made the allegation can best be managed if s/he is to continue working with them.

4.7 CONFIDENTIALITY

Every effort must be made to maintain confidentiality and to guard against any unwanted publicity while an allegation is being investigated or considered.

The investigating officer should take advice from the LADO, police and children's social care services to agree the following:

- who needs to know and, importantly, exactly what information can be shared;
- how to manage speculation, leaks and gossip;
- what, if any information can be reasonably given to the wider community to reduce speculation; and
- how to manage press interest if and when it should arise.

Further information regarding confidentiality and information sharing can be found in KCSIE.

4.8 RESIGNATIONS AND 'SETTLEMENT AGREEMENTS

Allegations must be investigated and concluded even in situations where a member of staff tenders their resignation.

It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate with the process. Wherever possible the person should be given a full opportunity to answer the allegation and make representations about it. The process of recording the allegation and any supporting evidence, and reaching a judgement about whether it can be regarded as substantiated on the basis of all the information available should continue even if that cannot be done or the person does not cooperate.

It may be difficult to reach a conclusion in these circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record a conclusion wherever possible. The person concerned should be notified of the conclusion of the allegations and sanctions that might be posed.

By the same token so called 'settlement agreements', by which a person agrees to resign if the employer agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference, must not be used in these cases. A settlement agreement will not prevent a police investigation where that is appropriate nor does it override the statutory duty to make a referral to the DBS.

4.9 CASE SUBJECT TO POLICE INVESTIGATION

If a criminal investigation is required, the police will aim to complete their enquiries as quickly as possible consistent with a fair and thorough investigation and will keep the progress of the case under review.

A target date for the case review will be set. The review will include the progress of the investigation consultation with the Crown Prosecution Service (CPS). If the police and/or CPS decide not to charge the individual with an offence, decide to administer a caution, or the person is acquitted by a court, the police should wherever possible, aim to pass all information they have, which may be relevant to

a disciplinary case, to the employer within 3 working days of the decision. In those cases, the employer and the LADO should decide how to proceed.

If the nature of the allegation does not require formal disciplinary action, the Principal will institute appropriate action within 3 working days. If a disciplinary hearing is required and can be held without further investigation, the hearing should be held within 15 working days.

Any case in which Children's Social Care have undertaken enquiries which are relevant to a disciplinary case should also be passed to the Principal.

If the person is convicted of an offence the police must inform the employer straight away so that appropriate action can be taken.

4.10 REFERRAL TO DfE/OFSTED/DBS

If upon conclusion of the case, SES ceases to use the person's services or the person ceases to provide his/her services, the Principal should consult the LADO regarding whether a referral to DfE/Ofsted or the Disclosure and Barring Service is required. If so, it should be made within 1 month.

4.11 DEALING WITH UNSUBSTANTIATED, UNFOUNDED, FALSE OF MALICIOUS ALLEGATIONS

If an allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO and the Principal should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help.

Where there is clear evidence that an allegation was deliberately invented or malicious, the Principal will consider whether any disciplinary action is appropriate against the child who made it.

Advice should be sought from the police regarding whether any action might be appropriate against the person responsible if he/she was not a child.

5 RESPONDING TO LOW LEVEL CONCERNS

Low level concerns are not insignificant and must be reported to ensure there is an open and transparent culture within SES establishments. A low-level concern is 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 establishment may have acted in a way that:

- is inconsistent with the staff code of professional practice, as outlined in the SES Safeguarding and Child Protection Policy and Practice document), 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 LADO.

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

A low level concern may be identified following an initial concern or allegation raised that subsequently does not meet the harms threshold following an initial consultation with the Principal. Where consultation is sought with the LADO, the allegation or concern will be recorded using the form "Summary Of Child Protection Allegation/Concern Relating To" (see appendix A), irrespective of whether the referral is dismissed as not meeting the harms threshold by the LADO.

Examples of low level concerns are (not an exhaustive list, also see appendix C):

- being over friendly with children that is not in line with the staff code of professional practice;
- having favourites or unexpected gifts for children;
- over use of shouting;
- use of sarcasm or deprecating humour;
- maintaining images of children on their mobile phone beyond immediate use;
- using inappropriate sexualised, intimidating or offensive language

Low level concerns may be as a result of poor professional practice, for example, thoughtless or inadvertent behaviour, through to that which is ultimately intended to abuse.

To prevent low level concerns arising, staff induction and ongoing staff support and development structures will make it clear what appropriate behaviour is and help staff distinguish expected and appropriate behaviour from concerning, problematic or inappropriate behaviour. The Principal, Registered Manager and Head of Education will monitor staff conduct through existing systems, including observation, leadership meetings, incident trends, positive handling sub committee minutes.

All low level concerns should be reported to a DCM (DPCP); the Head of Education, Head of Care, Registered Manager or Registered Support Manager (RSM) should be contacted without delay and they will liaise with the Principal so it can be dealt with at an early stage.

The concern will be recorded using the "Low Level Concerns' form (see appendix B). This will include details of the concern, the context in which the concern arose, and the action taken. Several outcomes are possible from a low level concern; the issue may require no further action, additional professional development, instigation of capability and/or disciplinary procedure or potential escalation to LADO.

Records of low level concerns will maintained by the Principal and within confidential staff personnel files. These records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the Principal will decide on a course of action, either through disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, a referral to the

LADO. Consideration should also be given to whether there are wider cultural issues within the establishment that enabled the behaviour to occur and where policy and practice could be revised or extra training delivered to minimise the risk of it happening again.

Low level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance.

6 MANAGEMENT OF ALLEGATIONS INVOLVING YOUNG ADULTS AGED 18 AND OVER LIVING IN SES CHILDREN'S HOMES

Where a young person has reached the age of 18 and continues to live at an SES Children's Home allegations relating to them must be considered under adult safeguarding procedures. Where the relevant thresholds are met, a referral should be made to Norfolk Adult Safeguarding Services using the online referral form for professionals.

Colleagues must follow the same procedures outlined from Section 3 onwards of the this document, with referrals and liaison directed through Adult Safeguarding rather than Children's Services. Consideration must also be given to whether a referral to the Local Authority Designated Officer (LADO) is required as the adult will be continuing to work with children. Advice should be sought from the relevant safeguarding team to determine appropriate referrals and any necessary joint oversight. All allegations, advice received, decisions and actions must be clearly recorded.

7 SES KITE: OPERATIONAL DIFFERENCES

All SES Kite staff must adhere to the guidance in section 3 of this policy and practice document, and the process and procedures for any allegation relating to a vulnerable young adult apply equally as specified in sections 4 and 5.

However, key operational differences exist; the LADO does not preside over allegations relating to vulnerable young adults (over 18 years of age). A Director, in partnership with the RSM, must consider any allegation and determine the appropriate way forward. **Establishing whether an allegation warrants further investigation is not the same thing as deciding whether an allegation is well founded.** In circumstances where sufficient concern exists following consideration, there will be consultation with the Suffolk Safeguarding Partnership. Placing authority for the young adult and potentially the police.

As with children in rare cases allegations will be so serious as to require immediate intervention by adult's social care and/or police. Others may seem much less serious and on the face of it will not warrant consideration of a police investigation, or enquiries by adult's social care.

8 TRANSFERABLE RISK

Keeping Children Safe in Education specifies the following in regard of transferable risk:

- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

This applies where a member of staff or volunteer is involved in an incident outside of the SES establishment, which did not involve children but could have an impact on their suitability to work with children or vulnerable young adults. For example, a member of staff is involved in domestic violence at home where no children were involved. In this example, SES would need to consider what triggered these actions and could a child or vulnerable young adult at Avocet House, Turnstone House or SES Kite home trigger the same reaction, therefore being put at risk.

In these circumstances the following three questions must be asked as part of any fact finding before any further action is taken:

- What happened?
- Why did it happen (what was the trigger)?
- Could the same trigger occur in SES establishments and said behavior make it unsafe for children or young adults?

There should be a written record made of the approach taken. Depending on the response to these questions may determine whether or not a referral to the LADO is made.

9 APPENDICES

Appendix A: Summary of Child Protection Allegation/Concern (LADO)

Appendix B: Low Level Concern Form

Appendix C: Table: What Is Acceptable Behaviour By Adults Towards Pupils?

Appendix D: Flow Chart: Steps Relating to Child Protection Allegations Against Staff or Adults Connected with the SES

Appendix E: Flow Chart: Additional Actions to Consider Following Allegation

Appendix A

Specialist Education Services

SUMMARY OF CHILD PROTECTION ALLEGATION/CONCERN (LADO):			
Name		Date	

Explanatory statement
This statement is made in accordance with Keeping Children Safe in Education.

Details of allegations that are found to have been malicious should be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned. Substantiated allegations will be included in future references, providing factual information only.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.

Schools and colleges have an obligation to preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. All other records should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

Summary of Allegations Made:

How Allegation Was Followed Up:

Outcome of Investigation*:

Action Taken and Decisions Reached:	
Employee Comments:	
Signed by Line Manager	
Signed by LADO (*if reached social care/criminal threshold*)	

***Definitions:**	
Substantiated	*There is sufficient evidence to prove the allegation.*
Unsubstantiated	*There is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.*
False	*There is sufficient evidence to disprove 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 of the allegation.*
Unfounded	*There is no evidence or proper basis which supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the incident or was mistaken about what they saw. Alternatively, they may not have been aware of all the circumstances.*

(These definitions are taken from "Keeping Children Safe in Education" issued September 2025, with the exception of unfounded which is from the Norfolk LADO service guidance, issued February 2023).

Appendix B

Specialist Education Services

LOW LEVEL CONCERN FORM			
Name		Date	
Explanatory statement This record is made in accordance with the 'SES Management of Allegations Concerns Regarding the Professional Conduct of Adults in Relation to Child and Vulnerable Young Adult Protection: Policy and Practice' and Keeping Children Safe in Education.			
Concern raised by:			
Summary of Concern or Allegation:			
Context in which Concern Arose:			
Action Taken and Decisions Reached:			
Employee Comments:			
Signed by Line Manager			

Appendix C

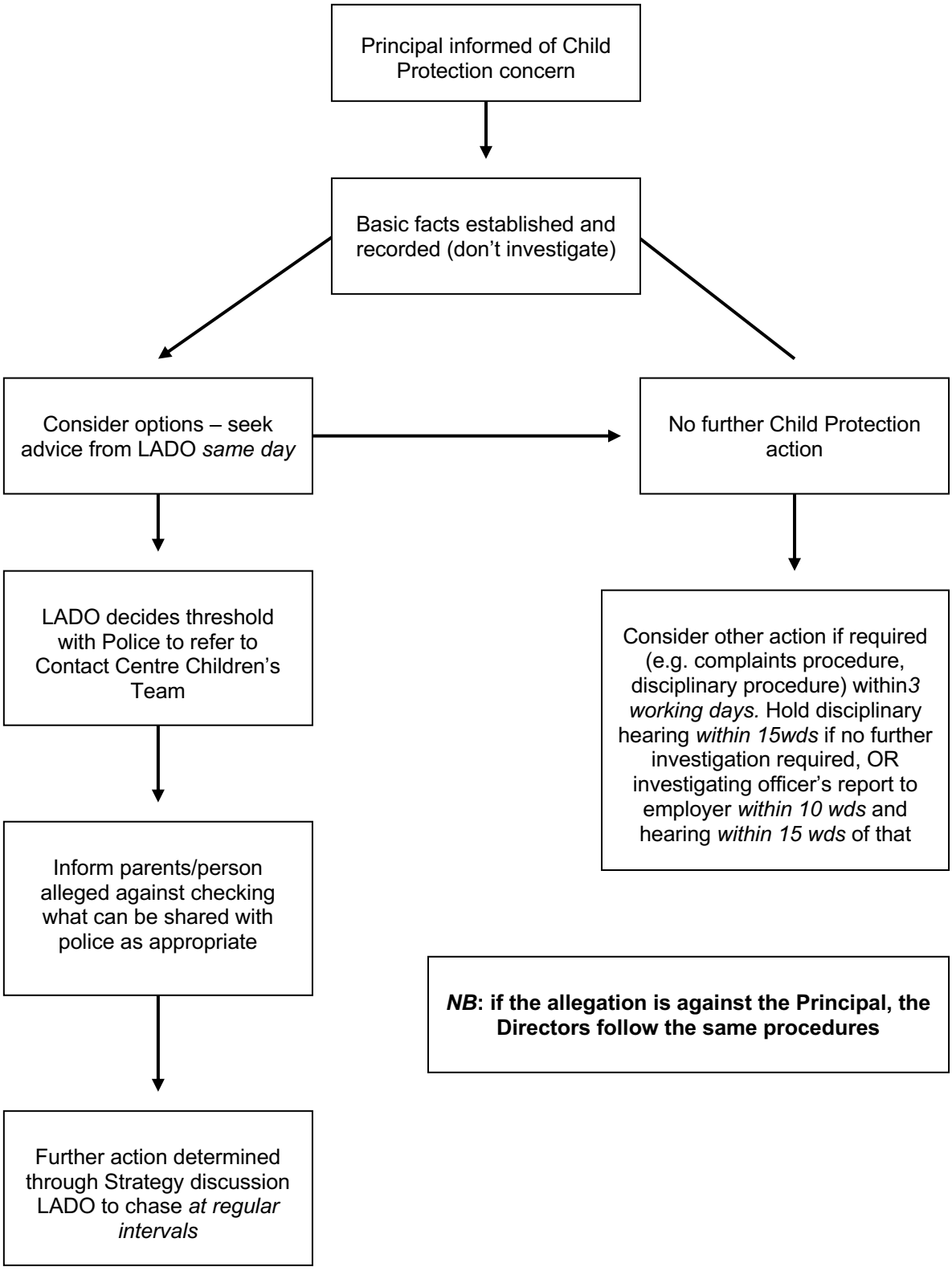
WHAT IS ACCEPTABLE BEHAVIOUR BY ADULTS TOWARDS CHILDREN?

The table below provides some examples of types of behaviour and action to be taken. It is only intended as an illustrative guide and every situation must be considered on its own merits and assessed carefully in the context within which it occurs. **If in doubt consult.**

Category	Physical	Sexual	Emotional	Risk/Action
1. Acceptable behaviour Good professional practice	• Appropriate reassurance, guidance and support within positive personal contact policy and guidance and positive management of behaviour policy and guidance • Appropriate physical restraint within permitted limits, policy and guidance. • Adhere to safe working practice guidance provided	• There can be no permissible behaviour which either implicitly or explicitly has sexual connotations • Maintains professional relationship • Appropriate language and attitude	• Children treated with dignity and respect • No misuse of power • Adhere to safe working practice guidance provided • Appropriate response to child distress, sadness or upset within positive personal contact policy and guidance and positive management of behaviour policy and guidance	• **NONE** • Praise and encourage staff
2. Inappropriate and unacceptable behaviour Poor professional conduct	• Unjustified and/or questionable use of restraint • Not adhering to all aspects of safe working practice guidance provided • Use of inappropriate physical techniques not validated by training or policy and guidance	• Lack of proper regard for privacy. • Inappropriate language • Suggestive remarks, jokes, innuendo, etc	• Over-use of shouting • Use of sarcasm or deprecating humour. • Degrading behaviour • Threats which fall outside positive management of behaviour policy and guidance, especially of a personal nature	• **MEDIUM** • Consider disciplinary procedures
3. Abusive or potentially abusive behaviour	• Persistent or repeated incidents of above • Deliberate physical assault – e.g. punching, smacking, kicking, etc	• Persistent or repeated incidents of above • Any overtly sexual contact-touching, grabbing, fondling • Any sexual relationship with a pupil • Overt sexualised comments or references	• Persistent or repeated incidents of above • Persistent or repeated threatening, intimidating or degrading behaviour • Bullying, racist comments, homophobic comments	• **HIGH** • Consider disciplinary procedures • Notification to or consult with external agency

Appendix D

Steps Relating to Child Protection Allegations Against Staff or Adults Connected with SES



Appendix E

FLOW CHART – ADDITIONAL ACTIONS TO CONSIDER FOLLOWING ALLEGATION

In the event of an allegation of abuse or neglect being made against an adult, the following flow chart is an aid to prompt actions that may be required; the order of actions is flexible.

INTERNAL

Adult(s) to be made aware an allegation has been made against them and what the process is; confidentiality essential.

Consideration of suspension(s) and whether required needed.

A support adult should be provided for all situations involving suspension. Support to be provided to adults involved should be in person and not via email. Updates to the LADO process could be via phone.

Risk assessments may be required for adults involved if not suspension is in place; these must be communicated to team and the adults as required.

Broader team communication to be considered

Consideration to whether any information sharing is needed with other children, e.g. if an adult cannot be in home.

Child Protection Timeline to be maintained of all key events and communication completed.

Copy of Ofsted notification to be maintained for Child Protection file and record in notification log to be completed.

Child's CP file to be update in line with agreed process in policy.

A Summary of Allegation and Concern Form must be completed for adult(s) and signed once process concludes.

EXTERNAL

LADO informed through online consultation/referral form; discussion needed between RM and Principal (If allegation relates to RM or Principal then they must not be involved at this stage).

Social workers updated for children involved, or EDT if out of hours.

Notification to Ofsted must be submitted within 24 hours. Further email or phone updates to named Ofsted inspector may be important.

Discussion by lead person overseeing allegation at SES to be held with social workers / LADO regarding family being updated; SES may take lead on communication to family.

Initial LADO strategy meeting (MALM) to be arranged as soon as possible if not closed as consultation. Further actions follow this initial strategy meeting and subsequent meetings.

Decision from LADO may be to close at consultation or agree threshold is met for referral. Any minutes of LADO meetings can only be kept by Principal in confidential storage area of network.