



QUANTOCK

EDUCATION TRUST

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

LINKS: Complaints Policy, Safeguarding and Child Protection Policy, Disciplinary Policy, Code of Conduct

DATE: January 2025

POSTHOLDER RESPONSIBLE: CEO

DATE RATIFIED BY PEOPLE, PERFORMANCE, PAY & RECRUITMENT COMMITTEE:

AUDIENCE: All Trust Staff

DUE FOR REVIEW: January 2026

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1. Principles

- 1.1. Quantock Education Trust (QET) takes its responsibility of care for its students and staff extremely seriously. QET recognises that any possibility that any safeguarding concerns or allegations made against a member of staff, supply staff, contractors or volunteers 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, supply staff, contractors or volunteers at our Trust, together with allegations relating to incidents that happened when an individual or organisation was using the Trust 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 4 of Keeping Children Safe in Education 2024.
- 1.3. This policy is set out in two parts. The first part deals with allegations made against members of staff, including supply staff contractors or volunteers, together with allegations relating to incidents that happened when an individual or organisation was using the Trust 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 staff, contractors or volunteers.
- 1.4. Definitions:
 - Chief Executive means the Chief Executive (CEO) of QET.
 - Headteacher refers to all or any of the Headteachers at all or any of the schools within QET.
 - Local Governance Committee (LGC) is a key mechanism for local accountability for each school.
 - Case Manager will manage the allegations/concerns raised and will be the Headteacher, a member of the Executive Team or the Chair of the Trust Board as appropriate
 - Local Authority Designated Officer (LADO) is the Designated Officer for Managing Allegations within the academy's Local Authority.

2. Important Contacts

	Position	Name	Contact Details
Trust Details	Chair of Trustees	Rob Brown	rbrown@quantockedtrust.co.uk
	Designated Trustee for Safeguarding (DTS)	Anna Hammond	ahammond@quantockedtrust.co.uk
	Local Authority Designated Officer (LADO)	Anthony Goble	Somerset Direct - 0300 123 2224
	CEO	Chrysta Garnett	01278 455531
	Trust HR Manager	Julie North	01278 455531
School Details	<i>Headteacher:</i> Ashlands Primary School Haselbury Primary School Haygrove School Merriott Primary School St Bartholomew's Spaxton Primary School Stogursey Primary School Sexey's School	Nicola Ball Lois Bowery Aaron Reid Lois Bowery Gemma Coward Rachel Rood Gary Tucker Steve Clayson	0146073437 / office@ashlandsprimary.school 01460 72547 / office@haselburyplucknettschool.co.uk 01278 455531 / office@haygrove.somerset.sch.uk 01460 72547 / office@merriottfirstschool.co.uk 01460 72829 / Office@stbartsprimary.co.uk 01278 671409 / office@spaxton-qet.co.uk 01278 732389 / stogurseyschool@Quantockedtrust.co.uk 01749 813393 / reception@sexey.somerset.sch.uk
	<i>LGC Chairs:</i> Ashlands Primary School Haselbury Primary School Haygrove School Merriott Primary School St Bartholomew's Spaxton Primary School Stogursey Primary School Sexey's School	David Harvey Craig Pearce Jenny Ashworth Craig Pearce Stephen Gray Andrew Watston Bernie Maskell & Jodie Burghes Revd Jonathan Evans	0146073437 / office@ashlandsprimary.school 01460 72547 / office@haselburyplucknettschool.co.uk 01278 455531 / office@haygrove.somerset.sch.uk 01460 72547 / office@merriottfirstschool.co.uk 01460 72829 / Office@stbartsprimary.co.uk 01278 671409 / office@spaxton-qet.co.uk 01278 732389 / stogurseyschool@Quantockedtrust.co.uk 01749 813393 / reception@sexey.somerset.sch.uk

3. Part One: Managing allegations made against members of staff, supply staff, contractors or volunteers

- 3.1. 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 2024 requires that it is followed in any case where it is alleged that a member of staff, including a supply teacher, volunteer or contractor 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; or
 - behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children;
 - behaved or may have behaved in a way that indicates he or she may not be a suitable to work with children.
- 3.2. The fourth bullet point above includes behaviour that may have happened outside of the QET that might make an individual unsuitable to work with children. This is known as transferable risk.
- 3.3. This policy will also be used where allegations are made relating to incidents that happened when an individual or organisation was using the Trust premises for the purposes of running activities for children.

3.4. This policy will be used alongside our complaints policy and child protection and safeguarding policy.

4. Reporting an allegation

4.1. The safety and welfare of our pupils is of paramount importance and so all staff must report their allegations immediately. Allegations made against a member of staff, supply staff, contractors or a volunteer should be reported to the Headteacher or CEO (as appropriate). Allegations involving the Headteacher should be reported to the CEO. Allegations involving the CEO should be reported to the Chair of Trustees. The Headteacher or CEO, or Chair of Trustees (as appropriate) will then contact the local authority designated officer (LADO). The Headteacher or CEO, or Chair of Trustees (as appropriate) will then act as the case manager.

4.2. When an allegation is made the case manager will consider two aspects:

- 4.2.1. looking after the welfare of the child; and
- 4.2.2. investigating and supporting the person subject to the allegation

4.3. In each case, the case manager will:

- 4.3.1. apply common sense and judgement;
- 4.3.2. deal with allegations quickly, fairly and consistently; and
- 4.3.3. provide effective protection for the child and support the person subject to the allegation.

4.4. Before contacting the LADO, the case manager will conduct basic enquiries to establish the facts to help determine whether there is any foundation to the allegation. The case manager 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 Designated Safeguarding Lead may also be involved in this discussion. This discussion may include that:

- no further action is required; or
- more information is required to determine a course of action; or
- a strategy discussion should take place; or
- police or social care should be involved.

4.5. The QET 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 academy will always attend that meeting. Representatives from other agencies such as health, social care and police may also be invited to the meeting.

4.6. Where an allegation is made or becomes known to the Trust relating to incidents that happened when an individual or organisation was using Trust premises for the purposes of running activities for children the case manager will inform the LADO in accordance with paragraph 4.6 of this policy.

5. Investigating an allegation

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

1.1 When determining the outcome of an investigation Part 4 of Keeping Children Safe in Education 2024 states that the following definitions should be used when determining the outcome of the investigation:

5.1.1. **Substantiated:** there is sufficient evidence to prove the allegation

5.1.2. **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

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

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

5.1.5. **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

1.2 In no circumstances would QET cease to use a member of supply staff due to safeguarding concerns without finding out the facts and liaising with the LADO to determine a suitable outcome. Whilst QET is not the employer of supply teachers, we will ensure allegations are dealt with properly and involve the supply staff agency in the process.

6. Supporting those involved

6.1. Parents/carers of the child(ren) involved

1.2.1 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 Trust will not tell the parents or carers until it has been agreed with those agencies what information can be shared.

1.2.2 The Trust will keep parents or carers informed about the progress of the investigation. Where there is no criminal prosecution the academy 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**.

6.2. The member of staff or volunteer

6.2.1. The QET has a duty of care to its employees and will act to minimise the stress inherent in the investigation process.

1.2.3 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 academy will work with children's social care and the police to agree what information can be disclosed and when.

1.2.4 The case manager 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 case manager will also consider what other support may be appropriate for the individual. The QET 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.

1.2.5 The person who is the subject of the allegation will be advised to contact their trade union representative, or a colleague for support.

1.2.6 Where an allegation is made against a member of supply staff, the supply agency should provide an additional support to that member of supply staff.

7. Suspension

7.1. Suspension is not an automatic response to an allegation being made. The QET 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.

- 1.3 Where the police or children's social care are involved in the case, the Trust will listen to their views regarding suspension.
- 1.4 The QET 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.
 - 7.2. Where the member of staff is suspended, they will receive written confirmation within one working day and will be informed of the reason for the suspension.
 - 7.3. After the suspension, if it is decided that the employee can return to work, measures will be put in place to support their return. This could include a phased return or offering another member of staff as a support system.
- 7.4. The QET will not prevent social contact with work colleagues and friends unless there is evidence to suggest such contact may prejudice the gathering of evidence.

8. Resignation

- 8.1. 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.

9. Action on conclusion of the case

9.1. If the allegation is substantiated and:

9.1.1. the employee is dismissed or resigns; or

1.4.1 we cease to use the supply staff member's services as a result of the allegation;

1.4.2 we cease to use the contractor's services as a result of the allegation; or

1.4.3 we cease to use the volunteer's services as a result of the allegation;

1.4.4 the QET will consider whether a referral to the DBS and/or to the TRA is required.

- 1.5 Where an allegation is found to be false, the Trust 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.

9.2. The QET's behaviour policies set out the action that may be taken against pupils who are found to have made malicious allegations.

9.3. 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.

10. Post incident review

- 1.6 It is good safeguarding practice for schools and academies 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 QET may carry out a review at the conclusion of the case.

11. Timescales

- 11.1. 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.

12. Record keeping

- 12.1. 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.
- 12.2. The record will be kept, including for people who leave the QET until the person reaches normal pension age or for 10 years if that will be longer, from the date of the allegation.
- 12.3. Details of any allegation made by a pupil will be kept in the confidential section of their record.

13. Confidentiality

- 1.7 The QET will make every effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated.
- 13.1. 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.

14. Non recent allegations

- 1.8 Where an adult makes an allegation to the QET that they were abused as a child, that adult will be advised to report the allegation to the police.
- 14.1. 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.

15. ~~Part Two: concerns that do not meet the harm threshold~~ Managing low level concerns

- 15.1. This part of the policy will be followed when dealing with low-level concerns raised in relation to members of staff, including supply staff, contractors or volunteers and may be adapted to each case as required. It will be used alongside the Trust's complaints policy, child protection and safeguarding policy, code of conduct and disciplinary policy.
- 15.2. The QET promotes a culture in which all concerns about all adults working in or on behalf of the trust (including supply teachers, contractors and volunteers) are addressed appropriately.
- 15.3. This policy is designed to:
- promote and support a culture of openness and trust where staff are clear about the behaviours expected of themselves and their colleagues
 - ensure staff are comfortable to raise low-level concerns; and
 - provide for efficient and proportionate handling of those concerns

16. Recognising low-level concerns

- 16.1. The term 'low-level' concern, defined in Part 4 of Keeping Children Safe in Education ~~2023~~ 2024 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 may have acted in a way that:
- Is inconsistent with the staff code of conduct, 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 local authority designated officer.
- 16.2. Examples of such behaviour could include, but are not limited to:
- Being overly 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.

17. Sharing low-level concerns

- 17.1. We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately. Serious Case Reviews and 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.
- 17.2. 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
- 17.3. 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.
- 17.4. 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 CEO. Concerns about the CEO should be reported to the Chair of Trustees.
- 17.5. 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, CEO or Chair of Trustees (as appropriate) will make this determination once the staff member has reported the issue.

18. Responding to low-level concerns

- 18.1. The Headteacher, CEO or Chair of Trustees (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, CEO or Chair of Trustees (as appropriate) will discuss the concern with the LADO to determine whether it should be dealt with under part one of this policy.

- 18.2. The Headteacher, CEO or Chair of Trustees (as appropriate) will discuss the concern with the individual who raised it and will investigate it as appropriate.
- 18.3. 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 policy.
- 18.4. If the concern has been raised via a third party, the Headteacher, CEO or Chair of Trustees (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.
- 18.5. Where a low-level concern is raised about a member of supply staff or a contractor, the concern will be shared with supply agency so they can take appropriate steps in accordance with their own policies and statutory guidance.

19. Record keeping

- 19.1. All low-level concerns will be recorded on the Trust's safeguarding platform MyConcern. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.
- 19.2. Records will be:
 - Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
 - Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the QET ~~we~~ will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in Part One of this policy, we will refer it to the designated officer at the local authority
 - Retained at least until the individual leaves employment at the Trust
- 19.3. Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

20. References

- 20.1. 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.

21. Responsibilities

- 21.1. The Trust Board will:
 - monitor and review this policy. They will ensure safeguarding and child protection training is available to all staff and delegate to the CEO and Headteacher the necessary discretion to manage cases of allegations against staff
 - appoint a Designated Trustee for Safeguarding (DTS) to monitor the effectiveness of this policy in conjunction with the Trust Board

- ensure that all allegations are dealt with in a fair and consistent way that provides effective protection and support for the child and the member of staff who is subject of the allegation. The Chair of the Trust Board will manage any allegations against the Chief Executive Officer (CEO) and assume the role of case manager. The CEO (or nominated member of the Executive Team) will manage any allegations against the Headteacher and assume the role of case manager.

21.2. Headteacher:

- will appoint an appropriate senior member of staff to the roles of Designated Safeguarding Lead (DSL) and Deputy DSL
- is responsible for the immediate notification of the allegation to the LADO and will assume the role of the case manager, notifying the CEO when appropriate – specifically if the allegation is likely to lead to a suspension
- will ensure that the reporting procedure for raising concerns and the contact details of key personnel are clearly displayed within the school and communicated to all staff (including temporary staff) and volunteers as part of their induction
- will ensure that all staff undertake appropriate safeguarding and child protection training and ensure this training is updated regularly
- If the Headteacher is absent, the role of ‘case manager’ will be delegated to a suitably experienced member of the senior team.

21.3. Designated Safeguarding Lead (DSL):

- is responsible for raising awareness through providing advice and support to staff on child welfare and protection issues. They are to ensure that all staff and students are aware of the procedures for reporting concerns and are aware and understand the contents of this policy
- will refer cases of suspected abuse to the local authority children’s social care, where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service (DBS) or where a crime may have been committed to the Police
- will work with the case manager, Designated Officer and take part in strategy discussions and inter agency meetings as required
- will have a responsibility to be familiar with the Statutory Guidance in its entirety
- Complete at the end of the process an outcome form (see Appendix A) and send to LADO.

21.4. All Staff:

- will read and understand Part one and Annex A of the Department for Education’s statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually
- all members of the senior management team have a responsibility to be familiar with the Statutory Guidance in its entirety.

21.5. Local Authority Designated Officer (LADO):

- The LADO’s role is to provide advice and guidance to organisations dealing with allegations, to liaise with the police and other agencies and to monitor the progress of cases to ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process. All referrals should be made in the first instance by phone to Somerset Direct. Referrals should be followed up using the LADO Reporting Form available on the [Somerset Children Safeguarding Board](#) website.