BRIGHTFIELD
ACADEMY

Inclusion. Choice. Growth.

Managing Allegations and Low-Level Concerns Policy

Ensuring all concerns about the conduct of staff and volunteers are managed fairly, promptly and in the best interests of learners.

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Last Update: June 2026

Managing Allegations and Low-Level Concerns Policy

The Brightfield Academy
Policy Owner: Head of Provision
Approved by: Directors of The Brightfield Academy
Date Adopted: March 2026
Review Cycle: Bi-Annually
Next Review: September 2026

THE Brightfield ACADEMY
Managing Allegations & Low-Level Concerns Policy
2026–2027
"Safeguarding is everyone's responsibility. Professional curiosity protects children."

1. Policy Introduction

Purpose and Aim

Brightfield Academy is committed to creating and maintaining a culture where safeguarding is everyone's responsibility and where concerns about the behaviour or conduct of adults working with children are recognised, reported and managed promptly, fairly and effectively.

The purpose of this policy is to:
safeguard children and young people from harm;
promote a culture of openness, accountability and professional curiosity;
ensure allegations and concerns about adults are responded to appropriately and without delay;
provide clear guidance for staff, volunteers, learners, parents/carers and visitors on how to raise concerns;
ensure compliance with statutory safeguarding guidance and Milton Keynes/Buckinghamshire safeguarding procedures;
protect both children and adults by ensuring concerns are managed fairly, consistently and confidentially.
Brightfield Academy recognises that maintaining high standards of professional conduct is fundamental to safeguarding and promoting the welfare of children.

2. Legislative & Guidance Framework

This policy is informed by:

Keeping Children Safe in Education (KCSIE)
Working Together to Safeguard Children
Guidance for Safer Working Practice
The Children Act 1989 & 2004
Data Protection Act 2018 (GDPR)

3. Key Principles

Brightfield is committed to:

safeguarding children effectively
taking all concerns seriously
responding proportionately and fairly
maintaining confidentiality appropriately
promoting a culture where concerns can be raised safely

We recognise that:

creating a culture of openness helps identify concerns early and protects everyone.

4. Scope of this Policy

This policy applies where concerns arise about an adult who:

works with children
may pose a risk to children
has behaved in a way that causes concern regarding suitability to work with children

This includes both:

formal allegations
low-level concerns

5. Definition of an Allegation

An allegation may relate to an adult who has:

behaved in a way that harmed a child or may have harmed a child
possibly committed a criminal offence against or related to a child
behaved towards a child in a way that indicates they may pose a risk to children
behaved in a way that may indicate unsuitability to work with children

Responsibility and Review

Overall responsibility for this policy rests with the Directors of Brightfield Academy.

Designated Safeguarding Lead (DSL)
Kathleen Larcombe
Telephone: **07545 123930**
Email: **dsl@brightfieldacademy.co.uk**

Deputy Designated Safeguarding Lead (DDSL)
Nik Larcombe
Telephone: **07395 111919**
Email: **nik@brightfieldacademy.co.uk**

Local Authority Designated Officer (LADO) – Milton Keynes Council
Telephone: **01908 254307**
Email: **lado@milton-keynes.gov.uk**

Local Authority Designated Officer (LADO) - Buckinghamshire Council
Telephone: **01296 382070**
Email: **secure-lado@buckinghamshire.gov.uk**

The LADO should be contacted whenever an allegation is made that an adult working with children has behaved in a way that may have harmed a child, committed a criminal offence against a child, behaved towards a child in a manner that indicates they may pose a risk of harm, or behaved in a way that indicates they may no longer be suitable to work with children.

6. Definition of a Low-Level Concern
A low-level concern is behaviour that:
does not meet the threshold for a formal allegation
may still be inconsistent with professional standards
may create a sense of unease, concern, or boundary blurring

Examples may include:
over-familiar behaviour
inconsistent professional boundaries
inappropriate language or joking
private messaging outside agreed systems
favouritism
unnecessary physical contact
social media boundary concerns
Low-level concerns should never be ignored.

7. Creating a Safe Reporting Culture
Brightfield actively promotes a culture where:
concerns are raised early
professional curiosity is encouraged
safeguarding discussions are normalised
staff feel safe to report concerns

All adults working at Brightfield are expected to:
report concerns promptly
act professionally
prioritise learner welfare at all times

8. Immediate Safeguarding Actions
Where a concern arises:
the safety and welfare of learners must be prioritised immediately
appropriate action must be taken to reduce risk
safeguarding procedures must be followed without delay

Where required:
emergency services may be contacted
the Local Authority Designated Officer (LADO) may be consulted immediately

9. Reporting Concerns

Concerns should be reported immediately to:
the Designated Safeguarding Lead (DSL)
or senior leadership where appropriate

If the concern relates to the DSL or senior leader:
concerns should be reported directly to the Local Authority Designated Officer (LADO) or relevant external authority

Staff should:
report factual information only
avoid investigating concerns themselves
avoid discussing concerns widely with others

9A. What Should I Do If I Am Concerned About Another Adult?

If you become concerned about the behaviour or conduct of a member of staff, volunteer, contractor, visitor or any adult working on behalf of Brightfield Academy, you must act immediately. Do not:
investigate the concern yourself;
confront the individual;
discuss the concern with colleagues unless necessary for safeguarding;
attempt to gather evidence.
Instead:
record what you have seen or heard;
report it immediately to the Designated Safeguarding Lead;
where the concern relates to the DSL, report directly to the Director or the Local Authority Designated Officer (LADO);
where a child is at immediate risk of harm, contact the Police (999) and then inform the DSL or LADO.
All concerns will be treated seriously and managed in accordance with Keeping Children Safe in Education and Milton Keynes/Buckinghamshire safeguarding procedures.

10. Role of the Designated Safeguarding Lead (DSL)

The DSL (or senior leader) is responsible for:
receiving concerns
assessing immediate risk
consulting with the LADO where required
ensuring appropriate safeguarding action
maintaining confidential records
ensuring procedures are followed fairly and consistently

Local Authority Designated Officer (LADO)

The LADO should be contacted where an allegation suggests that an adult working with children has:
behaved in a way that has harmed, or may have harmed, a child;
possibly committed a criminal offence against a child;
behaved towards a child in a way that indicates they may pose a risk of harm;
behaved in a way that indicates they may no longer be suitable to work with children.
The LADO should normally be contacted within one working day.

Milton Keynes LADO
Telephone: **01908 254307**
Email: **lado@milton-keynes.gov.uk**

Buckinghamshire LADO
Telephone: **01296 382070**
Email: **secure-lado@buckinghamshire.gov.uk**
No internal investigation should begin until advice has been obtained from the LADO where appropriate.

12. Managing Low-Level Concerns
Low-level concerns will be:
recorded appropriately
reviewed proportionately
used to identify patterns or emerging risks

Responses may include:
discussion with the individual
clarification of expectations
support or supervision
additional training
Brightfield recognises that:
early identification of low-level concerns helps prevent escalation.

13. Confidentiality
Information relating to allegations or concerns will be handled:
sensitively
confidentially
in line with safeguarding and data protection requirements
Information will only be shared:
on a need-to-know basis
where safeguarding or legal obligations require it

14. Record Keeping
Brightfield will maintain clear and secure records of:
allegations
low-level concerns
actions taken
decisions made
outcomes
Records will be:
factual
objective
securely stored

15. Supporting Learners
Where allegations or concerns arise, Brightfield will ensure:
learners feel listened to
safeguarding support is provided
wellbeing is prioritised
communication is handled sensitively

16. Whistleblowing
Brightfield Academy encourages all staff and volunteers to raise genuine concerns about unsafe practice, poor safeguarding culture or the conduct of colleagues.
No member of staff will suffer detriment for raising a genuine safeguarding concern in good faith.
Concerns should normally be raised with:
the Designated Safeguarding Lead;
a Director;
the Local Authority Designated Officer (where appropriate).
If staff believe concerns are not being appropriately addressed internally they may contact:
NSPCC Whistleblowing Advice Line
0800 028 0285
help@nspcc.org.uk

How Parents and Carers Can Raise a Concern

Parents, carers and learners who have concerns about the conduct of any adult working at Brightfield Academy should report these immediately to the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead. If the concern relates to either of those individuals, concerns may be reported directly to the Local Authority Designated Officer (LADO). Concerns may be raised in person, by telephone or in writing. All concerns will be taken seriously and managed confidentially wherever possible.

Milton Keynes LADO
Telephone: **01908 254307**
Email: **lado@milton-keynes.gov.uk**

Buckinghamshire LADO
Telephone: **01296 382070**
Email: **secure-lado@buckinghamshire.gov.uk**

When and How to Report
Concerns should be reported:
•immediately where a child may be at risk of harm;
•on the same working day for all allegations or low-level concerns;
•verbally to the DSL in the first instance;
•followed by a written record using LearnTreK before the end of the working day.
The written record should include:
•date and time;
•factual observations;
•names of those involved;
•witnesses;
•actions already taken.

Anonymity
Brightfield Academy recognises that some individuals may feel anxious about reporting concerns. While named reports enable more effective enquiries, anonymous concerns will also be considered where sufficient information is provided.

17. Supporting Staff
Brightfield recognises that allegations may be distressing for staff.
Support may include:
supervision
welfare support
clear communication regarding procedures
access to guidance and advice

Brightfield will ensure that:
concerns are handled fairly
individuals are treated respectfully
procedures remain proportionate and evidence-based

18. Suspension
Suspension is not an automatic response.

Any decision regarding suspension will:
prioritise safeguarding
consider risk carefully
follow external guidance where appropriate
Alternative arrangements may be considered where suitable.

19. False, Unfounded or Malicious Allegations
Where concerns are found to be:
unfounded
false
malicious
appropriate support and follow-up actions will be considered.

Where a malicious allegation is identified:
this may be addressed through behaviour or safeguarding procedures where appropriate

Brightfield recognises the importance of:
protecting children while also ensuring fairness to staff

20. Professional Boundaries
All adults working at Brightfield must maintain professional boundaries at all times.
Staff must:
avoid over-familiarity
maintain appropriate communication
use authorised systems
avoid behaviour that could be misinterpreted

This policy should be read alongside:
Staff Code of Conduct
Safeguarding Policy
Whistleblowing Policy
Online Safety Policy

21. Training & Awareness
All staff will receive training appropriate to their role, including:
safeguarding
professional boundaries
recognising low-level concerns
allegations procedures
Regular updates and safeguarding discussions will reinforce safe practice.

22. Monitoring & Review
Leadership will:
monitor safeguarding culture
review patterns or repeated concerns
evaluate effectiveness of procedures
identify training or support needs

This policy will be:
reviewed annually
updated in line with legislation and KCSIE guidance
reviewed following significant safeguarding incidents

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REPORTING CONCERNS
Flowchart

Safeguarding is everyone's responsibility. If in doubt, speak to the DSL.

I HAVE A CONCERN ABOUT AN ADULT'S BEHAVIOUR

Is a child at immediate risk?

YES

- **Call 999** immediately
- **Inform the DSL** immediately

NO

- **Record factual information** (what, where, when, who, how)
- **Report to the DSL** as soon as possible

Concern about the DSL?

YES

- **Contact the LADO directly**

NO

DSL assesses the concern

Low-Level Concern
Recorded and managed in line with our Low-Level Concerns Procedure

Internal Management
Managed internally in line with relevant policies and procedures

Consult LADO
Seek advice from the Local Authority Designated Officer (LADO)

Formal Allegation
Follow Managing Allegations Procedure and ensure LADO involvement

All actions are recorded securely on LearnTrek

Records are confidential and stored in line with our Data Protection Policy.

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We are here to listen and help.

If You Are Worried About the Behaviour of an Adult

A guide for children, young people and parents/carers

1



Tell someone you trust.

This could be:

- the Designated Safeguarding Lead (DSL)
- the Deputy DSL
- another trusted member of staff
- your parent or carer

2



Your concern will be listened to seriously.

You will be treated with respect and your worry will be taken seriously.

3



Brightfield Academy will decide what action needs to be taken.

We will look into your concern carefully.

4



If appropriate, other people will be involved.

This could include the Local Authority Designated Officer (LADO), Children's Social Care or the Police.

5



You will be supported throughout the process.

We are here to help you.

You are not alone.

It is never your fault.
It is right to speak up.

You can contact our safeguarding team:

- 07545 123930 (DSL)
- 07395 111919 (Deputy DSL)
- dsl@brightfieldacademy.co.uk

We are here for you.