Thallo
ALTERNATIVE PROVISION

Allegations Against Staff Procedure inc. low level concerns

Thallo Education Ltd.

VERSION: 1.0
DATE: 25th September 2026
AUTHOR: May MacKay-Morris

Case Manager	May MacKay-Morris Provision Lead / Director (unless the subject of concern)
Safeguarding Lead	May MacKay-Morris Designated Safeguarding Lead / Lead DSL
Approved By	May MacKay-Morris - Director Approved: 25th September 2026
Review Date	September 2027 Or sooner, following relevant change.

1. Aim

This procedure provides a clear, fair and child-centred framework for responding to safeguarding concerns or allegations about any adult working for or on behalf of Thallo Alternative Provision. It applies to employees, directors, sessional practitioners, agency or temporary staff, contractors, volunteers and trainees.

Thallo will respond promptly and consistently, protect children from harm, support the person who is the subject of the concern appropriately, preserve confidentiality as far as possible, and follow Suffolk Local Authority Designated Officer (LADO) procedures.

2. Relationship with other procedures

This procedure should be read alongside Thallo's Safeguarding and Child Protection Policy, Safer Recruitment and Selection Policy, Staff Code of Conduct, Whistleblowing Policy, Complaints Procedure and relevant disciplinary or contractual arrangements. A concern about an adult must not be treated only as an employment or complaints matter where safeguarding issues are present.

3. Concerns or allegations that may meet the harm threshold

This section applies where it is alleged that an adult working for or on behalf of Thallo 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 they may pose a risk of harm to children; or
- behaved, or may have behaved, in a way that indicates they may not be suitable to work with children, including relevant behaviour outside Thallo.

If there is doubt about whether the harm threshold is met, the case manager will seek advice from the Suffolk LADO. Immediate danger or suspected serious criminal offending will be referred to the police without waiting for LADO consultation, with the LADO informed as soon as practicable.

4. Reporting a concern

Any member of staff, volunteer, contractor or other adult who receives an allegation or has a safeguarding concern about another adult working with children must report it immediately to the Provision Lead / case manager.

If the concern is about the Provision Lead / Director, it must not be referred back to that person for management. The person receiving the concern must contact the Suffolk LADO directly where the concern may meet the harm threshold, or seek LADO advice where the threshold is uncertain, and follow the advice given. Where another suitably independent responsible person is available, they may act as case manager in liaison with the LADO. The relevant commissioner or placing setting will also be informed where appropriate to safeguard the child and manage the commissioned placement.

Safeguarding concerns about adults must be recorded factually. Staff must not investigate, interview witnesses extensively, promise confidentiality, confront the subject of the allegation, or attempt to determine whether an allegation is true before appropriate safeguarding advice has been obtained.

5. Initial response and LADO consultation

The case manager may make only the basic enquiries necessary to establish the nature and circumstances of the concern and whether there is an immediate safeguarding risk. The case manager will then consult the Suffolk LADO where the allegation may meet the harm threshold or where advice is required.

The case manager will follow the agreed course of action, including liaison with children's social care and/or police where appropriate. Information given to the person who is the subject of the allegation, the child, parents or carers, the commissioning school or local authority, and other parties will be managed in accordance with LADO, police and children's social care advice.

6. Case management and immediate risk

Thallo will take proportionate steps to protect children while avoiding assumptions about the outcome of an allegation. Suspension or cessation of duties will not be automatic. The case manager will consider the identified risk, the nature of the allegation, LADO advice, and whether safe alternatives are available.

Possible interim measures may include:

- temporary changes to duties or deployment;
- preventing direct or unsupervised contact with children;
- additional supervision or another adult being present;
- temporary exclusion from Thallo premises or activities where necessary;
- other proportionate measures agreed with the LADO or relevant agencies.

Any decision and the reasons for it, including alternatives considered, will be recorded. Where an individual is employed or supplied by another organisation, Thallo will liaise with that employer or agency and the LADO while maintaining its responsibility to safeguard children attending Thallo.

7. Outcomes

Where an allegation is formally considered, the outcome may be recorded using the following terms:

- **Substantiated:** there is sufficient evidence to prove the allegation.
- **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 subject.
- **Unsubstantiated:** there is insufficient evidence either to prove or disprove the allegation; this does not imply guilt or innocence.
- **Unfounded:** there is no evidence or proper basis supporting the allegation.

8. Support and communication

Thallo will consider the welfare and support needs of the child or children involved throughout the process. Parents or carers will be informed where appropriate, subject to advice from the LADO, police or children's social care. The commissioning school or local authority will be informed where necessary and appropriate to safeguard the child and manage the placement.

The person who is the subject of the allegation will be treated fairly and supported appropriately. They will be given a named point of contact and kept informed so far as this is compatible with safeguarding and any external investigation.

9. DBS, professional regulator and employment action

At the conclusion of a case, Thallo will consider and complete any referral to the Disclosure and Barring Service where the legal referral conditions are met. Resignation, termination of a contract, withdrawal from sessional work or volunteering, or otherwise ceasing to provide services will not prevent Thallo from completing safeguarding enquiries or making a required referral.

Where the person is a teacher or is subject to another professional regulator, Thallo will consider whether a referral or notification to the appropriate regulator is required or advised. Employment, disciplinary or contractual action will be considered separately from, but informed by, the safeguarding process.

10. Confidentiality and information sharing

Information about allegations will be shared only with those who need it for safeguarding, investigation, employment, commissioning or legal purposes. Thallo will take reasonable steps to protect confidentiality and prevent inappropriate discussion or publicity while a matter is being considered.

Data protection law does not prevent necessary and proportionate safeguarding information sharing. Decisions about significant information sharing will be recorded, including the reason for the decision.

11. Record keeping

Thallo will maintain a clear, confidential record of safeguarding allegations and concerns. Records will include the allegation or concern, relevant context, actions taken, advice obtained, decisions made, reasons for decisions and the outcome.

Records relating to allegations against adults will be stored securely with access restricted to those who need it. Retention and use in references will follow applicable safeguarding guidance, data protection requirements, and any advice from the LADO or relevant authority.

12. Learning lessons

Following the conclusion of an allegation or significant concern, the case manager will consider whether changes are needed to Thallo's safeguarding arrangements, recruitment, staff conduct expectations, supervision, premises, risk assessments, training or working practices. Where the LADO has been involved, learning will be considered with the LADO as appropriate.

13. Non-recent allegations

Abuse may be reported regardless of how long ago it occurred. Non-recent allegations made by a child about an adult who worked with children will be referred to, or discussed with, the LADO in accordance with local procedures. Where an adult reports that they were abused as a child, Thallo will support them to report the matter to the police and will seek safeguarding advice where current children may be at risk.

14. Concerns that do not meet the harm threshold

A low-level concern is a concern, however small, that an adult working for or on behalf of Thallo may have acted in a way that is inconsistent with Thallo's Staff Code of Conduct, including inappropriate conduct outside work, but which does not meet the harm threshold or otherwise require a LADO referral at that point.

Examples may include:

- being over-familiar with a young person or showing inappropriate favouritism;
- using a personal phone to take photographs of a young person contrary to Thallo's arrangements;
- unnecessarily meeting a young person in a secluded location, or creating avoidable situations in which professional boundaries are unclear;
- humiliating, belittling or speaking inappropriately to a young person;
- communications, physical contact, gifts, social-media contact or other boundary issues inconsistent with the Staff Code of Conduct.

15. Sharing and responding to low-level concerns

Thallo aims to maintain a culture in which adults feel able to raise concerns and self-refer where their own conduct could have been misinterpreted or fallen below expected standards. Low-level concerns should be reported promptly to the Provision Lead / case manager.

The case manager will gather enough information to understand the concern, including speaking to the person raising it, the adult concerned, and witnesses where appropriate. The case manager will determine the appropriate response and will consult the LADO if there is uncertainty about whether the harm threshold is met.

Responses may include clarification of expectations, advice, supervision, training, changes to working arrangements, management or contractual action, or escalation to the LADO where further information or a pattern of behaviour changes the safeguarding assessment.

16. Recording and reviewing low-level concerns

All low-level concerns will be recorded in writing. The record will include the concern, its context, action taken, decisions made and the rationale. Records will be confidential, securely stored, and reviewed for patterns involving an individual or wider weaknesses in Thallo's safeguarding culture or systems.

Where a low-level concern relates to a worker supplied or employed by another organisation, Thallo will consider what information must be shared with that employer or agency so that patterns can be identified and children safeguarded.

17. References

Information included in references will be accurate, fair and consistent with applicable safeguarding guidance. Thallo will not use a reference to reproduce unsupported allegations or low-level concerns that should not properly be included. Substantiated safeguarding information will be included where required and appropriate.

18. Key external contact

Suffolk Local Authority Designated Officer (LADO)

Email: LADO@suffolk.gov.uk

Telephone: 0300 123 2044

In an emergency where a child is at immediate risk, call **999**.

19. Review

This procedure will be reviewed at least annually and sooner following a relevant safeguarding incident, learning from a case, a change in local safeguarding arrangements, or a material change in legislation or guidance.