



Cornwall
Education
Learning Trust

Managing Allegations Policy

Safeguarding Policy Suite

Cornwall Education Learning Trust Policies

Cornwall Education Learning Trust (CELT), Atlantic Centre, Trenance Leisure Park, Newquay, Cornwall TR7 2LZ

Our Mission

At Cornwall Education Learning Trust (CELT), our mission is clear: to provide every learner with an **exceptional educational experience**. One that enables them to thrive, achieve and succeed in life. We believe in a **100%** mindset, that every learner, in every classroom, in every school, deserves the very best we can offer. For us, 100% means no compromise: no learner left behind, no community overlooked, and no opportunity wasted.

Our strategic goals reflect this ambition. We are committed to empowering and growing our people, building an ambitious all-through entitlement, forging exceptional relationships with our communities, transforming provision through meaningful partnerships, and leading an ethical, effective and innovative organisation. These are not just aspirations; they are promises that shape the way we work and the culture we are building together.



Our Values

Our values are at the heart of everything we do. We believe in the power of **Collaboration**, building strong relationships and working together as one team to achieve our collective goals. We are committed to **Empowerment**, creating a culture where initiative, innovation and trust flourish, and where every individual feels valued, respected and motivated.

As a Trust, we are grounded in promoting **Leadership**, sharing a moral and ethical purpose to improve the lives of others and make a lasting difference for our learners and communities. And we embrace **Transformation**, approaching change positively so that we can all become our best selves and do our best work.

These values guide every decision we make and every action we take. They are the foundation of our Trust and the reason we can offer such exceptional opportunities for our learners and staff. If you choose to join CELT, you will be part of a values-driven organisation where people are supported to grow, contribute, and thrive.



Policy Contents

1. Policy Overview	4
1.1 Safeguarding commitment	4
1.2 Policy Approval and Review	4
1.3 Policy Version History	4
2. Introduction	5
2.2 Key statutory guidance and legislation	5
3. Part One: Concerns or Allegations That May Meet the Harm Threshold	5
3.1 Scope and harm threshold	5
4. Reporting a concern or allegation	6
5. Initial response	7
6. Investigation	7
7. Supply staff, trainee teachers and third-party staff	8
8. Supporting the child and their parents or carers	8
9. Supporting the person subject to the allegation	8
10. Suspension and interim arrangements	9
11. Resignation or cessation of services	9
12. Outcomes and referrals	10
13. Organisational learning	10
13. Timescales and case monitoring	10
14. Record keeping	11
15. Confidentiality	11
16. Non-recent allegations	11
Part Two: Low-Level Concerns	12
17. Culture and purpose	12
18. Recognising low-level concerns	12
19. Reporting low-level concerns	12
20. Responding to low-level concerns	13
21. Recording and reviewing low-level concerns	13
22. References	14
23. Monitoring and review	14



1. Policy Overview

1.1 Safeguarding commitment

"It could happen here." We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children. We make every effort to provide an environment in which children and adults feel safe, secure, valued and respected, and feel confident to talk if they are worried, believing they will be effectively listened to. The purpose of this policy is to provide staff, volunteers and governors with the framework they need in order to keep children safe and secure at Cornwall Education Learning Trust (CELT). The policy also informs parents and carers how we will safeguard their children whilst they are in our care.

At Cornwall Education Learning Trust (CELT) we are committed to safeguarding and promoting the welfare of children and we expect all trustees, community champions, staff and volunteers to share this commitment. This policy is part of the following suite of annually updated safeguarding policies.

1.2 Policy Approval and Review

Policy Version Number:	3
Approved By:	Trustees
Approved On (Date):	10 th September 2026
Review Period:	Annually by end of September 2027

1.3 Policy Version History

Policy Version	Date Issued	Summary of Changes
1		First Issue – No Changes
2	19.08.2025	Reporting lines to include the DSL and Directors of Primary and Secondary
3	08.08.2026	Updated in line with KCSIE 2026, including provisions for trainee teachers and clarified responsibilities for third-party staff.



2. Introduction

Cornwall Education Learning Trust (CELT) takes the safeguarding of its learners seriously. All safeguarding concerns and allegations about adults working in or on behalf of CELT, however small, must be reported and managed promptly, fairly and appropriately.

This policy sets out how CELT manages safeguarding concerns and allegations about anyone working in or on behalf of CELT in a paid or unpaid capacity, including employees, supply staff, trainee teachers, volunteers and contractors. It also applies to safeguarding allegations relating to individuals or organisations using CELT premises to provide activities for children.

This policy reflects Part Four of *Keeping Children Safe in Education 2026 (KCSIE)* and is divided into:

- concerns or allegations that may meet the harm threshold; and
- concerns or allegations that do not meet the harm threshold (low-level concerns).

This policy should be read alongside CELT's Safeguarding and Child Protection Policy, Staff Code of Conduct, Whistleblowing Policy, Complaints Policy and relevant disciplinary procedures.

2.2 Key statutory guidance and legislation

This policy should be read in conjunction with relevant legislation and statutory guidance, including:

- *Keeping Children Safe in Education 2026*;
- *Working Together to Safeguard Children 2026*;
- Children Act 1989 and Children Act 2004;
- Education Act 2002;
- Safeguarding Vulnerable Groups Act 2006;
- Equality Act 2010;
- Data Protection Act 2018;
- UK General Data Protection Regulation; and
- Data (Use and Access) Act 2025.

CELT will also have regard to relevant local safeguarding partnership and LADO procedures.

3. Part One: Concerns or Allegations That May Meet the Harm Threshold

3.1 Scope and harm threshold

This part of the policy applies where it is alleged that anyone working in or on behalf of CELT, including an employee, supply member of staff, trainee 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;
- behaved towards a child or children in a way that indicates they 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.

The final criterion includes behaviour that may have occurred outside the school or workplace and may indicate that the individual presents a transferable risk to children.

This policy will also apply where CELT becomes aware of an allegation relating to an individual or organisation using CELT premises to provide activities for children.

Staff are not responsible for deciding whether a concern meets the harm threshold. All concerns must be reported.

4. Reporting a concern or allegation

The safety and welfare of learners is paramount. Any safeguarding concern or allegation about an adult working in or on behalf of CELT must be reported immediately.

Concerns or allegations should normally be reported to the Headteacher/Service Lead and Designated Safeguarding Lead (DSL).

Where the concern or allegation relates to:

- the Headteacher or Service Lead – it should be reported to the relevant Director of Primary/Secondary/Inclusion or Head of People;
- a concern which cannot appropriately be raised with the Headteacher/Service Lead – it should be reported to the Director of Inclusion or Head of People;
- a concern about a member of Executive Leadership Team – it should be reported to the Trust Leader;
- the Trust Leader – it should be reported to the Chair of Trustees; or
- trustees – it should be reported to the Members, as appropriate.

Where a person does not feel their concern has been heard or appropriately addressed, they should escalate the concern in accordance with CELT's safeguarding and whistleblowing arrangements.

The appropriate person will act as the case manager. The case manager will seek advice from the Local Authority Designated Officer (LADO) where the harm threshold may be met or where advice is required.



5. Initial response

The case manager will consider:

- the immediate safeguarding and welfare needs of the child or children;
- whether any other children may be at risk;
- appropriate support for the person who is the subject of the allegation; and
- what immediate action, if any, is necessary.

Before contacting the LADO, the case manager may undertake basic enquiries to establish the facts and determine whether there is any foundation to the allegation. These enquiries must not prejudice any subsequent police, children's social care, LADO or disciplinary investigation.

The case manager will discuss the allegation with the LADO as appropriate and agree the next steps. This may include:

- no further action;
- further information being required;
- a strategy discussion;
- involvement of children's social care and/or the police; or
- an internal investigation or other action.

Relevant information about the allegation, the child and the person who is the subject of the allegation will be shared lawfully and proportionately with the LADO and other agencies as necessary.

Where a strategy discussion is required, CELT will participate and cooperate fully with relevant agencies.

6. Investigation

Where the police or children's social care are involved, CELT will cooperate with their enquiries and agree with the LADO and relevant agencies how any internal process should proceed.

Where an external investigation is not required, an appropriate investigation may be undertaken by a suitably senior CELT employee or, where appropriate because of the circumstances, complexity or potential conflict of interest, an independent investigator.

Investigations will be undertaken fairly, objectively and without unnecessary delay using the investigation proforma.

The following definitions will be used when determining the outcome of an allegation:

- **Substantiated:** there is sufficient evidence to prove 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 who is the subject of the allegation.
- **False:** there is sufficient evidence to disprove the allegation.



- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. This does not imply guilt or innocence.
- **Unfounded:** there is no evidence or proper basis which supports the allegation being made.

7. Supply staff, trainee teachers and third-party staff

Where a safeguarding concern or allegation relates to an individual who is not directly employed by CELT, including supply staff, trainee teachers or contracted staff provided by an agency or other organisation, CELT will work closely with the individual's employer, agency or training provider.

CELT will remain responsible for gathering the relevant facts and managing the safeguarding process, working with the LADO and other agencies as appropriate. The individual's employer, agency or other organisation will usually lead any associated disciplinary or employment process.

CELT will not cease to use an individual's services solely because a safeguarding concern has arisen without first establishing the facts and liaising with the LADO to determine an appropriate outcome.

Agencies, employers and other organisations will be expected to cooperate fully with CELT's safeguarding process and any relevant enquiries.

Where the concern relates to a trainee teacher, the relevant teacher training provider will be fully involved in the process and is expected to follow the procedures applicable to supply agencies.

8. Supporting the child and their parents or carers

The needs and welfare of the child will remain central throughout the process.

Parents or carers will normally be informed of an allegation involving their child where they are not already aware of it. Where children's social care or the police are involved, the case manager will agree with those agencies what information can be shared and when.

Parents and carers will be kept appropriately informed about the progress and outcome of the case insofar as it relates to their child.

Information about the person who is the subject of the allegation will not be disclosed unless it is lawful and appropriate to do so. The case manager will seek advice from the LADO and, where involved, children's social care and/or the police about information sharing.

9. Supporting the person subject to the allegation

CELT recognises its duty of care towards its employees and will seek to minimise unnecessary stress while ensuring that safeguarding remains paramount.

The person who is the subject of an allegation will normally be informed as soon as possible following initial discussion with the LADO, unless children's social care or the police advise otherwise.



They will be provided with appropriate information about the allegation, the likely course of action and the progress of the case, subject to any restrictions necessary to protect children or an investigation.

Where appropriate, a named person will be identified to provide support and maintain contact. Employees may also seek support from their trade union, professional association, a colleague and relevant CELT support services.

Where an allegation relates to a supply member of staff, their agency should provide appropriate support. Where it relates to a trainee teacher or other third-party worker, CELT will work with the relevant training provider or employer to ensure appropriate support arrangements are in place.

10. Suspension and interim arrangements

Suspension is not an automatic response to an allegation.

The case manager will consider carefully whether there is cause to suspect that a child or other children are at risk of harm, or whether the allegation is sufficiently serious that it may constitute grounds for dismissal.

Where possible, alternatives to suspension will be considered. Any decision to suspend a CELT employee will be made in accordance with CELT's employment procedures, taking account of advice from the LADO and, where appropriate, children's social care and/or the police.

Where an allegation concerns an individual who is not employed by CELT, CELT will work with their employer, agency or training provider and the LADO to determine appropriate interim arrangements. CELT will not cease to use the individual's services solely because a safeguarding concern has arisen without first establishing the facts and liaising with the LADO.

Where appropriate, consideration may be given to suspension or redeployment by the individual's employer or agency.

Where an employee is suspended, they will receive written confirmation setting out the reasons in accordance with CELT's relevant procedures.

Appropriate support will be considered when an employee returns to work following suspension.

CELT will not ordinarily prevent social contact with colleagues unless there is evidence that such contact may prejudice the gathering of evidence or otherwise compromise the investigation.

11. Resignation or cessation of services

The resignation of an employee, or an individual ceasing to provide services to CELT, will not prevent CELT from following the safeguarding process to its conclusion.

Wherever possible, the individual will be given the opportunity to engage with the process.

CELT will not enter into a settlement or compromise agreement which prevents the appropriate safeguarding process, DBS referral or other statutory referral from being completed.



12. Outcomes and referrals

At the conclusion of the case, the outcome will be determined using the definitions set out in this policy and appropriate action will be taken.

Where an individual is dismissed, removed from regulated activity or would have been dismissed or removed had they not resigned or otherwise ceased to provide their services, CELT will make a referral to the Disclosure and Barring Service (DBS) where the statutory referral criteria are met.

Where the individual is a teacher, CELT will consider whether the circumstances require referral to the Teaching Regulation Agency (TRA) in accordance with the applicable statutory requirements and guidance.

Where the individual is employed or supplied by another organisation, the outcome of the safeguarding process will be shared appropriately with that organisation and the LADO.

Where an allegation is found to be false or malicious, consideration will be given to whether the child requires support or whether there may be a safeguarding reason for the allegation. Any response to a deliberately malicious allegation by a learner will be considered in accordance with CELT's Behaviour Policy, taking account of the learner's needs and circumstances.

13. Organisational learning

At the conclusion of a case, CELT will consider whether there are lessons to be learned about its procedures, safeguarding culture or practice.

Where appropriate, an organisational learning review will be undertaken and improvements identified and implemented.

This may include consideration of whether:

- policies or procedures require amendment;
- practice or supervision should be strengthened;
- training or professional development is required;
- environmental or organisational factors contributed to the concern; or
- wider patterns or safeguarding risks need to be addressed.

13. Timescales and case monitoring

Safeguarding allegations will be resolved as quickly as possible, consistent with a thorough and fair process.

The case manager will monitor the progress of each case and liaise with the LADO and other agencies as appropriate.

Wherever possible, the first review of an ongoing investigation should take place no later than four weeks after the initial assessment. Where an investigation continues, subsequent reviews should normally take place fortnightly and no longer than monthly.



Unnecessary delay will be challenged and escalated where appropriate.

14. Record keeping

A clear and comprehensive record will be maintained of allegations, decisions, actions taken and outcomes.

Allegations found to be malicious or false will be removed from the individual's personnel record unless otherwise required by law.

For other allegations, the record will include:

- a clear and comprehensive summary of the allegation;
- details of how the allegation was followed up and resolved;
- actions taken and decisions reached; and
- whether information will be referred to in any future employment reference.

A copy will be provided to the individual where required by KCSIE.

Records will be retained at least until the individual reaches normal pension age or for ten years from the date of the allegation, whichever is longer.

Records relating to learners will be retained securely in accordance with CELT's records management arrangements.

Information will be processed in accordance with applicable data protection legislation, including the UK GDPR, Data Protection Act 2018 and Data (Use and Access) Act 2025.

15. Confidentiality

CELT will make every reasonable effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

Information will only be shared with those who need it for safeguarding, investigation, employment or other lawful purposes.

Reporting restrictions relating to allegations against teachers will be observed in accordance with the Education Act 2002 and applicable legislation.

16. Non-recent allegations

Where an adult reports that they were abused as a child, they will be advised to report the matter to the police. CELT will also consider whether any current safeguarding risks require action or referral.

Non-recent allegations made by a child will be reported and managed in accordance with safeguarding procedures and, where appropriate, referred to the LADO, children's social care and/or police.



Part Two: Low-Level Concerns

17. Culture and purpose

CELT is committed to creating a culture in which all concerns about adults working in or on behalf of the Trust are shared responsibly and addressed appropriately.

A low-level concern does not mean that it is insignificant. The term refers to behaviour towards a child that does not meet the harm threshold set out in Part One.

CELT seeks to create an open and transparent culture in which staff:

- understand the standards of behaviour expected of them;
- feel confident to report concerns about themselves or others;
- understand that concerns will be taken seriously and handled proportionately; and
- recognise that apparently minor concerns may be significant when considered alongside other information or patterns of behaviour.

18. Recognising low-level concerns

A low-level concern is any concern, no matter how small and even if it amounts only to a sense of unease or a 'nagging doubt', that an adult working in or on behalf of CELT may have acted in a way that:

- is inconsistent with CELT's Staff Code of Conduct, including inappropriate conduct outside work; and
- does not meet the harm threshold or is otherwise not sufficiently serious to consider referral to the LADO.

Examples may include, but are not limited to:

- being over-friendly with children;
- having favourites;
- taking photographs of children using a personal mobile phone contrary to CELT expectations;
- engaging with a child one-to-one in a secluded area or behind a closed door without appropriate reason or safeguards; or
- humiliating children.

Such behaviour may exist on a wide spectrum, from inadvertent or thoughtless behaviour through to conduct that may ultimately be intended to enable abuse.

19. Reporting low-level concerns

All staff should report low-level concerns as soon as possible.



Low-level concerns relating to employees, supply staff, trainee teachers, contractors or volunteers should normally be reported to the Headteacher/Service Lead and DSL.

Concerns about a Headteacher/Service Lead should be reported in accordance with the escalation arrangements set out in Part One of this policy.

Staff do not need to determine whether a concern meets the harm threshold or constitutes a low-level concern before reporting it. The appropriate senior leader will make that determination, seeking advice from the LADO where necessary.

Staff are also encouraged to self-refer where they believe they have found themselves in a situation that could be misinterpreted, might appear compromising to others or where they believe they may have behaved in a way that falls below expected professional standards.

20. Responding to low-level concerns

The Headteacher/Service Lead and DSL will review the information and determine whether:

- the behaviour is consistent with CELT's Staff Code of Conduct and no further action is required;
- the matter constitutes a low-level concern;
- there is a pattern of concerns which requires further consideration; or
- the concern may meet the harm threshold and should therefore be managed under Part One.

Where necessary, advice will be sought from the LADO.

The concern will be investigated proportionately. This may include speaking with the person who raised the concern, the individual concerned and relevant witnesses.

Low-level concerns may be addressed through appropriate management action, advice, support, supervision or training. Where appropriate, CELT's disciplinary or other employment procedures may apply.

Where a concern relates to supply staff, a trainee teacher, contractor or another third-party worker, CELT will share relevant information with the appropriate agency, training provider or employer and work collaboratively to ensure the concern is appropriately managed.

21. Recording and reviewing low-level concerns

All low-level concerns will be recorded in writing.

Records will include:

- details of the concern;
- the context in which it arose;
- action taken;
- decisions reached and the rationale for them; and



- the outcome, where appropriate.

Records will be confidential and held securely on CELT's designated safeguarding recording system for staff.

Low-level concern records will be reviewed regularly, including to identify patterns of concerning, problematic or inappropriate behaviour.

Where a pattern is identified, CELT will consider whether:

- the behaviour may now meet the harm threshold;
- there may be a wider cultural or systemic issue within the school or Trust;
- policies require review;
- additional training or professional development is required; or
- other action is necessary.

Where the harm threshold may be met, the matter will be managed under Part One and advice sought from the LADO as appropriate.

Low-level concern records will be retained at least until the individual leaves CELT, subject to CELT's records retention arrangements and applicable data protection requirements.

22. References

Low-level concerns will not normally be included in employment references.

Where a low-level concern has subsequently met the harm threshold and has been substantiated, relevant information will be included in a reference where required and appropriate in accordance with KCSIE and applicable safer recruitment requirements.

References will contain only information that is substantiated and relevant to the purpose of the reference.

23. Monitoring and review

The Trust Board has strategic oversight of safeguarding arrangements across CELT.

The implementation of this policy will be monitored through CELT's safeguarding assurance arrangements. The policy will be reviewed regularly and updated where required to reflect changes to legislation, statutory guidance, local safeguarding arrangements or learning arising from safeguarding cases.

