

Title	ALLEGATIONS AGAINST STAFF AND LOW LEVEL CONCERNS POLICY
Cross References	External: • Keeping Children Safe in Education 2026 • Working Together to Safeguard Children 2026 Internal: • Apricot Safer Recruiting Policy • Apricot Safeguarding and Child Protection Policy • Apricot Online Safety Policy • Apricot Anti-Bullying Policy • Apricot Student Policies – Complaints, Equality, Online Safety, Anti-Bullying
Date	October 2026

1. Introduction and purpose

Apricot Online is committed to safeguarding and promoting the welfare of children. Any concern or allegation about an adult working for or on behalf of Apricot Online will be taken seriously, managed promptly and fairly, and handled in a way that protects children while supporting the person who is the subject of the concern.

This policy sets out Apricot Online's arrangements for managing allegations that meet the harm threshold and concerns or allegations that do not meet that threshold (low-level concerns). It should be read alongside the Safeguarding and Child Protection Policy, Safer Recruitment Policy, Staff Code of Conduct and relevant employment procedures.

The policy applies to all employees and any other adult working for or on behalf of Apricot Online, whether paid or unpaid, and to concerns arising from conduct at work or outside work where that conduct may indicate a safeguarding risk or suitability concern.

2. Roles and reporting

All staff must report safeguarding concerns about an adult working for or on behalf of Apricot Online immediately. Staff must not investigate the matter themselves, question witnesses beyond what is necessary to establish the basic facts, or promise confidentiality.

- Concerns about a member of staff should be reported immediately to the designated senior manager/case manager. For Apricot Online, this will normally be the Managing Director or another appropriately designated senior leader.
- Where the concern or allegation is about the Managing Director or another person who would normally act as case manager, it must be reported to an alternative senior leader and advice sought from the relevant Local Authority Designated Officer (LADO).
- The Designated Safeguarding Lead (DSL) must ensure that any immediate safeguarding needs of the child are addressed without delay.
- Where an allegation appears to meet the harm threshold, the LADO for the local authority in which the adult works should be informed within one working day, in accordance with local procedures.
- If a child is at immediate risk of harm, children's social care and/or the police must be contacted without delay.

3. Allegations that meet the harm threshold

The harm threshold is met where it is alleged that a person who works with children 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.
- These criteria apply to behaviour inside and outside the workplace. A concern about conduct outside work may therefore require consideration under this policy where it raises a transferable risk or suitability issue.

4. Initial action when an allegation is received

1. Make an accurate written record of the information received, using the child's or reporting person's own words where possible. Record the date, time and circumstances.
2. Ensure any immediate safeguarding needs of the child or other children are addressed.
3. Report the allegation immediately to the appropriate case manager and DSL.
4. Do not investigate, confront the person who is the subject of the allegation, interview witnesses or seek to prove or disprove the allegation before advice has been obtained.
5. The case manager will consider the information and, where the harm threshold may be met, contact the LADO within one working day and follow the LADO's advice.
6. Where a criminal offence may have been committed or a child may be at risk of significant harm, the police and/or children's social care will be involved in accordance with LADO and local safeguarding procedures.

5. Working with the LADO and other agencies

Apricot Online will cooperate fully with the LADO, children's social care, police and other relevant agencies. The LADO provides oversight and advice on the management of allegations; the LADO does not replace the employer's responsibility for employment decisions or the statutory responsibilities of police and children's social care.

There may be several strands to the response, including:

- a police investigation of a possible criminal offence;
- assessment or enquiries by children's social care regarding the welfare and protection of a child;
- consideration of disciplinary or other employment action by Apricot Online; and
- consideration of whether a referral to the Disclosure and Barring Service (DBS) and/or another professional regulator is required.

6. Informing the person who is the subject of an allegation

The case manager will inform the person who is the subject of the allegation as soon as appropriate. However, where the LADO, police or children's social care may need to be involved, Apricot Online will take advice before deciding what information can be shared and when.

The individual will be advised to seek support and, where applicable, to contact their trade union or professional association. Appropriate welfare support will be considered throughout the process.

7. Parents, carers and support for the child

Parents or carers should normally be informed of an allegation involving their child as soon as appropriate, unless doing so would place the child at additional risk or prejudice an investigation. Apricot Online will follow advice from the LADO, police, children's social care and/or the commissioning body about what information can be shared and when.

The child's welfare will remain the paramount consideration. Appropriate support will be considered with the commissioning school/local authority and other agencies where relevant.

8. Suspension and alternatives

Suspension is not an automatic response to an allegation. The case manager will consider whether there is cause to suspect a child is at risk of harm, whether the allegation is so serious that it may be grounds for dismissal, or whether suspension is necessary to allow a fair investigation.

The case manager will take advice from the LADO and, where involved, police and children's social care. Alternatives to suspension will be considered wherever they can safely manage risk, for example temporary changes to duties, supervision or restrictions on contact with children.

9. Confidentiality

Every reasonable effort will be made to maintain confidentiality and guard against unnecessary publicity while an allegation is being considered or investigated. Information will be shared only with those who need it for safeguarding, investigation, employment, legal or support purposes, subject to applicable law and statutory guidance.

Staff must not discuss allegations with colleagues or others except where authorised as part of the formal process.

10. Resignation or ceasing to provide services

An allegation will not be discontinued simply because the person resigns or otherwise ceases to work for Apricot Online. Apricot Online will continue to cooperate with the LADO and other agencies and will seek to reach an appropriate conclusion wherever possible.

A settlement or compromise agreement will never be used to prevent a safeguarding allegation from being followed up or to avoid a statutory referral where the referral criteria are met.

11. Outcomes of allegations

At the conclusion of a case, the outcome will be recorded using the terminology in current statutory guidance. Depending on the evidence, an allegation may be substantiated, malicious, false, unsubstantiated or unfounded.

The case manager will consider, with the LADO where involved, any further action required, including employment action, support for the child and staff member, changes to working arrangements, learning for the organisation and any statutory or professional referrals.

12. Referrals to the DBS and professional regulators

Where a person is removed from regulated activity (or would have been removed had they not resigned or otherwise left) because the relevant statutory referral conditions are met, Apricot Online will make a referral to the Disclosure and Barring Service. Where appropriate, Apricot Online will also consider referral to a relevant professional regulator, including the Teaching Regulation Agency for teachers. Apricot Online will follow the applicable statutory criteria and timescales rather than relying on the outcome of an internal disciplinary process alone.

13. Record keeping

A clear and comprehensive record will be kept of allegations, how they were followed up and resolved, decisions reached and action taken. Records will be stored securely and retained in accordance with Keeping Children Safe in Education, data protection requirements and Apricot Online's retention arrangements.

Where an allegation is found to be malicious or false, personal records will be handled in accordance with current statutory guidance. Information included in employment references will comply with current safer recruitment guidance.

14. Learning lessons and return to work

At the conclusion of a case, Apricot Online will consider with the LADO, where involved, whether lessons can be learned and whether policies, training, supervision, safer working practices or organisational arrangements should be improved.

Where an individual who has been suspended or temporarily removed from duties is able to return to work, Apricot Online will consider how best to support that return and how any future contact with the child or children involved should be managed.

15. Low-level concerns - concerns that do not meet the harm threshold

Apricot Online promotes an open and transparent safeguarding culture in which staff feel able to report any concern about an adult's behaviour, however small it may appear. A low-level concern does not mean that the concern is insignificant. It means that the behaviour does not appear to meet the harm threshold.

Examples may include behaviour that is inconsistent with the Staff Code of Conduct, including inappropriate or overly familiar behaviour, inappropriate communication, favouritism, use of inappropriate language or other conduct that causes a sense of unease even where no specific allegation of harm has been made.

Low-level concerns should be reported promptly to the designated senior manager in accordance with Apricot Online's safeguarding arrangements. The information will be recorded and reviewed so that patterns of behaviour can be identified. Where information suggests that the harm threshold may in fact be met, the matter will be referred to the LADO.

Appropriate action may include advice, training, management guidance, changes to working practice, disciplinary action or safeguarding referral, depending on the circumstances. Low-level concerns will be managed sensitively and proportionately.

16. Non-recent allegations

Where an adult reports that they were abused as a child, they should be advised that the matter can be reported to the police. A non-recent allegation made by a child will be reported to the LADO in accordance with local procedures. Abuse can be reported regardless of how long ago it occurred.

17. Online provision

Because Apricot Online delivers education remotely, allegations and low-level concerns may arise from online interactions as well as other contact. This includes, but is not limited to, inappropriate messaging, communication outside approved systems, inappropriate use of cameras or screen sharing, boundary concerns, recording or sharing lesson content inappropriately, and contact with students outside authorised channels.

All staff must use Apricot Online's approved systems and comply with the Staff Code of Conduct, Safeguarding and Child Protection Policy and Online Safety Policy.

18. Review and related guidance

This policy will be reviewed at least annually and sooner where there is a significant change to legislation, statutory guidance, local safeguarding procedures or Apricot Online's operating arrangements.

This September 2026 version has been reviewed against Keeping Children Safe in Education 2026 (effective from 1 September 2026) and Working Together to Safeguard Children 2026.

Authorised by: Jodie Phillips, Operations Director

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