

ALLEGATIONS AGAINST STAFF AND OTHER ADULTS POLICY





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Thrive Lincs Ltd

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1. Policy Statement

Thrive Lincs Ltd is committed to safeguarding children and to ensuring that concerns or allegations about any adult working with or on behalf of the organisation are managed promptly, fairly, consistently and transparently. The welfare of the child is the primary consideration, while the rights, welfare and fair treatment of the person who is the subject of the concern must also be respected.

This policy establishes the process for concerns or allegations involving employees, directors, tutors, mentors, volunteers, students on placement, agency workers, contractors and other adults working with or on behalf of Thrive Lincs. It distinguishes between allegations that may meet the harm threshold and concerns that do not meet that threshold, often referred to as low-level concerns.

No member of staff should investigate an allegation themselves. Immediate safeguarding action must be taken where required and the matter must be reported through the routes in this policy.

2. Purpose

- protect children from harm and respond promptly to welfare concerns;
- ensure allegations are referred to the appropriate safeguarding agencies without avoidable delay;
- provide a fair and consistent process for the adult who is the subject of the allegation;
- distinguish safeguarding allegations from low-level concerns, complaints, capability matters and ordinary employment issues;
- ensure decisions, actions and rationales are properly recorded;
- support appropriate referrals to the police, children's social care, the Local Authority Designated Officer (LADO), Disclosure and Barring Service (DBS) and other bodies where required; and
- promote an open safeguarding culture in which staff can raise concerns without fear of inappropriate retaliation.

3. Scope

This policy applies to concerns or allegations about anyone who works with or on behalf of Thrive Lincs in a paid or unpaid capacity, including staff, directors, self-employed tutors, agency workers, contractors, volunteers and students on placement. It applies whether the alleged behaviour occurred during Thrive Lincs work, outside work, online, in a learner's home, in the community or in another setting.

Behaviour outside work may be relevant where it indicates that an adult may pose a risk of harm to children or may not be suitable to work with children.

4. Legal and Guidance Framework

Thrive Lincs will have regard to the legal and safeguarding framework relevant to its status and activities, including:



- Working Together to Safeguard Children 2026;
- Keeping Children Safe in Education 2026, applying the relevant principles to Thrive Lincs and its work with commissioning schools and colleges;
- Children Act 1989 and Children Act 2004;
- Safeguarding Vulnerable Groups Act 2006, as amended;
- Crime and Policing Act 2026 and current regulated-activity requirements;
- Disclosure and Barring Service referral guidance;
- Data Protection Act 2018 and UK GDPR;
- local multi-agency safeguarding arrangements and LADO procedures in the relevant local authority area; and
- relevant employment law and ACAS principles where an employment process is required.

Working Together to Safeguard Children 2026 expects organisations working with children to have clear arrangements for allegations against people who work with children and to distinguish an allegation from a concern about practice or a complaint.

5. Safeguarding Contacts

Designated Safeguarding Lead (DSL)	Mark Haggis
Deputy DSL	Anita Carnell
Deputy DSL	Kerry Cooper
Safeguarding email	safeguarding@thrivelincs.co.uk
Emergency	999 where a child or another person is in immediate danger

The relevant LADO is determined by the applicable local safeguarding arrangements. Thrive Lincs works across more than one local-authority area and will use the appropriate current LADO referral route rather than relying on a telephone number printed in this policy. Current contact details must be checked before referral.

6. The Harm Threshold

A concern or allegation may meet the harm threshold 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.

The final criterion can include conduct outside the workplace. For example, behaviour in the adult's private life may raise a transferable safeguarding concern about their suitability to work with children.

Staff must not attempt to decide conclusively whether the threshold has been met before reporting. Where there is doubt, advice should be sought from the DSL and/or LADO without delay.

7. Low-Level Concerns

A low-level concern is any concern about an adult's behaviour towards a child that is inconsistent with the Staff Code of Conduct or Safer Working Practices Policy but does not appear to meet the harm threshold. The term 'low-level' does not mean insignificant.

Examples may include over-familiarity, inappropriate communication, favouritism, unnecessary one-to-one situations that have not followed agreed arrangements, inappropriate use of social media, boundary concerns or conduct that causes a sense of unease.

Low-level concerns must be reported promptly to the DSL. They will be recorded and reviewed so that patterns, repeated concerns or wider safeguarding implications can be identified. If information suggests that the harm threshold may be met, the matter must be escalated under this policy and LADO advice sought.



Where a low-level concern relates to Mark Haggis as DSL/Director, it must not be managed solely by him. It should be reported to a Deputy DSL, who should seek LADO advice where the threshold is unclear or the concern may meet the harm threshold.

8. Immediate Action When an Allegation Is Received

- Take the allegation or concern seriously and prioritise the child's immediate safety.
- Listen carefully without leading questions or attempting to investigate.
- Do not promise confidentiality. Explain that information must be shared with people who need to protect the child.
- Make a factual, contemporaneous record using the child's own words where possible.
- Do not confront the person who is the subject of the allegation.
- Preserve relevant evidence, including electronic communications, records or CCTV where applicable.
- Report immediately to the DSL or, where the concern is about the DSL/Director, to a Deputy DSL and the LADO as appropriate.
- Call 999 where there is an immediate risk of serious harm or urgent police assistance is required.

9. Reporting Route

Concerns about an adult working for or on behalf of Thrive Lincs must be reported immediately to Mark Haggis, DSL. Reports may be made verbally initially where urgency requires, but a written record must follow.

If the concern or allegation is about Mark Haggis, the person raising it should report it to Anita Carnell or Kerry Cooper as Deputy DSL and, where the harm threshold may be met, contact the relevant LADO without delay. The subject of an allegation must never control or investigate the process concerning themselves.

If a member of staff believes a concern has not been acted upon appropriately, they must escalate it through the Whistleblowing Policy and may seek advice directly from the LADO, children's social care, police or another appropriate prescribed/regulatory body.

10. Referral to the LADO

Where an allegation may meet the harm threshold, the relevant LADO must be informed without delay and within one working day. Earlier contact should be made wherever possible. Thrive Lincs will follow the local authority's current referral and consultation procedure.

The LADO provides advice, oversight and coordination. The LADO does not normally conduct the employer's investigation. Thrive Lincs must not begin a disciplinary investigation that could compromise police, children's social care or LADO processes without appropriate consultation.

A referral or consultation may be required even where the allegation appears difficult to substantiate, the adult has resigned, the placement has ended, the child does not wish to pursue the matter, or the alleged conduct occurred outside Thrive Lincs work.

11. Safeguarding the Child

Any necessary action to protect the child or other children must be taken immediately. This may include contacting children's social care or the police, altering staffing or contact arrangements, arranging appropriate support, preserving evidence or implementing an interim risk-management plan.

The child should be listened to and supported in a manner appropriate to their age, communication needs and circumstances. They should not be repeatedly questioned about the allegation by different adults unless required by the appropriate safeguarding or investigative process.

Where appropriate, Thrive Lincs will liaise with the commissioning school or local authority so that statutory and placement safeguarding responsibilities are coordinated.



12. Informing Parents or Carers

Parents or carers should normally be informed of an allegation concerning their child as soon as appropriate. However, Thrive Lincs must first consider whether doing so could place the child or another person at greater risk, prejudice a police or children's social care investigation, or conflict with advice from the LADO or another safeguarding agency.

The extent of information provided about an employment or disciplinary process will be limited by confidentiality, data protection and the rights of the adult concerned. Parents/carers may be told relevant outcomes concerning the safeguarding of their child, but are not entitled to confidential employment records or the deliberations of a disciplinary process.

13. Informing and Supporting the Person Subject to the Allegation

The person who is the subject of the allegation should be informed as soon as it is appropriate to do so, having regard to advice from the LADO, police or children's social care. They must not be given information that could prejudice an investigation or place a child at risk.

They should be told the nature of the concern when permitted, the process to be followed, any interim arrangements, the importance of confidentiality and the support available to them. Employees may seek support from a trade union, professional association or representative where applicable.

Thrive Lincs will seek to avoid prejudgment and will treat the person fairly while maintaining the child's welfare as the primary consideration.

14. Suspension and Interim Risk Management

Suspension is not an automatic response to an allegation. Thrive Lincs will consider whether risks can be managed through proportionate alternatives, taking account of LADO and police advice where relevant.

- temporary removal from direct work with the child concerned;
- alternative duties or location;
- additional supervision;
- changes to contact arrangements;
- temporary restriction of systems, premises or records access; or
- suspension where necessary and proportionate.

Where suspension is considered, the reasons and alternatives considered should be recorded. Suspension is a neutral precautionary measure and is not a disciplinary finding.

15. Police, Children's Social Care and Multi-Agency Processes

An allegation may involve several parallel or sequential strands: safeguarding enquiries relating to the child; police investigation of a possible criminal offence; LADO oversight; and an employer or commissioning process concerning the adult.

Thrive Lincs will coordinate its actions with the relevant agencies and will not take steps that could compromise another investigation. Where a criminal offence may have been committed, police advice should be sought as appropriate.

16. Employer Investigation and Disciplinary Action

Where an internal investigation is required, it will be undertaken by a person who is appropriately independent of the allegation and has sufficient competence to conduct the investigation fairly. Where necessary, Thrive Lincs may appoint an external investigator or obtain independent HR/safeguarding advice.

The scope and timing of an internal investigation will take account of LADO, police and children's social care advice. Safeguarding decisions and employment decisions are related but distinct; the absence of a criminal charge or conviction does not automatically prevent an employer from considering conduct under the applicable civil/employment standard of proof.



17. Resignations and Settlement Agreements

An allegation process must not be stopped merely because the person resigns, ceases providing services or otherwise leaves Thrive Lincs. Where practicable, the safeguarding process should reach a conclusion and any statutory or regulatory referral duties must still be considered.

Thrive Lincs will not use a settlement agreement to prevent appropriate safeguarding action, a DBS referral, a LADO process, lawful whistleblowing or the sharing of safeguarding information that it is legally required or entitled to share.

18. Outcomes

At the conclusion of the relevant process, the outcome will be recorded using terminology consistent with the applicable safeguarding guidance and LADO advice. Depending on the circumstances, an allegation may be substantiated, unsubstantiated, unfounded, malicious or false.

These terms must be used carefully. An unsubstantiated allegation is not the same as a false or malicious allegation. A finding that there is insufficient evidence to prove an allegation does not mean that the child deliberately invented it.

19. False or Malicious Allegations

No child or adult should be criticised or sanctioned simply because an allegation cannot be substantiated. Where there is evidence that an allegation was deliberately fabricated or malicious, Thrive Lincs will consider the circumstances carefully and seek safeguarding advice before deciding what action, if any, is appropriate.

A deliberately false allegation by a child may itself indicate unmet needs or safeguarding concerns and should be considered in that context. Police involvement in relation to a person making a deliberately false allegation will only be considered where appropriate and proportionate.

20. Confidentiality and Communications

Information about an allegation will be restricted to those who need it for safeguarding, investigation, employment, legal or regulatory purposes. Staff must not discuss allegations with colleagues, families, learners, on social media or with the press unless authorised or legally entitled to do so.

Thrive Lincs will manage external communications carefully to protect children, the integrity of investigations and the rights of the adult concerned. Nothing in this policy prevents lawful whistleblowing or a person obtaining confidential legal or professional advice.

21. Record Keeping

Thrive Lincs will maintain a clear, comprehensive and secure record of allegations, decisions, referrals, advice received, actions taken and outcomes. Records will distinguish allegations that meet or may meet the harm threshold from low-level concerns.

Records relating to allegations will be retained in accordance with current safeguarding guidance, legal requirements and Thrive Lincs' retention schedule. Records must be accurate enough to support future safeguarding decisions and references while avoiding the retention or disclosure of information that guidance requires to be excluded.

Low-level concern records will be reviewed periodically for patterns and retained in accordance with the Low-Level Concerns procedure and data-protection requirements.

22. Employment References

References will be accurate, fair and consistent with safeguarding guidance and legal requirements. Thrive Lincs will not include allegations that are false, unfounded, unsubstantiated or malicious merely because they were made. Substantiated safeguarding findings may be included where relevant and lawful.

Where there is uncertainty about what may lawfully be disclosed, appropriate safeguarding, HR or legal advice will be obtained.



23. Disclosure and Barring Service Referrals

Thrive Lincs will consider its legal duty to refer a person to the Disclosure and Barring Service where it is the regulated activity provider and the statutory referral conditions are met. This can include circumstances where a person is removed from regulated activity, or would have been removed had they not resigned or otherwise ceased the activity, because of relevant conduct, the harm test or a relevant offence.

A referral by the police, local authority or another organisation does not necessarily remove Thrive Lincs' own referral duty. The decision and rationale must be recorded.

24. Other Regulatory or Professional Referrals

Where relevant to the person's role or professional status, Thrive Lincs will consider whether information must or should be referred to another regulator, professional body, commissioning organisation or agency. Any referral will be made lawfully, proportionately and in accordance with the relevant body's criteria.

25. Low-Level Concerns, Patterns and Organisational Learning

The DSL will review low-level concerns and safeguarding allegations for patterns involving an individual, location, learner, working arrangement or aspect of organisational culture. Repeated concerns that appear minor in isolation may collectively indicate a safeguarding risk.

Learning may result in changes to supervision, training, safer-working arrangements, risk assessments, recruitment, policy or commissioning practice. Organisational learning should not wait for a serious incident.

26. Whistleblowing and Escalation

Staff are expected to challenge unsafe practice and report concerns about adults. A person who believes that Thrive Lincs has failed to respond appropriately may use the Whistleblowing Policy and seek external safeguarding advice.

No person should suffer inappropriate retaliation for raising a genuine safeguarding concern. Knowingly making a malicious allegation is different from raising a concern that later proves mistaken or cannot be substantiated.

27. Timescales

Cases will be progressed as promptly as possible while ensuring that safeguarding action, evidence gathering and procedural fairness are not compromised. Thrive Lincs will maintain contact with the LADO and other agencies as appropriate and will avoid unnecessary delay.

The requirement to contact the LADO within one working day where the harm threshold may be met is an escalation timescale, not a target for completing the entire case.

28. Roles and Responsibilities

28.1 Director / DSL

- ensure immediate safeguarding action is taken;
- seek LADO advice and make referrals where appropriate;
- coordinate with commissioners and statutory agencies;
- ensure conflicts of interest are managed;
- maintain secure records and decision rationales;
- consider interim risk management, DBS and other referrals; and
- ensure learning is incorporated into practice.

28.2 Deputy DSLs

Anita Carnell and Kerry Cooper support safeguarding action and escalation. Where an allegation concerns the DSL/Director, a Deputy DSL must ensure the matter is not managed by the person who is the subject of the concern and should contact the LADO directly where appropriate.



28.3 All Staff, Volunteers and Contractors

- report concerns immediately;
- do not investigate or confront the adult concerned;
- record facts accurately;
- preserve confidentiality;
- follow safer-working and safeguarding procedures; and
- escalate if they believe a concern has not been acted upon.

29. Related Policies

- Safeguarding and Child Protection Policy;
- Low-Level Concerns Policy or procedure;
- Safer Working Practices Policy;
- Staff Code of Conduct;
- Safer Recruitment Policy;
- Whistleblowing Policy;
- Compliments and Complaints Policy;
- Behaviour Policy;
- Lone Working Policy;
- Data Protection Policy; and
- Disciplinary and Grievance procedures.

30. Review

This policy will be reviewed at least annually and sooner following a significant allegation, safeguarding review, change in law or statutory guidance, material change to Thrive Lincs' service model or learning that indicates the policy should be amended.

Appendix 1 - Immediate Action Guide

- Is anyone in immediate danger? If yes, call 999 and take proportionate action to protect them.
- Listen; do not investigate or ask leading questions.
- Make a factual record as soon as possible.
- Report immediately to Mark Haggis, DSL.
- If the concern is about Mark Haggis, report to Anita Carnell or Kerry Cooper and contact the relevant LADO where appropriate.
- If the harm threshold may be met, ensure LADO contact without delay and within one working day.
- Do not tell the person who is the subject of the allegation until this has been agreed with the appropriate safeguarding/investigative agencies.
- Preserve evidence and maintain need-to-know confidentiality.
- Record decisions, advice, actions and rationale.

Appendix 2 - Management Decision Record: Minimum Information

- date/time the concern was received and by whom;
- child/children involved and immediate safety action;
- adult who is the subject of the concern and their role;
- factual description of the concern and source of information;
- whether the harm threshold may be met and rationale;
- LADO consultation/referral details and advice;
- police/children's social care involvement, where applicable;
- commissioner/school notification and rationale;
- parent/carer communication and rationale;
- interim risk-management measures and alternatives considered;



- support offered to the child and adult;
- investigation/disciplinary arrangements where applicable;
- outcome and terminology agreed;
- DBS/professional/regulatory referral consideration and decision; and
- learning, follow-up actions, responsible person and review date.