Managing Allegations, Low-Level Concerns and Whistleblowing Policy 2026-27

Challenge Sport and Education Ltd, company number 08332038. This policy sits alongside our Child Protection and Safeguarding Policy. Next full review: August 2027.

1. Purpose and scope

This policy explains what we do when there is a concern that someone who works with us may have harmed a child, may pose a risk to children, or has behaved in a way that is not in line with our Staff Code of Conduct. It also explains how anyone can raise a concern about unsafe practice in our organisation (whistleblowing).

It applies to everyone who works for or on behalf of Challenge Sport and Education: employees, freelance coaches, volunteers, students on placement and anyone else working with children in our name. It covers concerns about current and past behaviour, inside and outside work, and concerns about the owner and Designated Safeguarding Lead (DSL).

It follows Keeping Children Safe in Education 2026 (Part 4), Working Together to Safeguard Children 2023, the EYFS statutory framework for our early years provision, and the procedures of the Hertfordshire and Barnet safeguarding children partnerships.

Three levels of concern

Level	What it means	What happens
Allegation that meets the harm threshold	The person may have harmed a child, committed an offence against a child, or may pose a risk to children (see section 2)	Reported to the DSL immediately and to the LADO within one working day
Low-level concern	Behaviour that does not meet the harm threshold but is not in line with our Staff Code of Conduct	Reported to the DSL, recorded and dealt with (section 4)
Complaint	A concern about the quality of our service that does not involve a child's safety	Our Complaints Procedure

If you are unsure which level applies, treat it as an allegation and tell the DSL straight away. The DSL decides; you never need to.

2. Allegations that meet the harm threshold

This section applies when anyone working with us may have:

1. behaved in a way that has harmed a child, or may have harmed a child
2. possibly committed a criminal offence against or related to a child
3. behaved towards a child or children in a way that indicates they may pose a risk of harm to children
4. behaved, or may have behaved, in a way that indicates they may not be suitable to work with children. This includes behaviour outside work, such as a domestic abuse incident or an online offence

Step 1: Anyone who receives an allegation or has a concern

- If a child is in immediate danger, call 999.
- Listen, and write down what you were told or saw, with the date and time, in the words used. Sign it.
- Do not investigate, question the person the allegation is about, or tell them about it.

- Do not promise confidentiality. Explain that you have to pass it on.
- Tell the DSL (Doug Berlin) immediately, and always the same day. If the DSL is not available, tell the Deputy DSL.
- **If the allegation is about the DSL**, contact the LADO directly: Hertfordshire 01992 555420, Barnet 020 8359 4528.

Step 2: The DSL contacts the LADO within one working day

The DSL refers the allegation to the LADO for the local authority where the person works, before taking any other action. The DSL shares the facts known, the record made, and details of the person and any children involved. The DSL does not investigate, interview anyone or gather evidence unless the LADO agrees.

Step 3: Act on the LADO's advice

The LADO decides with the DSL whether the matter needs:

- a police investigation
- a children's social care enquiry about the child
- an internal disciplinary process
- a strategy meeting with other agencies

The DSL agrees with the LADO when and how the person is told about the allegation, and what parents are told.

Step 4: Notify Ofsted (our Ofsted-registered provision)

The DSL notifies Ofsted of any allegation of harm against someone working with children in our registered provision, as soon as reasonably practicable and always within 14 days.

Step 5: Work on school sites

If the allegation relates to work in a partner school, the DSL also informs that school's DSL the same day. If one of our staff has a concern about a member of school staff, they tell our DSL, who passes it to the school's headteacher or DSL under the school's own procedures.

Freelancers, volunteers and contractors are covered in the same way. We do not stop the process because someone stops working with us.

3. Managing the allegation

Risk assessment and suspension. The DSL, with the LADO's advice, decides whether the person can keep working while enquiries take place. Suspension is not automatic and is a neutral act, not a finding of guilt. Before suspending, we consider alternatives, such as:

- working only alongside another member of staff
- moving to a different setting or role without contact with the child or children involved
- working away from children altogether

The decision and reasons are recorded. We take advice from an HR adviser before any suspension or disciplinary step.

Support. The person the allegation is about is told who to contact for updates and is offered support, for example our employee assistance or their union. The child and their family are supported through the DSL and children's social care as appropriate. Staff who raise concerns are supported and protected (see section 5).

Confidentiality. Everyone involved keeps the allegation confidential and shares information only with those who need it. Nobody discusses it on social media.

Outcomes. At the end, the LADO and DSL agree one of these outcomes:

Outcome	Meaning
Substantiated	There is enough evidence to prove the allegation
Malicious	There is clear evidence of a deliberate act to deceive
False	There is enough evidence to disprove the allegation
Unsubstantiated	There is not enough evidence to prove or disprove it
Unfounded	There is no evidence or basis to support it

Referral to the DBS. If we dismiss someone, or would have dismissed them had they not resigned, because they harmed a child or posed a risk of harm, we have a legal duty to refer them to the Disclosure and Barring Service. We also notify Ofsted for our registered provision.

Resignations and settlement agreements. If the person resigns or stops working with us, we still complete the process and reach an outcome. We do not use settlement agreements to avoid reporting a concern.

Records. The DSL keeps a clear, confidential record of every allegation: what was alleged, the actions and decisions taken (with reasons), and the outcome. For substantiated, unsubstantiated and unfounded allegations, the record is kept on the person's confidential file until their normal retirement age or for 10 years, whichever is longer. Records of false or malicious allegations are removed from personnel records.

References. We only include substantiated allegations in references. False, malicious, unsubstantiated and unfounded allegations are not included.

Learning lessons. After every case, the DSL reviews with the LADO whether any changes to our policies or practice would help prevent a similar situation, and records this for the termly review.

4. Low-level concerns

A low-level concern is any concern, however small, that someone working with us has behaved in a way that is not in line with our Staff Code of Conduct, but does not meet the harm threshold in section 2. Sharing these early helps us keep a culture where everyone is clear about safe behaviour, and helps us spot patterns.

Examples include:

- being over-friendly with a child, or having favourites
- taking photos of children on a personal phone
- contacting a child privately by phone, message or social media
- spending time alone with a child behind a closed door
- using inappropriate, humiliating or offensive language

Reporting. Tell the DSL or, if they are unavailable, the Deputy DSL. If the concern is about the DSL, contact the LADO. Staff are encouraged to **self-report** if they find themselves in a situation that could be misinterpreted, or realise their own behaviour fell short.

What the DSL does. The DSL:

- records the concern in our confidential low-level concerns log: the details, the context, and the action taken
- speaks to the person, where appropriate, and reminds them of the expected behaviour, or arranges extra training or supervision
- decides whether the concern, or a pattern of concerns, actually meets the harm threshold. If it does, section 2 applies and the DSL contacts the LADO
- reviews the log at every termly review to look for patterns

Low-level concerns are kept until the person leaves, and are not included in references unless they formed part of a substantiated allegation or a pattern of behaviour that meets the harm threshold.

5. Whistleblowing

Whistleblowing means raising a concern about poor or unsafe practice, or possible failures in our safeguarding arrangements, that is in the public interest. Examples include safeguarding concerns not being acted on, unsafe recruitment, staff ratios not being met, or records being falsified.

How to raise a concern

1. Raise it with the DSL, Doug Berlin. If the concern is about the DSL, or you don't feel able to raise it internally, go to step 2.
2. Contact an outside organisation:
    - the LADO (Hertfordshire 01992 555420, Barnet 020 8359 4528), for concerns about how a child or an allegation has been handled
    - Ofsted (0300 123 1231), for concerns about our registered provision
    - the NSPCC Whistleblowing Advice Line (0800 028 0285), for advice on any safeguarding concern
    - the police, if a crime may have been committed

You can raise a concern in writing or in person. You do not need proof, only a reasonable belief that something is wrong.

What we will do. We will acknowledge your concern within 2 working days, look into it, and tell you the outcome as far as we can without breaching anyone's confidentiality.

Your protection. We will not treat anyone unfairly for raising a concern in good faith, even if it turns out to be mistaken. Workers who make a protected disclosure are protected by law under the Public Interest Disclosure Act 1998. We will keep your identity confidential if you ask us to, unless the law requires us to share it. Anonymous concerns will be considered, but they are harder to look into.

Raising a concern maliciously, knowing it to be untrue, may lead to disciplinary action.

6. Key contacts

Who	When	Number
Doug Berlin, DSL and owner	Any allegation, low-level concern or whistleblowing concern	info@challengesporteducation.co.uk
Hertfordshire LADO	Allegations about staff working in Hertfordshire, or about the DSL	01992 555420
Barnet LADO	Allegations about staff working in Barnet, or about the DSL	020 8359 4528
Ofsted	Notifications and concerns about our registered provision	0300 123 1231
NSPCC Whistleblowing Advice Line	Advice for staff with concerns	0800 028 0285
Police	Immediate danger, or a crime may have been committed	999 / 101

7. Training and review

All staff are told about this policy at induction and at the annual staff day, and sign to confirm they have read it on the Safeguarding Policy Acknowledgement Record. The DSL reviews allegations, low-level concerns and whistleblowing concerns at every termly review. This policy is reviewed every August, and whenever the law or guidance changes.

Approved by: Doug Berlin, owner and Designated Safeguarding Lead

Signed:

Doug Berlin

Date: 30.10.26