

Managing allegations and low level concerns raised in relation to staff, contractors, trainee teachers and volunteers policy

Version	1.2
Approving Body	Trust Board
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Owner	CEO
Applies to	All Trust Schools, all Trust staff

Version	Date	Reason
1.0		To establish a trust-wide policy
1.1	September 2023	Periodic review
1.2	September 2026	Complete review: see tracked changes and newly added section 2, plus appendices

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1 Policy Purpose

1.1 Initio Learning Trust takes the safeguarding of its pupils very seriously and we recognise that it is extremely important that any allegation made against a member of staff, supply staff, contractors, trainee teachers or volunteer is managed quickly and effectively. It is also important that low level safeguarding concerns are recognised and reported so behaviours can be appropriately managed.

1.2 This policy sets out how Initio Learning Trust and its schools will manage allegations and low level concerns raised in relation to a member of staff, supply staff, contractors, trainee teacher or volunteers at our Trust. It meets the requirements of the Department for Education statutory guidance for managing allegations set out in Part 4 of Keeping Children Safe in Education and the Dorset and BCP local authority Allegations of Abuse Against Adults policy.

1.3 This policy is set out in two parts. The first part deals with allegations made against members of staff, including supply staff, contractors, trainee teachers or volunteers. The second part deals with low level concerns raised in relation to members of staff, including supply staff, contractors, trainee teachers or volunteers.

2. Roles and Responsibilities

2.1 Chief Executive Officer (CEO)

The CEO holds ultimate responsibility for the safeguarding culture across the Initio Learning Trust. They must:

- Ensure that the Trust has robust procedures in place for reporting and managing allegations against staff.
- Guarantee that the policy is applied consistently across all schools and that the Director of People & Culture is supported in handling complex cases.

2.2 Directors of Education

The Directors of Education provide a bridge between the Executive team and school leadership. Their duties include:

- Oversight of how Headteachers manage low-level concerns to ensure no patterns of behavior are overlooked across the cluster.
- Supporting Headteachers in the decision-making process when a concern may meet the "harm threshold".
- Taking on the 'Lead Person' role where allegations are made in relation to members of the Trust's central team.

2.3 School Headteachers (The "Lead Person")

The Headteacher is usually the "Lead Person" for managing allegations at the school level. They must:

- Act as the central point of contact for all low-level concerns reported by staff.
- Decide whether a concern remains "low-level" or meets the threshold for an "allegation" that must be referred to the Local Authority Designated Officer (LADO).
- Maintain a secure, confidential record of all low-level concerns, separate from the personnel file, unless the concern escalates.

2.4 Trust Safeguarding Officer

The Trust Safeguarding Officer provides expert clinical and procedural guidance. They are responsible for:

- Monitoring & quality assuring the "Low-Level Concerns" logs across the Trust to identify any systemic issues or training gaps.

- Providing a second opinion to Headteachers on whether a behavior constitutes a "low-level concern" (e.g., a "nagging doubt") or meets the threshold of harm

2.5 HR / People Business Partners

The HR team ensures that the rights of the staff member are balanced with the safety of the pupils. Their responsibilities include:

- Advising on the employment law aspects of an allegation, including suspension, disciplinary procedures, or "neutral act" protocols.
- Ensuring that the Equality Impact Assessment (EIA) is followed so that investigations are conducted without bias.
- Assisting in the drafting of settlement agreements or references following an investigation, ensuring they comply with legal requirements.

2.6 External Agencies (e.g., LADO, Police, Social Care)

The Trust works in partnership with statutory bodies to ensure external scrutiny. They are responsible for:

- **The LADO (Local Authority Designated Officer):** Providing advice and management of allegations that meet the harm threshold.
- **Police/Social Care:** Leading on criminal investigations or child protection enquiries where necessary.

2.7 Reporting Culture: All staff, including shared services and external contractors, have a duty to report any "low-level concern"—defined as behavior that is inconsistent with the Staff Code of Conduct but does not meet the harm threshold—to the Headteacher immediately.

2.8 Staff Self-Reporting: The Trust encourages a culture of self-reporting, where staff can discuss inadvertent or "borderline" behavior without fear of immediate disciplinary action, provided the behavior was not intentional or malicious. During an employee's tenure of employment with Initio Learning Trust, they must disclose to their Headteacher / Line Manager any instances of personal social services involvement, which in turn should be consulted with the Trust's Safeguarding Officer.

2.9 Conflict of Interest: If an allegation or concern relates to the Headteacher, it must be reported directly to the CEO. If it relates to the CEO, it must be reported to the Chair of the Trust Board.

3 Part One: Managing allegations made against members of staff, supply staff, contractors, trainee teachers or volunteers

3.1 This part of the policy will be followed when managing such allegations and may be adapted to each case as required. Whilst it will be used in all cases, Part 4 of Keeping Children Safe in Education requires that it is followed in any case where it is suspected or alleged that a member of staff, including agency staff, or a volunteer has:

- behaved in a way that has harmed a child or may have harmed a child (see our child protection and safeguarding policy for what we mean by 'harm');
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children.
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

3.2 The fourth bullet point above includes behaviour that may have happened outside of the Trust that might make an individual unsuitable to work with children. This is known as transferable risk.

3.3 This policy will be used alongside our complaints procedure, child protection and safeguarding policy, code of conduct, disciplinary, behaviour and whistleblowing policy.

4 Reporting an allegation

4.1 The safety and welfare of our pupils is of paramount importance and so all staff must report their allegations immediately.

4.2 The person to whom an allegation or concern is first reported should treat the matter seriously and keep an open mind. They should not investigate or ask leading questions, make assumptions or offer alternative explanations, or promise confidentiality (though they can give assurance that information will only be shared on a 'need to know' basis). They should make a written record of the information (where possible in the person's own words), on the schools Staff Safeguarding software, and immediately report the matter to the headteacher.

4.3 Allegations made against a member of staff, supply staff, contractors, trainee teachers or a volunteer should be reported to the Headteacher or Director of Education (as appropriate). Allegations involving the Headteacher should be reported to the CEO.

4.3 When an allegation is made the Headteacher/Director of Education will consider two aspects:

- looking after the welfare of the child; and
- investigating and supporting the person subject to the allegation

4.4 In each case, the Headteacher/Director of Education will:

- apply common sense and judgement; deal with allegations quickly, fairly and consistently; and
- provide effective protection for the child and support the person subject to the allegation.

4.5 Before contacting the LADO, the Headteacher/Director of Education will conduct basic enquiries to establish the facts to help determine whether there is any foundation to the allegation. However, the employer must inform the local authority designated officer (LADO) within 1 working day when an allegation is made and before any further investigation takes place. Referrals should not be delayed to gather information. The Headteacher/Director of Education will contact the LADO and an initial discussion will take place to consider the nature, content and context of the allegation and agree a course of action. The School's Designated Safeguarding Lead or Trust Safeguarding Officer may also be involved in this discussion to decide:

- no further action is required; or
- more information is required to determine a course of action; or
- a strategy discussion should take place; or
- Police or social care should be involved.

4.6 The school will share relevant information with the LADO about the allegation, the child, and the person against whom the allegation has been made. If it is decided that a strategy discussion should take place, then the school will always attend that meeting. Representatives from other agencies such as health, social care and police may also be invited to the meeting.

4.7 If a member of staff believes that a reported allegation or concern is not being dealt with appropriately by their organisation, they should report the matter to the LADO directly.

Dorset LADO - [LADO referral](#)

BCP LADO - [LADO contact details](#)

5 Investigating an allegation

5.1 An investigation into the allegation should normally be undertaken by a senior member of staff at our Trust. Where no suitable staff are available or the nature or complexity of the allegation requires it, the Trust may appoint an independent investigator.

5.2 When determining the outcome of an investigation Part 4 of Keeping Children Safe in Education states that the following definitions should be used when determining the outcome of the investigation:

- **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 to the person subject to the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

5.3 In no circumstances would the Trust cease to use a member of supply staff, contractor or trainee teacher due to safeguarding concerns without finding out the facts and liaising with the LADO to determine a suitable outcome. Whilst the Trust is not the employer of supply teachers, contractors or trainee teachers we will ensure allegations are dealt with properly and involve the supply staff, contractor or trainee teachers employer in the process.

6 Supporting those involved

6.1 Parents/carers of the child(ren) involved

6.1.1 Parents or carers of the child involved will be told about the allegation if they do not already know of it. Where a strategy discussion is required, or police or children's social care need to be involved, the school will not tell the parents or carers until it has been agreed with those agencies what information can be shared.

6.1.2 The school will maintain regular communication with parents or carers regarding the progress of any investigation involving a member of staff. To comply with employment law and data protection obligations, the specific details of disciplinary deliberations, the evidence reviewed, and the specific internal sanctions applied will remain strictly confidential. While the school cannot disclose the specific disciplinary actions taken against an individual, we will confirm that the matter has been addressed in accordance with our internal policies. Provided there is no ongoing criminal prosecution or legal restriction, parents or carers will be assured of the safety measures in place once the outcome of the investigation is complete. This ensures a balance between parental transparency and the legal privacy rights of our employees.

6.2 The member of staff, supply staff, contractors, trainee teachers or volunteer

6.2.1 The Trust has a duty of care to its employees and will act to minimise the stress inherent in the investigation process.

6.2.2 The person who is the subject of the allegation will be informed as soon as possible, usually after the initial discussion with the LADO. The person will be advised of the likely course of action

unless the police or children's social care raise an objection. In those circumstances the school will work with children's social care and the police to agree what information can be disclosed and when.

6.2.3 The Headteacher/Director of Education (as appropriate) will appoint a named representative to keep the person who is the subject of the allegation informed of the progress of the case and up to date on other school related matters. The Headteacher/Director of Education (as appropriate) will also consider what other support may be appropriate for the individual. The school will advise the individual to contact their trade union representative or a colleague for support. They may also be given access to support services provided by the Trust.

6.2.4

6.2.5 Where an allegation is made against a member of supply staff, contractor or trainee teacher the agency/employer should provide additional support to that individual

7 Suspension

7.1 Suspension is not an automatic response to an allegation being made. The school will only suspend a member of staff following careful consideration in collaboration with Trust Safeguarding Officer and People Business Partner, using the Trust's suspension checklist to assess whether there is cause to suspect the child or other children is/are at risk of harm, or if the case is so serious that it might warrant gross misconduct and be grounds for summary dismissal. In many cases, it may be reasonably possible for alternative arrangements to be made so that the individual can continue working.

Please refer to the Trust's Disciplinary Policy if an allegation of misconduct or gross misconduct is suspected.

7.2 The Trust makes the decision whether or not to suspend a member of staff. Where the police or children's social care are involved in the case, the school will listen to their views regarding suspension.

7.3 The Trust has no authority or power to suspend a member of supply staff, contractor or trainee teacher where an allegation is made against them. Instead, the trust immediately will cease to use the services of that individual.

7.4 Where the member of staff is suspended, they will receive written confirmation within one working day and will be informed of the reason for the suspension.

7.5 After the suspension, if it is decided that the employee can return to the school, risk assessed measures will be put in place to support their return to work conducted by the school's Headteacher/Director of Education, supported by the Trust's Safeguarding Officer. Examples of this could include and are not limited to: a phased return or offering another member of staff as a support system.

7.6 The school will not prevent social contact with work colleagues and friends unless there is evidence to suggest such contact may prejudice the gathering of evidence.

8 Resignation

8.1 If the individual resigns or the supply staff member, contractor, trainee teacher or volunteer ceases to provide their service, the investigation into the allegation will be completed. The individual will be given the opportunity to engage with the investigation.

8.2 Settlement agreements must not be used (i.e. where a member of staff agrees to resign, provided that disciplinary action is not taken and that a future reference is agreed). A settlement agreement which prevents the employer from making a DBS referral when the criteria are met for so doing would likely result in a criminal offence being committed for failure to comply with the duty to refer.

9 Action on conclusion of the case

9.1 If the allegation is substantiated and the employee is dismissed or resigns, or we cease to use the supply staff member's, contractor's, trainee teacher or volunteer's services as a result of the allegation, the school will consider whether a referral to the DBS and/or to the TRA is required. If a referral is to be made, it should be submitted within 1 month of the allegation being substantiated.

9.2 Where an allegation is found to be false, the school may refer the case to social services to determine whether the child needs support and/or to understand if there is a safeguarding reason why the false allegation was made.

9.3 The trust's behaviour policy sets out the action that may be taken against pupils who are found to have made malicious allegations.

9.4 Where an allegation is made against a member of supply staff, contractor or trainee teacher the outcome of the investigation will be shared with the agency/employer and the LADO.

10 Post incident review

10.1 It is good safeguarding practice for schools to review incidents upon their conclusion so they can learn from them and continue to improve standards of safeguarding. Where allegations are made against staff, supply staff, contractors, trainee teachers or volunteers, the school may carry out a review at the conclusion of the case.

11 Timescales

11.1 Investigations into allegations against staff, including agency staff, contractors, trainee teachers or volunteers will be concluded as quickly and efficiently as reasonably possible to ensure that any risks to the child or other children and stress to the individual is minimised as far as possible. To assist with this, the trust aims to follow these target timescales:

- If formal disciplinary action is not required, appropriate action should be instituted within 3 working days.
- The investigating officer aims to conclude investigations within 10 working days. Where circumstances prevent this deadline from being met, the investigating officer will provide an update and an estimated date of completion to those involved.
- On receipt of the report, the employer should decide, within 2 working days, whether a disciplinary hearing is needed.
- If a disciplinary hearing is required, it should be held within 15 working days

12 Record keeping

12.1 Allegations found to be false or malicious will be removed from the employment record of the individual. For all other allegations, a clear and comprehensive summary of the allegation, how it was followed up and resolved, a note of actions taken and decisions reached will be retained on the staff safeguarding software. A copy will also be provided to the individual. A declaration on whether the information will be referred to in any future reference will be noted in the individual's staff e-file.

12.2 The record will be kept, including for people who leave the trust, at least until the person reaches normal pension age or for 10 years if that will be longer, from the date of the allegation as per our Retention Policy.

12.3 Details of any allegation made by a pupil will be kept in the confidential section of their record.

13 Confidentiality

13.1 The school will make every effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated.

13.2 The Education Act 2002 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher in a school who has been accused by, or on behalf of, a pupil from the same school. This applies to parents and carers as well as the press.

14 Non-recent allegations

14.1 Where an adult makes an allegation to the trust that they were abused as a child, that adult will be advised to report the allegation to the police.

14.2 Non-recent allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations.

Allegations against a person who is no longer employed at the school, should be referred to the LADO and/or the police. As a former employer there is an obligation that the school ensure allegations are dealt with appropriately and liaison and information sharing with relevant parties and agencies takes place.

15 Part Two: Managing low level concerns

15.1 This part of the policy will be followed when dealing with low level concerns raised in relation to members of staff, including supply staff, contractors, trainee teachers or volunteers and may be adapted to each case as required. It will be used alongside the trust complaints procedure, child protection and safeguarding policy, code of conduct, disciplinary procedure and whistleblowing policy.

15.2 The trust promotes a culture in which all concerns about all adults working in or on behalf of the trust (including supply teachers, contractors, trainee teachers and volunteers) are addressed appropriately.

15.3 This part of the policy is designed to:

- promote and support a culture of openness and trust where staff are clear about the behaviours expected of themselves and their colleagues
- ensure staff are comfortable to raise low-level concerns; and
- provide for efficient and proportionate handling of those concerns

16 Recognising low level concerns

16.1 This policy will be used to manage 'low-level' concerns, defined in Part 4 of Keeping Children Safe in Education as any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

16.1.1 is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. This includes a failure to inform the Headteacher/Director of Education of any cautions, convictions, criminal charges, or relevant orders accrued during employment. It also includes a failure to disclose any relationships or associations (in the real world or online) in their personal lives that may impact the trust's ability to safeguard pupils, compromise their position of trust, or bring the employer into disrepute does not meet the harm threshold or is otherwise not considered serious enough to consider a referral to the Local Authority Designated Officer (LADO).

16.2 Examples of such behaviour could include, but is not limited to:

- Any behaviours that are contradictory to the school's code of conduct including inappropriate conduct outside of work.
- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or using inappropriate sexualised, intimidating or offensive language.
- engaging in unapproved social contact with pupils or their parents outside of the workplace;
- giving or receiving personal gifts outside of an agreed reward system;
- failing to maintain professional boundaries regarding online communication, such as interacting with pupils on personal social media or giving out personal contact details;
- transporting pupils in private vehicles outside of normal working duties without prior management agreement; or initiating any form of secretive physical contact, or physical contact that is not in response to a child's needs.
- Making or encouraging others to make inappropriate remarks to or about a pupil.
- Using inappropriate language, such as swearing, racist, homophobic or gender bias terms in the presence of pupils.
- Discussing personal relationships in the presence of pupils.
- Making unprofessional comments that scapegoat, demean, discriminate, or humiliate others.

17 Reporting low level concerns

17.1 For our culture of openness and trust to prevail, all staff should share any low level concerns they have. Serious Case Reviews and Safeguarding Practice Reviews have often evidenced how low level concerns felt and/or expressed by staff relating to individuals who were later found to have abused children at a school were not recorded. When they are not recorded, they cannot be reviewed or studied for patterns of behaviour.

17.2 To minimise and hopefully eradicate the risk of those opportunities being missed, it is critical that staff understand their role in identifying and reporting low level concerns.

17.3 All staff are encouraged to immediately report low level safeguarding concerns as defined in this policy so that the identified behaviours can be investigated and managed appropriately.

17.4 All low level concerns in relation to staff, supply staff, contractors, trainee teachers or volunteers should be reported immediately to the Headteacher and recorded on the Staff Safeguarding Software. Concerns about the headteacher should be reported to the Director of Education/CEO.

17.5 The procedure for reporting low level concerns is consistent with that for reporting allegations of abuse as set out in part one of this policy. Staff do not need to determine whether their concern meets the threshold set out in part one of this policy or is a low level concern. The Headteacher/Director of Education(as appropriate) will make this determination once the staff member has reported the issue.

17.6 Self-reporting is also encouraged. Staff should work, and be seen to work, in an open and transparent way, which includes self-reporting if their own conduct or behaviour falls short of guiding principles, or if they find themselves in a situation which could be misinterpreted, this should be recorded on the Staff Safeguarding software.

17.7 If a staff member feels unable to raise an issue internally with the Trust, or feels that their genuine concerns are not being addressed, they should utilise the trust's whistleblowing procedures. Alternatively, staff can contact the NSPCC Whistleblowing Advice Line on 0800 028 0285 or email help@nspcc.org.uk as an alternative confidential route.

When contacting the NSPCC Whistleblowing Advice Line, callers will be directed to a child protection specialist who will conduct an initial assessment of the concerns and outline the whistleblowing process. Whether contact is made via phone or email, the specialist will gather all necessary information to determine the appropriate next steps. The NSPCC supports the whistleblower's right to remain anonymous; however, should contact details be provided, these will not be shared with external agencies without prior consent, unless required by law. The specialist will also provide guidance on available legal and employment protections, including the role of trade unions. Where a referral is necessary—specifically in instances where a child's identity is known or a child is at risk of immediate harm—the NSPCC will promptly notify social services and, if required, the local police to ensure immediate action is taken.

18 Responding to low-level concerns

18.1 The Headteacher/Director of Education (as appropriate) will review the concern to confirm that it is not a more serious issue that should be dealt with under part one of this policy. An issue reported as a low level concern would be dealt under part one of this policy where it meets the threshold of harm as set out in part one or there is a pattern of low level concerns expressed about the individual or wider staff practices generally. If necessary, the Headteacher/Director of Education (as appropriate) will discuss the concern with the LADO to determine whether it should be dealt with under part one of this policy.

18.2 The Headteacher/Director of Education (as appropriate) will discuss the concern with the individual who raised it and will investigate it as appropriate.

18.3 Most low-level concerns are likely to be minor and can be dealt with by means of management support or additional training. Where necessary, action may be taken in accordance with the trust code of conduct and disciplinary procedure.

18.4 If the concern has been raised via a third party, the Headteacher/Director of Education (as appropriate) will collect evidence by speaking directly to the person who raised the concern (unless it has been raised anonymously), the individual involved and any witnesses.

18.5 Where a low level concern is raised about a member of supply staff, trainee teacher, volunteer or contractor, the concern will be shared with the supply agency/employer so they can take appropriate steps in accordance with their own policies and statutory guidance.

19 Recording low-level concerns / Quality Assurance

19.1 All low-level concerns will be recorded in writing on the Staff Safeguarding Software, the record should include details of the concern including names of witnesses if appropriate, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted. The records will be kept confidential and held securely in accordance with the Data

Protection Act 2018 and the UK General Data Protection Regulation. The record of the low-level concern will be kept at least until the person leaves our trust.

19.2 Records of low-level concerns will be reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified. If patterns are identified, the school will decide on an appropriate course of action and will refer the matter to the LADO where the behaviour moves from a concern to meeting the threshold set out in the first part of this policy.

Trust Safeguarding Officer will quality assure the Low-Level Concerns logs across the Trust to identify any systemic issues or training gaps that will be completed as part of the programme quality assurance of safeguarding across the Trust.

20 References

20.1 When providing references the Trust will ensure that they only provide the facts of any substantiated safeguarding concerns or allegations that meet the harm threshold. Information will not include information about unsubstantiated, unfounded, false or malicious concerns or allegations.

20.2 Low level concerns should not be included in references unless they relate to issues which would normally be included in a reference such as misconduct or poor performance. A low level concern which relates exclusively to safeguarding should not be included in an employment reference.

21. Policy Review

This policy is reviewed every 3 years by the trust. We will monitor the application and outcomes of this policy to ensure it is working effectively.

22. Appendices:

- Guidance Links x2 below
- Managing Allegations and low level concerns risk management plan
- Trust Policies to review alongside: Code of Conduct, Disciplinary Policy, Equality, Diversity & inclusion, Safeguarding Policy, Behaviour Policy

 Appendix: Quick Reference Guidance for Headteachers and Directors of Education

 Appendix: Quick Reference Staff Guide: Reporting a Safeguarding Concern About an Adult

 Managing Allegations and low level concerns Risk Management plan

Appendix

Equality Impact Assessment/ Analysis (EIA)

Step 1: Scoping and Identifying the Aims

School/Service	People Department
Title of Change:	Managing allegations and low level concerns Policy
What are you completing this EIA for?	Policy
Is this a new or existing activity or change?	Existing
What are the main aims / objectives of the changes?	Ensure policy is still relevant and the most current legislation is being adhered to.
What is the context for this EIA? e.g., policy, practice, service, curriculum proposal or project?	
Why is the activity/change needed? E.g., The policy or practice affect different "protected groups" differently?, enhancing of services, education	
Name/s of people and Date undertaking analysis:	Shani Davies, Director People & Culture / Kelly Overhill Trust Safeguarding Lead
Who will be affected by this activity/change? eg pupils/students, service users, employees, wider community	All Staff in scope of this policy
Does it relate to an area with known inequalities? E.g., access to service for disabled people, pupils/students, vulnerable pupils/students, SEND, racist bullying etc.	
EIA Schedule When will the EIA be reviewed?	

Step 2: Assessing the Impact

Detail any positive or negative impacts of this document /policy on pupils/students and staff in the box below. If there is no impact, please select "not applicable"

Protected Characteristic	Positive Impact(s)	Negative Impact(s)	NA	Action to address negative impact: (e.g. adjustment to the policy)
Sex consider issues for: men and women, non-binary.	Y			
Gender reassignment E.g. privacy of data and harassment	Y			
Disability e.g., attitudes, physical, social barriers, visible and non-immediately visible disabilities, neurodivergence, learning disability	Y			
Age e.g., consider all ages but there may be some issues that relate for example to older people/younger people	Y			
Sexual Orientation	Y			

consider heterosexual as well as lesbian, gay and bisexual (and other sexual orientations)				
Pregnancy and maternity e.g., childcare, working arrangements, part time working	Y			
Marriage and civil partnership	Y			
Religion or belief consider religions, beliefs, or no belief	Y			
Ethnicity / Race e.g., language barriers, different ethnic groups/nationalities	Y			
Socio-economic factors e.g., resident status – socio economic/low-income groups, migrants, carers, impacts on children and families (please state)	Y			
Mental health e.g. short term, long term, acute, fluctuating mental health conditions, impacts	Y			

If you answer yes to any of the following, you MUST complete the evidence column explaining what information you have considered which has led you to reach this decision.

Assessment Questions	Yes / No	Please document evidence / any mitigations
In consideration of your document development, did you consult with others, for example, external organisations, employees, pupils/students, carers or community groups?	Yes	Staff and Trade Unions
Have you taken into consideration any regulations, professional standards?	Yes	KCSIE 25/26, Equality Act 2010, Public sector equality duty section 149, working together to safeguard children, data protection act 2018, UK GDPR, Teachers Standard, the education act 2022

Step 3: Review, Risk and Action Plans

Low – No major change	Medium - Adjust the policy	High – Stop and remove	
The activity is robust and there is no potential for discrimination, and you have taken all appropriate opportunities to advance and foster relations between groups.	This involves taking steps to remove barriers or to better advance equality. It can mean introducing measures to mitigate the potential effect.	If there are adverse effects that are not justified and cannot be mitigated, you will want to consider stopping the policy/project altogether. If the activity shows unlawful discrimination, it must be removed or changed.	
How would you rate the overall level of impact / risk to the school / service / Trust if no action was taken?	Low x ☐	Medium ☐	High ☐
What action needs to be taken to reduce or eliminate the negative impact?	N/A		
Who will be responsible for monitoring and regular review of the document / policy / change?	Director People & Culture		

Step 4: Authorisation and sign off

I am satisfied that all available evidence has been accurately assessed for any potential impact on pupils/students and employees with protected characteristics in the scope of this project / change / policy / procedure / practice / activity. Mitigation, where appropriate has been identified and dealt with accordingly.

Equality Assessor:

Shani Davies

Date:

22/4/26

