

Managing Allegations, Low-Level Concerns and LADO Procedure



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REPORT IMMEDIATELY

Any concern about an adult working or volunteering with children must be reported immediately to the Nursery Manager / setting Designated Safeguarding Lead (DSL) or the Deputy Manager / Deputy Designated Safeguarding Lead (DDSL). The DSL or DDSL must inform the provider-level Designated Safeguarding Officer (DSO) without delay. If a usual recipient is implicated, unavailable or conflicted, use the alternative route in section 4. Do not investigate, interview witnesses, confront the adult or promise confidentiality before safeguarding and LADO advice is obtained.

1. Purpose and scope

This procedure explains how Dottie Tots manages concerns or allegations about employees, managers, directors, agency workers, volunteers, students, apprentices, contractors and any person working for or on behalf of a Hampshire setting. It applies to conduct at work and conduct elsewhere, including online, where suitability or risk to children may be affected.

2. Hampshire allegation threshold

The Hampshire LADO procedure is followed where an adult working with children has allegedly:

- 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.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The fourth criterion can include transferable risk arising from behaviour outside work. The test is whether the information may indicate unsuitability; it is not limited to a proven offence or an incident on nursery premises.

3. Initial classification

Matter	Required route	Timing / owner
Possible harm-threshold allegation	Protect the child; report to the setting DSL or DDSL, or use the alternative route if implicated; submit a Hampshire LADO referral or seek LADO advice;	Immediately; setting DSL or DDSL. LADO within one working day. DSO informed unless implicated.

consider police / children's social care; assess Ofsted notification separately.

Threshold uncertain	Protect the child; submit the Hampshire LADO Enquiry Form or use the current published LADO enquiry route. Do not downgrade internally without appropriate consideration.	Without delay; setting DSL/DDSL, DSO or alternative route according to section 4.
Low-level concern	Record and review under this procedure; check patterns and wider information; consult LADO if doubt or cumulative information may meet threshold.	Promptly; setting DSL or DDSL, with DSO oversight unless implicated.
Quality-of-practice or conduct matter	Manage under supervision, capability, disciplinary or complaints procedure while continuing to assess safeguarding implications.	Promptly; line manager.
Concern about a child but not about a worker	Use the Child Protection and Safeguarding Policy and Hampshire children's social care route.	Immediate according to risk; setting DSL or DDSL.

4. Reporting routes

For this procedure, each Nursery Manager is the setting Designated Safeguarding Lead (DSL) and each Deputy Manager is the Deputy Designated Safeguarding Lead (DDSL). The DDSL has authority to receive concerns, protect children, make or support referrals and bypass an implicated or unavailable DSL. The provider-level Designated Safeguarding Officer (DSO) is not interchangeable with either setting role.

The DSO is also the Ofsted Nominated Person and a Company Director. The DSO has complete provider-level oversight of safeguarding concerns except where personally implicated or subject to an actual or perceived conflict. DSO oversight or LADO coordination does not complete the separate Ofsted notification duty.

The Head of Operations is the Alternative Senior Safeguarding Contact and operational case coordinator. The other Company Director provides independent provider-level decision-making where required. The controlled safeguarding contact list must name the current post-holders and be accessible whenever either setting operates.

- Concern about a staff member, volunteer, agency worker, student, apprentice or contractor: report immediately to the setting DSL or DDSL. The receiving lead protects the child, records the basic facts and informs the DSO without delay. The DSO retains provider oversight. If the DSO is implicated or conflicted, inform the Head of Operations and the unimplicated Company Director instead.
- Concern about the Nursery Manager / setting DSL: do not report through or seek permission from that person. Report to the DDSL, DSO and Head of Operations. The DDSL manages immediate setting safety; the Head of Operations coordinates operational actions; and the DSO retains provider oversight and ensures Hampshire LADO and separate Ofsted duties are addressed.
- Concern about the DDSL: report to the DSL, DSO and Head of Operations. Concern involving both the DSL and DDSL: report directly to the DSO and Head of Operations. Implicated setting leads take no part in classification, investigation or decisions about the concern.
- Concern about the Head of Operations: report directly to the DSO, who may use the other Company Director for independent scrutiny. Concern about the other Company Director: report to the DSO and Head of Operations. The DSO retains oversight unless personally implicated or conflicted.

- Concern about the DSO / Ofsted Nominated Person / Company Director: report directly to the Head of Operations and the other, unimplicated Company Director, and contact Hampshire LADO directly where the criteria may be met or are uncertain. Oversight transfers automatically to the unimplicated Company Director, supported operationally by the Head of Operations. The implicated DSO must not classify, investigate, access restricted case information beyond what is legally necessary, make employment or notification decisions, or control the response. If both directors are implicated, unavailable or conflicted, the Head of Operations contacts LADO and other agencies directly. Immediate danger, suspected crime or internal failure to act must be reported directly to 999, children's social care, police, LADO, Ofsted or the NSPCC as appropriate without internal permission.

5. Immediate actions by the receiving manager

1. Ensure the immediate safety, medical care and supervision of the child or children. Address corresponding child-welfare concerns without delay.
2. Listen and establish the basic facts necessary to identify the allegation. Do not conduct an investigation or ask leading or repeated questions.
3. Make a contemporaneous factual record, including the source, exact words, date, time, people present, visible presentation and immediate action.
4. Secure relevant records, CCTV, device or access information without searching personal devices or alerting people unnecessarily. Preserve evidence and chronology.
5. Inform the DSO immediately. If the DSO is implicated, unavailable or conflicted, inform the Head of Operations and the other, unimplicated Company Director. Where any internal route could cause delay or is unsafe, contact Hampshire LADO, police or children's social care directly as appropriate.
6. Contact Hampshire LADO using the live enquiry or notification route. All allegations meeting or potentially meeting the criteria must be brought to LADO attention within one working day.
7. Agree with LADO, police or children's social care what can be said to the child, parents, adult and workforce and who will take each action.
8. Open a restricted allegation record and a separate child safeguarding record where required.
9. Assess Ofsted notification separately under DT-PR-01.1B. LADO contact does not notify Ofsted. If the DSO / Ofsted Nominated Person is implicated or conflicted, the other Company Director assumes provider accountability and, supported by the Head of Operations, ensures an authorised, unimplicated person submits the notification as soon as reasonably practicable and in any event within 14 days.

6. Hampshire LADO contact and referral

USE LIVE HAMPSHIRE FORMS

Use the Hampshire LADO Enquiry Form when advice is required about threshold. Use the Hampshire LADO Notification Form for a referral and submit it by the method shown on the live Hampshire page. Do not rely on an individual officer's email address or an historic printed telephone number.

The manager records the date and time information was received, date and time of LADO contact, form used, advice, decision, named action owners and review date. If the LADO route is temporarily unavailable and a child may be at risk, contact police or children's social care as appropriate and continue trying the published route.

7. Information provided to LADO

- Identity and role of the adult, employer and setting; relationship to the child and whether they work elsewhere with children.
- Child's identity, age and immediate welfare, with necessary sibling or other-child information.
- Factual account, date, location, source and context of the concern; known witnesses and relevant records.
- Immediate safeguarding measures and whether police, children's social care, Ofsted, agency or regulator has been contacted.
- Relevant previous concerns or patterns, clearly distinguishing substantiated facts from untested information.

- Any conflict, relationship, health, communication or equality factor relevant to a fair and safe process.

8. Interim safeguarding measures

Interim action is precautionary, proportionate and kept under review. It is not a finding of guilt. The decision considers risk to children, integrity of evidence, views of LADO or police, staffing safety, the adult's rights and whether effective alternatives exist.

- Increased supervision, removal from particular duties, no lone working, no intimate care, no access to systems or particular children.
- Temporary redeployment, work at another location or authorised leave where this controls risk.
- Suspension where necessary because the allegation may justify dismissal for gross misconduct, there is reason to believe a child may be at risk, or investigation cannot be protected through a reasonable alternative.
- For agency, contractor or placement staff, removal from Dottie Tots duties and immediate liaison with their employer or provider, while Dottie Tots retains responsibility for safeguarding and LADO action.

SUSPENSION DECISION

Suspension is not automatic and is not a sanction. It is authorised at provider level by the DSO with the other, unimplicated Company Director after safeguarding and employment advice. If the DSO is implicated or conflicted, the other Company Director leads the decision, supported operationally by the Head of Operations. Reasons, alternatives considered, communication, support and review dates must be recorded.

9. Strategy discussion and investigation

- Dottie Tots cooperates with the LADO allegations management process, police and children's social care and does not begin an internal investigation that could prejudice external enquiries.
- An internal investigation begins only when agreed appropriate and has clear terms of reference, an impartial investigator, evidence plan and timescale.
- The child is not repeatedly interviewed. The child's welfare and support are reviewed throughout.
- The adult is given a named contact and appropriate information, subject to safeguarding and investigation restrictions, and is reminded not to contact the child or witnesses about the matter.
- Parents are informed as soon as appropriate unless an agency advises that this could place a child at risk or prejudice enquiries.

10. Low-level concerns

A low-level concern is behaviour towards a child or conduct connected with the role which is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside work, but which does not on the information available meet the harm threshold. "Low-level" does not mean insignificant.

- Examples may include over-familiarity, favouritism, inappropriate one-to-one situations, humiliating language, unnecessary physical contact, personal-device use or boundary-blurring communication.
- The manager records the concern, source, context, adult's response, decision, action and rationale; the reporter may remain confidential where reasonably possible but anonymity cannot be guaranteed.
- The adult normally has an opportunity to respond. Any employment action is fair, proportionate and separate from the safeguarding classification.
- Records are reviewed for patterns involving the adult, child, room, shift, manager or organisational culture. Multiple low-level concerns may collectively meet the LADO threshold.
- Self-referral is encouraged and may demonstrate insight, but does not remove the need to assess and record the concern.
- If doubt develops at any stage, stop the low-level process and consult Hampshire LADO.

11. Outcomes

The final outcome uses the terminology agreed through the LADO process and is recorded with the evidence and rationale. Outcomes may include substantiated, malicious, false, unsubstantiated or unfounded. An unsubstantiated outcome means there is insufficient evidence to prove or disprove the allegation; it does not mean the allegation was false.

- Safeguarding controls, training, supervision, disciplinary or capability action are based on the evidence and risk, not solely the outcome label.
- The child and adult receive appropriate outcome information within confidentiality constraints.
- Dottie Tots records learning, policy or practice changes and reviews whether other children or settings may be affected.
- The Ofsted notification is updated with action taken where required.

12. Resignations, compromise agreements and referrals

An allegation process continues so far as possible if the adult resigns, leaves, refuses to cooperate or their placement ends. Dottie Tots does not use a settlement or compromise agreement to prevent safeguarding investigation, referral or lawful information sharing.

- A DBS referral is made where the statutory conditions are met, including where a person is removed from regulated activity because they harmed or posed a risk of harm to a child, or would have been removed had they not left.
- Police, professional regulators, training providers, agencies and other employers are informed where there is a lawful safeguarding requirement or need.
- References include factual substantiated safeguarding information meeting the harm threshold and do not include allegations found to be false, unfounded, unsubstantiated or malicious, in accordance with current requirements.

13. Record keeping, confidentiality and retention

- The child record, allegation case record, low-level concern record and employment record are related but not merged indiscriminately.
- Records show facts, decisions, advice, interim action, investigation, outcome, referrals, notifications, support and learning.
- Access is restricted to authorised roles. Information is shared only where necessary and lawful.
- The adult allegation record is retained in accordance with current safeguarding and employment requirements and Dottie Tots' retention schedule. Records must not be destroyed simply because the allegation was unsubstantiated.
- Malicious or false findings are recorded accurately and not confused with an allegation that could not be substantiated.

14. Responsibilities and audit

- Nursery Manager / setting DSL and Deputy Manager / DDSL: immediate safety, basic fact recording, preservation of evidence, child safeguarding action and records, prompt escalation to the DSO or alternative route, and local implementation. The DDSL acts when the DSL is absent or implicated.
- DSO / Ofsted Nominated Person / Company Director: complete provider-level safeguarding oversight, Hampshire LADO liaison, case monitoring and assurance that the Ofsted notification duty is assessed separately, except where personally implicated or conflicted.
- Head of Operations: Alternative Senior Safeguarding Contact and operational case coordinator; receives concerns about setting leads or the DSO, secures immediate action and records, and supports external liaison and implementation without overriding statutory safeguarding decisions.
- Other Company Director: independent provider decision-maker when the DSO is implicated or conflicted; assumes oversight, authorises proportionate interim employment action and assures Ofsted, DBS and other referrals. Both directors must prevent any person from controlling a concern about themselves.
- Leadership and Management Team: audits timeliness, threshold decisions, low-level patterns, reviews and completed actions.

15. Related documents

- (Hampshire) Child Protection and Safeguarding Policy - DT-P-01.1.
- Ofsted Notifications and Significant Events Procedure - DT-PR-01.1B.
- Staff Suitability and Continuing Disclosure Policy - DT-P-02.1.
- Whistleblowing Policy; Staff Code of Conduct; Disciplinary and Capability Procedures; Data Protection and Retention documents.

16. Sources and live routes

- **Hampshire allegations against people in the children's workforce:** <https://www.hants.gov.uk/socialcareandhealth/childrenandfamilies/safeguardingchildren/allegations>
- **HIPS allegations procedure:** <https://hipsprocedures.org.uk/home/multi-agency-safeguarding-arrangements-and-organisational-responsibilities/adults-who-pose-a-risk-of-harm>
- **Working Together to Safeguard Children 2026:** <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- **EYFS statutory framework effective 1 September 2026:** <https://www.gov.uk/government/publications/early-years-foundation-stage-framework--2>

17. Review

This procedure is reviewed annually and sooner following a statutory, Working Together, Hampshire LADO or HIPS process change, a case review, an audit finding or evidence that the procedure did not protect a child or support a fair process.

Appendix 1 - Staff acknowledgement

I confirm that I have read and understood this document, know how it applies to my role and will follow it. I understand that concerns or uncertainty must be raised immediately with the setting DSL or DDSL, or through the DSO, Head of Operations, unimplicated Company Director or direct external route where a usual recipient is implicated, unavailable, conflicted or does not act.

Name	Role	Signature	Date

Document: DT-PR-01.1A - Managing Allegations, Low-Level Concerns and LADO Procedure