

Karate & Dance Fed Ltd - 17150545

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Allegations & Low Level Concerns about Adults Policy

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1. Policy Statement

Karate & Dance Federation Ltd (KDF) is committed to maintaining an open safeguarding culture in which concerns about any adult working with or around children are recognised, reported, recorded and acted upon appropriately. No adult working for, volunteering with or providing services to KDF is exempt from scrutiny because of seniority, length of service, professional qualifications, personal relationships or previous good character.

KDF recognises that safeguarding concerns about adults exist on a spectrum. Some behaviour may indicate that a child has been harmed or that an adult may pose a risk of harm and therefore require immediate consultation with the Local Authority Designated Officer, children's social care or police. Other behaviour may not meet that threshold but may nevertheless indicate poor professional boundaries, inappropriate conduct or a pattern that could become more serious if left unaddressed.

KDF will therefore operate a culture in which all concerns about adults can be raised, including concerns that initially appear minor or amount only to a sense that something is not right. The term "low-level concern" does not mean that the behaviour is insignificant; it describes a concern that does not currently appear to meet the allegation or harm threshold.

This policy reflects KDF's values of Kindness, Diversity, Friendship and supports the KDF Promise: Every Student, Every Session, Every Time. Protecting children requires adults to remain professionally accountable to one another and for safeguarding concerns to be addressed before unsafe behaviour becomes normalised.

2. Purpose

The purpose of this policy is to establish a clear procedure for responding to allegations, safeguarding concerns and low-level concerns about adults who work with, volunteer with or otherwise have relevant access to children through KDF.

It explains the distinction between allegation thresholds and lower-level professional concerns, establishes reporting routes, describes when external safeguarding advice

should be sought and sets expectations for recording, confidentiality, suspension, disciplinary processes, referrals and organisational learning.

The policy is intended to protect children while also ensuring that adults who are the subject of concerns are treated fairly and that conclusions are not reached before appropriate safeguarding or investigative processes have taken place.

3. Scope

This policy applies to employees, directors, managers, coaches, assistant coaches, administrators, casual workers, volunteers, work-experience students aged eighteen or over, contractors, hirers and any other adult working with or on behalf of KDF where their conduct may affect children.

It also applies to concerns arising from conduct outside KDF where that behaviour may indicate that the individual is unsuitable to work with children. Safeguarding suitability cannot always be assessed solely by looking at behaviour that occurred during working hours.

Adults under eighteen working or volunteering within KDF remain children themselves for safeguarding purposes. Concerns about their behaviour should be managed with appropriate consideration of both child safeguarding and conduct procedures rather than treating them automatically as adult persons in positions of trust.

4. Legal and Safeguarding Framework

KDF will have regard to Working Together to Safeguard Children 2026, relevant provisions of the Children Acts, the Safeguarding Vulnerable Groups Act 2006, the Protection of Freedoms Act 2012, relevant criminal law and Warwickshire's local safeguarding arrangements concerning persons in positions of trust.

Working Together 2026 expects organisations working with children to maintain clear procedures for allegations against people who work with children and to distinguish allegations from concerns about practice or complaints.

KDF is not a school or college and therefore does not present Keeping Children Safe in Education as directly governing every aspect of KDF. However, KDF adopts its low-level concerns framework as recognised safeguarding good practice because it supports early identification of inappropriate behaviour and stronger professional boundaries. The current 2026 guidance reinforces that safeguarding concerns about staff, volunteers and contractors should be acted upon regardless of apparent size.

5. Position of Trust

For the purposes of local safeguarding arrangements, an adult working or volunteering with children may be treated as a person in a position of trust. This includes paid staff and volunteers and may extend to contractors or other adults according to their role and access to children.

Warwickshire identifies concerns about people in positions of trust as matters requiring LADO involvement where an adult has harmed or may have harmed a child, may have committed a criminal offence against or relating to a child, or behaved in a way indicating they may pose a risk of harm to children.

KDF will additionally have regard to the wider Working Together 2026 threshold concerning behaviour indicating that a person may not be suitable to work with children.

6. The Allegation or Harm Threshold

A concern should be considered under the allegation procedure where an adult working with children has behaved in a way that has harmed a child or may have harmed a child; may have committed a criminal offence against or relating to a child; behaved towards a child or children in a way indicating that they may pose a risk of harm; or behaved in a way indicating that they may not be suitable to work with children.

The final category is important because concerns about suitability may arise from behaviour outside KDF and may not involve a KDF student directly. Domestic abuse, serious violence, sexual offending, exploitation, extreme boundary violations or other conduct may reasonably call into question whether an adult should continue working with children.

Staff are not expected to determine conclusively whether the threshold is met before reporting. Where there is uncertainty, the concern should be escalated and appropriate LADO advice sought.

7. Meaning of a Low-Level Concern

A low-level concern is any concern about an adult's behaviour that is inconsistent with KDF's Staff Code of Conduct, Professional Boundaries & Relationships Policy or safeguarding expectations but does not currently appear to meet the allegation or harm threshold.

A low-level concern may arise from a single event, a pattern of behaviour, information provided by another person or simply a reasonable sense of unease about an adult's interaction with a child.

The terminology must never be interpreted to mean that KDF regards the behaviour as trivial. Low-level concerns are important precisely because recognising inappropriate behaviour early can prevent boundaries deteriorating further.

8. Examples of Low-Level Concerns

Examples may include becoming excessively familiar with particular children, showing persistent favouritism, creating unnecessary private communication, communicating with children through inappropriate personal accounts, unnecessary secluded one-to-one contact, taking unauthorised photographs, using humiliating language, inappropriate physical contact or repeatedly testing ordinary professional boundaries.

The context always matters. A behaviour that appears minor in isolation may become significantly more concerning when viewed alongside earlier incidents or information held by another organisation.

KDF will therefore record concerns sufficiently to enable patterns to be recognised rather than judging every event in complete isolation.

9. Self-Reporting

KDF encourages adults to report situations in which they believe their own conduct may have been misinterpreted, fallen below expected professional standards or placed them in an unexpectedly vulnerable situation.

Self-reporting is not automatically an admission of misconduct. It can demonstrate professional awareness and allows KDF to assess events transparently rather than allowing uncertainty or rumours to develop.

Examples may include accidentally being left alone with a child unexpectedly, receiving an inappropriate personal message from a student, accidental physical contact that could have been misinterpreted or unintentionally breaching a communication rule.

10. Culture of Reporting

Staff and volunteers must be able to report concerns about colleagues regardless of the individual's seniority or popularity.

An adult should never be discouraged from raising a concern because somebody says that the colleague is "trusted", "would never do that", has worked with children for many years or is personally close to management.

Safeguarding concerns are assessed according to behaviour and risk, not reputation.

11. Immediate Reporting Requirement

Any allegation or concern about an adult must be reported promptly to the Safeguarding Lead or another authorised senior person.

Where the concern appears capable of meeting the allegation threshold, it must be escalated immediately rather than waiting for a staff meeting, supervision session or ordinary management review.

Where a child is in immediate danger, police or emergency services must be contacted without waiting for internal permission.

12. Concerns About the Safeguarding Lead

Where the concern involves the Safeguarding Lead, it must be reported directly to the Chief Executive Officer or another authorised senior leader who is not implicated.

The Safeguarding Lead must not manage or determine the outcome of a concern concerning their own conduct.

External LADO advice should be sought where the allegation threshold may be met.

13. Concerns About the Chief Executive Officer

Where an allegation or low-level concern relates to the Chief Executive Officer, it must not be routed solely to the CEO for determination.

The person receiving the concern should report it to another appropriate senior or authorised person and seek independent safeguarding advice directly from Warwickshire's LADO where the allegation threshold may be met.

An organisational hierarchy must never result in the most senior person becoming effectively exempt from safeguarding oversight.

14. Concerns Involving Multiple Senior Leaders

Where several senior individuals are implicated, or where staff reasonably believe that internal reporting cannot take place safely or independently, they may contact the LADO, children's social care, police or another appropriate safeguarding authority directly.

KDF's Whistleblowing & Protected Disclosures Policy also applies.

No employee is required to pass a serious safeguarding allegation through an individual whom they reasonably believe may suppress, distort or mishandle the concern.

15. Warwickshire LADO

KDF will use the Warwickshire Local Authority Designated Officer arrangements for relevant allegations concerning adults working with children. Warwickshire currently

directs Position of Trust referrals to its LADO service and provides a referral process and advice route for concerns about adults working or volunteering with children.

KDF will seek LADO advice where the threshold may be met rather than conducting a substantive internal investigation first.

The role of KDF at the initial stage is to secure immediate safety, obtain basic factual information necessary to understand the concern and make the appropriate referral.

16. No Internal Investigation Before LADO Advice

Where an allegation may meet the harm threshold, KDF should not begin interviewing witnesses, repeatedly questioning the child, obtaining detailed statements from colleagues or confronting the adult before appropriate safeguarding advice has been obtained.

Premature investigation can contaminate evidence, influence witnesses or prejudice police, social-care or LADO processes.

KDF may establish basic facts necessary to determine the nature of the concern, but this must not become an informal internal investigation.

17. Responding to a Child's Disclosure About an Adult

Where a child makes a disclosure about an adult, the staff member receiving it should listen carefully, remain calm and take the child seriously.

The child should not be subjected to leading questions or asked repeatedly to recount the allegation. Staff should clarify only what is necessary to understand the immediate safeguarding concern.

The child must not be promised secrecy. They should be told that information will be shared with adults who can help keep them safe.

18. Recording a Disclosure

The person receiving the disclosure should record the child's words as accurately as possible and distinguish direct quotation from interpretation.

The record should contain the date, time, location, people present, what prompted the conversation where relevant and any immediate action taken.

The record should be made as soon as reasonably practicable and must not be rewritten later in a way that changes the substance of the original account.

19. Immediate Protective Action

Where a concern indicates immediate risk, KDF must take action to protect children pending external advice.

This may include preventing the adult from having direct contact with a particular child, arranging additional supervision, reallocating duties, restricting particular access or temporarily requiring the adult not to attend the premises.

Immediate protective action is precautionary and must not be presented as a finding that the allegation is true.

20. Suspension

Suspension is not an automatic response to an allegation and should not be used as a disciplinary sanction before facts have been established.

KDF will consider whether risk can be managed through temporary alternative duties, increased supervision, changes to access or another proportionate control. Where these measures cannot adequately protect children or an investigation, suspension may be appropriate.

Where possible, KDF should take account of LADO, police or social-care advice before determining the appropriate employment response.

21. Neutrality of Suspension

Where suspension occurs, it should normally be communicated as a neutral precautionary measure while safeguarding or employment matters are considered.

Staff and families should not be told or encouraged to believe that suspension demonstrates guilt.

Information shared internally should be limited to what is necessary for safe operation.

22. Police and Children's Social Care

Where allegations indicate possible criminal offending or immediate risk to a child, police or children's social care may need to be involved in addition to the LADO.

KDF will cooperate with external agencies and should not proceed with internal interviews or disciplinary stages where this would interfere with their work.

Internal processes may resume when external agencies confirm that doing so will not prejudice their enquiries.

23. Managing Low-Level Concerns

Where an initial assessment indicates that the concern does not meet the allegation threshold, KDF will consider the concern under its low-level concerns procedure.

The adult may be asked to provide an account and relevant information may be obtained from appropriate sources. The purpose is to understand the behaviour, determine whether professional expectations were breached and decide what response is proportionate.

Where subsequent information suggests that the harm threshold may in fact be met, the internal low-level process must stop and LADO advice should be sought.

24. Determining the Response to a Low-Level Concern

A low-level concern may require no further action where the behaviour was appropriate and the concern arose from misunderstanding. Alternatively, it may require advice,

clarification of boundaries, reflective supervision, additional training, formal management guidance or action under disciplinary procedures.

KDF should consider the adult's explanation, the circumstances, the impact on the child, previous concerns and whether the behaviour appears accidental, thoughtless, inappropriate or deliberate.

The response should address both individual behaviour and any organisational system that contributed to the situation.

25. Patterns of Low-Level Concerns

Repeated low-level concerns involving the same adult must be reviewed collectively. Several apparently minor incidents may establish a pattern of boundary testing, favouritism, secrecy or inappropriate conduct that creates a materially different safeguarding picture.

KDF must therefore avoid deleting or disregarding earlier concerns merely because no formal action was required at the time.

Where a pattern begins to suggest risk of harm or unsuitability to work with children, the matter should be discussed with the LADO.

26. Concerns Arising Outside Work

Conduct outside KDF may be relevant where it raises questions about an adult's suitability to work with children.

KDF will not automatically investigate employees' private lives, but information involving violence, domestic abuse, sexual offending, exploitation, serious criminal conduct, abuse of another vulnerable person or other behaviour inconsistent with child safeguarding may require review.

Working Together 2026 expressly recognises concerns where behaviour may indicate that a person is unsuitable to work with children.

27. Transferable Risk

Where concerns arise about how an adult behaves toward their own children, partner, another vulnerable person or individuals outside KDF, KDF should consider whether that behaviour indicates transferable risk within a child-facing role.

No automatic conclusion should be drawn, but equally the absence of misconduct involving a KDF student does not make external behaviour irrelevant.

LADO advice should be sought where the circumstances may call the individual's suitability into question.

28. Concerns About Hirers

Where KDF receives an allegation about an adult working for a hirer, the immediate welfare of the child remains KDF's concern even though the individual is not a KDF employee.

KDF should ensure that the concern reaches the hirer's safeguarding lead and should make or support direct LADO or police referral where the allegation threshold may be met.

KDF may temporarily restrict the individual's access to KDF premises while the matter is considered.

29. Concerns About Contractors

An allegation involving a contractor who has contact with children should be escalated in the same child-centred manner.

KDF may also notify the contractor's employer where appropriate, but this should not substitute for LADO or police involvement where the safeguarding threshold may be met.

Contractor access may be suspended pending appropriate advice.

30. Concerns About Volunteers

Volunteers are subject to the same safeguarding expectations as paid staff. The absence of an employment contract does not reduce KDF's responsibility to respond appropriately to allegations.

Where necessary, volunteering duties may be suspended or ended while safeguarding enquiries take place.

Any DBS referral duty that arises should be considered independently of whether the individual was paid.

31. Concerns About Former Staff or People Who Leave

An adult resigning, ceasing to volunteer or otherwise leaving KDF does not end safeguarding procedures where a concern has already arisen.

KDF will continue to cooperate with the LADO, police, children's social care or DBS where appropriate and will maintain relevant records.

KDF will not enter into an agreement that prevents legitimate safeguarding information from being shared with statutory authorities.

32. DBS Referral Consideration

Where KDF removes a person from regulated activity because they harmed or posed a risk of harm to a child, or would have removed them had they not resigned, retired or otherwise left, KDF will consider whether a statutory referral to the Disclosure and Barring Service is required.

A DBS referral is separate from disciplinary, criminal or LADO processes and may still be necessary where no criminal conviction occurs.

Relevant advice should be obtained where KDF is uncertain about the legal threshold.

33. Employment and Disciplinary Procedures

Safeguarding and employment processes are related but distinct. A safeguarding allegation may require external referral even where the evidence would not yet justify disciplinary action.

Where an external safeguarding process concludes or permits internal action to proceed, KDF may consider misconduct under its disciplinary procedures using the applicable employment standard of proof and evidence.

KDF should not assume that a police decision not to prosecute means that no employment or safeguarding concern remains.

34. Support for the Child

The welfare of the child must remain central throughout an allegation process.

KDF should consider whether the child requires changes to sessions, contact arrangements, trusted-adult support or another reasonable measure to enable them to continue participating safely.

The child should not be treated as disruptive or responsible for organisational inconvenience arising from their disclosure.

35. Support for the Adult Subject to an Allegation

An adult who is the subject of an allegation should be treated fairly, respectfully and confidentially. Being accused of harming a child can have serious personal and professional consequences and appropriate welfare support should be offered where possible.

The adult should be informed of the allegation and process to the extent appropriate, having regard to police, social-care or LADO advice.

Fair treatment of the adult is compatible with maintaining the child's safety as the primary safeguarding concern.

36. Confidentiality

Information concerning allegations and low-level concerns must be shared only with those who have a legitimate need to know.

Staff must not discuss allegations informally, speculate about guilt, post information online or share confidential details with parents or colleagues who are not part of the safeguarding response.

Confidentiality also protects the integrity of investigations and the welfare of both the child and the adult.

37. Communication With Parents and Carers

Parents or carers of the child concerned should normally be informed at an appropriate stage, subject to safeguarding advice.

There may be circumstances where contacting a parent immediately could place the child at additional risk, prejudice an investigation or alert another alleged perpetrator. In such circumstances, KDF should seek advice from children's social care, police or the LADO before contact.

KDF should not make statements to the wider parent community about an allegation unless there is a legitimate organisational reason and the wording has been considered carefully.

38. Record Keeping

KDF will keep clear and secure records of allegations and low-level concerns, including the nature of the concern, how it arose, action taken, advice received, decisions made and reasons for those decisions.

Low-level concerns should be recorded in sufficient detail to allow patterns to be identified while access to the information remains appropriately restricted.

Safeguarding records must not be altered or deleted merely because a concern was not substantiated or because the adult later leaves KDF.

39. Outcomes

Safeguarding processes may result in a range of outcomes, including a finding that the allegation was substantiated, unsubstantiated, unfounded, false or malicious, depending on the terminology and evidence used by the relevant safeguarding process.

KDF should use outcome terminology carefully and should not describe an allegation as false merely because there was insufficient evidence to prove it.

Any employment or organisational action should reflect the evidence, safeguarding advice and applicable procedure.

40. References and Future Employment

Where KDF is asked to provide a reference for a person who has been subject to safeguarding concerns, information should be accurate, fair and consistent with legal and safeguarding requirements.

KDF must not use a reference to make unsupported allegations, but neither should it enter into arrangements intended to conceal safeguarding information that it is lawfully required or permitted to disclose.

Any agreed reference following employment proceedings must remain compatible with statutory safeguarding duties.

41. Whistleblowing and External Escalation

Where staff believe that KDF is failing to respond appropriately to an allegation or concern, they should use the Whistleblowing & Protected Disclosures Policy or contact the appropriate external safeguarding authority.

The current safeguarding framework expects adults to act immediately on safeguarding concerns and recognises whistleblowing as an important safeguard where internal practice is unsafe.

No person should suffer retaliation for raising a genuine safeguarding concern in good faith.

42. Organisational Learning

Every significant allegation and pattern of low-level concerns should prompt consideration of whether KDF's systems can be improved.

Learning may involve changing supervision, communication arrangements, one-to-one procedures, premises layout, photography practices, recruitment, induction, training or professional-boundary guidance.

Organisational learning should occur without attempting to re-investigate matters already considered by appropriate external agencies.

43. Training and Staff Awareness

All staff and volunteers should understand the difference between an allegation and a low-level concern and should know how to report both.

Training should reinforce that uncertainty is not a reason to remain silent and that concerns can be raised even where the reporter cannot identify exactly which policy has been breached.

Managers and Safeguarding Leads require additional understanding of LADO referral, record keeping, employment interfaces, confidentiality and management of patterns.

44. Kindness, Diversity and Friendship

Kindness requires KDF to listen to children, support adults fairly and take concerns seriously without creating unnecessary hostility or gossip. Diversity requires safeguarding decisions to remain free from stereotypes about who is capable of causing harm or whose disclosures are credible. Friendship requires professional relationships to remain safe, accountable and respectful rather than allowing loyalty between colleagues to discourage legitimate challenge.

KDF's values do not mean protecting colleagues from uncomfortable scrutiny. A safe organisational culture is one in which adults are willing to challenge one another appropriately because the welfare of children comes first.

45. The KDF Promise

This policy supports the KDF Promise: Every Student, Every Session, Every Time. Every child should enter KDF knowing that adults working around them are subject to clear professional standards and that concerning behaviour will not be ignored merely because it appears minor.

The Promise requires KDF to respond proportionately at the earliest appropriate stage, seek independent safeguarding advice when thresholds may be met and learn from patterns before they escalate into greater harm.

46. Related Policies

This policy should be read alongside KDF's Safeguarding & Child Protection Policy, Safeguarding Adults Policy, Safer Recruitment, DBS & Pre-Employment Checks Policy, Staff Code of Conduct & Professional Standards, Professional Boundaries & Relationships Policy, Disciplinary, Gross Misconduct & Suspension Policy, Whistleblowing & Protected Disclosures Policy, Bullying, Harassment, Sexual Harassment & Dignity at Work Policy, Staff IT, Communications, Social Media, Mobile Devices & AI Policy, Confidentiality, Data Protection, Conflicts, Leaving KDF & Personnel Records Policy, Visitors, Spectators, Hirers & Contractors Safety Policy, Hire of Premises & Facilities Policy and all other relevant safeguarding procedures.

These documents must be applied together where concerns about an adult involve professional conduct, employment, online communication, external organisations, criminal allegations or safeguarding suitability.

47. Policy Review

This policy will normally be reviewed annually, but an earlier review will take place following a significant allegation, LADO involvement, pattern of low-level concerns,

safeguarding audit, organisational restructuring or relevant national or Warwickshire safeguarding guidance change.

KDF will periodically review whether concerns are being reported openly, whether records allow patterns to be recognised and whether staff understand that reporting a low-level concern is a preventative safeguarding action rather than an accusation of abuse.

KDF will continue to promote a culture in which concerns about adults are neither minimised nor prematurely judged, but are recorded, assessed and escalated at the appropriate level with the welfare of children remaining central throughout.