The New Walk School *Bespoke support. Brighter futures.*

Managing Allegations and Low-Level Concerns Policy

The New Walk School policy framework

Policy	Managing Allegations and Low-Level Concerns Policy	**Version**	V1
Issue date	08 May 2026	**Next review**	08 May 2027
Policy owner	Headteacher	**Approved by**	Directors of The New Walk School Ltd

1. About The New Walk School

The New Walk School is an independent specialist day school for pupils aged 7 to 19 who have Social, Emotional and Mental Health (SEMH) needs, autism spectrum conditions, learning difficulties and communication difficulties. The school is located on New Walk in Leicester — a setting with a long-standing association with academic life — and is operated by The New Walk School Ltd, a Company Limited by Guarantee.

The majority of our pupils hold an Education, Health and Care Plan (EHCP) and many have experienced previous educational placements that did not meet their needs. Our offer combines a broad academic curriculum with an in-built therapeutic provision rooted in the PACE model — Playfulness, Acceptance, Curiosity and Empathy — developed by Dr Dan Hughes. PACE is a relational approach designed to build trust, regulate distress and create the safety from which learning can take place. It informs how every adult in the school speaks to, listens to and works with our pupils.

2. The PACE therapeutic model in practice

This policy protects pupils and protects staff. PACE is held within it: even when a serious concern is being investigated, the staff member at the centre is treated with curiosity and respect, while the safeguarding response itself is uncompromising:

- Playfulness — staff use a light, warm tone to reduce shame and de-escalate distress, using humour appropriate to the pupil and the moment.
- Acceptance — pupils' feelings and inner experiences are accepted unconditionally, even where specific behaviours are not. Acceptance is communicated before any limit is set.
- Curiosity — staff seek to understand the meaning behind a pupil's behaviour rather than reacting to its surface, asking 'what is this telling me?'
- Empathy — staff name and stay with the pupil's emotional experience, communicating that the pupil is not alone with what they feel.

PACE is not a behaviour-management tool layered on top of practice; it is the relational foundation from which all other aspects of the school operate.

3. Statutory framework

This policy is in line with KCSIE Part 4, Working Together to Safeguard Children, and the Children Act 2004 (section 11). It is read alongside the Safeguarding Policy, the Staff Code of Conduct and the Whistleblowing Policy.

4. Scope

This policy applies to allegations and concerns about: any person who works in the school in any capacity (employed, volunteer, supply, contractor, Director); a person who, in their role with the school, may have behaved in a way that has harmed or may have harmed a child; possibly committed a criminal offence against or related to a child; behaved towards a child in a way that indicates they may pose a risk of harm; or behaved or may have behaved in a way that indicates they may not be suitable to work with children.

5. Two thresholds

Allegations meeting the harm threshold

Where the threshold above is met, the matter is referred without delay to the LADO (Local Authority Designated Officer) and managed in accordance with KCSIE Part 4. The Headteacher is the Case Manager for allegations against staff; allegations against the Headteacher are managed by the Chair of the Directors and reported directly to the LADO.

Low-level concerns

Concerns that fall below the harm threshold but indicate behaviour inconsistent with the Staff Code of Conduct are recorded as low-level concerns. These are not minor; they are the early signals that the school takes seriously to maintain a culture of safety. Low-level concerns are recorded centrally, reviewed by the Headteacher and DSL, and addressed through reflective conversation, supervision, training or — where indicated — formal action.

6. Reporting routes

- Concerns about staff are reported to the Headteacher.
- Concerns about the Headteacher are reported to the Chair of the Directors.
- Concerns about a Director are reported to the Chair of the Directors and the LADO.
- Concerns may also be reported anonymously through the Whistleblowing Policy.
- Where a child may be at risk of significant harm, the Police and Children's Social Care are informed first.

7. Support during investigation

Staff who are the subject of an allegation are treated fairly. They are kept informed of progress, supported by their line manager (or, where the line manager is the Case Manager, by another senior leader), and signposted to support such as the Employee Assistance Programme. Suspension is not automatic; it is used only where it is necessary in the interests of pupils or the investigation.

8. Outcomes and referrals

On conclusion, outcomes are recorded as substantiated, malicious, false, unsubstantiated, or unfounded, in line with KCSIE definitions. Where a person leaves the school in circumstances that meet the legal duty to refer, the Headteacher refers to the DBS and (for teaching staff) the TRA without delay.

9. Records

Allegation records are kept on the personal file of the staff member until normal retirement age or for ten years (whichever is longer), in line with KCSIE.

10. Confidentiality

All parties — the child, the staff member, and witnesses — have a right to confidentiality. The Headteacher manages information sharing carefully and proactively addresses any breach of confidentiality.

Monitoring and review

This policy is reviewed annually by the Headteacher in consultation with the senior leadership team and the Directors of The New Walk School Ltd. It will be reviewed earlier where there is a material change in legislation, statutory guidance or the operational needs of the school. The most recent version is held on the school's policy register and is made available to parents, carers and staff on request.

Linked policies and documents

This policy should be read alongside the school's wider policy suite, including: Safeguarding and Child Protection; SEND; Behaviour and Relationships; Anti-Bullying; Equality, Diversity and Inclusion; Health and Safety; Curriculum; and Complaints.