

Managing Allegations Against Staff Policy

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| **Operated by:** Nudge Education Ltd · **Version:** Jan 2026 · **Owner:** DSL

MANAGING ALLEGATIONS AGAINST STAFF POLICY

JAN 2026 Review Date: JAN 2027

POLICY OVERVIEW

1. Purpose and Commitment

Nudge Education is committed to safeguarding and promoting the welfare of children and young people. All adults working for or on behalf of the organisation are in positions of trust, and any concerns about their conduct must be managed carefully, promptly, and fairly. The welfare of the child is always the paramount consideration.

This policy sets out how Nudge Education manages allegations and concerns about adults working with children. It reflects statutory requirements and best practice as outlined in Keeping Children Safe in Education 2026 (KCSIE) and Working Together to Safeguard Children, as well as local safeguarding partnership procedures.

This policy must be read alongside, and is underpinned by, the following organisational policies:

- Safeguarding and Child Protection Policy
- Safer Recruitment Policy
- Staff Code of Conduct
- Whistleblowing Policy
- Disciplinary Policy

The policy addresses two distinct but related contexts:

1. Allegations made by a child or by a parent or carer

2. Allegations, concerns, or disclosures raised internally by staff,

including through whistleblowing routes

2. Scope

This policy applies to all adults working for or on behalf of Nudge Education, including employees, contractors, volunteers, agency staff, associates, and anyone engaged in regulated or non-regulated activity with children and young people.

It applies to conduct:

- within professional settings
- during online or remote delivery
- outside of work, where this may indicate a risk to children or unsuitability to work with them

3. Core Principles

All concerns and allegations will be managed in a way that is child-centred, proportionate, and fair. Children will be listened to and taken seriously. Allegations will be acted upon without delay and managed in line with statutory guidance.

No internal investigation will take place prior to consultation with the Local Authority Designated Officer (LADO) where the allegation threshold is met. Confidentiality will be respected, with information shared on a strict need-to-know basis.

Appropriate support will be provided to children, staff, and others involved, and clear, accurate records will be maintained throughout.

4. Definitions and Thresholds

4.1 Allegations (Statutory Threshold)

An allegation is where an adult working with children has:

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

These concerns must be referred to the LADO and managed in line with statutory procedures.

4.2 Low-Level Concerns (Below Allegation Threshold)

A low-level concern is any concern about an adult's behaviour or conduct that does not meet the statutory allegation threshold, but which may indicate that expected standards of professional behaviour have not been consistently maintained.

Low-level concerns may include, for example:

- using inappropriate language or tone with a child
- failing to maintain appropriate professional boundaries
- favouritism or over-familiarity with a particular child
- poor judgement in communication with a child, including digital communication
- minor breaches of the Staff Code of Conduct
- behaviour that causes discomfort or concern but does not present immediate risk

Low-level concerns must still be reported, recorded, and addressed. When considered individually they may not indicate significant risk; however, patterns or repetition of low-level concerns may indicate escalation and require LADO consultation.

5. Roles, Responsibilities, and Training

All staff have a responsibility to report concerns or allegations immediately. Staff must not investigate, attempt to gather evidence, or ask leading questions.

The Regional Designated Safeguarding Lead (RDSL) is the central point of contact for managing allegations and concerns about staff. The RDSL is responsible for:

- assessing concerns and determining thresholds
- consulting with the LADO where required
- ensuring safeguarding actions are implemented
- maintaining accurate and secure records ensuring appropriate communication with commissioners and senior leaders

Training Requirement

The RDSL must receive specific training in managing allegations against staff, including LADO processes and statutory expectations. This training will be:

- completed on appointment to the role, and
- refreshed at least every two years, or sooner if statutory guidance changes

A case manager, usually a senior leader, will oversee the employer response, including liaison with HR, the LADO, external agencies, and commissioners, and will ensure the staff member is appropriately supported and informed.

6. Allegations Made by a Child or Parent/Carer

When a child or parent/carers raises an allegation against a member of staff, the concern must be taken seriously and acted upon immediately.

The receiving staff member must listen carefully, remain calm, and reassure the child or parent that the concern will be addressed. They must not promise confidentiality. A factual record should be made using the child's own words where possible and shared with the RDSL on the same day.

The RDSL will consider whether immediate safeguarding actions are required to protect the child or others. Where the concern meets the statutory threshold, the RDSL or case manager will consult with the LADO within one working day and follow the advice provided regarding next steps.

7. Allegations and Concerns Raised Internally by

Staff All staff are expected to report concerns about colleagues, regardless of seniority. Concerns must not be minimised or managed informally by the individual raising them.

Where concerns relate to the RDSL or a senior leader, staff must report directly to the most senior leader or the nominated safeguarding lead at board level. Whistleblowing routes may also be used.

Concerns will be assessed against statutory thresholds. Where the allegation threshold is met, the LADO will be consulted within one working day.

Where it is not met, the concern will be managed as a low-level concern through supervision, guidance, training, or management action, and recorded accordingly.

8. Informing the Commissioner and Continuity of

Provision Where an allegation meets the statutory threshold and is referred to the LADO, the commissioner of the placement will be informed, in line with KCSIE 2026 expectations, unless advised otherwise by the LADO or police.

Nudge Education will:

- inform the commissioner that an allegation has reached threshold
- outline the immediate safeguarding and risk management actions taken
- confirm arrangements to ensure continuity of education and support for the young person
- provide updates where appropriate, while respecting confidentiality and investigative integrity

This ensures transparency and enables joint planning to minimise disruption to the child's education and wellbeing.

9. Managing the Allegation

Where the allegation threshold is met, a case manager will be appointed. A written risk assessment will be completed to consider:

- the safety and welfare of children
- the nature of the allegation
- the role and responsibilities of the adult concerned

Interim measures may include increased supervision, temporary changes to duties, redeployment, or suspension. Suspension is a neutral act and will only be used where no reasonable alternative exists. All interim measures will be reviewed regularly.

Investigations may involve the police, children's social care, and/or internal disciplinary processes, which may run in parallel.

10. Outcomes and Actions

At the conclusion of the process, outcomes will be recorded as:

- Substantiated
- Unsubstantiated
- Unfounded
- Malicious
- False

Where allegations are substantiated, appropriate action will be taken, including disciplinary action, dismissal, and referral to the Disclosure and Barring Service (DBS) and/or relevant professional bodies where required.

11. Record Keeping and Retention

Clear and comprehensive records will be maintained for all allegations and low-level concerns, including decisions made, actions taken, advice received, and outcomes.

Records will be stored securely and retained in line with KCSIE 2026 guidance and data protection requirements.

12. Learning, Review, and Oversight

Following the conclusion of any case, the organisation will review the handling of the matter to identify learning and strengthen safeguarding practice.

This policy will be reviewed annually, or sooner where statutory guidance or safeguarding arrangements change.

REVIEW & REVISION

This policy will be reviewed annually or as required to ensure its effectiveness and alignment with best practices within Nudge.

This Code of Conduct has been signed off by the Nudge Education Directorate.
Brian Mair Director of Operations 21 January 2026

All Policies can be found [here](#).

Annexe A: Support Available During Allegations Against Staff Nudge Education recognises that allegations against staff can be distressing and complex for all involved. Appropriate and proportionate support will be offered throughout the process to safeguard children and to support the wellbeing of staff, while ensuring that statutory safeguarding responsibilities and the integrity of any investigations are maintained.

1. Support for the Child or Children Involved

The welfare of the child is the paramount consideration at all stages. From the point an allegation is raised, the Designated Safeguarding Lead (RDSL) will ensure that appropriate safeguarding and pastoral support is in place. This will be responsive to the individual needs of the child and may include adjustments to learning arrangements, supervision, or staffing to ensure the child feels safe and supported.

Children will be listened to and taken seriously. Information will be shared with them in a sensitive and age-appropriate way, ensuring they understand what will happen next without sharing details that could compromise confidentiality or any external enquiries. Where appropriate, additional emotional or therapeutic support may be considered, including signposting to specialist services in partnership with parents, carers, or external agencies.

2. Support for Parents and Carers

Parents and carers will be treated with respect and kept appropriately informed throughout the process, unless doing so would place a child at risk or interfere with statutory enquiries, in line with advice from the Local Authority Designated Officer (LADO) or the police.

Clear and factual information will be provided about how the allegation will be managed, the roles of relevant agencies, and likely timescales where these are

known. A named contact may be provided to support communication and to help manage questions or concerns in a consistent and sensitive manner.

3. Support for the Staff Member Who Is the Subject of the

Allegation Nudge Education acknowledges that being the subject of an allegation can be a highly stressful experience. Support will be offered in a way that does not compromise safeguarding processes or the safety of children.

As soon as it is appropriate to do so, the staff member will be informed of the allegation and the procedures that will be followed. They will be provided with a named organisational contact, usually the case manager or a senior leader, to offer procedural guidance and to act as a consistent point of communication.

Staff will be encouraged to access wellbeing support through Reward Gateway, which provides the organisation's Employee Assistance Programme (EAP). This includes confidential advice and support services designed to help staff manage emotional, practical, or work-related concerns. In addition, staff have access to confidential counselling services, which may be used alongside or independently of the EAP, depending on individual needs.

Staff will be reminded of their right to seek support from a trade union or professional association where applicable. Any interim measures, such as temporary changes to duties or suspension, will be explained clearly, confirmed in writing, and reviewed regularly. Suspension, where used, is a neutral act and does not imply guilt.

4. Support for Staff Who Raise Concerns

Staff who raise concerns or allegations in good faith, including through whistleblowing routes, will be supported and protected from detriment. The organisation recognises that raising concerns can be difficult and may cause anxiety or uncertainty.

Those who raise concerns will be offered reassurance about the process, advice regarding confidentiality, and clarity about how the concern will be managed. Where appropriate, they may also be signposted to wellbeing

support, including Reward Gateway or counselling services, particularly where the process has an emotional or professional impact.

5. Support for Other Staff and the Wider Organisation

Allegations may have an impact beyond those directly involved. Managers will be supported to maintain stability within teams, manage workloads, and reinforce professional boundaries. Communication with staff will be carefully controlled to prevent speculation and protect confidentiality.

Where necessary, additional supervision or safeguarding oversight may be put in place to ensure continuity of safe practice and to support staff wellbeing during the period of investigation.

6. Ongoing Review and Post-Outcome Support

Support arrangements will be kept under review throughout the duration of the allegation and adapted as circumstances change. Following the conclusion of the process, consideration will be given to any ongoing support needs. This may include reintegration planning, access to continued wellbeing or counselling support, or additional supervision and professional development.

Nudge Education is committed to fostering a culture of care, transparency, and learning, recognising the importance of wellbeing alongside robust safeguarding practice.

NEO Online Addendum

This addendum applies the canonical Nudge Education policy above to the online provision context of Nudge Education Online (NEO). It is sourced from NEO - Managing Allegations Against Staff Procedure v04.26.docx.

NEO BY NUDGE EDUCATION

Managing Allegations Against Staff Procedure Nudge Education Online

Policy Owner **Designated Safeguarding Lead (DSL),
countersigned by the Director, NEO & Head of
School and approved by the Proprietor**

Approved	April 2026
Review Date	April 2027
Version	04.26
Operating Company	Nudge Education Ltd (Company Number 10192753)
Proprietor	Diego Melo
Accreditation Route	Online Education Accreditation Scheme (OEAS) — accreditation in progress

This policy applies to all learners, staff, practitioners, contractors, volunteers and visitors of Nudge Education Online (NEO). NEO is a fully online alternative provision for learners aged 11–18, operated by Nudge Education Ltd. NEO is not a DfE-registered independent school and is not subject to Independent Schools Inspectorate (ISI) inspection. NEO is pursuing OEAS accreditation only.

1. Statement of Intent

Nudge Education Online (NEO) is committed to safeguarding and promoting the welfare of children, and to creating a culture in which concerns about adult behaviour can be raised promptly and handled fairly. This Procedure sets out how NEO manages allegations, concerns, and low-level concerns about staff, practitioners, contractors, volunteers, and anyone else working in or on behalf of NEO. The Procedure applies the statutory framework in Part Four of Keeping Children Safe in Education 2026 (KCSIE), which covers safeguarding concerns or allegations made about staff, including supply teachers, trainee teachers, volunteers and contractors, and is designed to ensure that: Allegations are taken seriously, handled sensitively, and resolved as quickly as possible consistent with a fair process. The welfare and safety of the child is the paramount consideration throughout. The rights and wellbeing of the person

subject to the allegation are protected, including the presumption of innocence and proportionate support. Records are clear, factual, and retained for the periods required by statutory guidance. Lessons from allegations are captured and fed back into safer recruitment, induction, training, and supervision. This Procedure must be read alongside the NEO Child Protection and Safeguarding Policy, the NEO Staff Code of Conduct, the NEO Safer Recruitment and Use of Volunteers Policy, the NEO Whistleblowing Policy, and the NEO Complaints Procedure.

2. Scope

This Procedure applies to: All staff employed by Nudge Education Ltd in connection with NEO, including the Director / Head of School, DSL, Deputy DSL, SENCo, administrative staff, and qualified subject-specialist teachers. All named practitioners, contractors, freelancers, and external providers delivering services to NEO learners. All volunteers, including guest speakers. Agency-supplied staff. Any allegation that arises in relation to any of the above, including allegations about conduct that took place outside NEO activity but which raises questions about suitability to work with children.

3. Legal and Regulatory Framework

Keeping Children Safe in Education 2026 (KCSIE) — Part Four is the authoritative framework. Working Together to Safeguard Children 2023 (updated May 2025). Children Act 1989 and Children Act 2004. Safeguarding Vulnerable Groups Act 2006. Education Act 2002 (Section 175) — applied as reference. Employment Rights Act 1996. UK GDPR and the Data Protection Act 2018. DBS Code of Practice and DBS referral guidance. Teacher Misconduct: advice for making a referral (DfE) — for qualified teachers. OEAS accreditation criteria.

4. Definitions

Allegation — A report that a person in scope has behaved in a way that has, 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 in a way (online or offline) that indicates they may not be suitable to work with children. **Low-level concern** — A concern (no

matter how small) that an adult working in or on behalf of NEO may have acted in a way that is inconsistent with the NEO Staff Code of Conduct — including in their conduct outside work — but which does not meet the allegation threshold above.

Case Manager — The person responsible for managing the allegation process at NEO. Normally the Director / Head of School, unless the allegation concerns the Director / Head of School (in which case the Proprietor acts as Case Manager) or the Proprietor (in which case the DSL coordinates an independent external Case Manager).

LADO — Local Authority Designated Officer, responsible for managing allegations against people who work with children.

Substantiated — Sufficient evidence to prove the allegation.

Malicious — Sufficient evidence to disprove the allegation and evidence of deliberate act to deceive.

False — Sufficient evidence to disprove the allegation.

Unsubstantiated — Insufficient evidence to either prove or disprove the allegation; does not imply guilt or innocence.

Unfounded — No evidence or proper basis that supports the allegation.

5. Roles and Responsibilities

Role	Responsibility
Proprietor	Named accountable person under OEAS; acts as Case Manager where the allegation concerns the Director / Head of School; approves outcomes for all substantiated cases involving dismissal or referral; receives annual Part-Four assurance.
Director, NEO & Head of School	Case Manager for the majority of allegations; first point of contact for NEO; consults LADO within one working day; makes interim-arrangements decisions; maintains case records; co-signs this Procedure.
Designated Safeguarding Lead (DSL)	Primary advisor on safeguarding throughout the process; ensures the child's welfare is the paramount consideration; liaises with MASH /

Role	Responsibility
	Front Door; coordinates support for the child and family; co-signs this Procedure.
Deputy DSL	Deputises for the DSL in their absence; can act as Case Manager where the allegation concerns the DSL.
Person subject to the allegation	Entitled to be treated fairly, to be supported, and to know the nature of the allegation (subject to safeguarding considerations). Required to cooperate with the process.
Union / representative (where applicable)	May support or accompany the person subject to the allegation at meetings.
HR adviser / external legal support	Commissioned as required to ensure fair employment process; the Director / Head of School retains operational ownership.
LADO	Consulted within one working day of an allegation meeting the threshold; provides advice, coordinates multi-agency response where needed.

6. Managing Low-Level Concerns

NEO applies the KCSIE 2026 expectation (Part Four, Section two) that low-level concerns are recorded, addressed, and used to spot patterns. A low-level concern is one that is inconsistent with the Staff Code of Conduct but does not reach the allegation threshold.

6.1 Culture

NEO encourages an open, honest, and supportive culture where low-level concerns can be raised without hesitation. Low-level concerns may be raised by any member of staff, learner, parent or carer, commissioner, or external party. Raising a concern in good faith is not a disciplinary act. Failing to raise a concern that is later corroborated may itself be considered a conduct issue.

6.2 Process for Low-Level Concerns

The concern is reported to the Director / Head of School (or to the DSL if the concern is about the Director / Head of School; to the Proprietor if about the DSL; see Section 8 for the escalation map). The concern is recorded factually, dated, and stored securely in a locked low-level concerns log, separate from the safeguarding log but audited by the DSL. The concern is addressed with the individual in a supportive but clear conversation, with a written record of the outcome. Patterns of low-level concern about the same individual are reviewed by the DSL termly; repeated concerns may escalate to the allegation process. Low-level concerns are retained on the personnel file for the same period as formal allegations, to inform references and pattern analysis.

7. Initial Response to an Allegation

Any adult at NEO who becomes aware of an allegation meeting the threshold in Section 4 must: Ensure the immediate safety of any child or children involved. If the child is at imminent risk, call 999. Report the allegation to the Case Manager (Director / Head of School) the same working day, in person or by telephone if at all possible. A written account follows within 24 hours. If the allegation concerns the Director / Head of School, report to the Proprietor. If the allegation concerns the Proprietor, report to the DSL, who will coordinate an independent external Case Manager. Do not discuss the allegation with anyone other than the Case Manager, the DSL, or LADO unless instructed; confidentiality is critical. Do not attempt to investigate the allegation or contact the person subject to the allegation.

8. Case Management and LADO Consultation

On receiving an allegation: The Case Manager undertakes an immediate risk check and decides, with the DSL, on any interim safeguarding arrangements (for example, withdrawing the individual from live lesson delivery pending

further assessment). The Case Manager consults the LADO within one working day. The LADO may advise that no further action is needed, that the allegation should be managed under employment procedures only, or that a multi-agency strategy meeting is required. The Case Manager ensures that the child and family are informed appropriately and supported, and that the person subject to the allegation is informed of the nature of the allegation as soon as it is consistent with not prejudicing the investigation. Where the allegation involves potential criminal conduct, the LADO leads liaison with police and children's social care. Where the allegation involves an agency-supplied worker, the agency is informed promptly and invited to participate in the process.

9. Interim Arrangements

Suspension is not an automatic response to an allegation and is used only where there is a justified case for it. Alternatives are always considered first, including: Temporary removal from live lesson delivery, with administrative duties continuing. Closer supervision during live sessions by a named senior member of staff. Variation of duties to reduce contact with the child or group at issue. Use of agency cover where necessary to maintain NEO's duty to learners. Where suspension is the only appropriate response, it is confirmed in writing with reasons, reviewed at least weekly, and discussed with the LADO. Suspension is a neutral act, not a disciplinary measure.

10. Investigation

The Case Manager commissions a proportionate investigation, usually undertaken by a senior member of staff or, where independence is required, an external investigator. The investigator gathers factual evidence, reviews relevant records (including session recordings where proportionate), interviews witnesses, and interviews the person subject to the allegation. The person subject to the allegation is entitled to union, legal, or other representation at interviews. Investigation outcomes are documented in a written report, with a clear finding against each element of the allegation. Where there is a parallel police or social care investigation, NEO will not act in ways that prejudice it; internal steps are coordinated with the LADO. KCSIE 2026 timescale expectations are observed: cases are dealt with as quickly as possible in a thorough and fair process; wherever possible, the first review takes place no later than four weeks after the initial assessment, with further reviews at

fortnightly or monthly intervals until the case is resolved. (KCSIE 2026 removed the indicative resolution percentages that appeared in earlier editions.)

11. Outcomes and Follow-Up

Each element of the allegation is recorded against one of the following outcome categories:

Outcome	Meaning
Substantiated	Sufficient evidence to prove the allegation.
Malicious	Sufficient evidence to disprove the allegation and evidence of deliberate act to deceive.
False	Sufficient evidence to disprove the allegation.
Unsubstantiated	Insufficient evidence to either prove or disprove; does not imply guilt or innocence.
Unfounded	No evidence or proper basis supports the allegation.

Following a substantiated allegation, NEO may: Take disciplinary action up to and including dismissal, in line with NEO's disciplinary procedures and employment law. Make a referral to the DBS under its referral duty where the criteria are met. Make a referral to the Teaching Regulation Agency (TRA) where a qualified teacher is involved and the criteria are met. Notify other relevant regulators where applicable. Notify commissioning bodies where the individual has worked with their referred learners. Update induction, training, and supervision in light of any systemic issues identified. Where an allegation is found to be malicious, NEO will consider action against the person who made it, including, where the child themselves made a malicious allegation, support and sanctions under the Behaviour and Regulation Policy. Where an allegation is unsubstantiated, NEO takes active steps to support the person subject to the allegation to resume their duties, including reintegration planning, communication, and support.

12. Confidentiality

NEO treats all allegations with strict confidentiality on a need-to-know basis. Information is shared only with those who need it to discharge their safeguarding, employment, or statutory responsibilities. Breaches of confidentiality by NEO staff are treated as a disciplinary matter. Where media or external interest arises, all communication is handled by the Proprietor and Case Manager in consultation with the LADO.

13. Support for All Parties

NEO recognises the stress caused by allegations, for all parties.

13.1 The Child and Family

The child is supported through their named practitioner and the DSL. A trusted adult outside the investigation is identified to provide pastoral support. The family is kept informed to the extent consistent with confidentiality and the investigation. Specialist support is signposted or commissioned where required, including CAMHS, specialist advocacy, or victim support.

13.2 The Person Subject to the Allegation

A named contact (separate from the Case Manager) is identified to provide support. Access to Employee Assistance Programme (EAP) or equivalent wellbeing support is confirmed. Regular, documented communication is maintained about the progress of the case. The person is informed of the outcome in writing, with reasons.

13.3 Other Staff

Staff affected by the process (for example, those interviewed as witnesses, or colleagues managing workload during a suspension) are offered support via the DSL or Director / Head of School. Team-wide communication about the case is limited strictly to what is necessary, with confidentiality maintained.

14. Referrals to the DBS and Regulators

NEO has a statutory duty to make a referral to the DBS where the referral threshold is met (for example, where a person has been dismissed, or would have been had they not resigned, on the grounds of harm or risk of harm to a

child). Referrals to the Teaching Regulation Agency (TRA) are made for qualified teachers where the criteria in DfE guidance are met. Referrals are made promptly, with the Case Manager responsible for ensuring the referral is submitted and recorded. Where the person subject to the allegation resigns during the process, NEO completes the investigation as if they had not resigned and makes any necessary referrals.

15. Records and Retention

A full record of every allegation, investigation, outcome, and follow-up is retained on the personnel file. Records are retained at least until the person reaches normal pension age, or for 10 years from the date of the allegation, whichever is longer, in line with KCSIE 2026 Part Four. Details of allegations found to be malicious or false are removed from personnel records unless the individual consents to their retention. Records are held securely in line with UK GDPR, the Data Protection Act 2018, and the NEO Data Protection, Confidentiality and Privacy Policy. References given after an allegation has been concluded include accurate and proportionate information consistent with KCSIE 2026.

16. Learning from Allegations

Every allegation is an opportunity to strengthen NEO's safer culture. The Case Manager and DSL prepare a lessons-learned note at the close of each case, identifying: Any systemic issues in recruitment, induction, training, supervision, or oversight that may have contributed. Any changes needed to policies, training, or procedures. Any wider staff communication or training required. Lessons-learned notes are reviewed annually by the Proprietor and feed into the NEO Safer Recruitment Policy, Staff Code of Conduct, and CPD programme.

17. Monitoring and Review

All allegations, low-level concerns, and outcomes are included in the DSL's termly safeguarding report. The Proprietor receives an annual Part-Four assurance report. This Procedure is reviewed annually, or sooner if KCSIE, OEAS criteria, or statutory guidance change. An interim review is triggered after any substantiated allegation to capture learning.

Related Policies

This policy should be read alongside: NEO Child Protection and Safeguarding Policy NEO Staff Code of Conduct NEO Safer Recruitment and Use of Volunteers Policy NEO Whistleblowing Policy NEO Complaints Procedure NEO Behaviour and Regulation Policy NEO Data Protection, Confidentiality and Privacy Policy NEO Online Safety and Acceptable Use Policy

Document Control

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