

Applecroft School

Managing Allegations Against Staff & Low-Level Concerns Policy

Person Responsible:	Headteacher
Review Cycle:	Annual
Date of Issue:	September 2026
Review Date:	September 2027



Managing Allegations Against Staff & Low-Level Concerns Policy

1) Introduction:

School Vision

'To create a positive and inspiring community that nurtures each individual and empowers leaders for life'.

School Mission Statement:

'Nurturing Potential, Inspiring Minds, Changing Lives'.

School Values:

- Ambition and Leadership
- Kindness and Supportiveness
- Respect and Honesty
- Determination and Resilience

This policy should be read alongside the following:

- Child Protection Policy
- Safeguarding Policy
- Staff Code of Conduct Policy
- Keeping Children Safe in Education, 2026

2) Compliance:

Applecroft School's low-level concern and allegations policy' is compliant with:

- [KCSiE, Part four](#) - the statutory guidance that outlines how schools and trusts deal with low-level concerns about the behaviour of staff working with children.
- Hertfordshire Safeguarding Children Partnership Procedures Manual, [Section 5.1.5 Managing Allegations Against People who work with Children and Young People](#).
- [Developing and implementing a low-level concerns policy \(Farrer & Co\)](#), which provides detailed guidance and examples.

This policy is a reflection and extension of Applecroft School's wider staff Code of Conduct.

All staff and volunteers at Applecroft School hold positions of trust and are expected to uphold safe working practices outlined in our Staff Code of Conduct.

A 'position of trust' refers to any role where an adult holds power or influence over a child due to the nature of their work (either paid or voluntary). As defined in the [Sexual Offences Act 2003 \(Sections.16-24\)](#) and further clarified by the [Crown Prosecution Service](#), it is a criminal offence for anyone in a position of trust to engage in sexual activity with a child in their care - even if that child is aged 16 or 17 and legally considered to have reached the age of sexual consent (16); this includes both in-person and online interaction, within or outside of employed/voluntary hours.

A **breach of trust** occurs when an adult working or volunteering with children crosses established boundaries in their professional relationship with a child or young person through inappropriate behaviour that involves an abuse of their position or authority. The behaviour itself does not need to be illegal to constitute a breach of trust – even when the child or young person is over the age of consent (16). Examples include:

- A 19-year-old Youth Worker at a youth club initiating a personal relationship with a 16-year-old club member.
- A teacher engaging in an intimate or sexual relationship with a Sixth-Form student.

These behaviours undermine professional integrity and breach safeguarding standards and Applecroft's Staff Code of Conduct regardless of legal consent due to the imbalance of power and the professional duty of care.

[Section 11 of the 2004 Children's Act](#) states that schools and colleges should have clear policies aligned with HSCP Procedures for dealing with safeguarding concerns or allegations against those working in or on behalf of schools and colleges in a paid or unpaid capacity, i.e. members of staff, including supply teachers, volunteers and contractors. These policies must clearly distinguish between:

Allegations – a claim or assertion that someone has done something illegal or wrong, typically one made without proof. The *Harm Threshold* (see section *Managing Allegations*, below) for an allegation is when a person working or volunteering with children in a position of trust has or may have:

- Behaved in a way that has, or may have harmed a child/young person;
- Possibly committed a criminal offence against/related to a child/young person;
- Behaved toward a child/children/young person(s) in a way that indicates he or she would pose a risk of harm; *
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children/young people; *

**These categories can include behaviour that may have happened outside of an organisation that might make an individual unsuitable to work with children/young people.*

Concerns about the quality of care/practice – is an accusation, not of a child protection nature, that the care/practice provided does not meet the expected standards. As with quality in other fields, it is an assessment of whether something is good enough and whether it is suitable for its purpose.

Complaints – an expression of dissatisfaction about actions or the lack thereof. Concerns may reflect a worry requiring reassurance, while complaints assert that something is unacceptable.

3) Levels of Concern and Allegation:

There are two levels of Concerns and Allegations relating to adults (in both paid and voluntary roles) working with children either directly and/or online:

1. **Low-Level Concerns**

These are behaviours by one or more adults (paid or voluntary) which are inconsistent with Applecroft School's Staff Code of Conduct but do not meet the Harm Threshold (see above under definition of Allegations) and are referred to as 'Low-Level Concerns'. Examples include repeated breaches of Applecroft School's Staff Code of Conduct in relation to safeguarding.

2. **Allegations**

These are behaviours by one or more adults (paid or voluntary) that do meet or may meet the Harm Threshold (see above under definition of Allegations). Such cases require referral within **one**

working day to the Local Authority Designated Officer (LADO) and potentially other statutory bodies such as the police or children's social care.

Low-Level Concerns and Allegations may emerge as a result of either observed suspicions or direct disclosures made by a child. In assessing the potential harm and impact to a child or young person, DSLs will consider the four categories of abuse - physical, emotional, sexual and neglect - as well as any safeguarding elements related to exploitation. Detailed definitions of these terms can be found in Chapters 4 and 9 on this policy.

The Harm Test is explained in the Disclosure and Barring service Guidance: [Making barring referrals to the DBS and Section 31\(9\) of the Children Act 1989 \(as amended by the Adoption and Children Act 2002\)](#).

4) Managing Low-Level Concerns (those that DO NOT meet the Harm Threshold for Allegation):

As part of our whole-school approach to safeguarding, we are committed to fostering an open and transparent culture where all concerns involving adults working in or on behalf of Applecroft School (including supply teachers, volunteers, and contractors) are addressed promptly and appropriately.

Creating an environment where all concerns can be shared responsibly, with the right person, recorded accurately, and handled with care is essential to keeping our children and young people safe.

We aim to:

- Enable all stakeholders to identify inappropriate, problematic, or concerning behaviour early and encourage them to do so.
- Reduce the risk of abuse by acting preventatively.
- Ensure that all adults working/volunteering in or on behalf of our school understand and adhere to professional boundaries consistent with our ethos and values at Applecroft School.

A 'Low-Level' Concern does not imply insignificance. It refers to any behaviour - however minor - that causes a sense of unease or a 'nagging doubt' about whether an adult's behaviour:

- Is inconsistent with Applecroft's staff code of conduct, including inappropriate conduct outside of work.
- Does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples may include (but are not limited to):

- Being over-friendly with children.
- Having favourites or showing preferential treatment towards specific pupils.
- Taking photographs or videos of children on a personal mobile phone or device, contrary to school policy.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door without a clear professional reason.
- Humiliating, belittling, or intimidating children.
- Mishandling children, including using inappropriate physical intervention.
- Using inappropriate, offensive, sexualised, or discriminatory language in the presence of children.
- Sharing personal information with pupils or encouraging them to share personal information unnecessarily.

- Contacting or communicating with pupils through personal social media accounts, messaging apps, or personal devices.
- Giving a child personal gifts, money, or special treatment without approval or a clear professional reason.
- Spending excessive time with a particular child or creating an inappropriate dependency.
- Transporting a child in a personal vehicle without prior authorisation or appropriate safeguards.
- Failing to maintain professional boundaries online or in person.
- Making inappropriate jokes, comments, or remarks that could be viewed as unprofessional.
- Entering personal, secretive, or overly familiar communications with a child or young person.
- Not following school safeguarding, behaviour, or safer working practice procedures.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or because of vetting checks undertaken.

5) The role of the Case Manager for Low-Level Concerns:

In our school, the Case Manager will be the Headteacher. If concerns involve the Headteacher, the Chair of Trustees will fulfil this role.

When a Low-level concern is raised (including third-party reports), the Case Manager or their nominated deputy will:

- Speak with the person who raised the concern (unless this was raised anonymously).
- Speak with the individual subject to the concern.
- Identify and interview any other involved parties or witnesses.

The information gathered will help us to categorise the type of behaviour and determine what further action may need to be taken. This information will be recorded in writing along with the rationale for our decisions and action taken.

The Case Manager, a nominated deputy, or Chair of Trustees will respond to reports of low-level concerns in line with the school's internal due processes for managing safe-staffing, our response may include the following:

- Prioritise the safety and wellbeing of any alleged victim and all other pupils.
- Share details only with those who need to know to maintain confidentiality.
- Conduct further inquiries with relevant children, staff, parents, or witnesses.
- If there are reasonable grounds, launch a formal internal investigation following the school's internal processes.
- Consult Human Resources on possible breaches of the staff code of conduct, [Teachers' Standards](#), or TA regulations to assess disciplinary thresholds.
- Inform the subject of the concerns and outline available support during the inquiry.
- Determine when to allow the subject to present their account.

- Review all evidence and decide on an outcome.
- If no risk of harm is found, consider additional training or monitoring for the staff member.
- If new information raises serious risk or meets the harm threshold, refer the matter to the LADO.
- Record our findings and the rationale for any decisions and action we take.

Applecroft School fosters a safeguarding culture where every staff member is professionally curious. We:

- Clarify expected staff behaviour and help them distinguish it from concerning conduct.
- Encourage prompt reporting of low-level concerns.
- Address unprofessional behaviour early and support corrective measures.
- Handle concerns sensitively and in proportion to their nature.
- Use reported concerns to identify and address any weaknesses in our safeguarding systems.

6) Record keeping for Concerns and Allegations:

It is vital that all stakeholders understand how to raise concerns about professionals and volunteers working with children and have confidence that concerns will be managed appropriately.

At Applecroft School, recording low-level concerns supports a culture of safeguarding, openness, and professional accountability. Low-level concerns are reviewed objectively and fairly and do not automatically imply wrongdoing. Recording concerns helps to identify patterns of behaviour, supports appropriate interventions, and contributes to the ongoing safety and welfare of children and young people.

To ensure safe working practice:

- All staff and volunteers must record and report low-level concerns to the Headteacher/Principal (or appropriate Case Manager) as soon as possible.
- Records are kept confidentially, stored securely, and managed in accordance with the [Data Protection Act 2018 and UK GDPR](#).
- Concerns are considered in context and reviewed proportionately, taking account of the individual's circumstances and any previous concerns.
- Where a pattern of concerning behaviour emerges, the Case Manager will determine whether further action is required, including support, guidance, disciplinary procedures, or referral to the Local Authority Designated Officer (LADO) if the harm threshold is met.
- Trends, themes, and learning from low-level concerns will be used to inform safeguarding practice, staff training, supervision, and policy development.
- Records of concerns are retained until the individual reaches normal retirement age or for ten years from the date of the concern, whichever is longer.

By maintaining accurate records and responding appropriately to concerns, seeks to protect children, promote professional standards, support staff development, and ensure that any safeguarding risks are identified and addressed at the earliest opportunity.

7) Managing Allegations (those that DO MEET the Harm Threshold for LADO):

Where a concern or allegation meets the harm threshold, will respond in accordance with statutory guidance, including HSCP [Section 5.1.5 Managing Allegations Against Adults Who Work With Children and Young People](#)).

All staff, volunteers, trustees, contractors, and any adults working on behalf of have a responsibility to immediately report concerns about the behaviour or conduct of an adult towards a child. This includes concerns relating to individuals delivering out-of-school activities or using school facilities.

The school takes all allegations seriously and will ensure that concerns are managed fairly, consistently, quickly, and in a way that provides effective protection for children whilst supporting those involved.

The procedures outlined in this section apply where it is alleged that a person working or volunteering in the school, including supply staff, contractors, and volunteers, has:

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

These criteria may also apply to behaviour that has occurred outside the workplace where it suggests that an individual may pose a risk to children or is unsuitable to work with children and young people.

Any allegation meeting the harm threshold will be reported to the Local Authority Designated Officer (LADO) without delay, and all subsequent actions will be taken in accordance with advice received and relevant safeguarding procedures. The welfare of the child or children involved will remain the paramount consideration throughout the process.

These are Applecroft School's procedures for managing cases of concerns/allegations that meet the Harm Threshold and may indicate a person is a risk of harm to children if they continue to work in their present position, or in any capacity with children and young people. This is the process and the threshold criteria we apply if it is alleged that anyone working in our school, including supply teachers, volunteers and contractors has:

<i>Behaved in a way that has, or may have harmed a child/young person</i>	<i>Possibly committed a criminal offence against/related to a child/young person</i>	<i>Behaved toward a child/young person in a way that indicates he or she would pose a risk of harm</i>	<i>Behaved or may have behaved in a way that indicates they may not be suitable to work with children/young people</i>
Harm Threshold	Criminal Threshold	Suitability Threshold	Transferable Risk Threshold
<u>Examples:</u> Sexual abuse, including grooming, both directly or online Physical abuse Emotional abuse Neglect Exploitation	<u>Examples:</u> Adult has been arrested / reported for downloading indecent images of a child Any sexual act that meets a criminal threshold	<u>Examples:</u> Adult has been the subject of criminal procedures Caused harm or possible harm to a child or adult at risk	<u>Examples:</u> Concerns about the adult's 'reckless' behaviour and conduct in their personal and private life that could bring the school into disrepute

Any form of abuse and neglect that has caused a child significant harm (as defined in the Children Act 1989)		Failed to understand or comply with the need for clear personal and professional boundaries in the workplace Conduct concerns or breach of policies that are more serious than Low-Level Concerns e.g. persistent, concerning behaviour	Criminal misuse of substances, alcohol, drugs Criminal acts of dishonesty or violence against another person Sexual violence and harassment towards another adult or child Internet crime
--	--	--	--

8) What happens when an allegation is made against staff or a volunteer?

The Headteacher or Chair of Trustees may undertake initial inquiries to gather key information. They will assess whether the allegation meets the Local Authority Designated Officer (LADO) threshold, if it does, they will make a referral to LADO giving consideration to our school's staff code of conduct, managing allegations policy and [5.1.5 HSCP procedures](#). If necessary, they will complete a LADO referral within one working day.

If the allegation does not meet the harm threshold for LADO, our Headteacher or Chair of Trustees will follow the school's Low Level Concerns policy.

9) Role of the Local Authority Designated Officer:

The LADO does not have a public facing role. They do not, for example, liaise directly with children and their families, nor do they directly investigate allegations. Their role is as follows:

- **Case management** - oversee the process and ensure it is working, not to investigate.
- **Consultation** - provide advice and guidance to employers and voluntary organisations.
- **Monitoring** - the progress of cases to ensure that they are dealt with as quickly as possible consistent with a thorough and fair process.
- **Liaison** - with the Police, Children's Services, and other partner agencies (managers of the subject of allegation).

10) Role of school's Case Manager for Allegations:

This will be the Headteacher or Chair of Trustees, if the concerns are about our school's Headteacher. Their remit is to:

- Clarify facts of the concerns/allegation (not investigate) before contacting the LADO.
- Take part in Strategy Meetings to liaise with other partner agencies.
- Undertake internal planned inquiries/fact finding.
- Take part to review the progress of the case in which there is a Police officer investigation.

- Operate a thorough disciplinary process when appropriate.
- Ensure a properly managed conclusion and outcome to process.

11) LADO Principles and Response:

Timeliness - any allegation of abuse must be dealt with fairly, quickly, and consistently in accordance with the safeguarding and child protection procedures, this is best practice to provide immediate safety for child/ren and make safe arrangements for the person who is the subject of the allegation. It is crucial that a **referral to LADO is made within one working day.**

Objectivity - it is not permissible for a member of staff to conduct (though their involvement may still be required) an enquiry about suspicion or allegation of abuse with respect to a:

- relative
- friend
- colleague, supervisor/supervisee or someone who has worked with her/him previously in any of these capacities.

If, following the conclusion of child protection processes, further enquiries are pursued for the purpose of disciplinary, regulatory or complaint investigation, they should be arranged in a way that avoids the repeated interviewing of children or other vulnerable witnesses.

Confidentiality - information about an allegation must be restricted to those who have a need to know in order to:

- protect children
- facilitate enquiries
- avoid victimisation
- safeguard the rights of the person about whom the allegation has been made and others who might be affected
- manage disciplinary/complaints aspects (Please refer to our Staff Disciplinary policy and Procedure and our Complaints policy and Procedure)
- A media strategy should be developed with no improper or inadvertent releases of information to the media, in accordance with the Association of Chief Police Officers (ACPO) guidance (now known as [The National Police Chiefs' Council \(NPCC\)](#)).

Support - parents/carers of a child(ren) involved should be:

- Informed of the allegation as soon as possible, provided provision of information and advice at that stage does not impede the enquiry, disciplinary or investigative processes, and may need to be told immediately, e.g. a child requires medical treatment.
- Helped to understand the process involved and kept informed about the progress of the case.
- Told that there has been an enquiry or disciplinary process (but no detail is to be provided in relation to any internal hr processes).
- When necessary, helped to understand the outcomes reached (but see above proviso in relation to the provision of advice).
- The employer should keep the subject of the allegation informed of progress in the case and arrange to provide appropriate support (via occupational health or equivalent). If the person is suspended, (s)he should be kept informed of development in the workplace and if a member of a trade's union or professional association.

Monitoring - the LADO should monitor the progress of cases either fortnightly or monthly depending on its complexity either via review Strategy Discussions or by liaising with Police and/or Children's Services colleagues, or employer as appropriate. The Designated Officer should keep records to ensure that every case is dealt with without undue delay.

If the Strategy Discussion/initial evaluation have decided that a Police investigation is required, the Joint Child Protection Investigation Team (JCPIT) should also set a target date for reviewing the progress of its investigation and consulting the Crown Prosecution Service (CPS), to consider whether to charge the individual/continue to investigate/close the investigation. Whenever possible that review should take place within four weeks of the decision to initiate a criminal investigation.

If the investigation is to continue, dates for subsequent reviews, ideally at fortnightly (at most monthly) intervals, should be set at the meeting.

Target Timescales - it is in everyone's interest for cases to be dealt with as quickly as possible, consistent with a fair and thorough investigation. Timescales (which are not performance indicators) will depend on nature, seriousness, and complexity of allegation(s) though in general (based upon data about allegations against education staff):

- 80% of cases should be resolved within one month.
- 90% within three months.

All but the most exceptional should be completed within twelve months (it is unlikely cases requiring a criminal prosecution or complex Police investigation can be completed in less than three months).

12) Reporting Concerns and Allegations:

Concern/Allegation about	Report to
Member of staff (including volunteers, supply staff and contractors)	Headteacher If the allegation is against supply staff or contractors the Headteacher will pass on a report to the adult's employer at their agency/company.
Headteacher	Chair of Trustees
Chair of Trustees / Vice Chair of Trustees / Trustee board or Manager who is the sole proprietor	Local Authority Designated Officer LADO (for staff only) LADO.Referral@hertfordshire.gov.uk and/or Report to the police on 101 or if urgent 999
If you are worried that the concerns raised have not been taken seriously or escalated.	Chair of Trustees Police 101 Children Services 0300 123 4043 NSPCC Whistleblowing Helpline 0800 028 0285 NSPCC Whistleblowing Email help@nspcc.org.uk
Concerns/Allegations relating to an incident that happened when an individual or organisation has used school premises for running activities for children e.g. community groups, sports and faith associations, or service providers that run extra-curricular activities)	Headteacher As with any safeguarding allegation, the DSL will follow their school's safeguarding policies and procedures, including informing the LADO. Out-of-school settings: safeguarding guidance for providers - GOV.UK

Concern about the Quality of Care/Practice: If a stakeholder is concerned about a matter that is not of a child protection nature, but general queries about the perceived quality and standard of certain practice in our school and it is considered that something is not good enough or/suitable for its purpose they should speak to the Headteacher or our Chair of Trustees.

Complaints: if a stakeholder is unsatisfied with any aspects of how we implement and comply with safeguarding policies and procedures, to keep children and young people safe in our school.

Please refer to our Complaints Procedures which will advise as part of the stages, to share any initial queries and concerns with our school's Headteacher or our Chair of Trustees. Your feedback is important to us, and we would like to reassure our stakeholders that any expression of dissatisfaction however made, about actions taken or a lack of action' is a priority to understand so that we can find a solution and support a complainant.

Our Complaints Procedures can be found on our school website.

After-school clubs, community activities and tuition: safeguarding guidance for providers

At Applecroft School we have a legal duty of care to ensure we maintain a safe environment for children. If we receive an allegation or concern relating to an incident that has happened when an outside individual or organisation are using our school premises, we will ensure that we follow our school's safeguarding and child protection procedures, which includes reporting allegations to the LADO, Children's Social Care and Police if a crime has been committed.

It is the role of Applecroft School's Board of Trustees to ensure any organisation that hires the school premises is compliant with the guidance set out in [After-school clubs, community activities and tuition: safeguarding guidance for providers - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/after-school-clubs-community-activities-and-tuition-safeguarding-guidance-for-providers) In particular we have embedded within our lease agreement with external organisations the standards and expectations for them to provide evidence and assurance of their safeguarding and child protection procedures.

13) Staff Requests of Anonymity:

If the staff member who raises the concern wishes to remain anonymous, the school will respect the person's request as far as possible. However, there may be circumstances where the staff member will need to be named and for this reason, anonymity should never be promised to members of staff who share low-level concerns.

Where possible, staff should be encouraged to consent to be named, as this will help to create a culture of openness and transparency.

14) Data Protection:

The Data Protection Act 2018 (DPA 2018) is not a barrier to a low-level concerns procedure but an important factor to consider. DPA 2018 includes a specific provision which permits organisations to process even the most sensitive personal data where it is necessary for the purposes of protecting children from harm. Low-level concerns recording must meet the relevant threshold of necessity.

School leaders should be mindful that staff they are making records about may have rights to access them through a subject access request (SAR). In consideration of this, school leaders should be mindful when recording Low-Level Concerns, particularly where the issue relates to a specific child. If a child may be identifiable from the record, then it is likely to be inappropriate to share this record following a subject access request. Please contact your Data Protection Officer (DPO) for further advice.

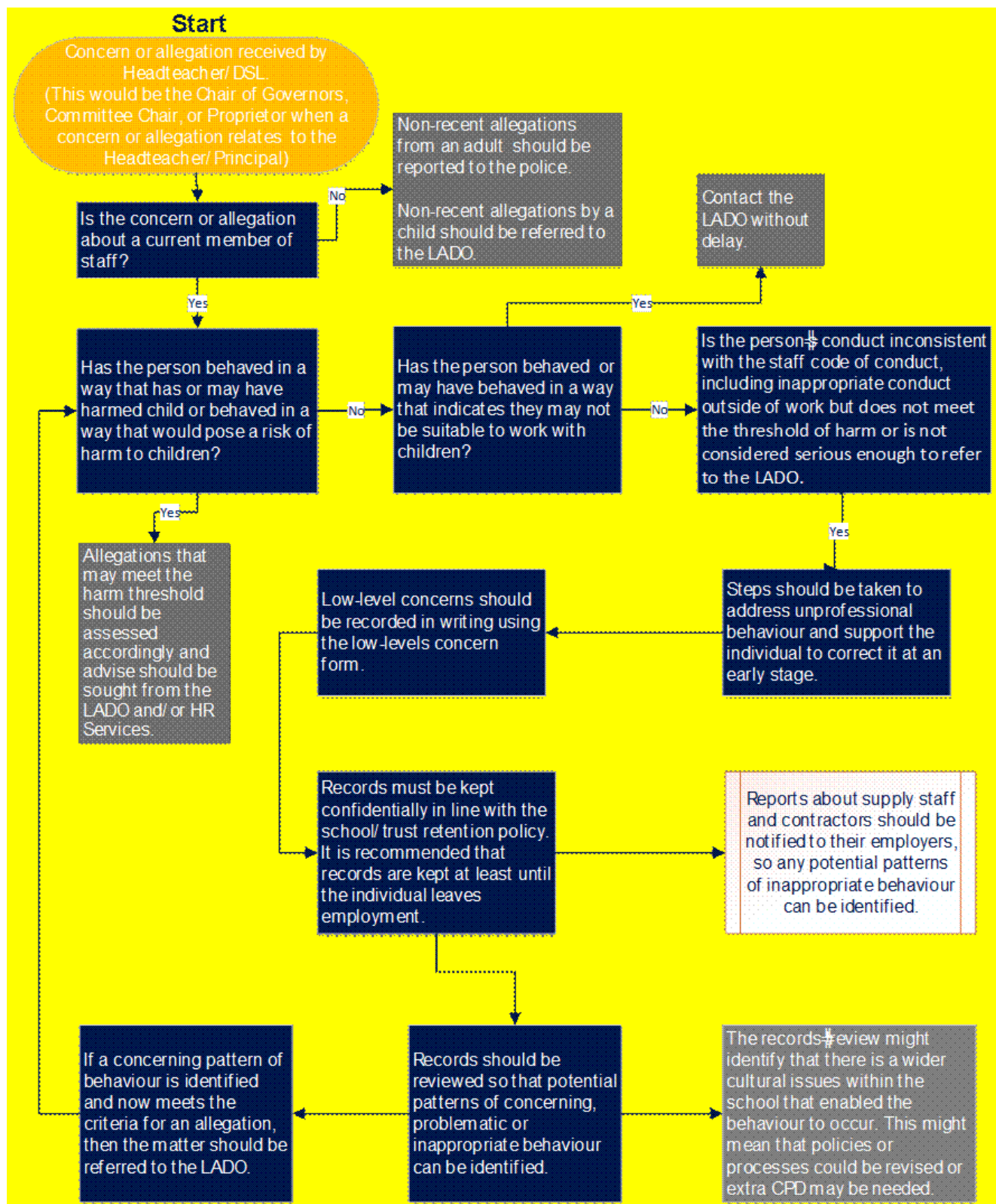
15) References:

Low-level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. However, where a low-level concern (or group of concerns) meets the harm threshold for referral to the LADO and is found to be substantiated, then it should be referred to in a reference.

Appendix 1

Process to Follow When a Low-Level Concern is Raised

Please refer to Keeping Children Safe in Education 2026 for more detailed information.



Applecroft School Low-Level Concern Form

1) Name of individual raising the concern <i>Leave blank if concern was raised anonymously or the individual wishes to remain anonymous</i>	
2) Date the concern was raised	
3) Name and role of individual about whom concern has been raised	
4) Details of the concern(s) reported <i>(give description and context)</i> <i>A 'low level' concern is any concern - no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult may have acted in a way that is inconsistent with the staff code of conduct but does not meet the allegations threshold set out in Section 1 of Part 4 of KCSiE</i>	
5) Details of steps taken to investigate this concern <i>Steps should include speaking to the individual who raised the concern, the individual about whom the concern is raised and any witnesses. Review the Code of Conduct and Safeguarding Policy to determine if there has been a breach</i>	
6) Set out the Individual's response to the concern	
7) Is this concern 'low level' or does it meet the harm threshold? If it meets the harm threshold it should be referred to the LADO in accordance with Section 1 of Part 4 of KCSiE. <i>To reach this decision, consider the information set out in KCSiE. If you are unsure, seek advice from HR Services and/or the lead on safeguarding and/or discuss the matter with the LADO. Set out your reasons for reaching your</i>	

conclusion, including any advice received.	
8) Have 'low level' or other concerns been raised about this individual previously? <i>If so, please provide dates, brief details and relevant file/document reference(s) for the concern(s). Also consider whether previous concern(s) raised coupled with this new concern meet the harm threshold set out in Section 1 of Part 4 of KCSiE.</i>	Yes [] No []
Details of further action required, including the rationale. <i>Action could range from no action or a conversation to discuss the concern, to being clear why the behaviour is concerning and formal disciplinary action.</i>	

Completed by:	Name:	
	Position:	
Date:		
Signature:		

Please note that low-level concerns will be treated in confidence as far as possible, Applecroft School may, in certain circumstances, be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.