



Managing Allegations Against Staff Policy

Reconnect Learning · Version 1.0 · Approved September 2026 · Review September 2027

POLICY OWNER: ELLEN KERR – MANAGING DIRECTOR & DESIGNATED SAFEGUARDING LEAD (DSL)

Statement of Commitment

The welfare of the child is paramount.

Reconnect Learning is committed to safeguarding and promoting the welfare of children and young people. We recognise our duty to respond to all concerns and allegations made against adults working with children in a manner that is timely, proportionate and fair.

This policy ensures that allegations are managed in accordance with statutory safeguarding guidance and the principles of natural justice — safeguarding the welfare of children remains the overriding priority, whilst staff are entitled to fair and transparent processes. Confidentiality will be maintained wherever appropriate and lawful, without compromising the safety of children.

Respond Appropriately

Every concern is taken seriously, handled with care and managed in line with statutory safeguarding guidance.

Act Promptly & Proportionately

Timely and proportionate action protects children and supports fair, transparent outcomes for all involved.

Treat Fairly

Staff are treated with professionalism and dignity throughout, in accordance with the principles of natural justice.

Purpose of This Policy

This policy has been designed to fulfil a clear set of safeguarding and organisational objectives, ensuring Reconnect Learning operates with transparency and accountability at all times.

→ **Protect Children and Young People**

Ensuring the safety and wellbeing of every child is the primary purpose of this policy.

→ **Support Openness and Accountability**

A culture where concerns can be raised safely and without fear.

→ **Protect Staff from Unfounded or Malicious Allegations**

Fair processes that safeguard staff from unfounded or malicious claims.

→ **Ensure Appropriate Management of Allegations**

All concerns are handled in line with statutory safeguarding guidance.

→ **Ensure Legislative Compliance**

Full alignment with safeguarding legislation and statutory guidance.

→ **Promote Safer Working Practices**

Embedding safe recruitment and professional conduct across all provision.

Scope

This policy applies to all individuals working with or on behalf of Reconnect Learning, across all forms of provision.

Who This Policy Covers

- Employees
- Tutors
- Associate Tutors
- Volunteers
- Contractors
- Agency Staff
- Directors
- Self-employed tutors
- Anyone working on behalf of Reconnect Learning

Provision Types Covered

- Face-to-face provision
- Home tuition
- Online tuition
- Remote learning
- Educational visits
- Community-based provision

Legislative Framework

This policy is informed by a comprehensive range of statutory guidance and legislation to ensure full compliance with national safeguarding requirements.

- 1

Keeping Children Safe in Education (KCSIE 2026)

The primary statutory guidance for safeguarding in educational settings.
- 2

Working Together to Safeguard Children (2026)

Multi-agency framework for child protection and safeguarding.
- 3

Children Act 1989 & 2004

Core legislation establishing duties to safeguard and promote children's welfare.
- 4

Education Act 2002

Places a duty on governing bodies to safeguard and promote pupil welfare.
- 5

Safeguarding Vulnerable Groups Act 2006

Establishes the barring scheme for those working with children.
- 6

Data Protection Act 2018 & UK GDPR

Governs the lawful handling and storage of personal and sensitive data.
- 7

Human Rights Act 1998

Ensures processes respect the fundamental rights of all individuals.
- 8

Equality Act 2010

Ensures safeguarding processes are free from discrimination and promote equality of opportunity.

This policy should be read alongside Reconnect Learning's Safeguarding and Child Protection Policy, which is the organisation's overarching safeguarding policy.

Definition of an Allegation

An allegation against an adult working with children may arise where an individual has met one or more of the following **Harm Threshold Criteria** as defined in KCSIE 2026. Any concern meeting one or more of these criteria must be managed under this policy.



Harmed a Child

Direct harm caused to a child by the individual.



May Have Harmed a Child

Reasonable cause to believe harm may have occurred.



Criminal Offence Against a Child

Committed or may have committed a criminal offence related to a child.



Behaviour Indicating Risk of Harm

Behaved towards a child or young person in a way that indicates they may pose a risk of harm.



Unsuitability to Work With Children

Behaved in a way that indicates they may not be suitable to work with children or young people.

Relationship to Low-Level Concerns

Reconnect Learning recognises the important distinction between low-level concerns and formal allegations. This distinction is essential to ensure that concerns are managed through the correct process and that proportionate, appropriate action is taken at every level of safeguarding practice.

LOW-LEVEL CONCERNS



BEHAVIOUR BELOW PROFESSIONAL STANDARDS. DOES NOT MEET HARM THRESHOLD. MANAGED INTERNALLY, RECORDED, AND MONITORED.

ALLEGATIONS



CONCERNS MEET HARM THRESHOLD. REQUIRES FORMAL SAFEGUARDING MANAGEMENT. LADO INVOLVEMENT, FORMAL INVESTIGATION, POTENTIAL SUSPENSION.

- i** Where uncertainty exists about whether a concern meets the harm threshold, the DSL will seek advice from the Local Authority Designated Officer (LADO) before determining the appropriate course of action.

Immediate Response to an Allegation

Any allegation must be taken seriously and reported immediately. Staff receiving an allegation must follow the steps below without delay — it is not the role of staff to investigate concerns themselves.

1

Listen

Remain calm and listen carefully to what is being said without interrupting or leading the individual.

2

Record

Make an accurate, factual record of what has been said, using the individual's own words wherever possible.

3

Report

Inform the Managing Director / DSL immediately and without delay.

4

Preserve Evidence

Do not alter, delete, or interfere with any evidence relating to the allegation.

⊗ Staff must NOT investigate the allegation themselves, interview witnesses, question the child or young person extensively, seek additional evidence before reporting, promise confidentiality, or discuss the matter with anyone other than the DSL. Delay in reporting is not acceptable.

Reporting Allegations

All allegations must be reported immediately through the correct channels. The route for reporting depends on who the allegation concerns. Allegations against self-employed tutors, contractors, volunteers, and agency staff must also be reported to the MD/DSL immediately.



This dual-route reporting structure ensures that no individual is responsible for managing allegations about themselves, maintaining the integrity of the safeguarding process at all times.

Role of the Local Authority Designated Officer (LADO)

The LADO provides independent oversight and advice where allegations meet or may meet the harm threshold. The DSL will consult the LADO as soon as reasonably practicable, and ordinarily within one working day of receiving an allegation. Reconnect Learning will follow LADO advice throughout the process, and all decisions and rationale will be appropriately recorded.

The LADO will advise on the appropriate course of action, which may include one or more of the following:

No Further Action

Where the allegation does not meet the threshold or there is insufficient evidence to support further action.

Internal Management Action

Where the concern relates to conduct or capability and can be appropriately managed through internal processes.

Safeguarding Investigation

Where a formal safeguarding investigation is required to establish the facts.

Police Involvement

Where a criminal offence may have been committed and referral to the police is required.

Children's Social Care Involvement

Where child protection concerns require statutory intervention by Children's Social Care.

Multi-Agency Strategy Meetings

Where a coordinated multi-agency response is required to manage the allegation effectively.

Multi-agency working is central to effective safeguarding. Reconnect Learning will cooperate fully with all agencies involved in the management of an allegation.

Initial Risk Assessment

Following receipt of an allegation, the DSL will conduct a written risk assessment to consider all relevant factors before determining the appropriate course of action.



Immediate Safeguarding Risks

Assessing whether the child or other children are at immediate risk of harm.



Needs of the Child

Considering the emotional, physical, and safeguarding needs of the child involved.



Risks to Other Children

Evaluating whether other children in the provision may be at risk.



Staff Welfare Considerations

Recognising the impact on the member of staff subject to the allegation.



Proportionality

Ensuring that any action taken is proportionate to the nature and seriousness of the allegation.



A written risk assessment will be completed and retained as part of the safeguarding record. Advice from the LADO will inform all risk assessment decisions. Alternative safeguarding measures will be considered before suspension is recommended.

Suspension and Alternative Arrangements

Suspension is a neutral act and is not an assumption of guilt.

Reconnect Learning will always consider alternative safeguarding measures before suspension. Suspension will only be considered where it is necessary to protect children, protect the integrity of the investigation, or preserve evidence, and will ordinarily be taken on the advice of the LADO.

Alternative Measures Considered First

- Increased supervision
- Temporary redeployment
- Adjusted duties
- Removal from specific activities
- Restricted contact with children

When Suspension May Be Considered

- To protect children from risk of harm
- To protect the integrity of the investigation
- To preserve evidence
- On advice from the LADO

Advice from the LADO will be sought before suspension is implemented wherever possible.



Investigations

Investigations may take a number of forms depending on the nature of the allegation. Reconnect Learning will cooperate fully with all investigations, regardless of the type or lead agency involved.

1

Internal Procedures

Where concerns relate to conduct or capability and can be managed within the organisation.

2

Safeguarding Procedures

Where safeguarding concerns exist and a formal safeguarding investigation is required.

3

Police Investigation

Where criminal offences may have occurred, the police will lead the investigation.

4

Children's Social Care

Where child protection concerns exist and statutory intervention is required.

Reconnect Learning will not conduct its own investigation where a police or Children's Social Care investigation is underway, unless advised to do so by the relevant agency. The DSL will maintain regular contact with the lead agency and keep records of all communications.

Confidentiality

All allegations will be managed confidentially. Maintaining confidentiality is essential to protect the integrity of investigations, the welfare of the child, and the rights of the staff member involved. Confidentiality does not prevent the sharing of information where it is necessary to safeguard a child.

Need-to-Know Basis

Information will only be shared with those who need it to fulfil their safeguarding responsibilities.

Safeguarding Duties

Sharing of information is permitted where it is necessary to protect a child from harm.

Data Protection Compliance

All information sharing must be in line with the Data Protection Act 2018 and UK GDPR.



Confidentiality must be maintained by all parties involved. Breaching confidentiality may compromise investigations and could itself constitute a disciplinary matter.

Support for Children and Staff

Reconnect Learning recognises that allegations are distressing for all involved. Appropriate support will be provided to both the child and the member of staff throughout the process.

Support for Children

- Appropriate safeguarding support
- Emotional support and reassurance
- Ongoing communication with the child and family
- Referral to specialist support services where appropriate

The welfare of the child remains the primary consideration throughout the entire process.

Support for Staff

- Regular communication and updates
- Welfare support throughout the process
- Access to Employee Assistance Programme or equivalent
- Access to advice and guidance
- Representation where appropriate

Reconnect Learning recognises the significant impact allegations can have on staff wellbeing and will treat all staff fairly and professionally.

Possible Outcomes

Following the conclusion of an investigation, one of the following outcomes will be recorded. All outcomes will be documented appropriately and retained as part of the safeguarding record.

Substantiated

There is sufficient evidence to prove the allegation. Further action will follow in line with LADO advice.

Unsubstantiated

There is insufficient evidence to prove or disprove the allegation. This does not mean the allegation was false.

False

The allegation is demonstrably untrue. The individual making the allegation may have genuinely believed it to be true at the time.

Malicious

The allegation is deliberately fabricated with the intention to deceive. This is a serious matter and may itself require further action.

Unfounded

There is no evidence or proper basis to support the allegation. It does not necessarily mean the concern was raised in bad faith.

- ❑ Where an allegation is substantiated, Reconnect Learning will consider whether a referral to the Disclosure and Barring Service (DBS) is required.

Learning Lessons

Following the conclusion of an allegation, Reconnect Learning will reflect on the process and consider what improvements can be made. Continuous improvement is an essential safeguarding responsibility.

Review Policies

Identify Training Needs



Apply Lessons Learned

Assess Safeguarding Arrangements

This reflective process ensures that Reconnect Learning's safeguarding arrangements remain robust, effective and responsive to emerging risks. Learning from allegations may lead to:

- Policy and procedure reviews
- Additional staff training and development
- Changes to supervision arrangements
- Improvements to safer recruitment processes
- Updates to risk assessments
- Organisational learning shared across the team

Referrals to the Disclosure and Barring Service (DBS)

Reconnect Learning has a **legal duty** to refer individuals to the Disclosure and Barring Service (DBS) in specific circumstances. DBS referrals will be made promptly where required.

1

Harm to a Child

An individual has harmed a child or poses a risk of harm to children.

2

Employment Ends Due to Safeguarding

The individual's employment or engagement is terminated, or they are removed from regulated activity, due to safeguarding concerns.

3

Resignation Before Conclusion

An individual resigns, retires, or their engagement ends before safeguarding processes have concluded.

Referrals must also be made where an individual is removed from regulated activity for safeguarding reasons, even if they are not dismissed.



Failure to make a required DBS referral is a criminal offence. Reconnect Learning takes this duty extremely seriously and will act without delay where a referral is required.

Record Keeping, Training and Monitoring

Record Keeping

Accurate records will be maintained for all allegations and will include:

- Nature of concern
- Actions taken
- Decision-making rationale
- Advice received
- Outcome
- Referrals made
- Date and time of all key actions

Records will be stored securely, treated as confidential, and retained in accordance with statutory safeguarding guidance, organisational retention schedules and data protection legislation.

Training

All staff will receive training regarding:

- Safeguarding responsibilities
- Professional boundaries
- Allegations procedures
- Low-Level Concerns procedures
- Staff Code of Conduct

Training records will be maintained.

Monitoring and Review

The Managing Director and DSL will:

- Review allegations procedures regularly
- Monitor safeguarding trends
- Audit safeguarding records
- Ensure compliance with KCSIE 2026, Working Together to Safeguard Children 2026 and relevant safeguarding legislation.
- Review policy effectiveness annually

This policy will be reviewed annually and without unnecessary delay following changes to legislation, statutory guidance, safeguarding practice, organisational arrangements or learning from safeguarding incidents.

Statutory Guidance Compliance

Reconnect Learning will ensure this policy remains compliant with **Keeping Children Safe in Education (KCSIE) 2026** and **Working Together to Safeguard Children 2026**, as well as all relevant safeguarding legislation and local safeguarding partnership procedures. This policy will be reviewed annually and without unnecessary delay following changes to legislation, statutory guidance, safeguarding practice, organisational arrangements or learning from safeguarding incidents.

Related Policies and Compliance

This policy should be read alongside the following related policies, which together form Reconnect Learning's comprehensive safeguarding suite.

Related Policies

- Safeguarding and Child Protection Policy
- Low-Level Concerns Policy
- Staff Code of Conduct
- Safer Recruitment Policy
- Online Safety Policy
- Prevent Duty and Radicalisation Policy
- Whistleblowing Policy
- Behaviour Policy
- Data Protection Policy

Compliance Assessment

-  Aligned with the allegations management requirements of KCSIE 2026
-  LADO consultation and referral procedures included
-  DBS referral legal duties addressed
-  Suitable for Ofsted inspection
-  Suitable for Alternative Provision
-  Suitable for Home Tuition and Online Learning
-  Suitable for Local Authority commissioning

Reconnect Learning Commitment

Reconnect Learning is committed to maintaining a culture of safeguarding, transparency and accountability. Allegations against adults working with children will always be taken seriously, managed in accordance with statutory guidance, and addressed promptly to ensure the safety and wellbeing of every child and young person.

Reconnect Learning is committed to fostering a culture of continuous improvement, ensuring safeguarding practice evolves in response to statutory guidance, emerging risks, organisational learning and lessons learned from safeguarding practice.

Approved By Ellen Kerr – Managing Director & DSL	Version 1.0
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