Safeguarding concerns and allegations made about colleagues, supply colleagues, contractors, and volunteers.

Resilience Multi Academy Trust

Summary	This procedure and guidance relate to ALL concerns regarding conduct towards students, including low level concerns.
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Applies to: (please circle/delete as appropriate)	Colleagues, Supply Colleague**,** Contractors, and Volunteers
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DOCUMENT CONTROL

Date	Version	Action	Amendments
02.11.2021	1	Reviewed	Updated to be in line with KCSIE and statutory guidance and reformatted.
09.07.2024	2	Amended	Updated in line with solicitors' advice and references to KCSIE 2024
May 2025	3	Policy amended	Rebranding
August 2025	4	Amended	• Updated references to KCSIE 2025 • Para 10 -Reference made to anonymous or third-party allegations • Para 49 – Digital example of low-level concern added • Section added on how we will respond to low level concerns

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Introduction

1. RMAT takes the safeguarding of its students very seriously and we recognise that it is extremely important that any safeguarding concerns or allegations made against a colleague, supply colleague, contractors or volunteers is managed quickly and effectively. It is also important that low level safeguarding concerns are recognised and reported so behaviours can be appropriately managed.

2. This policy sets out how RMAT will manage safeguarding concerns and allegations made about a colleague, supply colleague, contractors, or volunteers at RMAT, together with allegations relating to incidents that happened when an individual or organisation was using RMAT premises for the purposes of running activities for children. It meets the requirements of the Department for Education statutory guidance for managing allegations set out in Part 4 of Keeping Children Safe in Education 2025.

3. This policy is set out in two parts. The first part deals with allegations made against a colleague, including supply colleague, contractors, or volunteers, together with allegations relating to incidents that happened when an individual or organisation was using RMAT premises for the purposes of running activities for children. The second part deals with low level concerns raised in relation to a colleague, including a supply colleague, contractors, or volunteers.

Part one: Managing allegations made against a colleague, supply colleague, contractors, or volunteers.

4. This part of the policy will be followed when managing such allegations and may be adapted to each case as required. Whilst it will be used in all cases, Part 4 of Keeping Children Safe in Education 2025 requires that it be followed in any case where it is suspected or alleged that a member of colleague, including agency colleague, or a volunteer has:

    - behaved in a way that has harmed a child or may have harmed a child (see our child protection and safeguarding policy available on SharePoint or RMAT websites for what we mean by 'harm').

    - possibly committed a criminal offence against or related to a child; or

    - behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children.

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

5. The fourth bullet point above includes behaviour that may have happened outside of RMAT that might make an individual unsuitable to work with children. This is known as transferable risk.

6. This policy will also be used where allegations are made relating to incidents that happened when an individual or organisation was using RMAT premises for the purposes of running activities for children.

7. This policy will be used alongside our complaints policy and child protection and safeguarding policy, both of which can be accessed on SharePoint or RMAT websites.

Reporting an allegation

8. The safety and welfare of our children and young people is of paramount importance and so all colleagues must report their allegations immediately.

9. Allegations made against a colleague, supply colleague, contractors or a volunteer should be reported to the Principal. Allegations involving a Principal or member of central services should be reported to the Chief Executive. Allegations involving the Chief Executive should be reported to the Chair of the Trust Board. The person who receives a report will then arrange contact to the local authority designated officer (LADO). The person who receives a report will then arrange for a case manager to be appointed which can be themselves.

10. Where an anonymous allegation is made or an allegation is made by a third party, the Principal, Chief Executive or Chair of the Trust Board (as appropriate) will assess the credibility and seriousness of the information provided. Anonymous allegations will be treated with caution but not dismissed outright. Basic enquiries will be made to establish whether further investigation is warranted. Third party reports will be verified by speaking directly with the original source where possible, unless anonymity is requested.

11. When an allegation is made the Principal/Chief Executive/Chair of the Trust Board will consider two aspects:

- looking after the welfare of the child; and
- investigating and supporting the person subject to the allegation

12. In each case, the Principal/Chief Executive/Chair of the Trust Board will:

- apply common sense and judgement.
- deal with allegations quickly, fairly, and consistently; and
- provide effective protection for the child and support the person subject to the allegation.

13. Before contacting the LADO, Principal/Chief Executive/Chair of the Trust Board will conduct basic enquiries to establish the facts to help determine whether there is any foundation to the allegation. The Principal/Chief Executive/Chair of the Trust Board will contact the LADO, and an initial discussion will take place to consider the nature, content and context of the allegation and agree a course of action. The RMAT Designated Safeguarding Lead may also be involved in this discussion. This discussion may include that:

- no further action is required; or
- more information is required to determine a course of action; or
- a strategy discussion should take place; or
- police or social care should be involved.

14. RMAT will share relevant information with the LADO about the allegation, the child, and the person against whom the allegation has been made. If it is decided that a strategy discussion

should take place, then the academy will always attend that meeting. Representatives from other agencies such as health, social care and police may also be invited to the meeting.

15. Where an allegation is made or becomes known to RMAT relating to incidents that happened when an individual or organisation was using RMAT premises for the purposes of running activities for children the Principal/Chief Executive/Chair of the Trust Board will inform the LADO in accordance with paragraph 13 of this policy.

Investigating an allegation

16. An investigation into the allegation should normally be undertaken by a senior colleague in RMAT. Where no suitable colleague is available or the nature or complexity of the allegation requires it, RMAT may appoint an independent investigator.

17. When determining the outcome of an investigation Part 4 of Keeping Children Safe in Education 2025 states that the following definitions should be used when determining the outcome of the investigation:

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious**: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject to the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated**: there is insufficient evidence to either prove or disprove the allegation, the term, therefore, does not imply guilt or innocence
- **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made

18. In no circumstances would RMAT cease to use a supply colleague due to safeguarding concerns without finding out the facts and liaising with the LADO to determine a suitable outcome. Whilst RMAT is not the employer of supply teachers, we will ensure allegations are dealt with properly and involve the supply colleague agency in the process.

Supporting those involved

Parents/carers of the child(ren) involved.

19. Parents or carers of the child involved will be told about the allegation if they do not already know of it. Where a strategy discussion is required, or police or children's social care need to be involved, RMAT will not tell the parents or carers until it has been agreed with those agencies what information can be shared.

20. RMAT will keep parents or carers informed about the progress of the investigation. Where there is no criminal prosecution, RMAT will tell parents or carers the outcome of the investigation. The deliberations of any disciplinary hearing, and the information considered in reaching a decision, will not normally be disclosed but the parents or carers of the child will usually be told the outcome **in confidence**.

The colleague or volunteer

21. RMAT has a duty of care to its colleagues and will act to minimise the stress inherent in the investigation process.

22. The person who is the subject of the allegation will be informed as soon as possible, usually after the initial discussion with the LADO. The person will be advised of the course of action unless the police or children's social care raise an objection. In those circumstances the academy will work with children's social care and the police to agree what information can be disclosed and when.

23. The Principal/Chief Executive/Chair of the Trust Board (as appropriate) will appoint a named representative to keep the person who is the subject of the allegation informed of the progress of the case and up to date on other RMAT related matters. The Principal/Chief Executive/Chair of the Trust Board (as appropriate) will also consider what other support may be appropriate for the individual. RMAT will advise the individual to contact their trade union representative or a colleague for support. They may also be given access to support services provided by RMAT.

24. Where an allegation is made against a supply colleague, the supply agency should provide additional support to that supply colleague.

Suspension

25. Suspension is not an automatic response to an allegation being made. RMAT will only suspend a colleague following careful consideration of whether there is cause to suspect a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In many cases, it may be possible for alternative arrangements to be made so that the individual can continue working.

26. RMAT makes the decision whether or not to suspend a colleague. Where the police or children's social care are involved in the case, RMAT will listen to their views regarding suspension.

27. RMAT has no authority or power to suspend a supply colleague where an allegation is made against them. Instead, RMAT will immediately cease to use the services of that supply colleague.

28. Where the colleague is suspended, they will receive written confirmation within one working day and will be informed of the reason for the suspension.

29. After the suspension, if it is decided that the colleague can return to work, measures will be put in place to support their return to work. This could include a phased return or offering another colleague as a support system.

30. RMAT will not prevent social contact with work colleagues and friends unless there is evidence to suggest such contact may prejudice the gathering of evidence.

Resignation

31. If the individual resigns or the supply colleague, contractor or volunteer ceases to provide their service, the investigation into the allegation will be completed. The individual will be given the opportunity to engage with the investigation.

Action on conclusion of the case

32. If the allegation is substantiated and:

- the colleague is dismissed or resigns; or
- we cease to use the supply colleague's services as a result of the allegation.
- we cease to use the contractor's services as a result of the allegation; or
- we cease to use the volunteer's services as a result of the allegation.

RMAT will consider whether a referral to the DBS and/or to the TRA is required.

33. Where an allegation is found to be false, RMAT may refer the case to social services to determine whether the child needs support and/or to understand if there is a safeguarding reason why the false allegation was made.

34. Action may be taken against students who are found to have made malicious allegations in line with RMAT's PD (Behaviour) Policy.

35. Where an allegation is made against a supply colleague the outcome of the investigation will be shared with the supply agency and the LADO.

Post incident review.

36. It is good safeguarding practice for schools and academies to review incidents upon their conclusion so they can learn from them and continue to improve standards of safeguarding. Where allegations are made against a colleague, supply colleague, contractors, or volunteers, RMAT may carry out a review at the conclusion of the case.

Timescales

37. Investigations into allegations against a colleague, including agency colleagues or volunteers will be concluded as quickly and efficiently as possible to ensure that any risks to a child or other children and stress to the individual is minimised as far as possible.

Record keeping

38. Allegations found to be false or malicious will be removed from the employment record of the individual. For all other allegations, a clear and comprehensive summary of the allegation, how it was followed up and resolved, a note of actions taken, and decisions reached and a declaration on whether the information will be referred to in any future reference will be retained on the employment file. A copy will also be provided to the individual.

39. The record will be kept, including for people who leave RMAT, at least until the person reaches normal pension age or for 10 years if that will be longer, from the date of the allegation.

40. Details of any allegation made by a student will be kept in the confidential section of their record.

Confidentiality

41. RMAT will make every effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated.

42. The Education Act 2002 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher in a school who has been accused by, or on behalf of, a pupil from the same school. This applies to parents and carers as well as the press.

Non recent allegations

43. Where an adult makes an allegation to RMAT that they were abused as a child, that adult will be advised to report the allegation to the police.

44. Non recent allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations.

Part Two: Managing low level Concerns.

45. This part of the policy will be followed when dealing with low level concerns raised in relation to a colleague, including supply colleague, contractors or volunteers and may be adapted to each case as required. It will be used alongside RMATs complaints procedure, child protection and safeguarding policy, code of conduct and disciplinary procedure.

46. RMAT promotes a culture in which all concerns about all adults working in or on behalf of RMAT (including supply teachers, contractors, and volunteers) are addressed appropriately.

47. This policy is designed to:

- promote and support a culture of openness and trust where colleagues are clear about the behaviours expected of themselves and their colleagues.
- ensure colleagues are comfortable to raise low-level concerns; and
- provide for efficient and proportionate handling of those concerns.

Recognising low level concerns

48. This policy will be used to manage 'low-level' concerns, defined in Part 4 of Keeping Children Safe in Education 2025 as any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the personal and professional code of conduct, including inappropriate conduct outside of work; and

- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the Local Authority Designated Officer (LADO).

49. Examples of such behaviour could include, but is not limited to:

- being over friendly with children.
- having favourites.
- taking photographs of children on their mobile phone.
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or
- humiliating children.
- posting content online that contradicts RMAT's professional standards or safeguarding expectations.

Sharing low-level concerns

50. For our culture of openness and trust to prevail, all colleagues should share any low-level concerns they have. Serious Case Reviews and Safeguarding Practice Reviews have often evidenced how low-level concerns felt and/or expressed by colleague relating to individuals who were later found to have sexually abused children at a school were not recorded. When they are not recorded, they cannot be reviewed or studied for patterns of behaviour.

51. To minimise and hopefully eradicate the risk of those opportunities being missed, it is critical that colleagues understand their role in identifying and reporting low level concerns.

52. All colleagues are encouraged to immediately report low level safeguarding concerns as defined in this policy so that the identified behaviours can be investigated and managed appropriately.

53. All low level concerns in relation to a colleague, supply colleague, contractors or volunteers should be reported immediately to the Principal. Concerns about a Principal or member of Central Services should be reported to the Chief Executive. Concerns about the Chief Executive should be reported to the Chair of the Trust Board.

54. The procedure for reporting low level concerns is consistent with that for reporting allegations of abuse as set out in part one of this policy. Colleagues do not need to determine whether their concern meets the threshold set out in part one of this policy or is a low-level concern. The Principal, Chief Executive, Chair of the Trust Board (as appropriate) will make this determination once the colleague has reported the issue.

Responding to low-level concerns

55. The Principal, Chief Executive, Chair of the Trust Board (as appropriate) will review the concern to confirm that it is not a more serious issue that should be dealt with under part one of this policy. An issue reported as a low-level concern would be dealt under part one of this policy where it meets the threshold set out in part one or there is a pattern of low-level concerns expressed about the individual or wider staff practices generally. If necessary, the Principal, Chief Executive, Chair of the Trust Board (as appropriate) will discuss the concern with the LADO to determine whether it should be dealt with under part one of this policy.

56. The Principal, Chief Executive, Chair of the Trust Board (as appropriate) will discuss the concern with the individual who raised it and will investigate it, as appropriate.

57. Most low-level concerns are likely to be minor and can be dealt with by means of management, support, or additional training. Where necessary, action may be taken in accordance with the trust's code of conduct and disciplinary procedure.

58. If the concern has been raised via a third party, the Principal, Chief Executive, Chair of the Trust Board (as appropriate) will collect evidence by speaking directly to the person who raised the concern (unless it has been raised anonymously), the individual involved, and any witnesses.

59. Where a low-level concern is raised about a member of supply staff or a contractor, the concern will be shared with the supply agency, so they can take appropriate steps in accordance with their own policies and statutory guidance.

60. Where multiple low-level concerns are raised about the same individual, RMAT will review the pattern of behaviour to determine whether it meets the threshold for formal investigation under part one of the policy. The following are examples of when a concern may be escalated:

- Two or more low-level concerns are raised within a 12-month period.
- The nature of concerns suggests a developing pattern of inappropriate behaviour.
- The concern when viewed in context with previous incidents, indicates potential risk to children. In such cases, the Principal, Chief Executive, or Chair of the Trust Board will consult with the LADO to determine the appropriate course of action.

Recording low-level concerns

61. All low-level concerns will be recorded in writing and will include details of the concern, the context and action taken. The records will be kept confidential and held securely in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation.

62. Records of low-level concerns will be reviewed so potential patterns of concerning; problematic or inappropriate behaviour can be identified. If patterns are identified, RMAT will decide on an appropriate course of action and will refer the matter to the LADO where the behaviour moves from a concern to meeting the threshold set out in part 1 of this policy.

63. The record of the low-level concern will be kept at least until the person leaves RMAT.

References

64. Low level safeguarding concerns will not be included in references except where they have met the threshold for referral to the LADO and found to be substantiated, in which case they should be referred to in references.