




Annex 9

Managing and Reporting Allegations Against Staff, Volunteers, and Adults in a Position of Trust

2025/26

Academic Year


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Department Area	Human Resources/Safeguarding
Date of Review	September 2025
Date of Approval	October 2025
Approved by	Executive Team
Next Review Date	September 2026
Status	Internal

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1. Purpose and Scope

- 1.1 This procedure explains how the College responds when a concern or allegation is raised about the conduct of a member of staff, volunteer, governor, agency worker or contractor. It provides a framework to ensure there is a consistent approach which is clear to all staff. It covers behaviour that causes harm or potential harm to a child, possible criminal conduct, actions that suggest unsuitability to work with children, and other situations that raise safeguarding risks.
- 1.2 This applies to all adults working in or on behalf of the College at any campus.
- 1.3 The Sandwell Colleges are committed to providing the highest levels of care for both its students and staff. Allegations will be dealt with promptly and fairly, with confidentiality protected as far as possible. Records of decisions and actions will be kept. Everyone involved should be treated with dignity and support.


2. Definitions and Thresholds

- 2.1 **Allegations meeting the harm threshold:** Concerns that a person has harmed a child, may have committed a criminal offence, or behaved in a way that poses a risk of harm or indicates unsuitability to work with children. These must be referred to the Local Authority Designated Officer (LADO).
- 2.2 **Low-level concerns:** Conduct that does not meet the harm threshold but is inconsistent with professional expectations or raises a doubt. Examples include boundary issues, overfamiliarity, or inappropriate use of language. These are still recorded and monitored.
- 2.3 **Transferrable risk:** Behaviour outside work which might cast doubt on an individual's suitability to work with children.

3. Roles and Responsibilities

- 3.1 **Governing Body / Board**
Ensures this procedure is in place and monitored, receives regular anonymised reports, and checks that procedures are followed consistently.
- 3.2 **CEO & Principal and Executive Leadership Team**
Ensures that the Campus Principals, senior team, the Designated Safeguarding Lead (DSL), deputies, and the HR team work together as appropriate when allegations arise. They also make decisions in complex or cross-college cases, and liaise with the Governing Body to provide assurance and oversight.
- 3.3 **Campus Principals**
They must immediately notify a member of the Executive Team, senior member of the HR team and Safeguarding department of any allegation, ensuring that initial safeguarding measures are taken, and secure records and evidence.

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3.4 Executive Director of HR & OD

Will oversee investigations, decisions about suspension, disciplinary hearings and referrals to regulators. Their role is to ensure that the process is fair, lawful, and in line with both safeguarding and employment responsibilities.

3.5 DSL and Safeguarding Team

Will advise on safeguarding implications and liaises with the LADO, police, and children's social care when thresholds are met. They ensure that children and staff involved are supported, and they maintain central records of all concerns, including low-level matters.

3.6 All staff, volunteers and contractors must report any concern about another adult without delay to a Campus Principal or member of the Senior Leadership Team. The allegation will be shared with a member of the Executive team.

Staff must not attempt to investigate matters themselves or promise confidentiality to colleagues. They are expected to cooperate fully with safeguarding and investigatory processes to ensure that children are protected and that the procedure is implemented effectively.

4. Procedures


4.1 Allegations Meeting the Harm Threshold

1. Concern is raised with a member of the Executive Team. The CEO & Principal is informed.
2. Immediate safeguarding action is taken if a child is at risk.
3. DSL and Senior HR staff assess whether the allegation meets the harm threshold
 - a. If yes – refer to LADO without delay. Inform CEO & Principal.
 - b. If no – manage internally, as a low-level concern.
4. Safeguarding and control measures are identified and put into place while the process is managed.
5. Records are kept and support is provided for all involved.

4.2 Low-Level Concerns

1. A staff member identifies behaviour inconsistent with professional standards or of concern.
2. A member of the Executive Team is informed.
3. Concern is logged in the campus record.
4. The Executive manager decides whether it should stay as low-level or be escalated.
 - a. If low level – addressed through supervision, training, or informal management.
 - b. If escalation needed – referred to safeguarding and a senior member of HR for investigation.
5. Logs are reviewed regularly to identify repeat patterns or concerns.

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4.3 Allegations Against the CEO & Principal or Senior Postholder

1. Concern is raised with the Chair of Governors.
2. Immediate safeguarding action is taken if a child is at risk.
3. Chair of Governors, with advice from DSL and Executive Director of HR & OD assesses whether the allegation meets the harm threshold.
 - a. If yes – refer to LADO without delay.
 - b. If no – manage internally as a low-level concern.
4. Safeguarding and control measures are identified and put into place while the process is managed.
5. Records are kept and support is provided for all involved.

4.4 Suspension

Suspension is a neutral act and used only where necessary to protect children or an investigation. It will not be an automatic response when an allegation is reported. The decision to suspend will be taken by a member of the Executive Leadership Team with input from the safeguarding team, a senior member of HR and documented and reviewed regularly. Alternatives to suspension will be considered before such action is taken.

4.5 Information sharing

As appropriate, the College will share with relevant agencies all information they have about the person who is subject to the allegation and about the alleged victim. Beyond agencies, information will be shared only with those who need to know. Communications with parents, staff and external agencies are agreed in line with advice from the LADO, police or social care.


5. Investigations and Outcomes

- 5.1 Investigations will be led by an internal manager or an external investigator, depending on the circumstances of the case. Interviews, evidence collection and written reports will be carried out confidentiality and objectively.
- 5.2 Allegations may be substantiated, unsubstantiated, false, malicious, or unfounded. Outcomes may include disciplinary action, referral to a regulator, or involve no further action but involve ongoing monitoring.
- 5.3 After an investigation outcome, support will continue for children, families and staff members. Risk assessments will be updated, protective measures may remain in place, and lessons learned will be used to strengthen practice. Staff have the right to appeal against any formal sanction under the relevant, formal HR procedures.

6. Support for those involved

The College will act to minimise the stress inherent in an allegations process. Individuals will be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless there is an objection by the children's social care services or the police. The member of staff will be advised to contact their trade union representative, if they have one, or a colleague for support. The member of staff will also be provided with details of the College's Employee Assistance Programme.

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7. Multi-Campus Arrangements

7.1 Each Campus Principal (if at Cadbury or Central St. Michaels) may be the first point of contact for allegations of this nature, but a member of the Executive Leadership team must be informed.

8. Monitoring and Review

8.1 The governing body receives anonymised data on cases and outcomes. The central safeguarding team monitors logs across campuses to identify themes. Reviews take place annually or sooner if guidance changes. Learning feeds into staff training and procedural updates.

9. Other relevant policy content and guidance

- Professional Boundaries Policy
- Safeguarding Policy
- Keeping Children Safe In Education 2025 [link here](#)
- Staff disciplinary procedure

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