

Allegations Management Policy

Document owner	Director / Designated Safeguarding Lead
Version	2.0
Effective date	October 2026
Review date	October 2027, or sooner if law, statutory guidance, REC criteria or client requirements change
Status	Open policy; available to all via website

This policy explains how Unique School Solutions (USS), as an education recruitment agency and employment business, responds to concerns about adults' suitability to work with children. Protecting children, responding promptly and treating those involved fairly are central to our approach.

1 Scope and responsibility

It applies to registered candidates, supplied teachers and support workers, permanent introductions where relevant, USS employees, directors, trainees and volunteers. It covers conduct during education assignments, concerns identified during registration, online and outside-work conduct, and non-recent allegations that may indicate a current safeguarding risk. A child is under 18.

USS retains responsibility for its own supply decisions, employment or engagement processes, information sharing and statutory referrals. We work with the placing school or setting, the Local Authority Designated Officer (LADO), police and children's social care; we do not replace their responsibilities or investigations. Concerns involving adult learners are escalated through the relevant adult safeguarding arrangements where applicable, rather than treating the LADO as an adult safeguarding route.

The directors oversee this policy. The DSL coordinates each response and keeps a decision record. Where they are implicated, conflicted or unavailable, an alternative director or independent competent person must manage the case. Employees' disciplinary rights and workers' contractual and statutory rights remain applicable.

2 Reporting contacts

USS office and urgent out-of-hour contact: 0114 3392026

Address: Unit 3, Enterprise Court, Farfield Park, Rotherham, S63 5DB

The Designated Safeguarding Lead for USS is Rebecca Dodd, rebecca@uniqueschoolsolutions.co.uk, 0114 3392026

The Deputy Designated Safeguarding Lead for USS is Adele Roberts, adele@uniqueschoolsolutions.co.uk, 0114 3392026

A concern must not be delayed because a named contact is unavailable. Contact the alternative director or the relevant LADO directly. For an emergency or immediate danger call 999. Use local children's social care for a child protection referral.

Recognising and reporting concerns

3 Concerns that may meet the harm threshold

Treat a report as a potential allegation where an adult may have harmed a child, committed an offence involving a child, shown behaviour suggesting a risk to children, or behaved in a way calling their suitability to work with children into question. Conduct outside work can also reveal a risk. The initial classification is not a finding of guilt.

USS will obtain LADO advice where the threshold may be met or is unclear. We will not downgrade a concern to avoid external scrutiny or assume that a school ending an assignment resolves the safeguarding issue.

4 Low level concerns

A low-level concern describes behaviour inconsistent with the code of conduct which does not appear to meet the harm threshold. It is not insignificant. Examples include over-familiarity, favouritism, inappropriate personal phone photographs, unnecessary secluded one to one contact, or humiliating language. Context matters and apparently minor incidents may form a wider pattern.

Candidates and staff should report concerns promptly, including incidents involving themselves that might be misinterpreted or fall below expected standards. Anonymous reports will be considered; anonymity cannot be promised where disclosure is necessary for safeguarding or a fair process.

The USS DSL lead will record the concern, review previous concerns across assignments and agree proportionate enquiries with the setting. Once the threshold has been checked and any necessary LADO advice obtained, the lead will seek the reporter's account, the worker's response and relevant evidence, then record the decision and action. Responses may include clarification, training, supervision or a conduct process. Escalate any pattern or new evidence that may meet the harm threshold; do not treat repeated concerns in isolation.

5 How candidates and staff report

- During a placement, report a child welfare concern immediately to the setting's DSL or deputy. Report an allegation about an adult to the headteacher, principal or designated case manager, and notify the USS safeguarding lead without delay.
- If the concern involves the headteacher or principal, use the setting's alternative senior reporting route, such as the chair of governors or proprietor. Where the headteacher is the sole proprietor or there is a conflict of interest, report directly to the LADO.
- Report low-level concerns under the setting's procedure and to USS so relevant information can be considered across assignments.
- If the report concerns a USS employee or director, use the USS alternative reporting route on page 1; do not report solely to the person concerned.
- Do not investigate, confront the person concerned, ask leading questions or seek evidence from pupils. Record the facts and preserve relevant messages or documents securely.

A complaint about service, attendance or capability is normally managed through the appropriate complaints or conduct process. If it suggests a safeguarding risk, this policy also applies. Whistleblowing routes remain available where concerns are not addressed. Genuine concerns raised in good faith will not attract retaliation, even if they are not substantiated.

The initial agency response

6 Immediate action and recording

The USS person receiving the report must notify the case lead immediately. A written account should follow as soon as practicable, but obtaining a signed statement must never delay safeguarding action. The case lead will:

- Establish immediate safety needs and arrange emergency, police or children's social care contact where necessary. Check the worker's current and imminent assignments and flag the file to prevent unreviewed placements.
- Record who reported the concern, when and how it was received, the worker's identity, setting, children involved, factual account and any evidence. Distinguish direct knowledge from opinion or hearsay.
- Carry out only proportionate initial checks, such as confirming dates, assignment details and who may hold evidence. Do not interview children or undertake a substantive investigation before agreeing with the relevant authorities.
- Contact the school or setting's case manager promptly, agree immediate protective arrangements and establish who will contact the LADO. USS must verify that a required referral has been made; it must not simply assume the school has dealt with it.
- Where the harm threshold may be met, seek LADO advice or make a referral without delay, ordinarily within one working day and within any shorter local deadline. Record the advice and agreed responsibilities.

Use the LADO covering the relevant setting or incident and obtain advice about jurisdiction where several areas, agencies or employers are involved. USS being based in Rotherham does not mean all cases belong to Rotherham LADO.

7 Decisions about placements

USS will make and document an immediate risk assessment. Pending urgent assessment, new or continuing supply may need to be paused. A pause or removal is a precaution, not proof that the concern is true. Decisions must be proportionate to risk and reviewed when information changes.

The DSL and a director will consider the nature of the report, access to children, other assignments, available controls and LADO or police advice. Alternatives may include adjusted duties, supervision or another suitable arrangement, but USS will not move a worker to another school to avoid addressing an unresolved risk. Any alternative placement itself must be assessed and agreed safely.

For USS employees, suspension is considered under the applicable employment procedure and is not automatic. For supplied workers, decisions about offering or ending assignments are managed under their engagement terms and legal rights. USS will confirm the decision, reasons that can be disclosed, review arrangements, support contact and pay position in writing; this policy does not impose automatic unpaid suspension.

Coordinating enquiries and supporting people

8 Who undertakes enquiries

For an incident on placement, the education setting will usually lead the fact-finding because it holds the evidence and has access to its staff and pupils. USS will remain actively involved, nominate a representative, attend relevant meetings and supply relevant recruitment, placement and prior-concern information securely.

The parties will agree and record the lead, scope, evidence requirements, information-sharing arrangements and timetable. Police and children's social care determine their own enquiries; the LADO advises and oversees the allegations process. USS must not start parallel interviews that could prejudice those enquiries.

If a concern arises during registration, outside a placement or about USS personnel, USS will agree with the LADO or other relevant authority who should lead. Once authorised, a competent and impartial person may conduct USS enquiries. Any conflict of interest will be managed through independent assistance.

If a school ends a booking, declines to investigate or has not provided an outcome, USS will seek the missing information and LADO advice. A booking cancellation is not a recorded safeguarding outcome.

The case must remain under active review until an appropriate conclusion or documented outstanding position is reached.

9 Information and support for the worker

USS will give the person a named contact and explain the concern and process as soon as permitted by the LADO, police or children's social care. Information may need to be withheld temporarily to protect a child or investigation; the reason and review of that restriction will be recorded.

The worker will have a fair opportunity to respond when the agreed process permits. USS will encourage support from a trade union representative or appropriate colleague and allow reasonable accompaniment at agency fact-finding meetings, subject to safeguarding and conflict considerations. Any statutory right to accompaniment is preserved. Communication needs and reasonable adjustments will be considered.

At the outset, USS will agree an update timetable with the worker, normally at least weekly while active enquiries continue, even if there is no substantive change. External delays will be recorded and followed up. No fixed completion date will be promised where another body controls the timescale.

10 Protecting confidentiality

Share relevant information with the school, LADO, police, children's social care or regulators on a lawful, necessary and proportionate basis. Seek advice where the lawful basis is uncertain; do not make safeguarding disclosures depend solely on consent. Restrict access within USS, use secure channels and record what was shared and why.

Agree with the setting and relevant authorities who will communicate with the child and family. USS staff and candidates must not discuss the case on social media or contact witnesses to influence their accounts. Confidentiality does not prevent lawful reporting, whistleblowing or obtaining professional support.

Outcomes referrals and future supply

11 Reaching and recording an outcome

USS will obtain the agreed outcome and reasons in writing from the lead investigator or case manager where possible. If it remains outstanding, record that fact and continue follow-up rather than recording the worker as cleared. Use recognised outcome categories:

- Substantiated: the available evidence supports the allegation.
- Unsubstantiated: there is insufficient evidence to prove or disprove it; this does not establish innocence or guilt.
- Unfounded: there is no evidence or proper basis to support the allegation.

- False: sufficient evidence establishes that the allegation is not true.
- Malicious: sufficient evidence establishes a deliberately invented allegation intended to deceive or cause harm.

A criminal case ending without charge or conviction does not automatically end consideration of suitability or statutory referral duties. USS will assess the available evidence fairly and record any separate conduct or suitability decision, without purporting to overturn the decisions of statutory bodies.

12 Resignation and referrals

Ending an assignment, resignation, withdrawal from registration or refusal to cooperate must not prevent reasonable efforts to conclude the case, record the evidence or make required referrals. USS will not agree to suppress safeguarding information or waive statutory duties through a settlement or reference arrangement.

As a personnel supplier, USS must refer to DBS when both statutory conditions are met: permission to undertake regulated activity has been withdrawn, or would have been withdrawn had the person not left; and USS considers that relevant conduct, the harm test or a relevant caution or conviction applies. A precautionary pause alone does not automatically establish the referral duty. A director and the DSL must record the assessment and referral decision. A referral by a school, police or regulator does not discharge USS's separate duty.

Where relevant, USS will consider referral to the Teaching Regulation Agency for serious teacher misconduct and other professional bodies within their remit. These do not replace a DBS referral. USS will promptly notify REC of an investigation into a supplied worker that may bring USS or REC into disrepute, in line with applicable REC requirements, and meet any relevant framework reporting obligations.

13 Returning to work or ending engagement

A director will authorise future supply only after a recorded suitability and risk review. Outcomes do not create an automatic right to further assignments or an automatic bar. Any actual barring, prohibition or restriction must be followed. Agree any training, supervision, adjustments or support and update relevant systems before another booking. Give the worker the decision and reasons that can lawfully be disclosed, with an opportunity to request review by an uninvolved director or independent reviewer.

Records review and reference sources

14 Secure records and references

USS will maintain a restricted case record with the original concern, chronology, relevant evidence, threshold decisions, contacts with external agencies, risk assessments, placement decisions, worker communications, outcome and referral decisions. Review low-level concerns across settings to identify patterns. Escalate emerging risk to the LADO.

For harm-threshold allegations other than those found false or malicious, retain records at least until normal pension age or ten years from the allegation, whichever is later. Remove false or malicious allegations from personnel records unless the person consents to retention, taking advice where a separate legal preservation duty applies. Manage any such exceptional record separately with a documented lawful basis.

Keep low-level concern records during registration or engagement and review the necessary period afterwards under the USS retention schedule. A legitimate need to recognise patterns must be balanced against accuracy and data minimisation. Where concerns reach the harm threshold, apply the allegations retention rule. Do not delete evidence subject to an investigation or legal hold.

References must be accurate and fair. Do not include allegations found false, malicious, unfounded or unsubstantiated. Substantiated safeguarding allegations meeting the harm threshold should be disclosed factually. Standalone safeguarding low-level concerns should not be included unless they form a substantiated pattern reaching that threshold; separate verified misconduct or performance issues may be relevant. Seek advice on unresolved cases.

15 Implementation and review

Give this policy to agency staff and make it available via the website. Train staff on recognising concerns, escalating promptly and maintaining records. The directors will review learning after cases, check any outstanding actions and update processes or training. Review at least annually and sooner after changes to guidance, local arrangements or USS procedures. Align the handbook and Code of Conduct when this policy is approved.