BRADFORD ACADEMY TRUST

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A shining light in our community

You are the light of the world. A city on a hill cannot be hidden. - Matthew 5:14b

Managing Allegations Policy

Approved by:	RMC	**Date:** October 2025
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Related Documents		
Guidance		
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1. GENERAL SCOPE

1.1 This policy applies to all staff, Supply/Agency Workers, Contractors and Volunteers of Bradford Academy. It should be used in respect of all cases in which it is alleged that that a teacher, member of staff (including a volunteer) supply/agency workers or Contractors have:

- Behaved in a way that has harmed a student, or may have harmed a student
- Possibly committed a criminal offence against or related to a student
- Behaved towards a student or students in a way that indicates that s/he is unsuitable to work with students.

2. AIMS OF THE POLICY

2.1 To ensure that any allegation of abuse made against a teacher, professional services staff member, Agency/Supply Worker, Contractor or Volunteer is dealt with fairly, quickly and consistently in a way that provides effective protection for the student and at the same time supports the person who is the subject of the allegation.

2.2 The Academy wants an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

3. MANAGING ALLEGATIONS

3.1 All allegations should be reported immediately to the Executive Principal. In the absence of the Executive Principal the allegation should be reported to the Primary or Secondary Principal. In the absence of a Principal, the allegation should be reported to a Vice Principal. Where the Executive Principal is the subject of an allegation or concern the matter should be reported to the Chair of Governors.

3.2 Bradford Academy will liaise with the Local Authority Designated Officer responsible for advice and monitoring as set out in DfES guidance "Safeguarding Children and Safer Recruitment in Education"

3.3 There may be up to three strands in the consideration of an allegation:

- A police investigation of a possible criminal offence
- Enquiries and assessment by children's social care about whether a student is in need of protection or in need of services
- Consideration by the Academy of disciplinary action in respect of the individual.

4. THE TWO LEVELS OF ALLEGATION/CONCERN

ALLEGATIONS THAT MAY MEET THE HARMS THRESHOLD

Where it is alleged that anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may

pose a risk of harm to children; and/or

- behaved or may have behaved in a way that indicates they may not be suitable to work with children (includes behaviour that may have happened outside of school or college, that might make an individual unsuitable to work with children, this is known as transferable risk)

Where appropriate an assessment of transferable risk to children with whom the person works should be undertaken. If in doubt advice will be sought from the Local Authority Designated Officer (LADO).

In cases that meet this criteria of allegation a "Case Manager" will lead any investigation. This will be either the Executive Principal, or, where the Executive Principal is the subject of an allegation, the Chair of Governors.

CONCERNS THAT DO NOT MEET THE HARM THRESHOLD

WHAT IS A LOW LEVEL CONCERN?

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out earlier in this Section.

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 working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff 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 LADO

Examples of such behaviour could include, but are 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, using inappropriate sexualised, intimidating or offensive language.

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.

Staff should adhere to the **Code of Conduct** and follow the **Professional Boundaries Guidance** to ensure that low level concerns do not arise.

It is crucial that any such concerns, including those which do not meet the harm threshold, are still referred to the Executive Principal and shared responsibly with relevant designated safeguarding lead and line manager, recorded and dealt with appropriately. Persistent or sufficiently poor behaviour may be dealt with in accordance with the **Academy Disciplinary Procedure**. Any low level concerns involving Contractors or Agency Workers will be reported/discussed with their Employer/Agency. Ensuring low level concerns are dealt with effectively should also protect those working in or on behalf of schools from potential false allegations or misunderstandings.

Procedure for dealing with Low Level Concerns

Concerns that are defined as low level will still be reported to the Executive Principal who will appoint an Investigating Officer and ensure that the relevant designated safeguarding lead and the Human Resources

Manager are aware. Next steps will be determined by the outcome of the Investigating Officer Report. The Report will help to categorise the type of behaviour and determine what further action may need to be taken. The Report will be the means of recording and the basis for the rationale for any decisions and action taken including any involvement of the Academy's Disciplinary Procedure.

5. SUPPORTING THOSE INVOLVED

5.1 Parents or carers of a student or students involved should be told about the allegation as soon as possible if they do not already know of it, subject to advice from the local authority designated officer. They should also be kept informed about the progress of the case, and told the outcome where there is not a criminal prosecution including the outcome of any disciplinary process.

5.2 In cases where a student may have suffered significant harm, children's social care, or the police as appropriate, should consider what support the student or students may need.

5.3 The Academy should also keep the person who is subject of the allegations informed of the progress of the case and consider what other support is appropriate for the individual e.g. access to counselling. If the person is suspended the Academy should also keep the individual informed about developments at the Academy. If the person is a member of a union or professional association s/he should be advised to contact that body at the outset.

6. CONFIDENTIALITY

5.1 Every effort should be made to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.

7. RECORD KEEPING

6.1 A clear and comprehensive summary of any allegations made, details of how the allegation was followed up and resolved and a note of any action taken and decisions reached is kept on a person's confidential personnel file and a copy provided to the person concerned.

6.2 The purpose of the record is to enable accurate information to be given in response to any future request for a reference if the person has moved on. The record should be retained at least until the person has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer.

8. TIMESCALES

7.1 Every effort will be made by the Academy to manage cases to avoid any unnecessary delay.

8. INITIAL CONSIDERATIONS

8.1 Allegations of abuse against teacher and no teaching staff advises that the procedures need to be applied with common sense and judgement. In rare cases allegations will be so serious that as to require immediate intervention by children's social care and/or police. Other allegations that meet the criteria in paragraph 1 may seem much less serious. However it is important to ensure that even allegations that appear less serious are seen to be followed up and taken seriously and that they are examined objectively by someone independent of the Academy. The local authority designated officer should be informed of all allegations that come to the Academy's attention and appear to meet the criteria in paragrpah1 so that s/he can consult police and social care colleagues as appropriate.

8.2 The Local Authority's Designated Officer's first steps will be to discuss the allegation with the Executive Principal (or Chair of Governors if the allegation concerns the Executive Principal) to confirm details of the allegation and establish that it is not demonstrably false or unfounded. If the parents/carers of the student concerned are not already aware of the allegation, the Designated Safeguarding Officer (see below) will also discuss how and by whom they should be informed.

Assistant Associate Principal (Designated Safeguarding Officer) – Jane Berry

8.3 The Executive Principal should inform the accused person about the allegation as soon as possible after consulting the Local Authority Designated Officer. However where a strategy discussion is needed or police or social care may need to be involved, the Executive Principal should not do that until those agencies have been consulted and have agreed what information can be disclosed to the person. If the person is a member of union or professional association s/he should be advised to contact that organisation at the outset.

8.4 If the allegation is not demonstrably unfounded and there is cause to suspect a student is suffering significant or is likely to suffer significant harm, a strategy discussion should be convened in accordance with page 41 of "Working together to Safeguard Children".

8.5 In cases where a formal strategy discussion is not considered appropriate because the threshold of "significant harm" is not reached, but a police investigation might be needed, the Local Authority Designated Officer will discuss with the police, Executive Principal and any other agencies involved with the student to evaluate the allegation and decide how it should be dealt with. Like a strategy discussion that initial evaluation may not need to be a face to face meeting. It should share available information about the allegation, the student, and the person against whom the allegation has been made, consider whether a police investigation is needed and, if so, agree the timing and conduct of the investigation.

8.6 In cases where a police investigation is necessary the joint evaluation should also consider whether there are matters which can be taken forward in disciplinary process in parallel with the criminal process or whether any disciplinary action will need to wait completion of the police enquiries and/or prosecution.

8.7 If the complaint or allegation is such that it is clear that an investigation by police and/or enquiries by social care are not necessary, or the strategy discussion or initial evaluation decides that is the case, the local authority designated officer should discuss next steps with the Executive Principal and Chair of Governors. In those circumstances the options open to the Academy depend on the nature and circumstances of the allegation and the evidence and information available and will range from taking no further action to summary dismissal or a decision not to use the person's services in future.

8.8 In some cases there will need to be further enquiries to enable a decision about how to proceed. In straightforward cases the investigation will be undertaken by a senior member of the Academy. In other circumstances there may be a need to appoint an independent investigator. Advice should be sought from the Local Authority Designated Officer and the Human Resources Department.

9. SUSPENSION

9.1 The possible risk of harm to students posed by the accused person needs to be effectively evaluated and managed. In some cases that will require the Academy to consider suspending the person until the case is resolved.

9.2 Suspension should be considered in any case where there is cause to suspect a child is at risk of significant harm or the allegation warrants investigation by the police, or is so serious that it might be grounds for dismissal.

However a person must not be suspended automatically or without careful thought. Advice should be sought from the Human Resources Department. The Academy must also consider whether the result that would be achieved by suspension could be obtained by alternative means.

10. ACTION FOLLOWING A CRIMINAL INVESTIGATION OR A PROSECUTION

10.1 The Police or CPS should inform the Academy and Local Authority Designated Officer straight away when a criminal investigation and any subsequent trial is complete or if it decided to close an investigation without charge, or not to prosecute after the person has been charged.

In those circumstances the Local Authority Designated Officer should discuss with the Executive Principal and Chair of Governors whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the police and or children's social care should inform that decision. The options will depend on the circumstances of the case and the consideration will need to take account of the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

10.2 If the allegation is substantiated and the person is dismissed or the Academy ceases to use the person's services, or the person resigns or otherwise ceases to provide his or her services, the local authority designated officer should discuss with the Academy whether a referral to the DBS or by the Teacher Regulation Agency is required, or advisable and the form and content of a referral.

10.3 In cases where it is decided on the conclusion of a case that a person who has been suspended can return to work, the Academy should consider how best to facilitate this. It is recognised that most people will benefit from some help and support to return to work after a very stressful experience. The Academy should also consider how the person's contact with the student or students who made the allegation can best be managed if they are still attending the Academy.