Safeguarding Policy & Allegations Management Process

Issued by: Clarence Recruitment ("the Company")
Date: August 2026
Review Cycle: Annual, or sooner where required

Purpose of This Policy

Clarence Recruitment is committed to safeguarding and promoting the welfare of children (everyone under 18) and adults with care and support needs ("adults at risk"). We will act in the best interests of children at all times, prevent harm, and work transparently with schools/colleges and local partners.

We will have due regard to KCSIE (Part 1 for all staff; Parts 2–4 for managers), Working Together to Safeguard Children 2023 (multi agency working), and relevant legislation including the Education Act 2002 (s.175), Safeguarding Vulnerable Groups Act 2006 (SVGA) and Care Act 2014 (adult safeguarding).

Scope

This policy covers all recruitment, placement, and ongoing engagement activities undertaken by Clarence Recruitment for schools and colleges in England, including supply teachers, cover supervisors, teaching assistants, technicians, mentors, and other education staff. It also applies when we place staff in FE settings working with under 18s, and to any role that could involve contact with adults at risk (e.g., adult education or provisions on school sites).

Definitions (key terms)

- **Child**: Anyone under 18.
- **Adults at risk**: Adults with care and support needs who may be unable to protect themselves from abuse or neglect.
- **Regulated activity (children)**: Work a barred person must not do (e.g., teaching, training, care, supervision in specified places done regularly; plus personal care/health care). Determines eligibility for Enhanced DBS with Children's Barred List check.
- **Personnel supplier**: Employment business/agency that supplies workers to carry out regulated activity; has a legal duty to refer to the DBS if statutory conditions are met.
- **Harm threshold (KCSIE Part 4)**: Behaved in a way that harmed a child or may have; possibly committed a relevant offence; behaved in a way indicating they pose a risk of harm; or behaved in a way indicating they may not be suitable to work with children (including behaviour outside work).
- **Low-level concern**: A concern about an adult's behaviour that does not meet the harm threshold but is inconsistent with the Code of Conduct and still requires a response (e.g., being over-familiar, boundary blurring).

Legal and Statutory Guidance (summary)

- **KCSIE (current edition in force)** — statutory guidance for schools/colleges on safeguarding & safer recruitment; we align our agency processes to Parts 1–4 and safer recruitment in Part 3.
- **Working Together to Safeguard Children 2023** — multi-agency expectations and child protection standards; informs our inter-agency cooperation and referrals.
- **Education Act 2002 s.175** — safeguarding duty basis cited in KCSIE; we recognise host settings' duties and our own complementary responsibilities as a personnel supplier.
- **Safeguarding Vulnerable Groups Act 2006 / PoFA 2012** — defines regulated activity and offences; triggers for barred list checks.
- **DBS barring referrals** — legal duty for personnel suppliers when the two conditions are met (removal from regulated activity; and relevant conduct/harm test/relevant offence).
- **Care Act 2014 & Statutory Guidance** — adult safeguarding framework (enquiries, Safeguarding Adults Boards, multi-agency duties).
- **TRA referrals** — referrals to the Teaching Regulation Agency may be required in serious teacher misconduct cases.

1. Governance, roles and responsibilities

- **Board/Owner:** Approves policy, ensures resources, receives annual safeguarding report.
- **Designated Safeguarding Lead (DSL)** (and Deputies):
  - Point of contact for concerns; maintains safeguarding oversight; liaises with schools/colleges, LADO, police, children's social care, and Adult Safeguarding teams as needed.
  - Leads decisions on LADO consultation, s.47 thresholds (via host setting/local authority), DBS/TRA referrals, and case management.
- **Recruitment & Vetting Team:** Ensures safer recruitment checks; maintains **Single Central Record (agency equivalent)** and client-facing vetting packs.
- **All Staff:** Must read KCSIE Part **1 (**or Agency condensed equivalent), follow this policy and the host school's safeguarding procedures, and report concerns immediately.

2. Safer Recruitment Practices

We embed safeguarding at every stage: advert, application (no CV-only), structured screening of employment history (gaps explained), values-based interviewing, online search for shortlisted candidates (KCSIE), robust referencing (including last child-work employer), and pre-placement vetting:

- Enhanced DBS + Children's Barred List check (where role qualifies); identity; right to work; qualifications; overseas checks; prohibition/QTS checks (teachers); disqualification where applicable; medical fitness; and photo ID for schools.

- We maintain and share a placement pack to the school before engagement, confirming checks per KCSIE Part 3 and role-specific requirements.

Please see our **Vetting and Selection policy**

3. Induction, Training and Code of Conduct

- Before placement: All workers receive induction covering the host school's safeguarding policy, DSL contact, reporting lines, low-level concerns, whistleblowing, and online safety expectations.
- Annual refresh for agency employees and workers on KCSIE changes, safer working practice and boundaries; Code of Conduct issued and acknowledged.

4. Information sharing and record keeping

We share information lawfully and proportionately with safeguarding partners (e.g., host school/college, LADO, police, social care, TRA, DBS) to protect children and adults at risk. Records are accurate, timely, factual, and securely retained in line with data protection and KCSIE expectations.

5. Reporting a concern or allegation

Anyone can raise a concern. Report immediately (same day) to the Agency DSL (or deputy). If the concern relates to the DSL, report to the Managing Director/Board. If there is immediate risk to a child/adult, contact 999 and inform the DSL.
Where the concern arises in a placement, the worker must also follow the host school's procedures and inform the school's DSL without delay; our Agency DSL will coordinate with the school on next steps.

6. Allegations and reports on staff – two pathways

KCSIE Part 4 distinguishes between (A) concerns/allegations that meet the harm threshold and (B) those that do not (i.e., low-level concerns). Both routes apply to supply/agency staff.
A) Concerns or allegations that may meet the harm threshold
Examples: Actual/potential harm to a child; possible criminal offence against/related to a child; behaviour indicating risk of harm; behaviour suggesting unsuitability to work with children (including outside work).

Immediate steps (same day):

1. Remove from placement or restrict duties if needed to protect children. Consider alternatives to suspension where appropriate; the decision must be risk-based.
2. Consult the LADO (Local Authority Designated Officer) via the host setting's local authority within one working day where harm threshold is suspected; agree next steps and strategy discussion involvement (school DSL leads with case manager role; agency DSL participates and shares info).
3. Notify the host school/college (if they didn't raise it) and coordinate on safeguarding measures and communications
4. Consider police/children's social care referral (often via LADO triage/strategy meeting). Follow any directions given.

5. Safeguard adults at risk: if the allegation involves an adult with care and support needs, consult local Adult Safeguarding pathways under the Care Act.

6. Case management: keep clear records, ensure fairness, support for the worker and the referrer, and manage confidentiality.

Outcomes & referrals

- Disciplinary/engagement outcome (substantiated, malicious, false, unsubstantiated, unfounded) recorded.
- If we remove the individual from regulated activity (or would have if they had not resigned/ceased), and relevant conduct/harm test/relevant offence is indicated, the **Agency (as a personnel supplier) has a legal duty to refer to the DBS. This duty applies even if a LADO/police process is ongoing or another body has made a referral. Failure to refer without reasonable justification can lead to sanction.
- Where the individual is a teacher, consider TRA referral for serious misconduct (usually following conclusion of internal/external processes). Coordinate with the host school as appropriate.

Communication & support

- Inform parents/carers through the host setting (as case-manager lead), unless advised otherwise by police/social care. Provide support to the person who raised the concern and to the worker under investigation.

7. Low Level Concerns – do not meet threshold

Definition: Any concern, doubt or worry that a staff member/worker has behaved in a way inconsistent with the Code of Conduct, including boundary issues, that is not serious enough to meet the harm threshold. Examples: over-familiarity, favouritism, unprofessional language, private messaging with pupils, one-to-one in secluded areas without good reason.

Principles

- Encourage early, open reporting to build a transparent culture; record concerns and actions; patterns may emerge.
- Low-level concerns relating to agency workers in placements are managed jointly with the host school's DSL, with the Agency DSL retaining oversight and records.

Process

1. Report promptly to Agency DSL (and host DSL if in placement).
2. Initial triage: Does any element suggest harm threshold? If yes, move to LADO pathway (Section A). If no, proceed as low-level.

3. Proportionate response: management conversation, reflective practice, additional supervision, training, written expectations, or redeployment/removal from a setting as appropriate.

4. Record-keeping: brief, factual, with rationale and outcome; monitor for patterns. Records are kept securely and reviewed periodically. [

5. Escalation: Repeated or escalating low-level concerns may meet the harm threshold—reassess and consult LADO if needed.

Reference practice: We follow sector guidance (e.g., Farrer & Co low-level concerns framework) to embed culture and consistency.

8. Safeguarding Adults at risk

Where concerns relate to adults with care and support needs, we follow Care Act 2014 principles, making or supporting safeguarding enquiries with the local authority and working with the Safeguarding Adults Board partners. We adopt a Making Safeguarding Personal approach.

9. Whistleblowing

We actively support staff and workers to raise safeguarding concerns without fear. Where internal reporting is not possible/appropriate, individuals may contact the LADO, local authority children's social care, the police, or the NSPCC Whistleblowing Advice Line. (Low-level route does not replace whistleblowing when serious concerns exist.)

10. Managing Suspension, suitability and return to work

Decisions on suspension are risk-based and reviewed regularly, considering alternatives where possible. Where allegations are not substantiated and the individual returns to work, we provide a reintegration and support plan and take steps to manage workplace dynamics.

11. Data Protection, Confidentiality and retention

We handle data in line with UK GDPR and KCSIE principles—only share what is necessary to protect children/adults. Allegations and low-level concern records are retained securely in line with statutory guidance and sector best practice; access is restricted to the DSL and senior leadership.

12. Learning, Quality Assurance and Reporting

- The DSL will analyse trends (e.g., repeated low-level concerns) and report anonymised insights to leadership each term and annually to the Board, identifying training needs.
- We will update this policy to reflect KCSIE updates (typically each September) and any changes in Working Together, DBS or adult safeguarding requirements

13. Practical process (appendices)

Appendix A — At-a-glance flowchart (Agency worker in a placement)

1. Concern raised → Report to Agency DSL and host DSL (same day).
2. Immediate safety → Remove from placement/adjust duties if required.
3. Triage
4. Meets harm threshold? → Consult LADO within 1 working day; follow strategy meeting directions; police/children's social care where applicable.
5. Does not meet threshold → Low-level concern route (record, manage, monitor).
6. Outcome & referrals → Record outcome; DBS referral if duty triggered; TRA referral if teacher misconduct; inform host school; consider adult safeguarding route where relevant.

Appendix B — Low-Level Concerns: decision prompts

- Is behaviour inconsistent with the Code of Conduct? Pattern emerging? Any power imbalance? Any risk that suggests escalation to harm threshold? Consider training, management guidance, or formal action; document rationale and next review date.

Appendix C — DBS referral quick-check (for personnel suppliers)
Duty applies when BOTH are true:

7. We removed the person from regulated activity (or would have if they hadn't left); AND
8. We believe relevant conduct occurred / harm test met / relevant offence (caution/conviction). If yes → make a DBS barring referral (online) and keep records.

14. Contact List

- Agency DSL: Mia Jones, mia@clarencerecruitment.co.uk , Tel: 0330 133 1010
- Deputy DSL(s): Alan Hull, alan@clarencerecruitment.co.uk , Tel: 0330 133 1010
- Police (non-emergency): 101; Emergency: 999
- DBS Barring Referrals: Online portal (Gov.UK) [gov.uk]
- Teaching Regulation Agency (TRA): Referral guidance/portal [assets.pub...ice.gov.uk]

15. LADO Contacts

Local Authority	Contact Details
Leicester City	0116 454 2440; Lado-allegations-referrals@leicester.gov.uk
Leicestershire County	0116 305 4141; CFS-LADO@leics.gov.uk ; OOH 0116 3050005
Coventry	lado@coventry.gov.uk ; MASH 024 7678 8555 / 024 7683 2222
Warwickshire	lado@warwickshire.gov.uk ; 01926 745376; MASH 01926 414144/886922
Nottingham City	0115 876 5166; online referral; LADO Caroline Hose
Birmingham	ladoteam@birminghamchildrenstrust.co.uk ; CASS 0121 303 1888

16. Safeguarding Process

1. Concern raised → Report to Agency DSL and host DSL (same day).
2. Immediate safety → Remove from placement/adjust duties if required.
3. Triage → If harm threshold met, consult LADO within 1 working day.
4. If not harm threshold → Low-level concern route.
5. Outcome & referrals → Record outcome; DBS/TRA referral if required.

17. Additional Resources

- KCSIE 2025 (current) — sets out safer recruitment, Part 4 on concerns/allegations (including supply staff), harm threshold, and low-level concerns framework. [gov.uk], [assets.pub...ice.gov.uk]
- Working Together 2023 — multi-agency child protection expectations and national practice standards. [assets.pub...ice.gov.uk]
- SVGA 2006 & Regulated Activity (scope/eligibility for enhanced DBS + barred list checks). [assets.pub...ice.gov.uk], [legislation.gov.uk]

- DBS duty to refer for personnel suppliers (education agencies). [gov.uk], [assets.pub...ice.gov.uk]
- Adult safeguarding under the Care Act and statutory guidance. [legislation.gov.uk], [gov.uk]
- Low-level concerns practice (sector frameworks and NSPCC guidance). [farrer.co.uk], [learning.n...pcc.org.uk]

18. Review of This Policy

This policy will be reviewed annually, or sooner where there are changes to legislation, regulatory requirements, guidance or the Company's activities.

Policy Owner: Mia Jones, Head of Business Services & Governance
Next Review Date: August 2027