

# Genuine Futures CIC – Managing Allegations Against Staff and Volunteers Policy

PREVENTION OVER  
PUNISHMENT:  
BUILDING SAFER FUTURES  
TOGETHER

Version: 1.0 Approved by Board: 01 Nov 2025 Next Review: 01 Nov 2026

## 1. Policy Statement

**Genuine Futures CIC** is committed to ensuring that all allegations and concerns about staff, volunteers, trustees, and contractors are handled promptly, fairly, and in accordance with statutory safeguarding requirements. The organisation recognises that allegations can arise in both in-person and online contexts and will ensure that procedures protect children, young people, and adults at risk while supporting those against whom allegations are made.

## 2. Legislative Framework

This policy complies with the following UK legislation and guidance: • Keeping Children Safe in Education (KCSIE) 2025 – Part 4 • Working Together to Safeguard Children (2023) • Children Act 1989 and 2004 • Safeguarding Vulnerable Groups Act 2006 • Care Act 2014 (for adults at risk) • Data Protection Act 2018 and UK GDPR • Human Rights Act 1998

## 3. Scope and Purpose

This policy applies to all individuals working for or on behalf of **Genuine Futures CIC** in any capacity, including paid staff, volunteers, contractors, and trustees. It covers allegations that indicate a person may have: • Behaved in a way that has harmed, or may harm, a child or adult at risk; • Possibly committed a criminal offence against or related to a child or adult at risk; • Behaved towards a child, adult at risk, or colleague in a way that indicates they may pose a risk of harm; • Used online platforms or technology inappropriately to contact or harm others.

## 4. Definitions

An allegation refers to information that suggests a person who works with or on behalf of **Genuine Futures CIC** has behaved in a manner that may meet one or more of the criteria above. A low-level concern is any behaviour by a member of staff or volunteer that causes a sense of unease or does not meet the threshold for an allegation but may indicate a pattern of inappropriate conduct. Examples include overly familiar behaviour, boundary-blurring communications, or unprofessional online contact.

## 5. Roles and Responsibilities

- Board of Directors: Holds overall accountability for ensuring compliance with this policy.
- Designated Safeguarding Lead (DSL): Coordinates all allegations management, ensures referrals are made, and records outcomes securely.
- Managers and Supervisors: Must report any allegation or concern immediately to the DSL.
- Local Authority Designated Officer (LADO): Provides oversight and guidance for allegations involving children.
- Police and Adult Safeguarding Teams: May lead investigations in criminal or high-risk cases.

## 6. Procedure for Reporting Allegations

Any allegation or concern must be reported immediately to the DSL. If the allegation involves the DSL, it should be reported to the Chair of the Board. Initial reports should include factual details and avoid assumptions or

speculation. No internal investigation should take place until advice has been sought from the LADO or relevant safeguarding authority.

## 7. Initial Response and Record Keeping

The DSL will:

- Obtain written details of the allegation, including dates, witnesses, and context.
- Record the report in the secure safeguarding log within 24 hours.
- Inform the LADO within one working day of receiving an allegation involving a child or young person.
- Ensure confidentiality is maintained, sharing information only with those who need to know.

All documentation will be retained securely for at least 10 years in accordance with data protection requirements.

## 8. Referral to the LADO

Where an allegation involves behaviour that could indicate harm or risk of harm to a child, the DSL must contact the Local Authority Designated Officer (LADO) immediately. The LADO will provide direction regarding investigation, suspension, or other actions. **Genuine Futures CIC** will cooperate fully with the LADO, police, or social services in any investigation.

## 9. Support for Individuals Involved

The organisation will ensure that:

- The person who made the allegation is offered appropriate support and kept informed of progress where possible.
- The individual subject to the allegation is treated fairly, informed of the allegation at the appropriate stage, and given the opportunity to respond.
- Confidentiality is maintained to protect all parties.
- Support, supervision, or counselling is available to staff or volunteers affected by the process.

## 10. Outcomes of Investigations

Following investigation, outcomes will be categorised as:

- Substantiated – allegation supported by evidence.
- Unsubstantiated – insufficient evidence to prove or disprove the allegation.
- Unfounded – no evidence or incident did not occur.
- Malicious – deliberate fabrication or false claim.
- False – evidence demonstrates that the allegation did not happen.

Actions may include disciplinary measures, training, or reinstatement depending on findings.

## 11. Low-Level Concerns

All low-level concerns must be reported to the DSL, recorded, and reviewed periodically. Patterns of low-level concerns may indicate escalating risk and must be addressed proactively through supervision or retraining. Examples include boundary-crossing comments, unnecessary contact outside work hours, or unprofessional social media use.

## 12. Allegations in Online or Digital Contexts

Allegations may arise from inappropriate online activity, including:

- Sending or requesting inappropriate messages or images.
- Using organisational platforms to contact children or adults privately.
- Sharing confidential information without authorisation.
- Posting offensive, discriminatory, or harmful content.

These allegations will be managed following the same process as in-person concerns, with additional consideration for evidence preservation (e.g., screenshots, digital logs).

## 13. Training and Awareness

All staff, volunteers, and trustees will receive training on managing allegations, professional boundaries, and the importance of early reporting. The DSL and Deputy DSL will undertake specialist training every two years. Training will include online safety, digital communication, and whistleblowing procedures.

## 14. Monitoring and Review

This policy will be reviewed annually or sooner if new legislation, guidance, or organisational changes occur. Findings from case reviews will inform continuous improvement and policy updates. Last reviewed: [Insert Date] Next review due: [Insert Date + 12 months]

## 15. Linked Policies

• Safeguarding & Child Protection Policy • Whistleblowing Policy • Data Protection & Privacy Policy • Equality, Diversity & Inclusion Policy • Online Safety Policy

## Appendix: Allegations Management Flow Summary

1. Concern Identified – Any person observes or receives an allegation or concern regarding a staff member, volunteer, or trustee. 2. Immediate Reporting – Report immediately to the Designated Safeguarding Lead (DSL). If the DSL is implicated, report to the Chair of the Board. 3. Initial Recording – DSL logs concern securely, gathers basic details, and determines if it meets the threshold for referral. 4. Referral to LADO – If the allegation meets criteria for potential harm or risk, the DSL contacts the Local Authority Designated Officer (LADO) within one working day. 5. LADO Advice – LADO decides on strategy meeting, police involvement, or internal management. 6. Investigation – Follow directions from the LADO, maintaining confidentiality. 7. Outcome and Record Keeping – Document findings as substantiated, unsubstantiated, unfounded, malicious, or false. 8. Support and Review – Provide support to all parties, implement recommendations, and review procedures to prevent recurrence.