Safeguarding Concerns, Allegations & Professional Conduct Policy

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Contents

Definitions 3
Purpose and Scope 3
Legal and Regulatory Framework 3
Roles and Responsibilities 4
Assessing Concerns 4
Sources of Concerns 5
Types of Concern 5
Harm Threshold Allegations *5*
Low-Level Concerns *6*
Professional Conduct Concerns *6*
Patterns of Concern *7*
Concerns Arising Outside the Workplace 7
Historical Concerns and Allegations 7
Concerns Raised by Other Organisations 7
Concerns Relating to Clients, Parents, Carers and Service Users 8
Referrals and External Investigations 8
Duty to Disclose Relevant Safeguarding Matters 8
Cooperation with Investigations 8
Support During Investigations 9
Third-Party Enquiries 9
Investigation Process 9
Timescales 10
Precautionary Measures 10
Confidentiality and Information Sharing 11
Outcomes 11
Regulatory and Professional Referrals 12
Letters of Expectation 12
Record Keeping 13
References 13
Outcome Reviews 13
Learning and Continuous Improvement 14
Data Protection 14
Enforcement 14
Review 14

Definitions

- **Adult at Risk** – any person aged 18 years and over, who is or may be in need of community care services by reason of mental health issues, learning or physical disability, sensory impairment, age or illness and who is or may be unable to take care of him/herself or unable to protect him/herself against significant harm or serious exploitation.
- **Child/Children** - any person under the age of 18.
- **Client** – an organisation, which engages with Prospero Group to purchase Work-Finding Services. This includes, amongst others: Schools, Local Authorities, Care Homes, Universities, Parents/Carers and Private Sector organisations.
- **Parent/Carer or Guardian** – a person who has parental responsibility for, legal responsibility for, or provides day-to-day care and support to a child or adult at risk.
- **Prospero Group** – is comprised of three entities: Prospero Teaching, Prospero Health & Social and Prospero Integrated.
- **Service User** – is defined to mean Child, Children or Adult at Risk.
- **Temporary Worker** – an individual receiving Work-Finding Services, delivered by Prospero Group. This includes, amongst others: Teachers, Tutors, Teaching Assistants, Care Assistants, Support Workers and Nurses.
- **Work-Finding Services** – taken to mean recruitment activity, advertising of roles and provision of work-related training, provided by Prospero Group.

Purpose and Scope

Prospero Group is committed to safeguarding and promoting the welfare of Children, young people and Adults at Risk. We recognise our responsibility to respond appropriately to concerns regarding conduct, behaviour, professional boundaries, safeguarding and suitability to work. This policy sets out the principles and procedures for receiving, assessing, investigating and managing concerns relating to Temporary Workers engaged through Prospero Group.

The purpose of this policy is to support safe working practices, promote professional standards, ensure concerns are managed fairly and proportionately, and enable informed decisions to be made regarding suitability to provide services. The policy also supports Prospero Group's commitment to meeting its safeguarding, legal and regulatory responsibilities.

This policy applies to all Temporary Workers engaged through Prospero Group. It covers safeguarding concerns, allegations, low-level concerns, professional conduct concerns and other matters that may affect an individual's suitability to provide services.

Whilst the primary focus of this policy is concerns relating to Temporary Workers engaged by Prospero Group, it may also apply where concerns are raised regarding Clients, Parents, Carers, Guardians, Service Users or other third parties. In such circumstances, Prospero Group will take appropriate action in accordance with safeguarding responsibilities, reporting obligations and relevant procedures.

This policy applies to conduct occurring during assignments, placements, service delivery, training, work-related activities and, where relevant, conduct outside of work that may impact an individual's suitability to work with children, young people, adults at risk or other service users.

Legal and Regulatory Framework

This policy should be read alongside all relevant legislation, statutory guidance and local safeguarding procedures. Key legislation and guidance includes, but is not limited to:

- Keeping Children Safe in Education 2026 (Department for Education)
- Working Together to Safeguard Children – updated 2026 (HM Government)
- Information Sharing to Safeguard Children and Young People (Department for Education)
- The Children Act 1989
- The Children Act 2004

- The Care Act 2014
- The Education Act 2002 (including section 172)
- Care and Support Statutory Guidance 2023 (Department of Health and Social Care)
- Information Sharing: Guidance for practitioners and managers. HM Government (2018)
- Rehabilitation of Offenders Act 1974
- Disqualification under the Childcare Act 2006 - Update 2018 (Department for Education)
- Counter Terrorism and Security Act 2015 (including the 'Prevent Duty')
- The Prevent Duty, Departmental, Advice for Schools and Child Care Providers 2015 (Department for Education)
- Modern Slavery Act 2015
- Human Rights Act 1998
- Local Safeguarding Partners/Arrangements/Local Safeguarding Adult Board
- Guidance for safer working practice for those working with Children and Young people in Education settings 2022 (Safer Recruitment Consortium)
- Domestic Abuse Act 2021
- Mental Capacity Act 2005
- Non-School Alternative Provision: Voluntary National Standards 2025

Prospero Group recognises that services may be delivered across a range of education, health, social care, community, residential and home-based settings. Individuals engaged through Prospero Group are expected to comply with this policy and any safeguarding, conduct, reporting or operational procedures applicable within the Client, placement or service setting in which they are working.

Roles and Responsibilities

Prospero Group is responsible for:

- Receiving and assessing concerns.
- Determining the appropriate threshold.
- Undertaking enquiries and investigations where required.
- Implementing safeguarding measures.
- Making suitability decisions.
- Maintaining records.
- Making safeguarding and regulatory referrals where required.

Temporary Workers are responsible for:

- Cooperating with investigations and enquiries.
- Providing information requested by Prospero Group.
- Following safeguarding, professional conduct and client procedures.
- Reporting concerns in accordance with safeguarding requirements.
- Maintaining professional boundaries and standards of conduct.

Assessing Concerns

All concerns reported to Prospero Group will be assessed to determine the appropriate threshold.

When considering concerns, regard will be given to:

- The nature and seriousness of the concern.
- Actual or potential impact on Children, young people or Adults at risk.
- Professional boundaries.
- Professional judgement.
- Previous concerns or investigations.
- Patterns of behaviour.
- Suitability to work.

Where uncertainty exists, Prospero Group reserves the right to apply the higher threshold while further enquiries are undertaken.

Sources of Concerns

Concerns may arise from a variety of sources, including Temporary Workers, Service Users, Clients, Parents, Carers, professionals, Local Authorities, regulatory bodies, members of the public, other agencies, colleagues or incidents occurring outside the workplace.

All concerns will be considered on their own merits and assessed in accordance with this policy.

Types of Concern

- Harm Threshold Allegation
- Low-Level Concern
- Professional Conduct Concern
- Pattern of Concern

Harm Threshold Allegations

A Harm Threshold Allegation is an allegation that an individual has:

- Behaved in a way that has harmed, or may have harmed, a Child or Adult at Risk.
- Potentially committed a criminal offence against or relating to a Child or Adult at Risk.
- Behaved in a way that indicates they may pose a risk of harm.
- Behaved in a way that indicates they may be unsuitable to work with Children or Adults at Risk.

Examples may include:

- Physical abuse.
- Sexual misconduct.
- Grooming behaviour.
- Emotional abuse.
- Neglect.
- Serious safeguarding breaches.
- Criminal conduct affecting suitability to work.

Where there is uncertainty as to whether a concern meets the harm threshold, Prospero Group may seek advice from the Local Authority Designated Officer (LADO), Local Authority, police, social care or other safeguarding professionals before determining the most appropriate course of action.

Where appropriate, Prospero Group may:

- Refer to the Local Authority Designated Officer (LADO).
- Refer to the police.
- Refer to Children's Social Care or Adult Social Care.
- Restrict or suspend work-finding services.
- Implement safeguarding measures pending investigation.

Safeguarding considerations will always take priority.

Low-Level Concerns

A Low-Level Concern is behaviour that does not meet the Harm Threshold but is inconsistent with expected professional standards, safeguarding expectations, safer working practices or professional boundaries.

A concern may be categorised as a Low-Level Concern even where it is a one-off incident.

Examples may include:

- Over-familiar behaviour.
- Boundary concerns.
- Inappropriate comments.
- Inappropriate language around children or vulnerable individuals.
- Unprofessional communications.
- Sharing unauthorised personal contact details.
- Inappropriate use of social media.
- Conduct that causes concern regarding professional judgement.

A Low-Level Concern does not automatically indicate that an individual presents a safeguarding risk. However, all concerns will be recorded, assessed and retained in accordance with safeguarding requirements.

Professional Conduct Concerns

Professional Conduct Concerns relate to professionalism, performance, compliance or conduct that does not ordinarily raise safeguarding concerns regarding suitability to work with children or adults at risk.

Examples may include:

- Persistent lateness.
- Failure to complete required documentation.
- Failure to follow booking procedures.
- Poor communication.
- Failure to attend meetings.
- Failure to follow administrative processes.
- Minor breaches of client procedures where safeguarding is not impacted.

- Professional Conduct Concerns may still be formally investigated where appropriate.

Where safeguarding concerns emerge, the matter may be escalated and managed under the Low-Level Concern or Harm Threshold process.

Patterns of Concern

Prospero Group recognises that concerns do not always occur in isolation.

Multiple Professional Conduct Concerns, Low-Level Concerns, or a combination of both may collectively indicate wider concerns regarding professionalism, judgement, professional boundaries or suitability to work.

Repeated or related concerns may result in a review of an individual's suitability to provide services, regardless of whether any individual concern would independently justify such a review.

Historical concerns may be considered alongside newly reported concerns when assessing risk and suitability.

Concerns Arising Outside the Workplace

Prospero Group may consider concerns arising outside of assignments where such matters may impact an individual's suitability to work with Children, young people or Adults at Risk.

This may include:

- Criminal investigations.
- Criminal convictions.
- Police involvement.
- Domestic incidents.
- Online activity.
- Safeguarding concerns.
- Allegations reported by other organisations.
- Behaviour inconsistent with positions of trust.

The existence of an ongoing investigation elsewhere may be considered when determining suitability, future placements and safeguarding measures.

Historical Concerns and Allegations

Prospero Group recognises that concerns or allegations may sometimes relate to events that occurred in the past. Where such information raises questions about an individual's current suitability to work with Children, young people, Adults at Risk or other Service Users, it will be considered as part of any safeguarding or suitability assessment.

Prospero Group may undertake further enquiries, seek relevant information, consider whether precautionary action is required or make referrals where appropriate.

Concerns Raised by Other Organisations

Prospero Group may receive concerns, allegations or safeguarding information from:

- Schools.
- Local authorities.
- Other employment businesses.

- Alternative provisions.
- Previous employers.
- Regulatory bodies.
- Safeguarding agencies.

Prospero Group reserves the right to investigate concerns received from third parties where relevant to safeguarding or suitability to work.

Concerns Relating to Clients, Parents, Carers and Service Users

Where concerns relate to:

- Clients.
- Parents.
- Carers.
- Guardians.
- Service Users.
- Other third parties.

Prospero Group will not normally act as the investigating body. Instead, Prospero Group will gather relevant information and, where appropriate, refer concerns through the relevant safeguarding, reporting or organisational procedures, including referral to the appropriate Client, Local Authority, police, Local Authority Designated Officer (LADO), safeguarding agency or other relevant body.

Where concerns may affect the safety of individuals, service delivery, safeguarding arrangements or the suitability of an ongoing placement, Prospero Group may continue to monitor the matter, maintain records and consider whether any precautionary action is required in relation to ongoing service delivery, safeguarding arrangements or placements.

Referrals and External Investigations

Where a matter is referred externally, including to the LADO, police, social care or regulatory bodies, Prospero Group may seek updates where appropriate and where such information can lawfully be shared.

Where appropriate, Prospero Group may participate in or contribute to strategy discussions, safeguarding meetings, multi-agency meetings or case reviews relating to concerns under investigation.

Prospero Group reserves the right to take safeguarding action before the conclusion of any external investigation where considered necessary to protect Children, young people or Adults at Risk.

Duty to Disclose Relevant Safeguarding Matters

Prospero Group may advise an individual to inform other employers, agencies, professional bodies, voluntary organisations or organisations where they work or provide services where safeguarding considerations make such disclosure appropriate.

Prospero Group also reserves the right to share safeguarding information with third parties where lawful, necessary and proportionate to protect Children, young people, Adults at Risk or other Service Users, and where there is a legitimate safeguarding interest in doing so.

Cooperation with Investigations

Individuals are required to cooperate with safeguarding, suitability and professional conduct investigations.

This may include meetings with:

- Safeguarding.
- Training & Development.
- Management.

Where requested, individuals must participate in such meetings before an outcome is reached.

Failure to engage may result in decisions being made based on the information available and may impact ongoing registration and access to work-finding services.

Support During Investigations

Prospero Group recognises that concerns, allegations and investigations can be distressing for all parties involved. Investigations will be conducted fairly, objectively and proportionately.

Individuals will be provided with appropriate information regarding the process being followed, unless doing so would compromise safeguarding, legal obligations or an ongoing investigation.

Third-Party Enquiries

Prospero Group reserves the right to make reasonable enquiries with:

- Clients.
- Schools.
- Previous employers.
- Employment businesses.
- Local authorities.
- Regulatory bodies.
- Safeguarding agencies.
- Other relevant third parties.

Such enquiries may be undertaken without consent where lawful, proportionate and necessary to fulfil safeguarding or legal obligations.

Investigation Process

Prospero Group will assess all concerns, allegations and reports in a fair, proportionate and risk-based manner. The nature and extent of any investigation will depend on the circumstances of the concern, the level of risk identified and any safeguarding obligations.

An investigation may include:

- Reviewing information provided by the reporting party.
- Obtaining written statements or accounts.
- Speaking with the individual concerned.
- Seeking information from Clients, Service users, Parents, Carers or witnesses.
- Reviewing relevant records, correspondence, reports or electronic communications.
- Liaising with Local Authorities, safeguarding partners, regulatory bodies, police or other agencies where appropriate.

- Making enquiries with relevant third parties where necessary.

Prospero Group will take reasonable steps to secure and preserve relevant information, records and evidence to support enquiries and investigations.

Where concerns are being investigated by another organisation or agency, Prospero Group may rely upon information obtained from that process and is not required to duplicate external investigations before reaching its own suitability decision.

Investigations will be conducted using the civil standard of proof, namely whether it is more likely than not that the event occurred (the balance of probabilities).

Prospero Group may participate in, contribute to or receive information from strategy discussions, safeguarding meetings, professional meetings, multi-agency meetings or case reviews where appropriate.

Timescales

Prospero Group will seek to assess, investigate and conclude concerns as promptly as reasonably practicable, taking account of the nature and complexity of the matter, the availability of information and any involvement from external agencies.

Timescales may vary depending on factors including:

- The seriousness of the concern.
- The availability of relevant parties and evidence.
- The need to obtain information from clients or third parties.
- Ongoing police, local authority, regulatory or safeguarding investigations.
- Multi-agency enquiries or strategy discussions.

Where appropriate, Prospero Group will provide updates regarding the progress of enquiries and investigations. However, regular updates may not always be possible where information is restricted, external investigations are ongoing, or doing so may compromise safeguarding, legal or confidentiality requirements.

The involvement of external agencies does not prevent Prospero Group from reviewing available information, implementing precautionary measures or making suitability decisions where necessary to safeguard Children, Young People, Adults at Risk or other Service Users.

Precautionary Measures

Where concerns are raised, Prospero Group will continually review the information available and consider whether any precautionary action is required to safeguard children, young people, adults at risk, service users, Temporary Workers or others whilst enquiries or investigations remain ongoing.

In determining whether precautionary action is necessary, Prospero Group may consider the nature of the concern, safeguarding considerations, information available at the time, previous concerns, emerging information and any views provided by Clients, Local Authorities, safeguarding agencies or other relevant parties.

Precautionary action may include:

- Enhanced monitoring.
- Additional safeguarding requirements.
- Additional on-site safeguards or supervision arrangements.
- Notification to Clients where appropriate and lawful.
- Restrictions on placements or assignments.

- Withdrawal from ongoing assignments.
- Neutral suspension from work-finding services.
- Any other proportionate action considered necessary to safeguard individuals or manage identified concerns.

Any precautionary measure is a neutral safeguarding action and does not imply wrongdoing or that a concern has been substantiated.

Confidentiality and Information Sharing

Information relating to safeguarding concerns, allegations, investigations and suitability assessments will be shared only with those who have a legitimate need to know.

Prospero Group will handle information in accordance with safeguarding obligations, data protection legislation and applicable confidentiality requirements.

Information may be disclosed to Clients, local authorities, safeguarding partners, regulatory bodies, law enforcement agencies or other relevant organisations where lawful, necessary and proportionate to protect children, young people or adults at risk.

Outcomes

Following investigation, outcomes may include:

Harm Threshold Allegations

- Substantiated.
- Unsubstantiated.
- Unfounded.
- False.
- Malicious.

Low-Level Concerns

- Substantiated.
- Unsubstantiated.
- No further action.

Professional Conduct Concerns

- Substantiated.
- Unsubstantiated.
- No further action.

Where concerns are substantiated, or where Prospero Group determines that an individual may no longer be suitable to provide services, one or more actions may be taken, including:

- Advice, guidance or coaching.
- A Letter of Expectation.
- Additional training or supervision.
- Restrictions on placements or assignments.

- Temporary suspension from work-finding services.
- Removal from specific sectors, roles or client groups.
- Termination of registration and work-finding services.
- Notification to relevant clients, where appropriate and lawful.
- Referrals to safeguarding partners, local authorities or other relevant agencies.
- Referrals to regulatory, professional or oversight bodies where required.

An investigation outcome and a suitability decision are separate considerations.

The fact that a concern, allegation or complaint is not substantiated does not automatically mean that Prospero Group will continue to provide Work-Finding Services.

Prospero Group may consider an individual's conduct during the investigation, professionalism, engagement with safeguarding processes, judgement, insight, attitude towards safeguarding responsibilities and overall suitability to provide services when determining whether registration and work-finding services should continue.

Regulatory and Professional Referrals

Where required by law, safeguarding guidance, professional standards or the circumstances of a case, Prospero Group may make referrals to relevant safeguarding, regulatory, professional or oversight bodies.

This may include, but is not limited to:

- The Disclosure and Barring Service (DBS).
- The Teaching Regulation Agency (TRA).
- The Education Workforce Council (EWC).
- Social Care Wales (SCW).
- Social Work England.
- Professional regulators for health, care or other regulated professions.
- The police, local authorities or safeguarding agencies.

Referrals may be made where Prospero Group believes an individual has harmed, poses a risk of harm, is unsuitable to work with Children or Adults at Risk, or where there is a legal, regulatory or safeguarding obligation to do so.

Letters of Expectation

Where concerns are substantiated, Prospero Group may issue a Letter of Expectation.

A Letter of Expectation is intended to:

- Clarify required standards.
- Reinforce professional and safeguarding expectations.
- Promote safer working practices.
- Support future improvement.

Letters of Expectation may be issued following:

- Professional Conduct Concerns.
- Low-Level Concerns.

- Safeguarding concerns that do not warrant withdrawal of work-finding services.

Following an investigation, Prospero Group may require training, supervision, monitoring arrangements, professional development activities or other remedial measures designed to promote safe practice.

Failure to demonstrate improvement may result in further review or may impact ongoing registration and access to work-finding services.

Record Keeping

Prospero Group will maintain accurate records of concerns, allegations, investigations, actions taken, decisions reached and relevant correspondence.

Records will be stored securely and retained in accordance with data protection requirements and organisational retention schedules.

Safeguarding records may be reviewed periodically to identify patterns of behaviour, emerging risks or concerns relating to suitability to provide services.

References

Prospero Group reserves the right to provide accurate and factual safeguarding information when responding to reference requests.

Where lawful and appropriate, references may include information relating to:

- Substantiated Harm Threshold Allegations.
- Ongoing safeguarding investigations.
- Substantiated Low-Level Concerns.
- Patterns of concern impacting suitability to work.
- Restrictions imposed for safeguarding reasons.

Professional Conduct Concerns will not ordinarily be disclosed unless considered relevant to safeguarding, compliance, suitability or the role being undertaken.

All references will be completed in accordance with legal obligations, safeguarding responsibilities and the information available at the time of the request.

Outcome Reviews

There is no automatic right of appeal against safeguarding, conduct or suitability decisions.

However, Prospero Group may review a decision where:

- Significant new evidence becomes available.
- Relevant information was not previously disclosed.
- Further information materially impacts the original outcome.

Prospero Group reserves the right to reopen, revisit or amend outcomes at any time where substantial new information comes to light.

Learning and Continuous Improvement

Prospero Group may review concerns, allegations, investigations and outcomes to identify themes, learning opportunities, training requirements and areas for improvement.

Learning identified through investigations may be used to improve safeguarding arrangements, policies, procedures, guidance and staff training.

Data Protection

Prospero Group is committed to protecting the privacy and confidentiality of personal data. All personal data processed under this policy will be handled in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and Prospero Group's data protection policies and procedures.

Enforcement

This policy will be enforced by Prospero Group's CEO, Managing Director, Operations Directors, Head of Compliance & Safeguarding and Data Protection Officer.

Failure to adhere to this policy may result in appropriate action being taken. For Temporary Workers, this may include the suspension or termination of Work-Finding Services and referral to the Disclosure and Barring Service (DBS) and/or relevant professional body, where applicable. Prospero Group also reserves the right to suspend or terminate its relationship with any Client where safeguarding concerns, breaches of this policy, or actions that place Service Users at risk are identified.

Review

This policy will be reviewed annually and updated as necessary to reflect changes in legislation, government guidance and best practice.