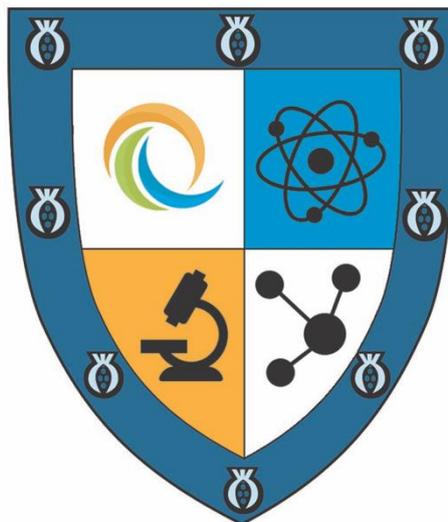




**MANAGING ALLEGATIONS POLICY AND
PROCEDURES
FOR
UNIVERSITY COLLEGIATE SCHOOL**



September 2021

Review date September 2022

CONTENTS

Introduction	5
Duty placed upon Local Safeguarding Children Board	5
Duty placed upon organisations	5
What is an allegation?	5
Principles	5
What do we mean by 'professional'?	5
Who is the procedure for?	5
Key Roles	6
The Process	6
The criteria for referral to the LADO	6
When to contact the LADO	6
Initial considerations with the LADO	6
When immediate action is required	7
Initial Consideration Meetings	7
Professional Strategy Meeting	7
Who attends the meeting?	8
What happens at the meeting?	8
Burden of Proof required	8
Confidentiality	8
Data Protection	8
Information sharing	8
Confidentiality Agreement	8
Requests for minutes of meetings	8

Record Keeping	9
Purpose of records	9
What records should Senior Managers make?	9
What records should the employer keep?	9
What records does the LADO keep?	9
What is included in PSM minutes?	9
How long are records retained?	9
Consideration of Suspension	9
The duty of the employer	10
What should be recorded?	10
Actions on Conclusion of the Case	10
Categorising the Allegation	10
Disciplinary Proceedings	10
Referral to professional/regulatory body or DBS	11
Specialist assessments	11
Lessons learned	11
Challenging Practice	11
Historical Abuse	11
Appendix A Links to Other Documents	12
Appendix B BSCB Contacts	13
Appendix C Process Flowchart	14
Appendix D Managing Allegations: The ‘First Five Minutes’	15
Appendix E Professional Strategy Group	16
Appendix F Checklist for Staff attending a PSG Meeting	17

Appendix G Consideration of Alternatives to Suspension	18
Appendix H Definitions	19
Appendix I Allegations against Teachers and School Staff	21
Appendix J Bolton Revised Framework for Action - July 2021	22
Appendix K Low level concerns	30

INTRODUCTION

The vast majority of adults who work with children act professionally and aim to provide a safe and supportive environment that secures the well-being and very best outcomes for children and young people in their care; however, children can be subjected to abuse by those who work with them in any setting.

It is also the case that some professionals may feel vulnerable to false allegations. The length of time taken to deal with cases, plus the widespread publicity some cases attract can have very damaging effects on children, the adults involved, their families and their carers. It is in everyone's interest to have a rigorous, fair and timely system for dealing with allegations of abuse.

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2020), Working Together to Safeguard Children (2018), Teachers' Standards (2012) and Bolton LSCB Managing Allegations Procedures (2019). This document provides practice guidance for Bolton UTC when allegations are made. It does not replace or take priority over any aspect of employment law and will be used in conjunction with Bolton Safeguarding Children Board procedures.

1.1 Duty Placed Upon Local Safeguarding Children Boards

The Children Act (1989) places a duty on the Local Safeguarding Children Board (LSCB) to have a clear policy for managing allegations against those who work with children and young people in line with that of the LSCB.

1.2 Duty Placed Upon Organisations

All organisations that provide services for children; or provide staff or volunteers to work with or care for children are required to operate a procedure for handling such allegations and identify a senior manager, in the case of the UCS this is the Principal or his/her nominee, to whom all allegations or concerns are reported. The CEO of the Trust will handle the allegations if the Principal is the subject of the allegation themselves.

1.3 What is an Allegation?

An allegation may relate to a person who works with children who has:

- Behaved in a way that has harmed, or may have harmed, a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

2 PRINCIPLES

UCS believes, as does Bolton Safeguarding Children Board, that the welfare of the child is paramount and that allegations against professionals should be investigated with the same thoroughness as allegations against parents and carers. This is intended as a policy document that complements existing professional procedures, protocols and guidance which relate to specific roles, responsibilities or professional practices. These procedures need to be applied using common sense and reasoned judgement and should be read in conjunction with other Safeguarding-related policies of the UCS (Appendix A).

2.1 What do we mean by 'professional'?

The term 'professional' is used throughout to refer to people acting on behalf of an agency whether in a paid, professional or voluntary capacity, this includes foster carers.

2.2 Who is the procedure for?

It is important to remember that statutory guidance and legislation relating to managing allegations is directed at the employer, i.e. the UCS Principal and CEO of the Trust. It is the employer's duty to adhere to the guidance and to seek the advice of the LADO.

KEY ROLES

Case Manager

Each agency is required to have a Senior Manager at local level or designated Case Manager who is acting on behalf of the most senior manager. In the case of the UCS a Senior Manager (i.e. a member of SLT) could act as Case Manager on behalf of the Principal.

Senior Nominated Officer (SNO)

All LSCB member organisations are required to have a named Senior Officer with overall responsibility for ensuring that their organisation operates procedures for dealing with allegations.

Local Authority Designated Officer (LADO)

Bolton LSCB has in place a LADO who is involved in the management and oversight of individual cases. The LADO provides advice and guidance to the UTC, liaises with the Police and other agencies and monitors the progress of cases to ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process. The LADO role covers any individual working with children in Bolton and from all agencies and sectors.

Child Protection Unit

The Child Protection Unit has officers, who may advise and/or deputise for the LADO in his/her absence.

Bolton Safeguarding Children Board (BSCB)

The BSCB is a statutory partnership responsible for making sure that children and young people in Bolton are safe. BSCB members include representatives from Bolton Council, Health agencies, Police, Probation, local Schools, Academies, Children and Family Court Advisory Support Service (CAFCASS), the faith and voluntary sector. Contacts for BSCP partners can be found at Appendix B.

THE PROCESS

4.1 The Criteria for Referral to LADO

All those involved in the management of allegations are required to be familiar with the process (see Appendix C for Process Flowchart). All staff should be aware of the 'First Five Minutes' process (Appendix D) and should **immediately** inform their line manager when a concern arises where an adult working with children may have:

- Behaved in a way that has harmed, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child in a way that indicates they may pose a risk of harm to children.

The line manager will immediately inform the SNO.

4.2 When to Contact the LADO

The LADO should be informed within one working day of all allegations that come to the attention of the Principal, or CEO of the Trust if the allegation is against the Principal, which appear to meet the criteria.

4.3 Initial Considerations with the LADO

The LADO should first establish, in discussion with the Principal or CEO that the allegation is within the scope of these procedures and may have some foundation. The LADO will where necessary, obtain further details of the allegation and the circumstances in which it was made. Any tasks to gather information such as statements etc. are then under advice from the LADO, who is independent of the organisation and objective. Once all relevant information is gathered the Principal or CEO, if the allegation is against the Principal, and LADO would consider whether the allegation is, on the balance of probability, false or unfounded and would therefore require only a single agency response i.e. no other agencies need become involved. (See Appendix D 'First Five Minutes').

Recommendations may be made to the Principal or CEO if the allegation is against the Principal, at this stage regarding their next steps. All information would be recorded and the case would be filed as a 'no further action' for the LADO i.e. one that does not require a professional strategy meeting.

4.4 When Immediate Action is Required

Some allegations are so serious as to require immediate referral to Social Care and to the Police for investigation. Others are much less serious, and at first sight may not seem to warrant consideration of a Police investigation or enquiries by Children's Social Care. However, it is important to ensure that even apparently less serious allegations are seen to be followed up, and that they are examined objectively by someone independent of the organisation concerned.

4.5 Initial Consideration Meetings

Occasionally an allegation/concern is referred which is complex in nature and many agencies are involved in providing information, however, it has not been established that the criteria for a professional strategy meeting has been met i.e. it is not known if harm was caused by a particular professional. In simpler cases, as above, this could be resolved by the LADO and employer, however, in complex cases it is beneficial to bring all those who may be able to add information or further investigate the case together. In these cases the LADO may call an 'Initial Consideration Meeting'. This meeting would often be able to establish information, generate discussion and would make recommendation and decisions about who would gather what information. If information is established that the allegation then meets the criteria, a professional strategy meeting would then be called.

4.6 Professional Strategy Meeting (PSM)

A Professional Strategy Meeting will be arranged by the LADO and professionals will be invited who can provide information, in respect of the subject of the allegation or the alleged victim, or may be able to action any recommendations, this would normally include Police, Social Care, Principal or Case Manager. In the case of an allegation against the Principal, this would be the Chair of Governors. All those invited form part of the Strategy Group (See Appendix E).

The Strategy Meeting Group (SGM) will be chaired by the LADO and will discuss the allegation and cover the following areas:

- Consider whether a Section 47 Enquiry, Children Act (1989) has been carried out or is required and/or Police investigation and consider the implications;
- Ensure that arrangements are in place to protect the child/ren involved and any other child/ren affected;
- Review any previous concerns or allegations regarding the conduct of the subject of the allegation;
- Consider what support should be provided to all children who may have been affected directly and indirectly;
- Make arrangements to inform the child's parents/carers or the parents/carers of any other children involved, and consider how to provide them with support and information during enquiries;
- Consider what support should be provided to the subject of the allegation and others who might have been affected. Where the allegation is against a foster carer independent support should be offered. Where the allegation is for physical contact the group should take into account legislation relating to reasonable restraints and the use of reasonable force;
- Review the case against three criteria:
 - Criminal;
 - Child protection;
 - Disciplinary;
- Consider whether any parallel disciplinary process can take place;
- Determine what information can be shared, with whom and when;
- Make recommendations to the employer, where appropriate, regarding suspension, or alternatives to suspension;

- Agree protocols for reviewing and consider the need to share information with the employer or voluntary organisation;
- Formulate actions in regards to the above.

4.7 Who Attends the Meeting?

This would normally include the Police, Social Care, Principal or Case Manager. In the case of the Principal this would be CEO. See guidance for staff attending a Professional Strategy Meeting (see Appendix F).

4.8 What Happens at the Meeting?

It is imperative that any child who is the subject of an investigation is interviewed by identified members of the investigation team, in line with BSCB procedures. It is not expected that the professional who is subject of the allegation nor the child/family making the allegation attend the PSM.

4.9 Burden of Proof Required

It is important that all agencies understand that action to protect children or disciplinary proceedings is not dependent upon a Police prosecution (as 'beyond reasonable doubt'). The group will consider all information available on 'the balance of probability'.

5. CONFIDENTIALITY

5.1 Data Protection

Information sharing is vital to safeguarding and protecting the welfare of children and young people. The Data Protection Act (1988) and the Human Rights Act (1998) are the two main legislative frameworks governing how and what and in what circumstances information may be shared. However, disclosure of any confidential information should always be appropriate for the purpose and only to the extent necessary to achieve that purpose.

5.2 Information Sharing

Keeping Children Safe in Education DfE (2020) provides guidance for those who have to make decisions about information sharing on a case-by-case basis.

Professional Strategy Meetings are held under strict confidentiality agreements between the group, and the meeting is held on behalf of Bolton Safeguarding Children's Board.

The information being discussed is of a highly confidential nature and reports will not be copied without the prior consent of the author of the report or the chair. Any information discussed verbally will not be passed onto anybody outside the meeting without first obtaining the permission of the person who provided that information, or the chair.

5.3 Confidentiality Agreement

All those invited to the PSM will receive minutes, which also carry this confidentiality agreement. All information relating to the subject of the allegation and the alleged victim will be shared at the PSM. Police and Social Care WILL seek permissions to share statements etc., where relevant.

5.4 Requests for Minutes of Meetings

The minutes of the PSM are extremely confidential. Agencies and regulatory bodies may request a copy of the minutes but these may not be shared without the permission of the chair.

For Disclosure and Barring Services (DBS) purposes this may be requested under Section 40 of the Safeguarding Vulnerable Groups Act (SVGA) (2006) and the SVGA Regulations (2008) and falls within Schedule One. Advice should be first sought from LADO or legal team before sharing.

Where a request is submitted under Subject Access Request under GDPR and the Data Protection Act (1998) or Freedom of Information request to the Local Authority this would not be provided.

A redacted version, prepared by the employer or relevant member of the PSM, may be shared under certain circumstances, only after approval by LADO.

6. RECORD KEEPING

6.1 Purpose of Records

The purpose of keeping records of allegations managed is to enable accurate information to be given in response to future requests for references. It will provide future clarification where DBS disclosures reveal information from the Police about an allegation that did not result in a criminal conviction and it will help prevent unnecessary reinvestigation if, as sometimes happens, an allegation resurfaces after a period of time.

6.2 What Records should Senior Managers Make?

The Case Manager or Principal should ensure that a factual account of the allegation is initially recorded, dated and signed. A chronology of events initiated and key information should be identified.

6.3 What Records should the Employer Keep?

It is important that the Principal, or CEO, in the case of allegations against the Principal, keep a clear and comprehensive summary of any allegations made, details of how the allegations were followed up and resolved and of any action taken and decisions reached. These should be kept in the subject's confidential personnel file and a copy given to them.

6.4 What Records does the LADO Keep?

The LADO should keep an accurate record of all referral discussions, recommendations made and any outcomes which are resolved at Initial Consideration Stage (i.e. resolved by a single agency without the need for a PSM). The LADO records and retains all relevant information on behalf of BSCB.

6.5 What is Included in PSM Minutes?

For all Professional Strategy Meetings a comprehensive set of minutes is produced. The minutes will include a record of discussions, together with professional opinions, events leading to the allegation, with context of any incidents and a clear rationale for decisions and recommendations made. The LADO case file should record actions taken and final outcomes.

Following the meeting, the LADO will forward the draft minutes to all attendees, who should provide any amendments within 14 days from the date on which the minutes were sent. If amendments are not received within 14 days, it will be assumed that the minutes are approved.

The LADO will confirm that the minutes have been finalised, whereupon all agencies/individuals in possession of the draft minutes will destroy and/or delete the same.

The final approved minutes will be retained by the LADO only. Agencies/Individuals in attendance at the meeting may retain a copy of the Decisions and Recommendations only.

6.6 How Long are Records Retained?

Records should be retained at least until the subject has reached normal retirement age or for a period of 10 years from the date of the allegation, if that is longer. The LADO should report managing allegations data to BSCB quarterly and annually. This includes identifying themes and making recommendations to further safeguard children.

7. CONSIDERATION OF SUSPENSION

The possible risk of harm to children posed by the subject of an allegation should be evaluated and managed in respect of the child/ren involved in the allegations. In some cases that will require the Principal or Case Manager to consider suspending the subject of the allegation until the case is resolved.

In cases where the UCS is made aware that the Secretary of State has made an interim prohibition order in respect of an individual at the school or college, it will be necessary to immediately suspend that person from teaching pending the findings of the National College for Teaching and Leadership's (NCTL) investigation.

However, suspension must not be an automatic response. Suspension should be considered only in a case:

- Where there is cause to suspect a child or other children is/are at risk of significant harm;
- The case is so serious that it might be grounds for dismissal.

A person should not be suspended automatically. The Principal or Case Manager must consider carefully whether the circumstances warrant suspension from contact with children or until the allegation is resolved, and may wish to seek advice from their personnel adviser and the LADO. The PSM will seek advice from the Police and Social Care colleagues; however, the group can only make recommendations. The decision to suspend the Principal lies with the CEO.

7.1 Duty of Employer

The Principal or CEO, in the case of allegations against the Principal, should also consider whether the result that would be achieved by immediate suspension could be obtained by alternative arrangements. (See Appendix G).

7.2 What should be Recorded?

If immediate suspension is considered necessary, the rationale and justification for such a course of action should be agreed and recorded by both Principal or Case Manager or CEO, in the case of allegations against the Principal, and the LADO. This should also include what alternatives to suspension have been considered and why they were rejected.

8 ACTIONS ON CONCLUSION OF THE CASE

Whilst guidance urges that cases are resolved as quickly as possible, some cases which require protracted Police investigation and /or Court proceedings can become lengthy. The LADO should review the case at regular intervals and update the group on any progress. It is vital therefore that the group has access to all information and are involved/informed of the resolution of the case. The group or LADO may make recommendations to support the subject of the allegation should they return to work from any suspension.

8.1 Categorising the Allegation

The Professional Strategy Group will be asked to consider and give a rationale to categorise the allegation as:

- Substantiated;
- False;
- Malicious;
- Unfounded;
- Unsubstantiated. (See Appendix H for definitions of categories)

It is not the role of the LADO to make decisions but the PSG as a whole to make recommendations relating to the case.

8.2 Disciplinary Proceedings

Any Police investigation would normally take precedent and the LADO will liaise with the Police to ensure that any disciplinary does not breach rules of sub-judice (see Appendix H).

The LADO would seek Police consent to run parallel proceedings where possible. The LADO would seek permissions for the Police to share information with disciplinary hearings.

8.3 Referral to Professional/Regulatory body or DBS

The UCS has a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult; where the harm test is satisfied in respect of that individual; where the

individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence; and that the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

The DBS will consider whether to bar the person. Referrals should be made as soon as possible after the resignation or removal of the individual.

8.4 Specialist Assessments

Very rarely a specialist assessment is required of an adult's behaviour which is deemed inappropriate and would be commissioned by the UCS in order to assess any risk posed to children.

8.5 Lessons Learned

At the conclusion of a case, the LADO will review the circumstances with the UCS. This is to determine whether there are any improvements to be made to procedures or practice to help prevent similar events or allegations in the future. This would also include consideration of suspension, whether this was justified, and whether any lessons can be learned for future practice.

9 CHALLENGING PRACTICE

The managing allegations process and the role of the LADO is statutory within WT2015 and sits within the BSCB framework.

Information under these procedures is gathered on behalf of and retained by the BSCB; information is given voluntarily and is retained by the agencies and professionals providing it.

Any complaints regarding the conduct of an individual should be referred to the relevant agency.

In the event the subject or any Professional wishes to complain in relation to either the process or the outcome of any Professional Strategy Meeting, the complaint should be referred in writing, in the first instance, to Head of Service, Child Protection Unit, Westhoughton Town Hall. Complaints should be made within 6 months of the date of the Professional Strategy meeting. The Head of Service of Child Protection Until will investigate the complaint and if necessary escalate the matter to the Chair of Bolton Safeguarding Children Board, who will Review the process followed and/or the outcome of any Professional Strategy Meeting. The Chair may take the following action:

- (i) Arrange for any meeting to be re-convened in order that consideration may be given as to whether the process has been followed
- (ii) Arrange for any meeting to be re-convened in order that any decision may be further considered and if appropriate a different outcome substituted.

10 Historical Abuse

Historical allegations should be responded to in the same way as contemporary concerns. In these cases it is important to find out if the subject of the allegation is still working with children, in a paid or voluntary role. Often historical allegations are complex and require protracted Police and/or Social Care investigations

This policy has been reviewed with due regard to the Equality Act 2010 and approved by Directors during the Autumn Term 2021.

Signed by: Chair of Directors

APPENDIX A

Links to Other Documents

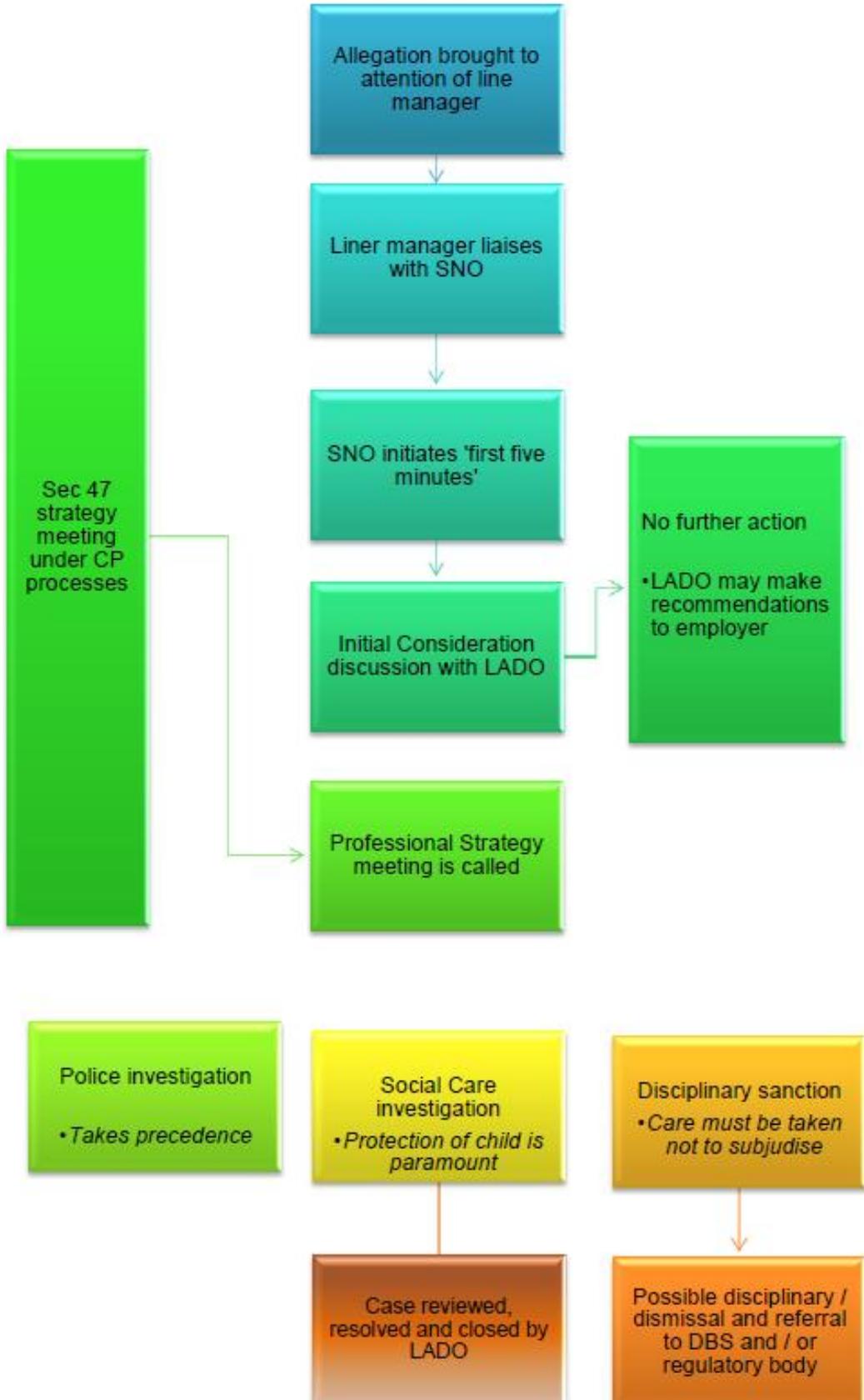
1. Working Together to Safeguard Children (2018)
2. Keeping Children Safe in Education (2020)
3. Bolton Safeguarding Children Board Procedures and Protocols
4. The Children Act (2004)
5. Education Act (2002)
6. Information Sharing: guidance for practitioners and managers (2008)
7. Disclosure and Barring Service
8. UCS Safeguarding Policy (2020)

**APPENDIX B
BSCB Contacts**

Key Agency	Role	Contact
LADO	Paula Williams LADO Child Protection Bolton Safeguarding Children Board	01204 337474
Bolton Referral and Assessment Teams		01204 331500
Bolton Children's Services	Head of Service Child Protection Unit	01204 337470
Bolton MASS Duty Team	Castle Hill Centre, Castleton Street, Bolton	01204 337408 01204 331505
Bolton Council of Mosques- Bolton Together		07341089467
Greater Manchester Police	Public Protection and Investigations Unit (PPIU)	0161 8567949

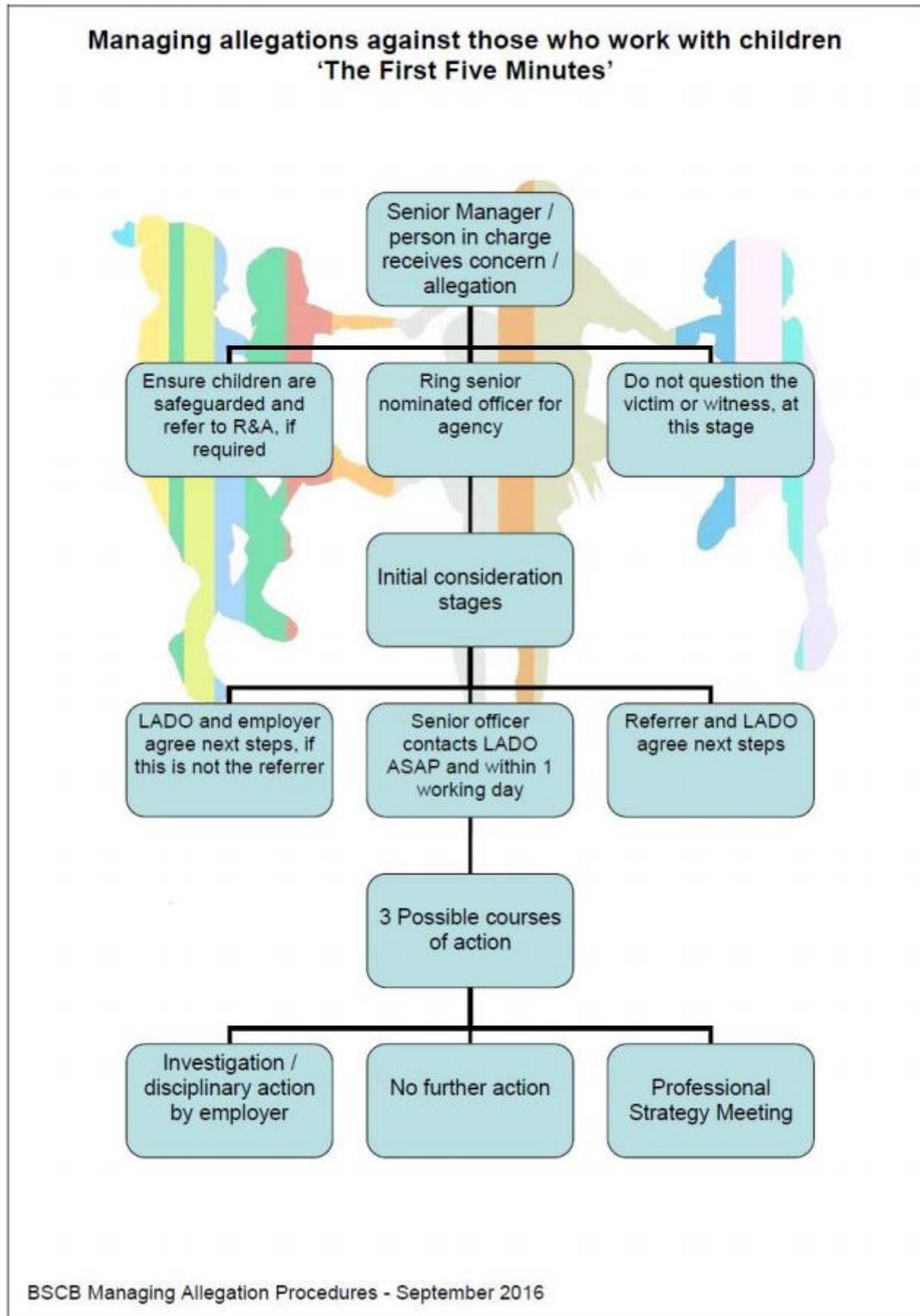
Process Flowchart

Appendix C



APPENDIX D

Managing Allegations Against those Working with Children
'THE FIRST FIVE MINUTES'



APPENDIX E

The Professional Strategy Group

The LADO considers which professionals, agencies, employers and regulators to invite to the Professional Strategy Group and takes advice on who would be able to bring information to the meeting and /or action any recommendations and further support the process. These would make up the Professional Strategy Group.



Appendix F

Checklist for Staff Attending a Professional Strategy Meeting

A professional invited to provide information, in respect of the subject of the allegation or the alleged victim, will help form part of the Strategy group. This checklist is aimed to assist and offer support to anyone attending a Strategy meeting. It is important that attendees are able to participate fully.

	Ask Yourself	X / <input type="checkbox"/>
	Am I able to bring along relevant information?	
	Am I able to action or feedback tasks?	
	Is this person known to my service?	
	Am I familiar with the case notes?	
	Do I feel there may be a conflict of interest?	
	Do I know the subject personally/work in closely with the subject?	
	Has a Section 47 enquiry been carried out?	
	Is one required prior to the professional strategy meeting	
	Please bring along, where appropriate	
1	Name, address, DOB of alleged victim(s)	
2	Name, address, DOB of subject(s)	
3	Chronology of recent events	
4	What you know about the incident	
5	What you know about the victim	
6	What you know about the subject(s) of the allegation	
7	Any record/ notes of interviews	
8	Any record/ notes of assessments	
9	Historical information about the alleged victim	
10	Historical information about the subject(s) of the allegation	

APPENDIX G

Consideration of Alternative to Suspension

Name:

Date:

Alternatives discussed with and advice sought from:

Recommendation made:

To:

Date/Time:

Re-deployment within the UCS so that the individual does not have direct contact with the child or children concerned:

Providing an assistant to be present when the individual has contact with children:

Redeploying to alternative work so the individual does not have unsupervised access to children:

Moving the child or children to a place where they will not come into contact with the member of staff, making it clear that this is not a punishment and parents/carers have been consulted:

Temporarily redeploying the member of staff to another role in a different location eg. to an alternative school or college or work for the Local Authority.

APPENDIX H

Definitions

Adult:

Refers to anyone who has attained the age of 18 years and who is employed on a paid or unpaid voluntary basis or contracted to work with or on behalf of children and young people.

Allegation:

Information which comes to light which suggests an employee, volunteer or contractor may have behaved in a way that has harmed, or may have harmed, a child, possibly committed a criminal offence against or related to a child or behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

BCSB:

Bolton Safeguarding Children Board.

Case Manager:

This term was introduced by the 'Dealing with Allegations against Teachers and School Staff' Guidance (2012). It is used throughout this policy to describe the senior manager nominated by the employer to manage an allegation on their behalf.

Children and Young People:

These terms refer to children who have not yet reached their 18th birthday.

DBS Disclosure and Barring Service:

Previously ISA and CRB which combined in December 2012.

Employer :

Refers to the organisation which employs, contracts, uses services of or in the absence of an employer the regulatory body. **In this policy QUEST is the employer.**

LADO:

Local Authority Designated Officer for managing allegations against those who work with children in Bolton.

PPIU:

Public Protection and Investigations Unit (Police).

Professional:

The term professional is used throughout to refer to people acting on behalf of an agency whether in a paid, professional or voluntary capacity, this includes foster carers.

PSG:

Professional Strategy Group.

PSM:

Professional Strategy Meeting.

Redacted:

To edit or revise something in preparation for publication.

Regulatory Body:

Body who is responsible for the regulation of an organisation or profession such as Ofsted, Charities Commission.

Safeguarding Children:

The action we take to promote the welfare of children and protect them from harm.

Sub Judice:

Under judicial consideration and therefore prohibited from public discussion elsewhere.

Categories of Allegations:

Substantiated - There is sufficient identifiable evidence to prove the allegation.

False - There is sufficient evidence to disprove the allegation.

Malicious - There is clear evidence to prove there has been a deliberate act to deceive and the allegation is entirely false.

Unfounded - There is no evidence or proper basis which supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the incident or was mistaken about what they saw. Alternatively they may not have been aware of all the circumstances.

Unsubstantiated - This is not the same as a false allegation. It means that there is insufficient evidence to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

APPENDIX I

Dealing with Allegations against Teachers and School Staff

Clarification of actions regarding references.

What information can and should be retained and by whom.

Category Recorded	HR/ Personnel Files	References	LADO/CPU Files	Sanctions which can be applied to student	
Substantiated	A clear and comprehensive summary of the allegation, how this was followed up and resolved, what action was taken and how this was resolved	Should appear	All allegations should be recorded and retained for 25 years		
Unsubstantiated		Should not appear			
Unfounded		Should not appear			
False		Should not appear			
Malicious	Should not appear	Should not appear			May consider whether disciplinary action is appropriate (if this appears in Behaviour Policy)
Record Keeping	All allegations should be recorded and retained for 25 years				



Framework for Action (FFA), Integrated Front Door (IFD) and Early Help (EH) Frequently Asked Questions

□ Questions

[When making an online referral, will a copy of the referral form be generated and sent automatically to the referrer?](#)

[In the Thresholds Document we have retained the advice and guidance section: is that available through the IFD?](#)

[Will it be possible to get some practice examples for people to follow, that will take them through what to do?](#)

[Will the IFD have a say when a child needs move up the continuum? What timescales will be used to determine this?](#)

[What should I do if I have not received a response to my referral within 24 hours/one working day?](#)

[Will clear identification of thresholds be applied to aid in referral process?](#)

[What is the role of the Advanced Practitioner?](#)

[Will there be clear feedback given to the referrer from the IFD and Access Point regarding the suggested plan of support, especially if the child is going to be signposted to other services?](#)

[What if families don't give consent to a referral?](#)

[How do I access the online referral form?](#)

[Is there a section on housing conditions in the online referral form?](#)

[If attaching an Early Help, do we still need to fill in all the sections on the online referral?](#)

[Are current Early Help Assessments logged on the central database being reviewed?](#)

[Do we not have to keep a signed copy of the EHA by parents anymore?](#)

[Is the current Early Help Assessment being updated or remaining the same?](#)

[Are transition arrangements being updated?](#)

[Do we still send Early Help Assessments to BoltonISA@bolton.gov.uk?](#)

[Do you refer to the Targeted Early Help Service through this process or is that a separate referral process?](#)

[If a child/ family are already working with a social worker and I want to share a current concern, will this be done directly to the designated social worker rather than go through the online form?](#)

[How do we share information with primary schools when they leave Pre-school?](#)



[Will consent still be required to share information after every EH review or can the consent in the EHA carry forward?](#)

[When this form moves online, how would we gain consent from parents? Would this need to be verbal?](#)

[What is the difference between the online referral form and EHA?](#)

[When will we need to start using the new referral process?](#)

[Do EHA's not have to be shared with the Integrated Front Door?](#)

[Can I ring through a referral that is not a concern regarding Significant Harm/Child Protection?](#)

[If I have a concern for a child out of hours, what should I do?](#)

[I would like to request information in respect of a child or family member, what should I do?](#)

Responses

When making an online referral, will a copy of the referral form be generated and sent automatically to the referrer?

No; a copy **will not** be generated for the referrer's records. If a copy is needed, referrers can either download or print a copy before submitting to the IFD. The system does not have a facility to email a copy to the referrer.

Once an online referral has been submitted, it will send an alert to IFD practitioners and they will review and triage the referral. Referrers will then be contacted and the outcome of the referral discussed.

In the Thresholds Document we have retained the advice and guidance section; is that available through the IFD?

If advice and guidance is needed from the IFD or a practitioner is unsure about whether a referral needs to be made, they can ring 01204 331500 number to access an automated message; option 1 will navigate the caller to the Early Help Access Point and advice and guidance will be given from there.

Advice and guidance can be sought from a number of agencies in Bolton, including adult mental health services, substance misuse services, CAMHS etc. The Framework for Action (P28) encourage practitioners to use advice and guidance as using this approach can help inform and strengthen assessments of need, as well as ensure timely, effective help and support is offered to children and their families.

Will it be possible to get some practice examples for people to follow, that will take them through what to do?



Yes, this will be part of the training resources being developed. Exemplar Early Help will also be developed to support practitioners.

Will the IFD have a say when a child needs move up the continuum? What timescales will be used to determine this?

If a practitioner considers the level of need for a child exceeds the Early Help thresholds, a referral to the IFD should be made using the online referral form, or by telephone if the child is suffering or at risk of significant harm. The IFD Team will triage the referral to assess the threshold and decide if statutory support is needed. Decisions will be made within 24hrs/one working day from receipt of referral.

Targeted Help will be offered for up to 20 weeks, if during or after this involvement it is evident that statutory support is required this will be stepped up.

What should I do if I have not received a response to my referral within 24 hours/one working day?

If you have not received a response within 24 hours, you should contact us by telephone, 01204 331500.

Will clear identification of thresholds be applied to aid in referral process?

Yes, these are outlined in the Framework for Action threshold document. Practitioners should use this document to support their decision making about the level of help and support needed, following the appropriate pathway. This should be offered at the earliest opportunity.

What is the role of the Advanced Practitioner?

Within the IFD, the Advanced Practitioner's role is to support the service and staff development across the Referral Team. This role supports continuous service improvement in addition to undertaking a Social Work role on the team.

Will there be clear feedback given to the referrer from the IFD and Access Point regarding the suggested plan of support, especially if the child is going to be signposted to other services?

The IFD and Access Point will always liaise with the referrer with regard to signposting and recommendations for additional services who could support. The Access Point will not refer children on to additional services on behalf of the current Lead Professional. This is to ensure that the Lead Professional is able to have an open and transparent discussion with the family about other services becoming involved in their support plan.



For example, if the referrer is the schools DSL, they will be contacted directly about the referral they have made and feedback, advice and guidance given for the DSL to act upon and continue to support the child and family.

What if families don't give consent to a referral?

Within the context of Early Help support, consent is always required, as this is not statutory support. If a practitioner feels that a referral to IFD is required for statutory assessment and support, it is good practice to seek their consent and discuss the referral and your concerns with the family.

However, in some circumstances, it may not be safe or appropriate to do so, this is where advising a family about a referral may introduce further risk to the child. In these cases, the rationale about why consent has not been sought should be provided in the online referral form.

How do I access the online referral form?

The form will be hosted on Bolton Council's web page 'Worried about a child'. A link to the form will also be available on the '[Worried about a Child](#)' BSCP web page. Please note, the link will not be available until 26th July 2021 when this new process is live.

Is there a section on housing conditions in the online referral form?

There isn't a specific question on housing conditions within the online referral form, however, a practitioner would capture this within the 'what are you worried about' section if this was a concern.

If attaching an Early Help, do we still need to fill in all the sections on the online referral?

Yes, the online referral form does need to be completed to support the triage process and to demonstrate why the practitioner is requesting support. The EHA and plan can be shared as part of the online referral process.

Are current Early Help Assessments logged on the central database being reviewed?

Currently, we are undertaking a cleanse exercise of the EHA database. This supports a wider programme of work relating to systems support and infrastructure in Early Help. At this time, there are Early Help Assessments held on the system that have not been closed in a timely way, and there has been no activity in over six months. The cleanse of the database will close Early Help Assessments that fall into this category.



It is critical that practitioners regularly update and interact with the Early Help database in order to submit plans and reviews in a timely manner. This ensures the most up to date information is available should another practitioner make an enquiry about existing Early Help support.

The Early Help database is an early safeguarding mechanism to support and enable practitioners to work in a joined-up way, reduce duplication and ensure an effective team around the family approach.

Do we not have to keep a signed copy of the EHA by parents anymore?

The central Early Help database is used as a mechanism to ensure joined up working practices. However, in addition, each agency is responsible for their own record keeping in relation to Early Help Assessment information and referrals. Please consult with your own agency's information governance guidance.

Is the current Early Help Assessment being updated or remaining the same?

The EHA template is currently being revised and it is expected that this will be launched early Autumn. Until this is launched, the existing EHA should continue to be used.

Are transition arrangements being updated?

Yes, there are some key transition points which we know need further work and support, so that will be a focus going forward. It is really important that as we progress in terms of Early Help that our colleagues undertake an Early Help Assessment, interact with the database, and tell us there is an EHA in place and submit that information as well as information that follows in terms of reviews. That central database allows us to connect partners together and will assist us to link professionals together.

Do we still send Early Help Assessments to BoltonISA@bolton.gov.uk?

This email address remains active for now to maintain the central Early Help database.

It is likely that this will change when the new EHA is in place to reduce the number of Early Help email addresses we have and simplify the way in which you contact us about Early Help.

Do you refer to the Targeted Early Help Service through this process or is that a separate referral process?

Yes, the online referral form supports the single point of access to Children's Services (Children's Social Care and Targeted Help). Practitioners should complete



this form if they are requesting this service and attach a copy of the current EHA and plan. Please be clear about what you are asking the service to support with.

If a child/ family are already working with a social worker and I want to share a current concern, will this be done directly to the designated social worker rather than go through the online form?

Yes, where there is an allocated social worker, you should contact them directly.

How do we share information with primary schools when they leave Pre-school?

To share Early Help Assessment information and ongoing support requirements for a child, a practitioner will need to obtain consent from the family to share with the primary school setting. During this discussion, consideration should be given to who undertake the role of Lead Professional and ensure the family agree.

When the child leaves the pre-school setting, and support provided by the primary school, the pre-school (with consent) can share the relevant documents directly with school. The pre-school should also email BoltonISA@bolton.gov.uk to update the Lead Professional details.

Will consent still be required to share information after every EH review or can the consent in the EHA carry forward?

The current Early Help Assessment processes are under review, alongside the EHA template. This review will seek to introduce consent for the 'life' of the EHA. However, should a referral for statutory help be required, consent will still need to be obtained as this is not covered within the consent statement of the EHA.

When this form moves online, how would we gain consent from parents? Would this need to be verbal?

Verbal consent is acceptable and details of when and how this was gained should be included where available. However, each agency is responsible for their own record keeping in relation to referrals and consent. Please consult with your own agency's information governance guidance.

What is the difference between the online referral form and EHA?

The EHA is an assessment of need at an Early Help level of need, to provide support to a child and their family as need arises. The new processes for referring to Children's Services do not affect the way in which this process operates. Early Help should be considered as an initial intervention. Early Help processes, including Early Help Assessment will continue to run without changes at this current time. This process can be led by partners without the need to engage with the IFD.



Any Early Help Assessments and plans/reviews should be submitted to [BoltonISA@bolton.govuk](mailto:boltonISA@bolton.govuk)

The online referral form is a referral to Children's Services to access: -

- Targeted Early Help Services – this should be considered when support provided at an Early Help level by a practitioner is no longer effective but does not meet the threshold for statutory intervention i.e. Child in Need/Child Protection. This service provides intensive Early Help support which is time limited. On completion, the work may step down to the referring service or alternative lead professional from a partner agency. The descriptors and pathways for each level of need are in the Framework for Action and practitioners should always refer to this.
- Statutory Support - this is for cases the practitioner believes meet the threshold for a statutory Children and Families assessment (Child in Need/Child Protection). Wherever possible, Early Help support should have been tried and the assessment and plan shared as part of the referral.

Please note that the online referral form **does not** replace the Early Help Assessment. Decisions about referrals to the above services should be supported by referring to the relevant sections of the Framework for Action.

For concerns about immediate risk to a child, please use 01204 331500 to refer.

When will we need to start using the new referral process?

The Integrated Front Door will go live on Monday 26th July 2021. The Framework for Action is live from 19th July 2021.

Do EHA's not have to be shared with the Integrated Front Door?

No, there is no requirement to share the EHA with the IFD unless this is to support a referral. However, on completion of an EHA, a copy should be submitted to boltonISA@bolton.gov.uk to ensure the central Early Help database is kept up to date, as part of the early safeguarding mechanisms.

Can I ring through a referral that is not a concern regarding Significant Harm/Child Protection?

No, this telephone line is reserved for those cases of most concern. Please do not ring about cases where you do not have concerns about significant harm/child protection. If a practitioner attempts to use this line to refer through a case without significant harm/child protection concerns, they will be redirected to the online referral form.

The number for significant harm/child protection concerns is 01204 331500.



If I have a concern for a child out of hours, what should I do?

Our opening hours are Monday – Friday from 8:45 – 5pm, excluding bank holidays. Outside of these hours, you should continue to complete the online referral form if you wish to make a referral in respect of a child that lives in Bolton and we will triage this during working hours.

If you believe there is immediate risk of significant harm to a child, contact the Police on 999.

If you believe there are significant safeguarding concerns for a child, you can call the emergency duty team on 01204 337777.

I would like to request information in respect of a child or family member, what should I do?

If you would like to request information in respect of a child or family member, you should complete our 'Request For Information' form. The form can be found on our website along with guidance information at www.bolton.gov.uk and search 'worried about a child.' The form will be available on this page for you to complete. We will respond to your request within 5 working days.

Appendix K

Concerns that do not meet the harm threshold

This section of the policy has been reviewed with due regard to the Equality Act 2010, Keeping Children Safe in Education 2021 and approved by Directors during the Autumn Term 2021. Governing body Boards and proprietors should have policies and processes to deal with concerns (including allegations) which do not meet the harm threshold set out above. Concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

This process has been developed to manage and record any such concerns and take appropriate action to safeguard children within our schools.

Low Level Concerns

As part of our approach to safeguarding, we will ensure that we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the schools (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

QUEST schools should create a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately. These policies should encourage an open and transparent culture; enable Principals/DSLs to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of our schools are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the Trust – see Safeguarding, Child Protection and Early Help Policy and Staff Code of Conduct.

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 at paragraph 338 of KCSIE 2021 and as detailed within this policy.

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, where this would not normally be a regular expectation as part of the individual's role, for example, as a School Counsellor.
- 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. It is crucial that any such

concerns, including those which do not meet the harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of our Trust from potential false allegations or misunderstandings.

Staff code of conduct and safeguarding policies

The information contained within this policy sits alongside the staff code of conduct, behaviour and safeguarding policies. Together these documents outline the expected high level of professional behaviour required by employees and ensures that appropriate action is taken, in a timely manner, to safeguard children and facilitate a trust-wide approach to dealing with any concerns.

This will be achieved by:

- ensuring their staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others;
- empowering staff to share any low-level safeguarding concerns;
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage;
- providing a responsive, sensitive and proportionate handling of such concerns when they are raised; and,
- helping identify any weakness in the school safeguarding system.

Sharing Low Level Concern

Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported following the procedures below. Reports regarding supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

QUEST schools will create 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.

Recording low-level concerns

All low-level concerns should be recorded in writing – see Appendix A. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Any recorded allegations should be held in the school's safeguarding file/staff personnel file. This will ensure that it is held securely to comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

All concerns should be discussed with the Trust's Director of Education and records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO.

Consideration should also be given to whether there are wider cultural issues within our organisation that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.

The information will be retained while the member of staff remains in employment with the Trust and until the person's normal retirement age or 10 years from the date of the concern whichever is the longer, in line with the retention of safeguarding records.

References

We will only provide substantiated safeguarding allegations within references. Low level concerns will not be included unless they relate to issues which would normally be included in a reference and are appropriate to do so under employment law policies, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

Responding to low-level concerns

It is important to respond to all reports of low-level concerns. If the concern has been raised via a third party, the Principal should collect as much evidence as possible (unless the allegation concerns the Principal then the Whistleblowing policy should be followed) by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

The Principal should acknowledge the concern in writing. Any written particulars should be quality assured by the Trust's BDD Department, alongside any required information regarding retaining and sharing this information.

The information collected will help the Principal to categorise the type of behaviour and determine what further action may need to be taken. All of this needs to be recorded along with the rationale for their decisions and action taken.

The General Data Protection Regulations of 2018 allows even the most personal data and information to be shared in order to safeguard children. All low-level concerns should be shared with the CEO, Chief Operating & Finance Officer and Director of Education in order to reduce any potential risk posed by an individual, both within and across settings within Quest Trust.

More detailed guidance and case studies on low-level concerns can be found in [Developing and implementing a low-level concerns policy](http://farrer.co.uk) (farrer.co.uk).



QUEST

Low-level Concern Report

Name of Staff Member	Address	School

Date	Concern

Signed: _____ Date: _____

Print Name: _____

<u>Action Taken by DSL</u>	
Signed	(DSL) Date: