



Consilium
Academies

Trust Wide Safeguarding and Child Protection Strategy

Strategy approved by Trust Board on:

Implemented by Local Governing Body on:

Review Date: June 2019 (or in line with new legislation as appropriate)

1. Introduction

The Trust Wide Safeguarding Strategy provides an overarching strategy for partner school on safeguarding principles and practices which links into the School's Safeguarding Policy at a local level.

The aim is to provide a consistent approach to safeguarding across the trust whilst still adhering to the requirements of the appropriate Safeguarding Strategic Board which is managed within the boundaries of the Local Authority Area.

2. Safeguarding Legislation and Compliance

Safeguarding and Child Protection of children, young people and vulnerable adults is supported by robust legislation, principally the Children's Act 1989 and 2004 and the associated guidance including Keeping Children Safe in Education (2018) and Working Together to Safeguard Children (amended 2017). Appropriate links to legislation and statutory guidance can be found below and full details are provided in individual school policies.

- DfE guidance: [Keeping Children Safe in Education](#) and [Working Together to Safeguard Children](#), and the [Governance Handbook](#).
- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- Statutory [guidance on the Prevent duty](#), which explains schools' duties under the CounterTerrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

This policy also complies with our funding agreement and articles of association. This is managed through our Trust Scheme of Delegation and Trust Safeguarding Strategy.

There are a significant number of policy requirements and additional links to wider policies as appropriate. As a minimum these include:

- Individual School level Safeguarding & Child Protection Policy which includes management of allegations, support for vulnerable children and young people and the process to follow locally to keep children safe.
- Safer Recruitment practices, inclusive of enhanced Disclosure and Barring Scheme (DBS) checks, single central register and assessments completed through recruitment practices.
- Extended policies including Looked After Children; Social Media and use of technology; Prevent; Anti-bullying; Sex and Relationship Education
- Staff conduct is managed at a local school level and incorporated into the positive culture ethos expected in a Consilium Academies school. In addition, expected behaviours from staff are included in appropriate Human Resource policies, Teacher Standards and the vision and values of the Trust and all partner schools. These behaviours are extended to all adults working in our schools. Associated training at the required level dependant on level of responsibility and accountability is required to support the above.

3. Definitions

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment
- Preventing impairment of children's health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Children includes everyone under the age of 18.

4. Equality statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs or disabilities
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality

- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers

5. Key Principles and Practices

All Consilium Academies partner school are required to:

- Implement the Locally agreed Safeguarding and Child Protection Policy.
- Implement the associated trust and school level policies and practices which support effective safeguarding and child protection.
- Appoint a Designated Safeguarding Lead (DSL) who meet all the required criteria for this role and is appropriately trained.
- Appoint associated roles to support the DSL as appropriate to school need. This may include: Deputy Designated Safeguarding Person(s); Child Protection Person(s); Looked After Children Co-Ordinator. Any staff appointed must receive the relevant training and support expected at DSP level in order to make sure they can deputise effectively.
- Provide regular and appropriate staff training in line with current legislation.
- Provide induction training within 15 days of commencement of employment through either a locally run programme or approved on-line programme.
- Provide policy information, advice and guidance in line with compliance requirements on individual school websites and direct to staff through the internal school procedures. This must include information through staff recruitment processes, on day one following commencement of new employees, for all adults working directly with the school and in reception areas for visitors so the safeguarding principles are clear.
- Students and young people in the care of the school must be able to fully understand the supportive approach taken by the school and feel able to speak to an adult about any concerns they have, including how to make an allegation or disclose a concern and how to access support.
- Record and report incidents and allegations through the appropriate process in line with the local policy and procedure.
- Manage allegations and incidents through the appropriate process in line with the local policy and procedure.
- Report in summary form all incidents and allegations to the central trust Designated Lead Officer (this will be used within the Trust Board reports) and to the Local Governing Body.
- Escalate high profile incidents and allegations immediately to the Trust Designated Safeguarding Lead (TDSL) in order to make sure links with the Local Authority and external partners are appropriately supported and recorded.
- Work in partnership with the central trust and, where appropriate, other partner schools to continually enhance effective safeguarding working practices.

6. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This strategy and the associated individual school policy, applies to all staff, volunteers, members, trustees and governors in the trust and each partner school. Our policy and procedures also apply to extended school and offsite activities.

All staff All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.

All staff will be aware of:

- Our systems which support safeguarding, Human Resource Policies and the staff conduct which impacts on safeguarding practices, the role of the Designated Safeguarding Lead (DSL), the behaviour policy, and the safeguarding response to children who go missing from education
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), FGM and radicalisation

Section 12 and appendix 4 of this policy outline in more detail how staff are supported to do this.

The Designated Safeguarding Lead (DSL)

Each school has an appointed Designated Safeguarding Lead and other associated roles dependant on the context of the school.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

The DSL will also keep the headteacher informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate. The full responsibilities of the DSL are set out in their job description.

The Trust's Designated Safeguarding Lead (TDSL)

The Trust Designated Safeguarding Lead is responsible for the strategic management of safeguarding across the partnership. The Trust DSL is Sonia Johnson who can be contacted by emailing Sonia.Johnson@consilium-at.com or telephone 01925 347995.

The requirements of this role are:

- Strategic management of safeguarding principles and practices at a central and partner school level.
- Development and implementation of appropriate policies, procedures and processes which meet safeguarding and child protection requirements.
- Auditing School level practices, agreeing improvement & development plans and where appropriate putting strategic interventions in place.
- Working with the network of Designated and Deputy Designated Safeguarding Leads in school to:
 - Collecting, collating and analysing safeguarding information across trust schools.
 - Reporting to the CEO and Trust Board.
- Leading and managing on high profile safeguarding allegations and serious case reviews, working in partnership with the relevant school and LADO and other external services as appropriate.
- Reporting to external agencies such as the police, Teacher Regulation Agency (TRA) and Local Strategic Safeguarding Board as appropriate and working in partnership with the relevant school (including any associated external services eg HR; Legal) if appropriate.

The Trust Board/Local Governing Body

The Trust Board will approve the Trust Safeguarding Strategy and will require the implementation of a safeguarding and child protection policy at an individual school level, which has a clear connection with the Local Authority approach to safeguarding children and young people in their local community. They will delegate responsibility of the implementation and management of the local policy to the Local Governing Body (LGB). This will include a requirement for the LGB to appoint a lead governor to monitor the effectiveness of this policy in conjunction with the full LGB. This is always a different person from the DSL.

The Trust Designated Safeguarding Lead will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher (see appendix 3). They will be supported by the Chair of Governors of the LGB as appropriate and will report to the Trust Board.

The CEO

The CEO is responsible for the implementation of this strategy and the associated school policies, including:

- Ensuring that schools are informed of this strategy on incorporation.
- Ensuring that the LGB and Headteacher implement a safeguarding and child protection policy which connects to the local safeguarding services and they are compliant with safeguarding practices.
- Ensuring that the TDSL is appropriately trained in order to manage the Trust safeguarding strategy.
- Ensuring that all central staff, members and trustees (including consultants and external advisers) undertake appropriate safeguarding and child protection training and update this regularly.
- Acting as the 'case manager' in the event of an allegation of abuse made against a member, trustee, or central staff.

7. Confidentiality

Consideration of Data Protection principles will be made at all time and the school will follow their Data Protection Policy as appropriate and in line with GDPR. Consent will be gained as required and Subject Data Access Requests will follow the process outlined. Information will be provided to external agencies appropriate to need and following consent unless there is a clearly identified safeguarding and/or child protection issue which requires information to be shared in order to safeguard a child or young person in our care.

Information systems will follow appropriate levels of encryption. All information on the children and young people in our care will be retained in line with the Trust retention policy and will be transferred to a new provision within 15 days of the child or young person transferring to a different educational establishment.

The following principles will be adopted:

- Timely information sharing is essential to effective safeguarding
- Information must only be shared on a 'need-to-know' basis, but you do not need consent to share information if a child is suffering, or at risk of, serious harm.
- Staff should never promise a child that they will not tell anyone about an allegation, as this may not be in the child's best interests
- Confidentiality is also addressed in this policy with respect to record-keeping in section 11, and allegations of abuse against staff in appendix 3

8. Local Safeguarding Boards

All Safeguarding Strategic Boards operate in line with legislation and in particular the 'Keeping Children Safe' requirements and they will have an appointed Local Authority Designated Officer (LADO), however reporting and management of safeguarding allegations and child protection procedures may differ. This must be clearly identified within the School's Safeguarding Policy and managed at local level. School's will be required to follow the local procedure as appropriate whilst adopting key trust principles (particularly around reporting, recording and management of high profile incidents) which are outlined in point 2 above.

Schools are required to escalate any high profile incident immediately to the Trust Designated Safeguarding Person. This includes:

- Allegations against the Headteacher/Principal, Designated Safeguarding Lead or Chair of LGB.
- Allegations concerning any member of the Central Trust Team.
- Incidents which may lead to staff dismissal.
- Incidents which are likely to attract significant publicity.

9. Complaints

Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

Other complaints

All other complaints will be handled through the Trust Complaints procedure which is available on request from the school or via the school or trust website. Where safeguarding concerns are raised within the body of a complaint these will be investigated separately and referrals to the Local Authority Designated Officer made as appropriate. The Trust complaints procedure also covers whistle blowing.

Appendix 1

School/Hub Level Information

South Yorkshire Hub

Armthorpe Academy:

Principal: Mr A Peirson
DSP: Mrs S Forsythe
Deputy DSP:
School main contact:

Doncaster information:

Salford Hub

Buile Hill Visual Arts College:

Headteacher: Mr J Inman
DSP: Mrs M Howard (Designated Child Protection Person)
Designated Governor: Mrs M Whittington
School main contact: Mrs M Howard - 0161 9211327

Ellesmere Park High School:

Headteacher: Mrs H Aaron
DSP: Mr M Knapper (Designated Child Protection Person)
Designated Governor: Mrs A Baxendale
School main contact: Mr M Knapper 0161 7894565

Moorside Academy:

Headteacher: Mr N Ogden
DSP: Mrs S Rowland (Strategic Safeguarding Lead)
Deputy DSP(s): Mrs L Redmond (Designated Safeguarding Person)
Mr J Hill (Designated Looked After Children Teacher)
Mrs A Graham (School Counsellor)

Salford information:

The Bridge Partnership for child protection referrals – tel: 0161 603 4500 or e mail worriedaboutachild@salford.gov.uk

GMP Public Protection Investigation Unit (PPIU) – for referrals/consultation about crime-related safeguarding concerns – tel: 0161 856 5171 or e mail parklane.ppiu@gmp.police.uk

Managing allegations against an employee (or volunteer) - Local Authority Designated Officer (LADO) tel: 0161 603 4350 / 4445

North East Hub

Wyvern Academy:

Headteacher: Mrs M Wilkinson
DSP: Mrs N Brown
Deputy DSP: Mrs K Philips
Designated Governor: Mrs J Wilson
Main school contact: Mrs N Brown

Darlington information:

LADO – Carol Glasper tel: 01325 406459 email: lscb@darlington.gcsx.gov.uk

Thornhill Academy:

Headteacher: Mr I Redford
DSP: Mrs C Meadwell
Deputy DSP(s): Ms N Luke
Miss A Tench
Mrs K Neeson (SENCo & Looked After Children Teacher)
Designated Governor: Mrs D Nicholson
Main school contact:

Washington Academy:

Principal: Dr M Beverley
DSP: Mrs L Coates
Deputy DSP (s): Mrs P Seldon (SENDCo)
Mrs J Ralphs
Main school contact: Mrs L Coates

Sunderland information:

Safeguarding Childrens Board – www.sunderlandscb.com
Tel: 0191 561 7007 (out of hours – 0191 520 5552)

Heworth Grange Academy:

Headteacher: Mr C Richardson
DSP:
Deputy DSP:
Main school contact:

Gateshead information:

LADO: Nicholas Leon email: nicholasleon@gateshead.gov.uk
Reporting concerns – tel: 0191 433 2653 (0191 477 0844 out of hours)
Email: R&Aduty@gateshead.gcsx.gov.uk Gateshead LSCB - tel: 0191 433
8010 email: sairapark@gateshead.gov.uk

Appendix 2: safer recruitment and DBS checks – policy and procedures

We will record all information on the checks carried out in each school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

The SCR will include details of governors, trustees, members and staff from the Central Trust Team as well as all staff, volunteers and regular adults working in the school.

Appointing new staff

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state
- Ask for written information about previous employment history and check that information is not contradictory or incomplete

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will 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 the individual (i.e. that no action or inaction occurred but the present risk that it could was significant)
- Where the individual has received a caution or conviction for a relevant offence
- If there is reason to believe that the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#)
- If the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Consultants and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Service Providers and Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check. This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

Members, Trustees and Governors

- All members, trustees and governors will have an enhanced DBS check without barred list information and members and trustees will also have a section 128 check. They will have an enhanced DBS check with barred list information if working in regulated activity.

The chair of the board of trustees will have their DBS check countersigned by the secretary of state.

All trustees, proprietors and local governors will also have the following checks:

- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Appendix 3: allegations of abuse made against staff

This section of this policy applies to all cases in which it is alleged that a current member of staff or volunteer has:

- Behaved in a way that has harmed a child, or may have harmed a child, or
- Possibly committed a criminal offence against or related to a child, or

- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children

It applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police. We will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension

Suspension will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school 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 the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the academy trust.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the headteacher (or Trust DSL where the headteacher is the subject of the allegation) – the ‘case manager’ – will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case

manager will notify the designated officer as soon as practicably possible after contacting the police)

- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and consider what other support is appropriate. Members of staff can access support from their trade union or employee association and the school will offer to complete a referral to Occupational Health.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teacher Regulation Authority.

Where the police are involved, wherever possible the school/trust will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Timescales

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week where possible. If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days.
- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days.
- If it is likely that a resolution can not be achieved in this timescales outlined above the individual will be informed and will be provided with the reason.

Specific actions Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager, supported by HR advisory services as appropriate, will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the TRA to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the headteacher, or other appropriate person in the case of an allegation against the headteacher, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil. **Confidentiality**

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the local authority's designated officer, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual. We will retain these records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file. **References**

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning lessons

After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual