

Managing allegations against Staff Policy



Date February 2023

Signed Headteacher

Signed Chair of Governors

Managing Allegations Against Staff Policy

This policy has been written in accordance with the statutory policy in Keeping Children Safe in Education and it is consistent with local safeguarding procedures and policy. It covers the two levels of allegation/concern:

Allegations that may meet the harms threshold.

Allegation/concerns that do not meet the harms threshold – referred to for the purposes of this policy as 'low level concerns'.

Allegations that may meet the harms threshold

This part of the policy is about managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in the school. This policy will be followed where it is alleged that anyone working in the school, including supply teachers, volunteers and contractors, has:

- Behaved in a way that has harmed a child, or may have harmed a child and/or;
- Possibly committed a criminal offence against or related to a child and/or;
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The harm test is explained on the Disclosure and Barring service website on GOV.UK. Section 31(9) of the Children Act 1989 as amended by the Adoption and Children Act 2002

<https://www.legislation.gov.uk/ukpga/1989/41/section/31>

The last bullet point above includes behaviour that may have happened outside of school, that might make an individual unsuitable to work with children, this is known as transferable risk. Where appropriate an assessment of transferable risk to children with whom the person works will be undertaken. If in doubt, we will seek advice from the local authority designated officer (LADO).

Allegations will be reported to the CASE MANAGER, Janet Elmes (HT), or Deputy CASE MANAGER, Rachael Carroll (PSA) and this will be done **without delay**. A "case manager" will lead any investigation. This will be the headteacher or, where the headteacher is the subject of an allegation, the chair of governors.

The initial response to an allegation

Where the school has identified that a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, a referral will be made to First Contact and as appropriate, the police, immediately as with any child protection referral.

There are two aspects the school will consider if an allegation is made:

Looking after the welfare of the child - the CASE MANAGER is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care.

Investigating and supporting the person subject to the allegation - the case manager will discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

When dealing with allegations, the school will:

- Apply common sense and judgement;
- Deal with allegations quickly, fairly and consistently; and
- Provide effective protection for the child and support the person subject to the allegation.

The CASE MANAGER will complete the paperwork as required by the LADO and pass on any associated evidence.

If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion involving the police and/or children's social care will be convened in accordance with the statutory policy Working Together to Safeguard Children. If the allegation is about physical contact, for example restraint, the strategy discussion or initial evaluation with the LADO will take into account that teachers and other school and college staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour.

Where the CASE MANAGER is concerned about the welfare of other children in the community or the member of staff's family, they will make a referral to First Contact.

Where it is clear that an investigation by the police or children's social care is unnecessary, or the strategy discussion or initial assessment decides that is the case, the CASE MANAGER will discuss this with the LADO.

No further action

Where the initial discussion leads to no further action, the CASE MANAGER will:

- Record the decision and justification for it; and
- Agree on what information will be put in writing to the individual concerned and by whom.

Further enquiries

Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager will discuss how and by whom the investigation will be undertaken. In straightforward cases, the investigation will normally be undertaken by the headteacher and, in the case of allegations against the headteacher, the chair of governors.

If the nature or complexity of the allegation requires it, the allegation may require an independent investigator. The school will liaise with the LA HR and LADO in regard to this.

The CASE MANAGER will monitor the progress of cases to ensure that they are dealt with as quickly as possible in a thorough and fair process. Reviews will be conducted at fortnightly or monthly intervals, depending on the complexity of the case.

Wherever possible, the first review will take place no later than four weeks after the initial assessment. Dates for subsequent reviews, ideally at fortnightly intervals, will be set at the review meeting if the investigation continues. Advice and policy will be sought from the LADO throughout.

Supply teachers and all contracted staff

The school may have to consider an allegation against an individual not directly employed by them.

Whilst we may not be the employer of supply teachers, we will ensure allegations are dealt with properly. We will NOT cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. We will discuss with the supply agency or agencies where the supply teacher is working across a number of schools or colleges, whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

The school will usually take the lead in an investigation because agencies do not have direct access to children or other school or college staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by the school, are under the supervision, direction and control of the governing body when working in the school. They will be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which will be arranged by the LADO will address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency or agencies are taken into account by the school during the investigation.

When using a supply agency, the school will inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This will include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about policies.

Governors

If an allegation is made against a governor, the school will follow the same procedures. Where an allegation is substantiated, we will follow the procedures to consider removing them from office.

Suspension

Suspension will not be an automatic response when an allegation is reported. All options to avoid suspension will be considered prior to taking that step. The CASE MANAGER must consider carefully whether the circumstances warrant suspension from contact with children at the school, or until the allegation is resolved. It will be considered only in cases where there is cause to suspect a child or other children at the school is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. If in doubt, the CASE MANAGER will seek advice from HR and the LADO, as well as the police and children's social care where they have been involved.

If the school is made aware that the Secretary of State has made an interim prohibition order, in respect of an individual who works at the school, we will take immediate action to ensure the individual does not carry out work in contravention of the order. This means that pending the findings of the TRA investigation, the individual will not carry out teaching work. The person will be paid whilst they are suspended or where there is an interim prohibition order in place.

In many cases, an inquiry can be resolved quickly and without the need for suspension. The school will decide on whether the individual will continue to work at the school, based on consultation with the LADO who will provide relevant information they have received from the police or children's social care on whether they have any objections to the member of staff continuing to work during the investigation of the case. The case manager will be as inventive as possible to avoid suspension.

Based on advice from HR and/or a risk analysis drawn up with the LADO, the following alternatives will be considered by the case manager before suspending a member of staff:

- 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 to alternative work in the school so the individual does not have unsupervised access to children;
- Moving the child or children to classes where they will not come into contact with the member of staff, but this decision will only be made if it is in the best interest of the child or children

concerned and takes accounts of their views. It will be made making it clear that this is not a punishment and parents have been consulted; or

- Temporarily redeploying the member of staff to another role in a different location, for example to an alternative school or where available, work for the local authority.

These alternatives allow time for an informed decision regarding the suspension, this will, however, depend upon the nature of the allegation. The case manager will consider the potential permanent professional reputational damage to employees that can result from suspension where an allegation is later found to be unfounded, unsubstantiated, malicious, or false.

If immediate suspension is considered necessary, the case manager will record the rationale and justification for such a course of action. This will also include what alternatives to suspension have been considered and why they were rejected.

Where it has been deemed appropriate to suspend the person, written confirmation will be given within one working day, giving as much detail as appropriate for the reasons for the suspension. It is not acceptable for an employer to leave a person who has been suspended without any support. The person will be informed at the point of their suspension who their named contact is within the organisation and provided with their contact details.

Children's social care or the police may give their view to the LADO but they cannot require the case manager to suspend a member of staff or a volunteer, although the case manager will give appropriate weight to their views. The power to suspend is vested in the governing body. However, where a strategy discussion, or initial assessment, concludes that there will be enquiries by the children's social care, and/or an investigation by the police, the LADO will canvass police and children's social care for views about whether the accused member of staff will be suspended from contact with children. Police involvement does not make it mandatory to suspend a member of staff; this decision will be taken on a case-by-case basis having undertaken a risk assessment about whether the person poses a risk of harm to children.

Supporting those involved

Duty of care

The welfare of a child is paramount (how children will be protected and supported is set out throughout this policy) and this will be the prime concern in terms of investigating an allegation against a person in a position of trust. However, when an allegation or safeguarding concern is being investigated it is likely to be a very stressful experience for the adult subject of the investigation, and potentially for their family members. It is important that an employer offers appropriate welfare support at such a time and recognises the sensitivity of the situation. Information is confidential and will not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

Governors and leaders have a duty of care to their employees. They will:

- Manage and minimise the stress caused by the allegation;
- Inform the individual as soon as possible, explaining the likely course of action, guided by the LADO, and the police where necessary;
- Advise the individual to contact their trade union representative, or a colleague for support;
- Appoint a named representative to keep the person informed about progress of the case;
- Provide access to counselling or medical advice where appropriate. For staff in schools maintained by the local authority this may include support via the local authority's occupational health arrangements; and

- Not prevent social contact with work colleagues and friends, when staff are suspended, unless there is evidence to suggest this may prejudice the gathering of evidence.

Parents or carers of the child or children involved will be:

- Formally told about the allegation as soon as possible. The case manager will consult the LADO and where involved children's social care and/or the police on what information can be disclosed;
- Kept informed about the progress of the case, only in relation to their child - no information can be shared regarding the staff member; and
- Made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in schools whilst investigations are in progress as set out in section 141F of the Education Act 2002 (see paragraphs 372-380).

In deciding what information is disclosed, careful consideration will be given to the provisions of the Data Protection Act 2018, the law of confidence and, where relevant, the Human Rights Act 1998.

Confidentiality and Information sharing

In an allegation's management meeting or during the initial assessment of the case, the agencies involved will share all relevant information they have about the person who is the subject of the allegation, and about the alleged victim.

Where the police are involved, wherever possible the school will ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer's disciplinary process. This will be done as their investigation proceeds and will enable the police to share relevant information without delaying the conclusion of their investigation or any court case.

Children's social care will adopt a similar procedure when making enquiries to determine whether the child or children named in the allegation need protection or services, so that any information obtained in the course of those enquiries which is relevant to a disciplinary case can be passed to the employer without delay.

The school must make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2011 amended the Education Act 2002, to introduce reporting restrictions. These provisions made it an offence (except in the limited circumstance expressly permitted by the legislation), for any person to publish any material that may lead to the identification of a teacher in a school who has been accused by, or on behalf of, a child from the same school (where that identification would identify the teacher as the subject of the allegation).

The reporting restrictions apply until:

- The point that the accused person is charged with a relevant offence; or
- The Secretary of State or the General Teaching Council for Wales publishes information about an investigation or decision in a disciplinary case arising from the allegation.
- Section 141F of the Education Act 2002 only applies to teachers in schools does not apply to colleges.
- Carried out by the Teaching Regulation Agency.

The reporting restrictions are disapplied if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a court lifts the reporting restrictions in response to a request to do so.

The legislation prevents the “publication” of material by any person that may lead to the identification of the teacher who is the subject of the allegation. “Publication” includes “any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public.” This means that a parent who, for example, published details of the allegation on a social networking site would be in breach of the reporting restrictions (if what was published could lead to the identification of the teacher by members of the public). In circumstances where the schools need to make parents aware about an allegation, they will make parents and others aware that there are restrictions on publishing information.

In accordance with the Authorised Professional Practice published by the College of Policing in May 2017, the police will not normally provide any information to the press or media that might identify an individual who is under investigation, unless and until the person is charged with a criminal offence. In exceptional cases where the police wish to depart from that rule, for example an appeal to trace a suspect, they must apply to a magistrates’ court to request that reporting restrictions be lifted.

The case manager will take advice from the LADO, police and children’s social care to agree the following:

- Who needs to know and exactly what information can be shared;
- How to manage speculation, leaks and gossip;
- What, if any, information can be reasonably given to the wider community to reduce speculation; and
- How to manage press interest if, and when, it will arise.

Allegation outcomes

The definitions that will be used when the school determines the outcome of an allegation are set out below:

- 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 or cause harm to the person subject of the allegation;
- False: there is sufficient evidence to disprove the allegation;
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence; or,
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Ultimately the options open to the school depend on the nature and circumstances of the allegations and the evidence and information available. This will range from taking no further action, to dismissal or a decision not to use the person’s services in future. Suspension will not be the default position; an individual will be suspended only if there is no reasonable alternative.

If the allegation is substantiated and:

- The person is dismissed; resigns, or otherwise ceases to provide his or her services; or □
The employer ceases to use the person’s services.

The school has a legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

In the case of a member of teaching staff at the school, the case manager will consider whether to refer the matter to the TRA to consider prohibiting the individual from teaching.

There is a legal requirement for the school to make a referral to the DBS where they consider an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.

Following a criminal investigation or a prosecution

The police will inform the LADO and the employer immediately when:

- A criminal investigation and any subsequent trial is complete;
- It is decided to close an investigation without charge; or
- It is decided not to continue to prosecute after the person has been charged.

In those circumstances, during the joint assessment meeting the LADO will discuss with the case manager whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the police and/or children's social care will also inform that decision. The options will depend on the circumstances of the case and the consideration will consider the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO and the case manager will consider whether the child and/or the person who has made the allegation needs help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the school, will consider whether any disciplinary action is appropriate against the individual who made it as per their own behaviour policy.

Returning to work

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the case manager will consider how best to facilitate that. Policy and advice are usually provided via HR or the LADO. The school will provide help and support to return to work after a stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to aid and support in the short term will be offered. The case manager will also consider how the person's contact with the child or children who made the allegation can best be managed if they are still attending the school.

Managing the situation and exit arrangements

Resignations and 'settlement agreements'

'Settlement agreements' (sometimes referred to as compromise agreements), by which a person agrees to resign if the employer agrees not to pursue disciplinary action and both parties agree a form of words to be used in any future reference, will not be used, where there are allegations that indicate the person is a risk or poses a risk of harm to children or deemed not suitable to work with children. Such an agreement will not prevent a thorough police and/or school investigation where that is appropriate.

The school will not cease their investigations if the person leaves, resigns or ceases to provide their services. It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate.

Wherever possible, the accused will be given full opportunity to answer the allegation and make representations about it. The process of recording the allegation and any supporting evidence and reaching a judgement about whether it can be substantiated or otherwise on the basis of all the information available, will continue even if the accused does not cooperate. It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record an outcome wherever possible. The person concerned will be notified of the conclusion of the allegations and sanctions that might be posed.

Other than where allegations are false, malicious, unsubstantiated, or unfounded, the outcome will be made clear when providing references to prospective employers. This is particularly important where the person moves into another position involving working with children.

Where a settlement/compromise agreement is used because the person has been found not to be a risk, schools and colleges will not let it prevent the employer from:

- Fulfilling their legal duty to refer cases to the DBS where the referral criteria are met. Noncompliance of this duty is a criminal offence; or
- Providing a reference to potential employers when requested; or
- Considering whether to make a referral to the Teaching Regulations Agency where the criteria are met.

Record keeping

Details of allegations following an investigation that are found to have been malicious or false will be removed from personnel records, unless the individual gives their consent for retention of the information. However, for all other allegations, the following information will be kept on the file of the person accused:

- A clear and comprehensive summary of the allegation;
- Details of how the allegation was followed up and resolved;
- A note of any action taken, and decisions reached and the outcome as categorised above; A copy provided to the person concerned, where agreed by children's social care or the police; and,
- A declaration on whether the information will be referred to in any future reference.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.

The school has an obligation to preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry (further information can be found on the IICSA website). All other records will be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

The Information Commissioner has published policy on employment records in its Employment Practices Code and supplementary policy, which provides some practical advice on record retention. This can be found on the ICO website.

References

Cases in which an allegation was found to be false, unfounded, unsubstantiated or malicious will not be included in employer references. Any repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious will also not be included in any reference. Substantiated allegations will be included in references, provided that the information is factual and does not include opinions.

Learning lessons

Throughout the process in handling allegations and at conclusion of a case in which an allegation is substantiated, the LADO will review the circumstances of the case with the case manager to determine whether there are any improvements to be made to the school's procedures to help prevent similar events in the future. This will include issues arising from any decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons will also be learnt from the use of suspension when the individual is subsequently reinstated. The LADO and case manager will consider how future investigations of a similar nature could be carried out without suspending the individual.

For all other cases the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Where an adult makes an allegation to a school that they were abused as a child, the individual will be advised to report the allegation to the police. Non-recent allegations made by a child, will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the police. Abuse can be reported no matter how long ago it happened.

Concerns that do not meet the harm threshold

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. It is important that schools and colleges have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

Low level concerns

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

Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this will encourage an open and transparent culture; enable schools and colleges to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

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. 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 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; or, □ 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 allegation/harm threshold are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively will also protect those working in or on behalf of the school from potential false allegations or misunderstandings.

Staff code of conduct and safeguarding policies

The staff code of conduct makes it clear the importance of sharing low-level concerns, and an explanation of what the purpose of the policy is – i.e. to create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour which are set out in the staff code of conduct are constantly lived, monitored and reinforced by all staff.

Leaders will ensure their staff code of conduct, behaviour policies and safeguarding policies and procedures are implemented effectively, and ensure appropriate action is taken in a timely manner to safeguard children and facilitate a whole school approach to dealing with any concerns.

The school will:

- 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 as per paragraph 74;
- 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's safeguarding system.

Sharing low-level concerns

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

We 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 will be recorded in writing. The record will include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns will also be noted, if the individual wishes to remain anonymous then that will be respected as far as reasonably possible.

Records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) (see paragraph 109 for more information).

Records will 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 will 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 will be referred to the LADO. Consideration will also be given to whether there are wider cultural issues within the school 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 until the individual leaves their employment.

References

The school will only provide substantiated safeguarding allegations in references. Low level concerns will not be included in references unless they relate to issues which would normally be included in a reference, 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) will 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 will be referred to in a reference.

Responding to low-level concerns

Concerns about safeguarding will be reported to the designated safeguarding lead or deputy. If the concern has been raised via a third party, the designated safeguarding lead will collect as much evidence as possible by speaking:

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

The information collected will help them 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.