Allegations of Abuse Against Staff Policy 2021-2022





School: Prudhoe Castle First School

Head Teacher: Katie Jacobs

Named personnel with designated responsibility				
Academic Year	Lead	Nominated ???? Local Governor	Chair of board of trustees	
2021-2022	Katie Jacobs	Judith Meek	Rob Moore	

Policy review dates				
Review Date	Changes made	By whom	Date shared	
September 2022				

ALLEGATIONS OF ABUSE AGAINST STAFF POLICY PRUDHOE CASTLE FIRST SCHOOL

1. Introduction

- 1.1 These procedures are based on the guidance contained in Chapter 6 and appendix 5 of *Working Together to Safeguard Children A guide to inter agency working to safeguard and promote the welfare of children* (Working Together 2010).
- 1.2 The procedures should be used by all organisations where adults work with or on behalf of children and young people or come into contact with children through their work. This includes organisations or persons that provide staff or volunteers to work with or care for children.
- 1.3 For convenience the term employer is used throughout this guidance to refer to organisations that have a working relationship with the individual against whom the allegation is made.
- 1.4 Within this definition the term employer includes:
 - Organisations that use the services of volunteers
 - People who are self employed
 - Service providers, voluntary organisations, employment agencies or business, contractors, fostering services
 - Regulatory bodies such as Ofsted in the case of childminders
 - And others that may not have a direct employment relationship with the individual but will need to consider whether to continue to use the person's services, or to provide the person for work with children in the future, or to maintain the registration of the individual.
- 1.5 In some individual circumstances the term 'employer' will encompass more than one organisation, for example, where staff providing services for children in an organisation are employed by a contractor, or where temporary staff are provided by an agency. In those circumstances both the contractor or agency and the organisation in which the accused individual worked will need to be involved in dealing with the allegation.
- 1.6 These procedures should be applied when there is an allegation that a person who works with a child has:
 - Behaved in a way that has harmed a child, 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 s/he is unsuitable to work with children
 - Whilst in connection with his/her employment, or voluntary or contracted activity. However these procedures may also be used where concerns arise about:
 - A person's behaviour in their personal life which may impact upon the safety of children to whom they owe a duty of care
 - A person's behaviour with regard to his/her own children

- The behaviour in the private or community life of a partner, member of the family or other household member.
- 1.7 If an allegation relating to a child is made about a person who undertakes paid or unpaid care of vulnerable adults, consideration should be given to the possible need to alert those who manage her/him in that role. These procedures can also be applied if a complaint or an allegation is made against a person in relation to his/her work with adult service users if it causes concern about the welfare of an adult service user's children.
- 1.8 Compliance with these procedures should help ensure that allegations of abuse are dealt with effectively, in the best interests of the child and in a way that is thorough and fair for all involved.
- 1.9 Further guidance on the appropriate conduct of practitioners can be found in the NSCB *Guidance for Safe Working Practice for adults who work with children and young people.*

2. Roles and Responsibilities

- 2.1 Northumberland Safeguarding Children Board (NSCB) has responsibility for ensuring that there are effective inter-agency procedures in place for dealing with allegations against people who work with or on behalf of children and for monitoring and evaluating the effectiveness of those procedures.
- 2.2 In order to discharge the duties of the NSCB each member organisation should identify a Named Officer (NO). NSCB will maintain a record of the NSOs who have overall responsibility for:
 - Ensuring that their organisation operates procedures for dealing with allegations which are in line with NSCB procedures
 - Resolving any inter-agency issues that may arise
 - Liaising with NSCB
- 2.3 In order to discharge the duties outlined in Working Together 2010, employers should:
 - Have in place and operate arrangements for handling allegations in accordance with these procedures
 - Identify a designated senior manager (DSM) to whom allegations or concerns should be reported. There should also be a named deputy for the sm. The SM does not need to have direct line management of staff
- 2.4 NSCB and the local authority (Northumberland County Council) are also required to ensure that a Local Authority Designated Officer (LADO) is identified who will:
 - Be involved in the management and oversight of individual cases
 - Provide advice and guidance to employers and voluntary organisations
 - Liaise with the police and other agencies

- Monitor the progress of cases to ensure that they are dealt with as quickly as possible consistent with a thorough and fair process
- 2.5 Figure 1 appended to this report provides a diagrammatic overview of the process for responding to an allegation in Northumberland.

3. Recognising and responding to an allegation

Allegations may arise from:

- A child or an adult
- A parent or carer
- A member of the public
- A professional body
- Police/children's services or other agency
- 3.2 Agencies covered by these procedures should have in place their own policies, procedures and guidance relating to the conduct of their employees and they should be used to ensure compliance with these procedures.
- 3.3 There are different procedures for responding to allegations and complaints. Care should be taken to ensure that the correct procedures are followed. As a general guide, allegations refer to information or concerns which suggest a child has been hurt or harmed by an adult who owed them a duty of care.
- 3.4 The person(s) against whom the allegation is made should not be informed of the allegation until a decision is made on how and when this should happen. This decision will be made either at the strategy meeting or during discussions between the Designated Senior Manager and the LADO.

4. What to do if an allegation is made by a child or young person

- 4.1 The person to whom the allegation is reported must:
 - Treat the matter seriously
 - Ensure that, where necessary, the child receives appropriate medical attention
 - Make a written record of the information recording the child/parents own words and when the alleged incident took place, who was present and what happened
 - Sign and date the written record
 - Report the matter immediately to the designated senior manager or deputy in his/her absence. Where it is the DSM that is the subject of the allegation a referral should be made directly to the LADO
 - The information should be treated as confidential.

5. Initial action by the Designated Senior Manager (DSM)

5.1 The DSM will:

- Obtain written details of the allegation, signed and dated by the person receiving the allegation
- Countersign and date the written details
- Record any other information and names of any potential witnesses
- Establish a chronology of significant events
- Consider any information already known about those involved
- Discreetly check any incident or log books
- On the basis of these factors make a professional judgement and record the reasons for any subsequent action taken.
- 5.2 If the allegation is believed to meet the criteria in paragraph 1.6 above (or if there is uncertainty about whether it does or doesn't) the DSM should consult the LADO as soon as possible and certainly within 1 working day. No action should be taken until this discussion has taken place unless emergency action is required to protect the child concerned, in which case the child protection procedures will take precedence. Contact with the LADO should not be delayed in order to gather information.
- 5.3 If an allegation requiring immediate attention is received outside of normal office hours the DSM should consult immediately with the Out of Hours Emergency social work service on (0845-6005252) or the Police. The DSM should inform the LADO the next working day.

6. Responding to an allegation made to the Police or Children's Social Care

- 6.1 If the police receive an allegation regardless of whether a crime appears to have been committed, the matter should be immediately reported to their DSM who will inform the LADO immediately or in the case of out of hours, the next working day. The Police also have a responsibility to decide whether emergency action is required to safeguard the child's welfare.
- 6.2 If Children's Social Care receives an allegation the matter should be reported to the LADO within 1 working day. Children's Social Care also has a responsibility to decide whether the allegation requires a child protection enquiry and/or emergency action to safeguard the child's welfare.
- 6.3 Where the LADO receives information from the Police or Children's Social Care which relates to an allegation they should immediately contact the DSM concerned unless they have been requested by the police not to do so.

7. Initial consideration by the DSM and the Local Authority Designated Officer (LADO)

- 7.1 The LADO should establish, in discussion with the DSM that the allegation is within the scope of these procedures and may have foundation. The discussion will centre upon whether there is a need for:
 - A police investigation because a crime has or may have been committed

- Enquiries and assessment by social care to determine if services or emergency actions are required
- Consideration by the employer of disciplinary action in respect of the individual

There will also need to be consideration as to whether the subject of the allegation needs to be suspended from any contact with children. The decision to suspend will rest with the employer.

- 7.2 Agreement will be reached between the LADO and the DSM which will include:
 - Plan of action
 - Agreement about informing parents/carers
 - How and when to inform the subject of the allegations
 - How the LADO and DSM will keep each other informed of developments
- 7.3 If the allegation appears to have some foundation and there is reason to believe that a child is suffering or is likely to suffer significant harm, the LADO should immediately refer to Children's Social Care and ask them to convene a strategy discussion as soon as possible. This will include the Police and should also include the LADO and the DSM.
- 7.4 A Police investigation may also be needed, so the LADO should conduct a similar discussion with the Police, the employer and any other agencies to evaluate the allegation and decide how it should be managed.
- 7.5 If the allegation is such that it is clear to the LADO that investigations by police and/or enquiries by Children's Social Care are not necessary the LADO will discuss the next course of action with the DSM/ employer.
- 7.6 Where there is disagreement about the course of action to be followed the LADO will make the final decision which will be guided by what is in the best interests of the child/young person.
- 7.7 Both the LADO and DSM must keep and maintain appropriate records which ensure there is a chronology of discussions, decisions and actions taken.
- 8. Action following the Initial consideration by the LADO and DSM
- 8.1 The initial consideration by the LADO and the DSM can result in one of three outcomes:
 - No further action
 - Initial evaluation discussion
 - Strategy Meeting
- 8.2 The initial evaluation discussion is an extension of the first consideration by the LADO and DSM. It may be necessary to check out certain pieces of information before deciding whether there is reason to believe that the

- allegation meets the criteria in paragraph 1.6 above. It can be conducted by way of telephone discussion but it should take the form of a face to face meeting with a dedicated minute taker wherever practicable.
- 8.3 When a strategy meeting is convened to consider an allegation against an adult, care should be taken to ensure the relevant people are invited to attend. The meeting should also have a dedicated minute taker.
- 8.4 There should be clarity about the purpose and function of the strategy meeting with regard to the management of allegations. For example, where there is a decision not to pursue any criminal or social care enquiries, there should be clarity as to why the behaviour of the individual causes concern.

9. Recording of Initial Evaluation Discussions & Strategy Meetings

9.1 The record of the discussions and meetings is an important working document and one which may at some time need to be shared with the individual concerned.

Care should be taken to ensure that any record contains:

- Essential facts
- Summary of discussions which accurately reflect the contributions made
- The decisions reached, with information outlining the reasons for these decisions, and
- A translation of these decisions into an action plan, which can inform any disciplinary action which may be taken.
- 9.2 The recipient agencies and professionals should retain copies of these notes in accordance with their own record retention policies.
- 9.3 Should any decisions be subject to appeal, in some situations, the individual concerned will have a right to have access to any documents which have a bearing on his/her case. As such, care should be taken when producing minutes of strategy or initial evaluation meetings to ensure that any personal details relating to a child or their family can be easily removed.
- 9.4 The LADO will regularly monitor the progress of cases through a regular review of strategy meeting recommendations and action plan. This will involve liaising with the Police and/or Children's Social Care, agency DSM and employer as appropriate.
- 9.5 A final strategy meeting or evaluation discussion should be held at the end of the enquiries to ensure that all tasks have been completed and where appropriate, an action plan agreed for learning lessons to inform future practice.

10. Resignations and 'Compromise Agreements'

- 10.1 The fact that a person tenders his or her resignation or ceases to provide their services must not prevent an allegation from being followed up in accordance with these procedures and a conclusion reached.
- 10.2 A so called 'compromise agreement' (by which a person agrees to resign, the employer agrees not to pursue disciplinary action and both agree a form of words to be used in any future reference) must not be used in situations which are relevant to these procedures. In any event, such an agreement cannot prevent a thorough criminal investigation where appropriate.
- 10.3 Every effort should be taken to ensure that the individual concerned is given an opportunity to answer the allegation and make representations. The investigations should continue to a conclusion, on the basis of any supporting evidence, even if the person refuses to cooperate or tenders their resignation.

11. Disciplinary Process & Assessment regarding Unsuitability

- 11.1 The LADO and the DSM should discuss and agree what action is appropriate in all cases where it is clear at the outset or decided by a strategy meeting that the investigations by the police or enquiries by Children's Social Care are not necessary.
- 11.2 Where the employer and LADO is informed by the Police or the Crown Prosecution Service (CPS) that a criminal investigation and any subsequent trial is complete or that an investigation is to be closed without charge or a prosecution discontinued, there must be a discussion between the LADO and the employer as to the next course of action. This should centre on the threshold of 'balance of probabilities' rather than the legal threshold of 'beyond reasonable doubt'.
- 11.3 A lack of criminal investigation, charge or conviction is not an adequate defence for the adult who is the subject of a disciplinary hearing. There may be elements of an allegation which suggest a breach of expected or appropriate standards of behaviour or propriety even when no criminal activity is identified. A disciplinary panel, under these circumstances, is required to consider whether the person can be trusted to work with children in their present if their employment continues.
- 11.4 The discussion between the LADO and the employer should consider any potential misconduct or gross misconduct on the part of the staff member and take into account information provided by the Police or Children's Social Care and have due regard to the different standard of proof in disciplinary and criminal proceedings. It is a consideration of whether a person is 'Unsuitable' to work with children.
- 11.5 The options open to the employer range from taking no further action, to summary dismissal or a decision taken not to use the person's services in the future. The nature and circumstances of the allegation and the evidence and information available will determine which option is most appropriate.

- 11.6 Where the initial consideration concludes that the allegation does not involve a possible criminal offence, the matter will be passed to the employer who should decide upon appropriate action.
- 11.7 If it is determined that a disciplinary hearing is required, without the need for a disciplinary investigation, a hearing can be held without further investigation. This must take place within 15 working days.
- 11.8 Where further investigations are required, to determine if disciplinary action should be taken, the LADO will discuss with the employer who should undertake these. In some circumstances it may be appropriate for the disciplinary investigation to be conducted by a person who is independent of the employer to ensure objectivity. In all cases the investigating officer should aim to provide a report within 10 working days.
- 11.9 On receipt of the report, the employer should decide within 2 working days whether a disciplinary hearing is needed, if so the hearing should be held within 15 working days.

12. Sharing Information for Disciplinary Purposes

- 12.1 If the police or CPS decide not to charge or decide to administer a caution, or the person is acquitted, the police should pass all relevant information to the employer without delay.
- 12.2 If the person is convicted, the police should inform the employer immediately to enable the employer to take the appropriate action.
- 12.3 Individuals should be advised at the earliest opportunity that information may need to be shared with an employer if concerns about risks to children remain and disciplinary action is later required.

13. Record Keeping

- 13.1 Employers should keep a clear and comprehensive summary of the case record on a person's confidential personnel file and give a copy to the individual.
- 13.2 The record should include details of how the allegation was followed up and resolved, the decisions reached and the action taken. It should be kept at least until the person reaches normal retirement age or for 10 years if longer.
- 13.3 The record will provide sufficient information for any future reference and provide clarification if a future CRB disclosure reveals an allegation that did result in a prosecution or conviction. A sufficient record will prevent unnecessary re-investigation if the allegation should re-surface.

14. Monitoring Progress

- 14.1 The LADO will keep comprehensive records in order to ensure that each case is being dealt with expeditiously and that there are no undue delays.
- 14.2 This record will assist NSCB to monitor and evaluate the effectiveness of the procedures and provide statistical information to the Department of Education (DOE) as required.
- 14.3 The Police can consult with the CPS at any stage regarding the evidence needed to charge a person, but they should also set target dates for reviewing the progress of the investigation and consulting the CPS about charging, continuing or closing the investigation.

15. Action in Respect of Unsubstantiated Allegations

- 15.1 Where there is insufficient evidence to substantiate an allegation the employer should consider what further action, if any, should be taken. Parents and child/young person should be informed as to the reasons why no further action will be taken. This should be confirmed in writing. The individual against whom the allegations were made should be informed and confirmation given in writing.
- 15.2 Where necessary the individual's line manager should consider whether to emphasise to the individual aspects of the employer's guidance for safe practice.

16. Action in Respect of Unfounded Allegations

16.1 Where an allegation has been determined as unfounded, consideration should be given as to whether the child and his/her family should be referred to Children's Social Care to determine whether the child is in need of services, or may have been the subject of abusive behaviour by someone else.

17. Action in Respect of Malicious Allegations

17.1 If an allegation has been deliberately invented or is seen to be particularly malicious, the LADO and employer should discuss with the Police whether action in respect of those who made the allegation would be appropriate or advisable.

18. Referral to DOE and Regulatory Bodies

If the allegation is substantiated and on conclusion of the case, the person is dismissed or the employer ceases to use the person's services or the person resigns or otherwise ceases to provide his/her services, the employer should consult with the LADO as to whether a referral to the DOE Children's Safeguarding Operation Unit (CSOU), the (ISA) Independent Safeguarding Authority and/or professional regulatory body is required.

If a referral is appropriate the report should be made within one month of that decision having been made.

Appendix 1 – The Question of 'Unsuitability'

Working Together to Safeguard Children 2010 states that procedures for dealing with allegations should be used when there are concerns that a person who works with or on behalf of children has, or may have, Behaved in a way that has harmed a child, 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 s/he is unsuitable to work with children

An adult may be considered to be unsuitable to work with children or young people if they meet the first two criteria outlined above. There may, however, also be occasions when there is no evidence that a crime has been committed or that a child has been hurt or harmed. Where concerns persist about the behaviour of the individual, further consideration is necessary about whether the behaviour in question places child or children at risk. It is here that the question of 'unsuitability' should be further explored.

An adult may also be considered to be unsuitable to work with children and young people when they

- Act in an irresponsible manner which any reasonable person would find alarming or questionable
- Demonstrate a failure to understand or appreciate how his/her own actions or those of others could adversely impact upon the safety and well being of a child or young person
- Demonstrate an inability to make sound professional judgements which safeguard the welfare of children
- Fail to understand or recognise the need for clear personal and professional boundaries in their work
- Behave in a way in his/her personal life which could put children at risk of have been the subject of a criminal investigation
- Have been subject to enquiries under local child protection procedures
- Behave in a way which undermines the trust and confidence placed in them by their employer

Appendix 2 – Key Roles and Responsibilities of the LADO, Named Officer and Designated Senior Manager

Northumberland Safeguarding Children Board (NCCB) has responsibility for ensuring there are effective inter-agency procedures in place for dealing with allegations against people who work with children and a process in place to monitor and evaluate the effectiveness of those procedures.

To enable this to occur there are three specific roles outlined in Working Together 2010;

Named Officer (NO)

Each member agency of the NSCB should have a named senior officer who has overall responsibility for; ensuring that their organisation operates procedures for dealing with allegations in accordance with the guidance in Appendix 5 of WT 2010; resolving any inter agency issues and liaising with NSCB on the subject.

Responsibilities include:

- Ensuring that their organisation complies with the standards identified and agreed by the NSCB for managing allegations as outlined within the Working Together to Safeguard Children 2010.
- Ensuring that NSCB procedures for managing allegations are implemented within their own agency procedure.
- Ensuring that the workforce is aware of and implements the procedures in relation to all allegations against adults who work with or on behalf of children.
- Ensuring that the organisation has systems in place to review cases and identify and implement any changes including, whether there are features of the organisation which may have contributed to the abuse occurring therefore improving procedures and practice.
- Resolving any inter-agency issues which impede the implementation of NSCB procedures.
- Ensuring that the roles of Named Officer, Local Authority Designated Officer (and their contact details) and Designated Senior Manager are included in their agency policy and procedures.
- Ensuring that effective reporting and recording arrangements within their agencies are in place.

Meeting these responsibilities will require:

- An identified strategic lead with appropriate authority
- Access to up to date and relevant information regarding the management of allegations within their own organisation

Designated Senior Manager

The Designated Senior Manager (DSM) within the organisation has overall responsibility for ensuring procedures are followed at an operational level. This person may be the employer or a senior representative of the agency/organisation.

Responsibilities include;

- Advising the NO as to whether NSCBs procedures are properly applied and implemented in their agency
- Providing advice, information and guidance for staff within the organisation
- Being the senior manager within the organisation to whom all allegations or concerns are reported
- Referring allegations in accordance with the organisation's and NSCBs procedures

- Gathering any additional information which may have a bearing on the allegation e.g. Previous known concerns, care and control incidents, etc
- Providing the subject of the allegation with information and advise them to inform their union or professional body
- Should the allegation be unfounded consideration needs to be given to a referral through to social care for support or to the police if the allegation is deemed to be deliberately malicious or invented
- Attend strategy meetings where required
- Liaising with the local authority designated officer
- Liaising with human resources where employer's disciplinary action required
- Ensuring that risk assessments are undertaken where and when required
- Ensuring that effective reporting and recording systems are in place which allow for the tracking of allegations through to the final outcome
- Undertaking appropriate checks with data the agency may hold
- Providing reports and information as required by the named senior officer
- Raising the awareness of the need to empower children and young people who are in vulnerable positions by ensuring their agency produce good whistle blowing and complaints procedures for all children
- Ensuring appropriate and relevant training programmes are in place for all and accessed by all staff
- Ensuring relevant support programmes are in place for staff, parents and young people.

Meeting these responsibilities will require;

- An understanding of the NSCB procedures for managing allegations against adults who work with or on behalf of children and young people
- Training in procedural matters
- Access to a recording and monitoring system
- Access to advice and guidance from 'someone independent of the organisation' (WT 2006 Para 13, Appendix 5)

Local Authority Designated Officer (LADO)

Local authorities are required to have designated officers with the following responsibilities:

- Management and oversight of individual cases from all partner agencies of the NSCB if the allegation appears to meet the criteria set out in paragraph 1, appendix 5 (WT 2010) (Also paragraph 1.6 above)
- Providing advice, information and guidance to employers and voluntary organisations
- Liaise with the police, social care, cps and other agencies as needed
- Monitoring the progress of cases, through to their final conclusion to ensure they are dealt with within set timescales as specified in WT 2010
- Ensuring a consistent, fair and thorough process for all adults working with children and young people against whom allegations are made
- Responsibility for maintaining information databases in relation to all allegations and concerns through to the final outcome, producing qualitative and quantitative reports for NSCB and DOE

- Attendance at strategy meetings and initial evaluation meetings and liaising with the chairs of the meetings
- Contributing to the work of the NSCB and the authority, regarding the content and availability of relevant training
- Development of relevant single and inter agency policy, procedures and practice
- Providing support, advice and expertise to senior managers identified in the employers procedures in the consideration of referral of cases to social care and or the police, initiation and conduct of disciplinary procedures, suspension, appropriate action in regard to false and malicious allegations report to the secretary of state for consideration of barring

Meeting these responsibilities will require

- A working mandate from the NSCB
- Sufficient status to liaise with the DSM and NO
- Access to database programmes
- Appropriate administrative support

The LADO should, therefore, be informed of all allegations that come to the employer's attention. The LADO and the Employer will discuss whether the allegation fits the criteria as set out in Paragraph one appendix five of WT 2010 so that the LADO can consult Children's Social Care or the Police as appropriate when there is an allegation that a person who works with a child has:

- Behaved in a way that has harmed a child, 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 s/he is unsuitable to work with children.

WT 2010 also states that 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. (WT 2010 App 5 Para 14)

Appendix 3 – The Function & Membership of Strategy Meetings

The Function of Strategy Discussions

(Where these relate to allegations against an adult who works with children and young people)

Strategy Discussions take place to:

- Ensure that arrangements are in place to protect the child/ren involved and any other children affected, including taking emergency action where needed
- Review the three criteria set out in section 1
- Review any previous concerns or allegations regarding the conduct of the accused person
- Consider whether there should be a section 47 inquiry (children act 1989) and/or police investigation and consider the implications

- Consider whether any parallel disciplinary process should take place
- Consider whether a complex abuse investigation is applicable
- Identity why the alleged or acknowledged behaviour raises concerns about suitability to work with children and young people
- Determine what information can be shared, with whom and when
- Consider what support should be provided to all children who may have been affected directly and indirectly
- Consider what support should be provided to the person against whom the allegation has been made and others who might have been affected.
- Ensure that investigations will be sufficiently independent
- Agree arrangements to inform the child's' parents, and consider how to provide them with support and information during any enquiries.
- Make recommendations where appropriate regarding suspension, or alternatives to suspension.
- Take note of agreed timescales as set out in WT 2010
- Consider the need to share the statements and evidence with the employer

List of individuals who should be invited to a Strategy meeting

Attendance should include the following practitioners/managers. The LADO will decide in each individual case the appropriate membership of the specific strategy meeting:

- Local Authority Designated Officer (LADO) (or delegated officer)
- Employer and/or Senior Manager
- Relevant child care social worker and his/her manager
- Supervising social worker and his/her manager when an allegation is made against a foster carer
- Police
- Senior representative of the employment agency or voluntary organisation if the member of staff or volunteer has been placed by them, unless it is alleged that they have colluded or failed to respond to previous complaints.
- Those responsible for regulation and inspection e.g. Ofsted, where the allegation is against a childminder or owner of a regulated setting
- Human Resource personnel, where in post
- A medical practitioner with specialist knowledge where appropriate
- Where a child is placed by or resident in the area of another Local Authority, a representative of that Authority
- Complaints officer if the concern has arisen from a complaint

• A representative of the legal department of the Local Author