

BFHA Managing Allegations Policy

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1. Introduction and Criteria

All allegations of abuse of children by those who work with children must be taken seriously. Allegations against any person who works with children, whether in a paid or unpaid capacity, cover a wide range of circumstances.

This procedure should be applied when there is such an allegation or concern that a person who works with children, 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 in a way that indicates he / she is unsuitable to work with children.

These behaviours should be considered within the context of the four categories of abuse (i.e. physical, sexual and emotional abuse and neglect). These include concerns relating to inappropriate relationships between members of staff and children or young people, for example:

- Having a sexual relationship with a child under 18 if in a position of trust in respect
 of that child, even if it claimed to be consensual (see ss16-19 Sexual Offences Act
 2003);
- 'Grooming', i.e. meeting a child under 16 with intent to commit a relevant offence (see s15 Sexual Offences Act 2003);
- Other 'grooming' behaviour which may not meet the criminal threshold but gives rise to concerns of a broader child protection nature (e.g. inappropriate text / email messages or images, gifts, socialising etc);
- Possession of indecent photographs / pseudo-photographs of children.
 - If concerns arise about the person's behaviour to her/his own children, the Police and/or Children's Social Care must consider informing the employer / organisation in order to assess whether there may be implications for children with whom the person has contact at work / in the organisation, in which case this procedure will apply.
 - Allegations of historical abuse should be responded to in the same way as a contemporary concern. In such cases, it is important to find out whether the person against whom the allegation is made is still working with children and if so, to inform the person's current employer or voluntary organisation or refer their family for assessment.
 - o All references in this document to 'staff or members of staff' should be

interpreted as meaning all paid or unpaid staff / professionals and volunteers, including for example foster carers, prospective adopters and child minders. This chapter also applies to any person, who manages or facilitates access to an establishment where children are present.

Roles and Responsibilities

Both the Nottinghamshire County Safeguarding Children Board (NSCB) and the Nottingham City Safeguarding Children Board (NCSCB) member organisations should identify a named senior officer with overall responsibility for:

- Ensuring that the organisation deals with allegations in accordance with this LSCB procedure;
- Resolving any inter-agency issues;
- Liaising with the LSCB on the subject.
 - The Local Authority have assigned a Local Authority Designated Officer (LADO) to:
- Receive reports about allegations and to be involved in the management and oversight of individual cases;
- Provide advice and guidance to employers and voluntary organisations;
- Liaise with the Police, Children's Social Care and other agencies;
- Monitor and quality assure the progress of cases to ensure that they are dealt with as quickly as possible and consistent with a thorough and fair process;
- Provide advice and guidance to employers in relation to making referrals to the Disclosure and Barring Service (DBS) and regulatory bodies such as Ofsted, the GMC etc;
- Seek to resolve interagency issues;
- Liaise with other LADOs where applicable.
- Employers should appoint:
 - A Designated Senior Officer to whom allegations or concerns should be reported;

- A deputy to whom reports should be made in the absence of the Designated Senior Officer or where that person is the subject of the allegation or concern.
- The Police Detective Inspector on the

Child Abuse Investigation Team will:

 Have strategic oversight of the local police arrangements for managing allegations against staff and volunteers;
 Liaise with the NSCB / NCSCB on the issue; Ensure compliance with these procedures.

The Police should designate a Detective Sergeant/s to:

- Liaise with the Local Authority Designated Officer (LADO);
- Take part in strategy meetings/discussions;
- o Review the progress of cases in which there is a Police investigation;
- Share information as appropriate, on completion of an investigation or related prosecution.

Reference may be made to the DfE Guidance for Safe Working Practice for Adults who Work with Children and Young People, March 2009, and the AMA Guidance for Safer Working Practice for Adults who Work with Children and Young People, November 2007, which are conduct guidance documents designed for staff at induction.

2. General Considerations Relating to Allegations Against Staff Persons to be notified

The employer must inform the Local Authority Designated Officer (LADO) within one working day when an allegation is made and prior to any further investigation taking place.

The LADO will advise the employer whether or not informing the parents of the child/ren involved will impede the disciplinary or investigative processes. Acting on this advice, if it is agreed that the information can be fully or partially shared, the employer should inform the parent/s. In some circumstances, however, the parent/s may need to be told straight away (e.g. if a child is injured and requires medical treatment).

The parent/s and the child, if sufficiently mature, should be helped to understand the processes involved and be kept informed about the progress of the case and of the outcome

where there is no criminal prosecution. This will include the outcome of any disciplinary process, but not the deliberations of, or the information used in, a hearing.

The employer should seek advice from the respective LADO, the Police and Children's Social Care about how much information should be disclosed to the accused person.

Subject to restrictions on the information that can be shared, particularly if there is a Police investigation, the employer should, as soon as possible, inform the accused person about the nature of the allegation, how enquiries will be conducted and the possible outcome (e.g. disciplinary action, and dismissal or referral to the DBS or regulatory body).

If it is concluded that the Police and / or Children's Social Care need to be involved in further inquiries, informing the accused should not happen prior to a Strategy Discussion or until the decision is made at a Strategy Meeting.

The accused member of staff should:

- Be treated fairly and honestly and helped to understand the concerns expressed and processes involved;
- Be kept informed of the progress and outcome of any investigation and the implications for any disciplinary or related process;
- o If suspended, be kept up to date about events in the workplace; Offered support from their employing organisation.

Ofsted should be informed of any allegation or concern made against a member of staff in any day care establishment for children under 8 or against a registered child minder. They should also be invited to take part in any subsequent strategy meeting/discussion.

The respective Children's Social Care should ensure that Ofsted are made aware of allegations made against a foster carer, prospective adopter, or member of staff in a residential child care facility.

Confidentiality

Every effort should be made to maintain confidentiality and guard against publicity while an allegation is being investigated or considered. Apart from keeping the child, parents and accused person (where this would not place the child at further risk or compromise evidence) up to date with progress of the case, information should be restricted to those who have a need to know in order to protect children, facilitate enquiries, manage related disciplinary or suitability processes.

The Police should not provide identifying information to the press or media, unless and until a person is charged, except in exceptional circumstances (e.g. an appeal to trace a suspect). In such cases, the reasons should be documented and partner agencies consulted beforehand.

Section 13 of the Education Act 2011 introduced restrictions implemented in September 2012 on the publication of any information that would identify a teacher who is the subject of an allegation of misconduct that would constitute a criminal offence, where the alleged victim of the offence is a registered pupil at the school.

Such restrictions remain in place unless or until the teacher is charged with a criminal offence, though they may be dispensed with on the application to the Magistrates' Court by any person, if the court is satisfied that it is in the interests of justice to do so, having regard to the welfare of:

- a. The person who is the subject of the allegation; and
- b. The victim of the offence to which the allegation relates.

There is a right of appeal to the Crown Court.

This restriction will apply to allegations made against any teacher who works at a school, including supply and peripatetic teachers. 'School' includes academies, free schools, independent schools and all types of maintained schools.

There is a new offence of publishing any information in breach of these restrictions. Publication includes any communication, in whatever form, which is addressed to the public at large or any section of the public.

It is not a defence to show that the person publishing was not aware of the allegation having been made as set out in section141H 'Defences' of the Act.

Support

The organisation, together with the respective Children's Social Care and / or Police, where they are involved, should consider the impact on the child concerned and

provide support as appropriate. Liaison between the agencies should take place in order to ensure that the child's needs are addressed.

As soon as possible after an allegation has been received, the accused member of staff should be advised to contact their union or professional association. Human resources should be consulted at the earliest opportunity in order that appropriate support can be provided via the organisation's occupational health or employee welfare arrangements.

Suspension

Suspension is a neutral act and it should not be automatic. It should be considered in any case where:

- There is cause to suspect a child is at risk of harm, or has been significantly harmed; or
- The allegation warrants investigation by the Police; or
- The allegation is so serious that it might be grounds for dismissal.
 - The possible risk of harm to children should be evaluated and managed in respect of the child/ren involved and any other children in the accused member of staff's home, work or community life.
 - If a strategy meeting / discussion is to be held or if the respective Children's Social Care or the Police are to make enquiries, the LADO should canvass their views on suspension and inform the employer. Only the employer, however, has the power to suspend an accused employee and they cannot be required to do so by a local authority or Police.
 - If a suspended person is to return to work, the employer should consider what help and support might be appropriate (e.g. a phased return to work and/or provision of a mentor), and also how best to manage the member of staff's contact with the child concerned, if still in the workplace.
 - Resignations and 'compromise agreements'
 - o Every effort should be made to reach a conclusion in all cases even if:
 - The individual refuses to cooperate, having been given a full opportunity to answer the allegation and make representations;
 - It may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete.
 - Compromise agreements' must not be used (i.e. where a member of staff agrees to resign provided that disciplinary action is not taken and that a future reference is agreed). A settlement/compromise agreement which prevents the employer from making a DBS referral when the criteria are met for so doing would likely result in a criminal offence being committed for failure to comply with the duty to refer.

Organised abuse

Investigators should be alert to signs of organised or widespread abuse and/or the
involvement of other perpetrators or institutions. They should consider whether the
matter should be dealt with in accordance with complex abuse procedures which, if
applicable, will take priority. Historical allegations should be responded to in the same
way as contemporary concerns. It will be important to ascertain if the person is
currently working with children and if that is the case, to consider whether the current
employer should be informed.

Whistle-blowing

All staff should be made aware of the organisation's whistle-blowing policy and feel confident to voice concerns about the attitude or actions of colleagues.

If a member of staff believes that a reported allegation or concern is not being dealt with appropriately by their organisation, they should report the matter to the LADO.

Timescales

It is in everyone's interest for cases to be dealt with expeditiously, fairly and thoroughly and for unnecessary delays to be avoided. It is reasonable to expect that 80% will be achieved within one month, 90% within 3 months and all but the most complex cases should be resolved within 12 months. Timescales are calculated from the date the incident was referred. Where timescales are not going to be met the reason for this should be included within the strategy discussion and minutes.

3. Initial Response to an Allegation or Concern

An allegation against a member of staff may arise from a number of sources (e.g. a report from a child, a concern raised by another adult in the organisation, or a complaint by a parent). It may also arise in the context of the member of staff and their life outside work or at home.

Initial action by person receiving or identifying an allegation or concern

The person to whom an allegation or concern is first reported should treat the matter seriously and keep an open mind.

They should not:

- Investigate or ask leading questions if seeking clarification;
- Ask a child to write a statement or write down their version of events;
- Make assumptions or offer alternative explanations;
- Promise confidentiality, but give assurance that the information will only be shared on a 'need to know' basis.

They should:

 Make a written record of the information (where possible in the child/ adult's own words), including the time, date and place of incident/s, persons present and what was said;

- Sign and date the written record;
- Immediately report the matter to the Designated Senior Officer, or the deputy in their absence or; where the Designated Senior Officer is the subject of the allegation report to the deputy or other appropriate Senior Officer. Initial action by the Designated Senior Officer

When informed of a concern or allegation, the Designated Senior Officer should not investigate the matter or interview the member of staff, child concerned or potential witnesses. They should:

- Obtain written details of the concern / allegation, signed and dated by the person receiving (not the child / adult making the allegation);
- Approve and date the written details;
- Record any information about times, dates and location of incident/s and names of any potential witnesses. Record discussions about the child and/or member of staff, any decisions made, and the reasons for those decisions.
- The Designated Senior Officer should report the allegation to the LADO and discuss
 the decision in relation to the agreed threshold criteria in the Management of
 Allegations Against Staff or Volunteers Who Work with Children within one working
 day. Referrals should not be delayed in order to gather information and a failure to
 report an allegation or concern in accordance with procedures is a potential
 disciplinary matter.
- If an allegation requires immediate attention, but is received outside normal office hours, the Designated Senior Officer should consult the respective Children's Social Care Emergency Duty Team or local Police and inform the LADO as soon as possible.
- If a police officer receives an allegation, they should, without delay, report it to the Designated Detective Sergeant from Public Protection. The Detective Sergeant should then ensure immediate notification to the LADO.
- Similarly an allegation made to the respective Children's Social Care should be immediately reported to the LADO. Initial consideration by the Designated Senior Officer and the LADO There are up to
 - three strands in the consideration of an allegation:
- A police investigation of a possible criminal offence;
 - The respective Children's Social Care enquiries and/or assessment about whether a child is in need of protection or services;
- Consideration by an employer of disciplinary action.

The LADO and the Designated Senior Officer should consider first whether further details are needed and whether there is evidence or

information that establishes that the allegation is false. Care should be taken to ensure that the child is not confused as to dates, times, locations or identity of the member of staff.

If the allegation is not demonstrably false and there is cause to suspect that a child is suffering or is likely to suffer significant harm, the LADO should refer to the respective Children's Social Care and ask them to convene an immediate Strategy Meeting / Discussion:

- If a child is not believed to have suffered, or to be likely to suffer Significant Harm but a Police investigation will continue, the Local Authority Designated Officer (LADO) should conduct this discussion with the Police, the Designated Senior Officer and any other agencies involved to evaluate the allegation and decide how it should be dealt with;
- This Evaluation discussion should take place within one working day and must consider how to take matters forward in a criminal process parallel with a disciplinary process or whether any disciplinary action will need to await the completion of the police enquiries and/or prosecution. The progress should be reviewed by the Police no later than four weeks after the initial evaluation meeting and thereafter at fortnightly or monthly intervals.
- Strategy meeting / discussion Wherever possible, a strategy meeting / discussion should take the form of a meeting. However, on occasions a telephone discussion may be justified. The following is a list of possible participants, depending on the scenario and circumstances:
- LADO;
- Social Care manager to chair (if a strategy meeting);
- Relevant social worker and their manager;
- Detective sergeant;
- The Designated and/or named Safeguarding Children Health Professional (CCG); and always when an allegation concerns a health agency worker / professional;
- Consultant paediatrician;
- Designated Senior Officer for the employer concerned;
- Human resources representative;
- Legal adviser where appropriate;

- Senior representative of the employment agency or voluntary organisation if applicable;
- Manager from the fostering service provider when an allegation is made against a foster carer;
 - Supervising social worker when an allegation is made against a foster carer;
 - Those responsible for regulation and inspection where applicable (e.g. CQC,GMC or Ofsted);
 - Where a child is placed or resident in the area of another authority, representative/s of relevant agencies in that area;
 - Complaints officer if the concern has arisen from a complaint. The strategy meeting / discussion should:
 - Decide whether there should be a Section 47 Enquiry and / or police investigation and consider the implications;
 - Consider whether any parallel disciplinary process can take place and agree protocols for sharing information;
 - Consider the current allegation in the context of any previous allegations or concerns;
 - Where appropriate, take account of any entitlement by staff to use reasonable force to control or restrain children (e.g. section 93, Education and Inspections Act 2006 in respect of teachers and authorised staff);
- Consider whether a complex abuse investigation is applicable;
- Plan enquiries if needed, allocate tasks and set timescales;
 - Decide what information can be shared, with whom and when.
 - The strategy meeting / discussion should also:
 - Ensure that arrangements are made to protect the child/ren involved and any other child/ren affected, including taking emergency action

where needed;

- Consider what support should be provided to all children who may be affected;
- Consider what support should be provided to the member of staff and others who may be affected and how they will be kept up to date with the progress of the investigation;
- Ensure that investigations are sufficiently independent;
- Make recommendations where appropriate regarding suspension, or alternatives to suspension;
- Identify a lead contact manager within each agency;
 - Agree protocols for reviewing investigations and monitoring progress by the LADO, having regard to the target timescales;
 - Consider issues for the attention of senior management (e.g. media interest, resource implications);
 - Consider reports for consideration of barring;
- Consider risk assessments to inform the employer's safeguarding arrangements; Agree dates for future strategy meetings / discussions.

A final strategy meeting / discussion should be held to ensure that all tasks have been completed, including any referrals to the DBS if appropriate, and, where appropriate, agree an action plan for future practice based on lessons learnt.

The strategy meeting / discussion should take in to account the following definitions when determining the outcome of allegation investigations:

- 1. Substantiated: there is sufficient identifiable evidence to prove the allegation;
- 2. False: there is sufficient evidence to disprove the allegation;
- 3. Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- 4. Unfounded: there is no evidence or proper basis which supports the allegation being made. It might also indicate that the person making the allegation

- misinterpreted the incident or was mistaken about what they saw. Alternatively, they may not have been aware of all the circumstances;
- 5. Unsubstantiated: this is not the same as a false allegation. It means that there is insufficient evidence to either prove or disprove the allegation; the term therefore does not imply guilt or innocence.

Allegations management special circumstances meeting

An allegations management special circumstances meeting will be called in the following circumstances:

- If there are any safeguarding allegations/concerns relating to a number of adults;
- Where there are broader practice issues within an agency;
 - Where no specific child or young person was involved or where the identifying details of the child/young person are not known.
 - The meeting will be chaired and managed in the same way as a strategy meeting.
 - Allegations against staff in their personal lives
 - If an allegation or concern arises about a member of staff, outside of their work with children, and this may present a risk of harm to child/ren for whom the member of staff is responsible, the general principles outlined in these procedures will still apply.
 - The strategy meeting / discussion should decide whether the concern justifies:
 - Approaching the member of staff's employer for further information, in order to assess the level of risk of harm; and / or
 - Inviting the employer to a further strategy meeting / discussion about dealing with the possible risk of harm.

There will be circumstances where more than one local authority could be responsible for managing the allegation process. An example of this would be where the adult who is the subject of the allegation lives in one local authority area and works in a different area. In these circumstances the primary responsibility for leading on the process to establish whether the adult is suitable to continue to work with children rests with the local authority in which the adult works. If the situation suggests that a different local authority should manage the process, this can only be undertaken if there is agreement between LADOs. If the adult works or volunteers in more than one local authority area then the LADO from each authority will liaise to agree which area has the lead responsibility for the process.

In some cases, an allegation of abuse against someone closely associated with a member of

staff (e.g. partner, member of the family or other household member) may present a risk of harm to child/ren for whom the member of staff is responsible. In these circumstances, a strategy meeting / discussion should be convened to consider:

- The ability and/or willingness of the member of staff to adequately protect the child/ren;
- Whether measures need to be put in place to ensure their protection;
 Whether the role of the member of staff is compromised.

5.Disciplinary Process

Disciplinary or suitability process and investigations

The LADO and the Designated Senior Officer should discuss whether disciplinary action is appropriate in all cases where:

- It is clear at the outset or decided by a strategy meeting / discussion that
 a Police investigation or LA Children's Social Care enquiry is not necessary;
 or
- The employer or LADO is informed by the Police or the Crown Prosecution Service that a criminal investigation and any subsequent trial is complete, or that an investigation is to be closed without charge, or a prosecution discontinued.
- The discussion should consider any potential misconduct or gross misconduct on the part of the member of staff, and take into account:
- Information provided by the Police and / or Children's Social Care;
- The result of any investigation or trial;
 - The different standard of proof in disciplinary and criminal proceedings.
 - In the case of supply, contract and volunteer workers, normal disciplinary procedures may not apply. In these circumstances, the LADO and employer should act jointly with the providing agency, if any, in deciding whether to continue to use the person's services, or provide future work with children, and if not, whether to make a report for consideration of barring or other action.

If formal disciplinary action is not required, the employer should institute appropriate action

within three working days. If a disciplinary hearing is required, and further investigation is not required, it should be held within 15 working days.

If further investigation is needed to decide upon disciplinary action, the employer and the LADO should discuss whether the employer has appropriate resources or whether the employer should commission an independent investigation because of the nature and/or complexity of the case and in order to ensure objectivity. The investigation should not be conducted by a relative or friend of the member of staff.

The aim of an investigation is to obtain, as far as possible, a fair, balanced and accurate record in order to consider the appropriateness of disciplinary action and / or the individual's suitability to work with children. Its purpose is not to prove or disprove the allegation.

If, at any stage, new information emerges that requires a child protection referral, the investigation should be held in abeyance and only resumed if agreed with the respective Children's Social Care and the Police. Consideration should again be given as to whether suspension is appropriate in light of the new information.

The investigating officer should aim to provide a report within ten working days.

On receipt of the report the employer should decide, within two working days, whether a disciplinary hearing is needed. If a hearing is required, it should be held within 15 working days.

Sharing information for disciplinary purposes

- Wherever possible, Police and the respective Children's Social Care should, during the course of their investigations and enquiries, obtain consent to provide the employer and/or regulatory body with statements and evidence for disciplinary purposes.
- 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.
- If the person is convicted, the police should inform the employer and the LADO straight away so that appropriate action can be taken.

6. Record Keeping and Monitoring Progress Record keeping

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. 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 ten years if longer.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference if the person has moved on. It will provide clarification where a future DBS request reveals non convicted information, and will help to prevent unnecessary reinvestigation if an allegation re-surfaces after a period of time. In this sense it may serve as a protector to the individual themselves, as well as in cases where substantiated allegations need to be known about to safeguard future children.

Details of allegations that are found to be malicious should be removed from personnel records.

The respective Local Authority will have in place recording mechanisms that meet the legislation requirements of those cases that do not meet the threshold and are considered consultations.

Monitoring progress

The LADO should monitor and record the progress of each case, either fortnightly or monthly depending on its complexity. This could be by way of review strategy meetings / discussions / getting an update from case notes / initial evaluations or direct liaison with the Police, Children's Social Care, or employer, as appropriate. Where the target timescales cannot be met, the LADO should record the reasons.

The LADO should keep comprehensive records in order to ensure that each case is being dealt with expeditiously and that there are no undue delays. The records will also assist the LSCB to monitor and evaluate the effectiveness of the procedures for managing allegations and provide statistical information to the Department for Education (DfE) as required.

If a Police investigation is to be conducted, the Police should set a date for reviewing its progress and consulting the CPS about continuing or closing the investigation or charging the individual. Wherever possible, this should be no later than four weeks after the strategy meeting / discussion / initial evaluation. Dates for further reviews should also be agreed, either fortnightly or monthly depending on the complexity of the investigation.

7. Unsubstantiated and False Allegations

Where it is concluded that there is insufficient evidence to substantiate an allegation, the minutes of the strategy meeting will be provided to the employer and that these conclude matters. There may still be actions for the employer to take, for example, training and supervision issues. There may still potentially be suitability to work with children issues arising for employers to consider if there is concerning information about the allegations but difficulties with evidence.

False allegations are rare and may be a strong indicator of abuse elsewhere which requires further exploration. If an allegation is demonstrably false, the employer, in consultation with the LADO, should refer the matter to the respective Children's Social

Care to determine whether the child is in need of services, or might have been abused by someone else.

If it is established that an allegation has been deliberately invented, the Police should be asked to consider what action may be appropriate.

8. Substantiated Allegations and Referral to the DBS

Substantiated allegations

The Disclosure and Barring Service (DBS) was established under the Protection of Freedoms Act 2012 and merges the functions previously carried out by the Criminal Records Bureau (CRB) and Independent Safeguarding Authority (ISA). The relevant legislation is set out in the Protection of Freedoms Act 2012. The DBS Privacy Policy explains the individuals rights as a customer of the DBS under the Data Protection Act 1998.

If an allegation is substantiated and the person is dismissed or the employer ceases to use the person's service or the person resigns or otherwise ceases to provide his/her services, the LADO should discuss with the employer whether a referral should be made to the Disclosure and Barring Service (DBS). It is the responsibility of the employer to make the referral. However, there may be rare occasions when the LADO may need to consider doing this. For example, if the employer is a single employer or a small charity.

If a referral is to be made; it should be submitted within one month of the allegation being substantiated.

Bodies with a legal duty to refer

The following groups have a legal duty to refer information to the DBS:

- Regulated Activity suppliers (employers and volunteer managers);
- Personnel suppliers;
- Groups with a power to refer.
- Bodies with the power to refer the following groups have a power to refer information to the DBS:
- Local authorities (safeguarding role);
- Health and Social Care (HSC) Trusts (NI);
- Education and Library Boards;

- Keepers of registers e.g. General Medical Council, Nursing and Midwifery Council;
- Supervisory authorities e.g. Care Quality Commission, Ofsted if the person being referred to the DBS is a teacher in England they should also be referred to the National College for Teaching and Leadership.

9. Learning Lessons

The employer and the LADO should review the circumstances of the case to determine whether there are any improvements to be made to the organisation's procedures or practice.

10. Procedures in Specific Organisations

It is recognised that many organisations will have their own procedures in place, some of which may need to take into account particular regulations and guidance (e.g. schools and registered child care providers). Where organisations do have specific procedures, they should be compatible with these procedures and additionally provide the contact details for:

- The Designated Senior Officer to whom all allegations should be reported;
- The person to whom all allegations should be reported in the absence of the Designated Senior Officer or where that person is the subject of the allegation; The LADO.