



# Managing Allegations: Person in a Position of Trust (PiPoT) Local Authority Designated Officer (LADO)

This is a new procedural document



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## Amendment Form

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## 1 INTRODUCTION

Doncaster & Bassetlaw Teaching Hospitals (DBTH) recognises its responsibility to ensure safe working systems are in place for colleagues working with children and adults. This policy will provide a framework for managing allegations made against an employee, which indicates they may pose a risk to themselves, a child or an adult at risk or another colleague. The policy provides guidance to ensure the trust takes appropriate action to manage allegations against people who are employed by DBTH, Learners or those whom are contracted or volunteer for the trust. Having a robust policy in place for guidance, only accounts to one part of the managing allegations process. The policy should be supported by safe recruitment and selection policies, robust disclosure procedures and training for colleagues to ensure they understand their responsibilities in terms of safeguarding and training for managers to ensure they understand how to support the management of an allegation.

The Care Act 2014, defines people in positions of trust as: ‘people who work, in either a paid or unpaid capacity with adults with care and support needs’.

The Children’s Act 2004, states “that a child's welfare is the paramount consideration of their upbringing. It details what local authorities and the courts should do to protect the welfare of children and charges local authorities with the duty to investigate.” Our responsibility also relates to reporting to the Local Authority Designated Officer (LADO) if we believe an employee working with children or when adults pose a potential risk to children they are working with.

The process outlined in this policy should be considered when it is alleged that any person linked to DBTH (regardless of current role or place of work) may have:

- Behaved in a way that has, or may have, harmed an adult or child, including omissions to take actions to safeguard.
- Possibly committed a criminal offence against, or related to an adult or child (including domestic abuse)
- Behaved (or has alleged to have behaved) in a way that indicates that they are unsuitable to work with children/adults with vulnerability.
- Have been discussed as a perpetrator of abuse in any safeguarding meeting, including Multi-Agency Risk Assessment Conference (MARAC) or Multi-Agency Public Protection Arrangements (MAPPAs)
- May be subject to abuse themselves and as a consequence, means their ability at that time to support patients with care needs may need to be reviewed and reasonable adjustments made.
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

(Care Act 2014) / Working Together 2023

The above list is not exhaustive and other concerns, including historical cases should be discussed with the Safeguarding Team should you have concerns about an employee/contractor/learner or volunteer in Doncaster & Bassetlaw teaching hospitals (DBTH)

The guidance set out in this policy may need to be followed with consideration of other DBTH Policies, which can be found on the Hive (Intranet):

- Disciplinary Procedure
- Working with Vulnerable Adults & Children: Disclosure & Barring Service (DBS)

- Freedom to speak up policy “Speak up to make a difference”
- Information Governance Policy
- Data Protection Policy
- Safeguarding Adults Policy
- Safeguarding Children’s Policy.
- Domestic Abuse Policy
- Sexual Safety Policy
- Recruitment and Management of Volunteers policy
- Grievance & Resolution Policy
- Conduct, capability, ill health and procedures for practitioners
- Civility and respect
- Freedom to speak up

Other policies may need to be considered in other circumstances and cases need to be addressed on a case by case basis.

This policy reflects the principles of the multiagency & National policies including:

- Doncaster Safeguarding Adults Board (DSAB) PiPoT Guidance procedure.
- Doncaster Safeguarding Adults Board (DSAB) Safeguarding Adults Policy.
- Nottinghamshire Safeguarding Adults Board PiPoT practice guidance.
- Doncaster Children’s Partnership LADO procedure
- Nottinghamshire Children’s Partnership LADO procedure
- HM Government Information Sharing: Guidance for practitioners & managers.
- Working Together to Safeguard Children 2023
- Data Protection Act 2018
- Human Rights Act 1998
- Children’s Act 2004
- Sexual Offences Act 2003
- Domestic Abuse Act 2021

After referral into the PiPoT/LADO process, this is not an assumption of guilt of the alleged colleague; all allegations will be treated with a fair and consistent approach. The management of any PiPoT/LADO cases should be considerate of the Data Protection Act 2018 and principles set out in the Act.

Any enquiry relating to PiPoT/LADO should be completed in conjunction with Human Resources, Divisional Nurses, Appropriate Senior Medical input & Safeguarding, who is involved will be based on the role of the colleague that is the subject of the PiPoT/LADO concern.

Any information sharing relating to PiPoT/LADO needs to be robustly recorded and the decision to share information must be justifiable and proportionate to the potential or actual harm caused to a child or adult at risk.

## 2 PURPOSE

The Policy will:-

- Provide a fair and transparent framework, setting out clear reporting requirements when an allegation has been made with regards to a person working within Doncaster & Bassetlaw Teaching Hospitals.
- Ensure concise recording & information sharing, whilst having robust control of a person’s information in accordance with data protection and confidentiality requirements.
- Set timescales for action.

- Support's conversations to identify if a referral into the individuals Professional Body needs to be made. Please consider The Nursing & Midwifery Council (NMC) The General Medical Council (GMC) The General Dental Council (GDC) and the Health Care Professional Council (HCPC). A referral to Disclosure & Barring Service (DBS) or the Police may also be appropriate.

The Policy applies whether allegations are made in connection with any of the following:-

- The employees work, within DBTH
- If the employee works elsewhere (Bank, Locum, Agency or other employment) and concerns are raised.
- Voluntary work an individual may be involved with.
- The individual's family members including children.
- Other adults/Children living within or outside the family.
- Historical and current concerns.

Careful consideration should be given to differentiate clearly, whether it is an allegation that has been raised, or that it is a practice complaint/concern and does not meet the safeguarding criteria. In this case, we should explore other procedures to recognise, respond and resolve issues where applicable.

### 3 DUTIES AND RESPONSIBILITIES

**Safeguarding Adults & Children is everybody's responsibility  
regardless of role within or out of Doncaster & Bassetlaw Teaching Hospital.**

#### 3.1 Examples when concerns about an individual's behaviour may be identified

- Police intervention outside our trust.
- Freedom to speak up guardian
- Commissioner's contract
- Safeguarding adults enquiry monitoring activity
- Safeguarding Children's team via safeguarding referral
- Safeguarding Adult Board/Children's Partnership, partner investigation
- CQC
- Complaints
- Reports from members of the public

#### 3.2 When an Employee of the Trust Raises a Concern

All employees at Doncaster & Bassetlaw Teaching Hospitals have a responsibility to ensure they: conduct themselves in a professional manner at all times to any individual they may come into contact with during their employment at our trust.

All colleagues must always report to their line manager/on-call manager & the Safeguarding team, if they have knowledge and information that a person in a position of trust has been involved in the actual or potential abuse of an adult or child. This includes during work but also in their personal time or within their care responsibility for a child or vulnerable adult.

We appreciate this may make some employees feel uncomfortable reporting these concerns, but this will sit under our professional code of conduct to share this information when an adult or child is

at risk, and their needs should be paramount. Failure to report concerns could indicate collusion and will be viewed seriously by the Trust and may lead to police reporting if appropriate.

All Employees disclosing information should be listened to and advised that their concern will need to be taken further, where appropriate. Employees should be aware that it may not be possible for their anonymity to be maintained.

When an allegation is raised from outside of the trust this information should not be withheld, but shared with the Head of Safeguarding/Deputy Head of Safeguarding as soon as able. The same principles will apply and the policy should be followed but it will be decided during discussions who best to complete the referral form and gather further information relating to the case.

### 3.3 Table of Key Roles

Roles	Responsibility
<b>All DBTH employees</b>	<ul style="list-style-type: none"> <li>• To adhere to the principles of this policy</li> <li>• Ensure any allegations about another member of staff are escalated to line manager</li> <li>• Ensure allegations relating to themselves are reported to line manager</li> <li>• Complete a PiPoT referral form when an allegation has been made.</li> <li>• Participate in investigation as required</li> <li>• Maintain confidentiality throughout the investigation process and thereafter.</li> </ul>
<b>Divisional Leads/Matrons</b>	<ul style="list-style-type: none"> <li>• Ensure this policy is implemented and cascaded throughout their area/division to ensure compliance</li> <li>• Ensure any concern raised with them is listened to and taken seriously</li> <li>• Inform the person raising the concern that it may not be possible to maintain their anonymity</li> <li>• Document concerns and refer to the Head of Safeguarding or appropriate safeguarding practitioner in their absence.</li> <li>• Complete the referral form (Appendix 2), gather all information that may be relevant to the allegation and make sure this is readily available prior to the scoping meeting.</li> <li>• With support of the Safeguarding Team, identify any key themes and trends from the allegation and ensure learning is embedded into all relevant practice</li> <li>• Including training, supervision and sharing across the trust.</li> </ul>
<b>Head of Safeguarding/Deputy Head of Safeguarding (Tasks may be delegated to a Safeguarding Lead Professional in the team where appropriate)</b>	<ul style="list-style-type: none"> <li>• To act as PiPoT lead for DBTH</li> <li>• Be informed of all allegations of abuse</li> <li>• Liaise with partner agencies including supporting notification to the LADO of all allegations of child abuse brought against anyone providing a service for the trust.</li> <li>• Ensure compliance in dealing with allegations of abuse.</li> <li>• Ensure staff and managers have access to expert advice when managing and investigating allegations, which may include Human Resources and the Legal Team.</li> <li>• Review the allegation to determine if the allegation meets the threshold to progress.</li> </ul>



	<ul style="list-style-type: none"> <li>• Arrange the scoping meeting</li> <li>• Monitoring the progress of an allegation</li> <li>• Assess if escalation to the Safeguarding Executive lead is required.</li> <li>• Assess if the allegation needs reporting to the Local Authority safeguarding team for consideration for a section 42 enquiry</li> <li>• Assess if the allegation needs reporting to Children’s Social care/Safeguarding HUB/MASH</li> </ul>
<b>Human Resources</b>	<ul style="list-style-type: none"> <li>• To comply with this policy</li> <li>• Ensure this policy is implemented and cascaded throughout their area/division to ensure compliance</li> <li>• To support colleagues with the PiPoT/LADO process and provide advice relating to managing imminent risk, changes to employment and disciplinary procedures.</li> </ul>
<b>Safeguarding Team</b>	<ul style="list-style-type: none"> <li>• Key role in ensuring awareness of abuse and promoting good standards of professional practice to all groups of clinical staff.</li> <li>• Provide support to all Trust employees who may need additional guidance to understand and apply the principles of this policy.</li> <li>• Provide support to colleagues, to safeguard patients and staff who may need a safeguarding response.</li> <li>• Co-ordinating and providing safeguarding supervision for all DBTH colleagues as requested and referral to specialist services if appropriate to support anyone involved in a PiPoT/LADO allegation.</li> <li>• The Lead Nurse for Adult Safeguarding, the Named Nurse for Safeguarding Children, the Named Midwife and the Named Nurse for Mental Capacity / Deprivation of Liberty, will support the Divisional Leads or Matrons to identify any key themes and trends from the allegation and support them to ensure learning is embedded into front line practice including training, supervision and sharing across the trust.</li> <li>• Provide support to Head of Safeguarding/Deputy Head of Safeguarding with any duties that are delegated.</li> </ul>
<b>Chief Nurse / Deputy Chief Nurse</b>	<ul style="list-style-type: none"> <li>• To work closely with Head of Safeguarding to ensure robust process is in place to implement, embed and monitoring of this policy.</li> <li>• Ensure the responsibility has been delegated to the appropriate Lead</li> <li>• To look at communication strategy if the allegation is in the public domain.</li> </ul>
<b>Medical Director/Associate Medical Director/ Medical Staff</b>	<ul style="list-style-type: none"> <li>• To support with PiPoT/LADO cases within DBTH</li> <li>• To work closely with Head of Safeguarding to ensure robust process is in place to implement, embed and monitoring of this policy.</li> <li>• Ensure this policy is implemented and cascaded throughout their area/division to ensure compliance</li> </ul>

## 4 PROCEDURE

### 4.1 Information Sharing / Confidentiality

Information sharing should comply with the Trust's legal obligations, including under the GDPR/Data Protection Act 2018 (principally that sharing should be fair and lawful, but the legislation should not be a barrier to sharing information where a failure to do so would cause the safety or well-being of a child or adult to be at risk).

No matters relating to the PiPoT/LADO should be discussed outside this process to maintain the confidentiality of those involved.

## 4.2 Record Keeping

A referral form should be completed with all relevant information gathered before the Scope Meeting. This should be initially shared with the Head of Safeguarding or Deputy Head of Safeguarding via the generic safeguarding inbox Refer to Appendix 2.

All records relating to PiPoT/LADO will be kept in a confidential file on the Safeguarding B Drive. Records that relate to PiPoT/LADO investigations and concerns, must be retained in line with internal information governance and retention procedures regardless of the outcome.

Information from the referral form will be shared with the relevant senior clinical/medical lead and senior representative from HR.

## 4.3 The Process

If a PiPoT is alleged to have abused, harmed or pose a risk to a child or an adult it is essential that the concerns are appropriately reported and responded to.

Once the allegation has been reported, the welfare and safety of the child or adult is paramount, however, the Trust should ensure any colleague who has had an allegation made against them are treated fairly, proportionately and provided with appropriate support.

The PiPoT should be kept fully informed of the progress of any investigation unless it is established that sharing such information would increase risk.

Please ensure the following is considered when responding to an allegation:-

- Adult/Children's Safeguarding process followed if it is found that a colleague has abused/neglected an adult at risk/child whilst undertaking work duties.
- LADO referral, where a child is at risk/may have been abused/come to harm, or when a person's conduct towards an adult may impact on their suitability to work with or continue to work with children. (Appendix 6)
- Third party reporting to police if a suspected crime has been committed
- The next steps if the allegation has not met threshold for a PiPoT/LADO referral (Consider other safeguarding referrals or an internal HR Management investigation)
- That no decision of next steps is made until further clarity is received

## 4.4 Scoping Meeting

Please see Appendix 3 for the Scoping Meeting agenda.

The purpose of the Scoping Meeting is to provide a framework for decision making, in order to robustly and fairly manage the allegation that has been raised.

Colleagues that should be involved include:-

- Head of Safeguarding/Deputy Head of safeguarding or/and Lead Nurse for Safeguarding Adults/Children and/or Named Midwife for Safeguarding (on delegated behalf of Executive lead for the Trust)
- Deputy Chief Nurse should be kept informed of referrals and co-opted depending on case details or escalation requirements.
- Alleged individual's Divisional Lead and Line Manager
- Human Resources.

The scoping meeting will:-

- Determine if the thresholds have been met to commence a PiPoT/LADO investigation / referral, these are listed in the introduction of this policy and the decision making tool Appendix 1
- Ensure process is followed
- Identify any actions and delegate who will be responsible for the actions
- Set a time frame for actions
- Identify a support plan for the individual subject to a PiPoT/LADO process.
- Identify how the trust will respond and manage any potential publicity matters
- Identify if police involvement is appropriate if it is determined that a criminal act may have occurred. If this is the case subsequent investigations may be suspended until the police confirm the investigation can commence but permission to carry out an internal investigation is not required from the police.
- Identify and appoint an appropriate individual to liaise with the police (Updates should be reported back to the PiPoT lead to ensure no delays occur)
- Identify who is best placed to complete a risk assessment and management plan.
- Consider Redeployment/Suspension with support from Human Resources (HR)
- Consider referral to the professional body if they meeting confirms thresholds are met to complete the formal investigation
- Consider CQC / Professional body notification if the meeting confirms thresholds are met to complete the formal investigation – this would be with prior discussion with the Deputy Chief Nurse.

#### **4.5 Support for the person against whom the allegation has been made**

Our duty of care towards any individual who is potentially at risk is paramount, however, the Trust also has a duty of care to the individual against whom the allegation has been brought. Support should be provided to minimise any potential stress associated with the process.

To meet this responsibility we must ensure that we:-

- Support the individual to understand the allegation, the process being followed and what investigations will be carried out.
- Provide updates and developments within the process and explain any investigations being carried out
- Give the individual fair opportunity to respond to the allegation/concern
- Support the individual to raise questions and/or concerns about their circumstances.
- Offer referral to occupational health and health and wellbeing services within the trust.
- Advise the individual that they may wish to seek support from their union, professional body or independent advice. However special consideration should be made to restricting information sharing where it may place anyone at risk, hinder an inquiry or compromise an investigation.

#### **4.6 Conclusion of the Case**

The outcome of the case agreed by the reviewing panel will be:-

- False: - Where there is sufficient evidence to disprove an allegation.
- Unsubstantiated: - There is insufficient evidence to prove or disprove the allegation. Therefore this does not imply guilt or innocence.
- Malicious:- there is sufficient evidence to disprove the allegation and evidence of a deliberate act to deceive
- Substantiated: - There is sufficient evidence to prove the allegation. Standards of proof is balance of probability.

Recommendations will then be made for further actions subject to the PiPoT which may include:-

- No further action
- Referral to professional Body
- Referral to DBS
- Individual Action Plan including informal support requirements
- Performance Management
- Information sharing to partner agencies including social care/police
- Additional training requirements
- Duty of Candour
- Disciplinary Action

If the PiPoT is removed, by either being dismissed or permanently redeployed to a non-regulated activity, because they pose a risk of harm to children and/or adults with care and support needs, the employer has a legal duty to refer the person to the Disclosure and Barring Service (DBS). In addition, where appropriate, employers should report workers to the statutory and other bodies responsible for professional regulation such as the General Medical Council and the Nursing and Midwifery Council. The individual must be informed of any action undertaken against them.

If a person subject to a PiPoT investigation attempts to leave their employment by resigning in an effort to avoid the investigation or disciplinary process, the employer should continue with the investigation and invite the PiPoT to remain involved. This would also be the case where the person intends to take up legitimate employment or a course of study. A referral to DBS may need to be made at this point and should be discussed with HR.

Records that relate to investigations and actions taken to investigate PiPoT concerns which have been found to be without substance or with substance must be retained in line with internal information governance and retention procedures. The information relating to the investigation will be saved in the Safeguarding Confidential B Drive. They must not be kept in an existing colleague's personal file which is stored in department and potentially accessible to multiple people in the department.

Individuals, including the person whom the allegation has been made about, are entitled to request access to their personal records whether they are stored electronically or manually. It is important that the records are fair, accurate and balanced.

The final outcomes will be recorded on the Allegation closure form, Appendix 4

#### **4.7 Learning from an Allegation**

The Safeguarding Team and HR will support Medical leads, Divisional Leads or Matrons to identify any key themes and trends from the allegation and support them to ensure learning is embedded into front line practice including training, supervision and sharing across the trust.

## 5 TRAINING/SUPPORT

This policy will be shared throughout DBTH and to all Lead Roles to ensure awareness. Further support can then be accessed on an Ad-Hoc basis to ensure the process is applied when an allegation has been made about a person in a position of trust working within DBTH. Further information about the PiPoT/LADO process will be incorporated in the

Level 2 & 3 Safeguarding training for a general awareness and understanding of responsibility. For further guidance please contact The Safeguarding Team directly or the HR lead of managing allegations.

## 6 MONITORING COMPLIANCE WITH THE PROCEDURAL DOCUMENT

The monitoring of the compliance and effectiveness of the policy will be achieved as outlined below:

What is being Monitored	Who will carry out the Monitoring	How often	How Reviewed/ Where Reported to
The incidence of allegations against an individual who is employed by DBTH.	Safeguarding Team DBTH	Quarterly  Annually	Reporting to Strategic Safeguarding Group (SSG).  The number of incidents recorded should be shared with Safeguarding Adult Board/Children's Safeguarding Partnership and reported in the Annual Report.
Experience of colleagues	People and Organisational Development	Annually	Staff Survey

## 7 DEFINITIONS

**Abuse:** Where someone in a position of trust harms, hurts or causes someone distress

**Adult:** A person 18 or over

**Allegation:** A claim made against someone, often without proof.

**Child:** Any person under 18

**Crime:** An act or omission which constitutes an offense and is punishable by law

**Harm:** Damage to a person's rights, property, physical or mental wellbeing

**LADO:** Local Authority Designated Officer

**Malicious:** Intending or intended to cause someone harm or damage

**Neglect:** Ongoing failure to meet a person's/children's basic needs

**Omission:** The act of leaving something out or failing to do what is required by duty, procedure or law.

**PiPoT:** Person in a Position of Trust

**Risk:** The chance that an action or activity could happen and harm a person

**Trust:** Firm belief in Character, Integrity, ability of something or someone.

## 8 EQUALITY IMPACT ASSESSMENT

The Trust aims to design and implement services, policies and measures that meet the diverse needs of our service, population and workforce, ensuring that none are disadvantaged over others. Our objectives and responsibilities relating to equality and diversity are outlined within our equality schemes. When considering the needs and assessing the impact of a procedural document any discriminatory factors must be identified.

An Equality Impact Assessment (EIA) has been conducted on this procedural document in line with the principles of the Equality Analysis Policy (CORP/EMP 27) and the Fair Treatment For All Policy (CORP/EMP 4).

The purpose of the EIA is to minimise and if possible remove any disproportionate impact on employees on the grounds of race, sex, disability, age, sexual orientation or religious belief. No detriment was identified.

## 9 ASSOCIATED TRUST PROCEDURAL DOCUMENTS

CORP/COMM 4 Complaints Handling Policy (including Concerns)

PAT/PS 8 Safeguarding Adult Policy

PAT/PS 10 Safeguarding Children Policy

PAT/PS 12 Domestic Abuse Policy

PAT/PS 26 Sexual Safety Policy

PAT/PA 19 Mental Capacity Act 2005 Policy and Procedure, including Deprivation of Liberty Safeguards (DoLS)

PAT/PA 28 Eliminating Mixed Sex Accommodation, whilst maintaining Privacy and Dignity Policy

CORP/EMP 2 Disciplinary Procedure

CORP/EMP 3 Grievance and Resolution Policy

CORP/EMP 13 Conduct, Capability, Ill Health and Appeals Policies and Procedures for Practitioners

CORP/EMP 14 Freedom to Speak Up Policy 'Speak up to make a difference'

CORP-EMP 31 Health and Wellbeing Policy

CORP/EMP 58 Civility Respect and Resolution Policy

CORP/EMP 59 Equality, Diversity and Inclusion Policy

## 10 DATA PROTECTION

Any personal data processing associated with this policy will be carried out under 'Current data protection legislation' as in the Data Protection Act 2018 and the UK General Data Protection Regulation (GDPR) 2021.

For further information on data processing carried out by the trust, please refer to our Privacy Notices and other information which you can find on the trust website:

<https://www.dbth.nhs.uk/about-us/our-publications/information-governance/>

## 11 REFERENCES

Care Act (2014), Available at: [Care Act 2014 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2014/16)

Children Act (2004), Available at: [Children Act 2004 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2004/31)

General Data Protection Act (2018), Available at: [Data Protection Act 2018 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2018/12)

Human Rights Act (1998), Available at: [Human Rights Act 1998 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/1998/42)

Doncaster Safeguarding Childrens Partnership, Responding to allegations (2024) , Available at: [Responding to Allegations Against Staff, Carers or Volunteers \(proceduresonline.com\)](https://www.proceduresonline.com)

Doncaster Safeguarding Adults Board, Available at: [Doncaster Safeguarding Adults Board \(DSAB\) - City of Doncaster Council](https://www.doncaster.gov.uk)

Nottinghamshire Safeguarding Adults Board, Available at: [Nottinghamshire Safeguarding Adults Board](https://www.nottinghamshire.gov.uk)

Working Together to Safeguard Children 2023, Available at: [Working together to safeguard children 2023: statutory guidance \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk)

<b>Consider</b>	<b>No Concern</b>	<b>Some Concerns – require further enquiry</b>	<b>Significant Cause for Concerns</b>
Has the person behaved in a way that has harmed or may have harmed an adult with care and support needs	No concerns of harm or potential harm	Some concerns of harm or potential harm	Serious harm or potential harm
Has the person possibly committed a criminal offence against or related to an child or adult at risk	No	No harm towards a child or adult with care and support needs but a crime has been committed	Yes
Has the person behaved towards an adult at risk in a way which indicates unsuitability to work with children / adults with care and support needs	No	Yes	Yes

<p>Has the person behaved in a way that has harmed or may have harmed children which means their ability to provide a service to adults with care and support needs must be reviewed</p>	<p>No</p>	<p>Yes</p>	<p>Yes</p>
<p>Has the person behaved in a way which questions their ability to provide a service to adults with care and support needs which must be reviewed e.g. conviction for assault outside the work environment</p>	<p>No</p>	<p>Yes</p>	<p>Yes</p>
	<p>Safeguarding/PiPoT criteria not met for referral</p>	<p>PiPoT referral criteria met</p>	<p>PiPoT referral referral criteria met</p>



## APPENDIX 2 – PIPOT REFERRAL FORM

A referral form must be completed prior to any scoping meetings being commenced and any supporting information should be available to support the decision making process. Failure to access any information or evidence will prevent a scoping meeting taking place. A Referral should be made when it is believed a person working within the trust:-

- Behaved in a way that has, or may have, harmed an adult or child, including omissions to take actions to safeguard.
- Possibly committed a criminal offence against, or related to an adult at risk or child (including domestic abuse)
- Behaved (or has alleged to have behaved) in a way that indicates that they are unsuitable to work with children/adults with vulnerability.
- Have been discussed as an alleged perpetrator of abuse in any safeguarding meeting, including Multi-Agency Risk Assessment Conference (MARAC) or Multi-Agency Public Protection Arrangements (MAPPA)
- May be subject to abuse themselves and as a consequence, means their ability at that time to support patients with care needs may need to be reviewed and reasonable adjustments made

Completed forms should be emailed to DBTH generic Safeguarding inbox: [dbh-tr.safeguarding@nhs.net](mailto:dbh-tr.safeguarding@nhs.net) and marked for the attention of the Head of Safeguarding and/or the Deputy Head of safeguarding. Information will then be shared as deemed appropriate to Lead Professionals for Adult & Children’s Safeguarding, HR Senior representative, Medical Director / Associate Medical Director, Divisional lead. Sharing of the information on the referral form is to support with the scoping meeting.

### **Referrers Details**

Date of referral	
Referrers Name	
Position	
Organisation/Division/Service	
Divisional Lead	
Contact Number	
Referrers work email address	

### **Detail of Person in a Position of Trust (PiPoT)**

Full Name	
Date of Birth	
Gender	
Role	
Ward/Area	
Division	
Manager’s Name	
Workplace Address	
Employment Start Date	
Date of last DBS	

### **Referral Details/Concerns**

Date of incident	
Time of incident	
Location of incident	
Datix Number if linked to a SG Adult referral	
Is the PiPoT aware of the allegation?	

**What is the alleged harm? (Tick all boxes that apply)**

Physical	
Sexual	
Domestic Abuse	
Psychological	
Financial	
Neglect/Act of omission	
Discriminatory	
Modern Slavery	
Conduct outside work	
Inappropriate behaviour at work	
Prevent	
Criminal Investigation	
Other	

**Full description of allegation/concern:-**

**Witnesses to concern/others involved:-**

<u>Name</u>	<u>Role/Relationship to PiPoT</u>	<u>Email Address</u>	<u>Contact Number</u>

**Does the PiPoT have any other employment or connection to Vulnerable Adult or Children?**

--

**Managers: Action Log**

Please note it may not be appropriate for all actions to be completed at this time. Please ensure this is reviewed if progressed to a Scoping meeting and actions reconsidered.

<b>Action</b>	<b>Outcome / Comments</b>
Name of person supporting PiPoT	
Have police been informed? Incident number	
Have you informed any regulatory body at this stage?	
Has HR been informed at this stage	

**Supporting information:-**

--

**Details of connected children/adults at risk:-**

<b>Name</b>	<b>DOB</b>	<b>Person at risk aware of allegation?</b>	<b>Care &amp; Support needs:</b>	<b>Social Care involvement?</b>	<b>Currently supported by?</b>

**Further Considerations:-**

Please consider, if at this point a children's/Adult safeguarding referral needs to be made. This can be discussed further with the DBTH Head of Safeguarding / Deputy Head of Safeguarding or a DBTH safeguarding lead. If a referral has already been made please record below.

<b>Type of referral</b>	<b>Has the person at risk consented to the referral</b>	<b>Telephone/Written referral. Names of who was spoken to.</b>	<b>Further comments</b>

## APPENDIX 3 – PIPO T SCOPING MEETING: AGENDA

Date	
Time	
Venue	
Meeting number	
Chair of meeting	
Meeting relates to (PiPoT details)	

1	Attendees & Apologies
2	<p><u>Confidentiality &amp; Information Sharing.</u></p> <p>Information discussed throughout this meeting is strictly confidential. Information is shared within accordance with legislation and guidance. Information will be shared in accordance with the seven golden rules of information sharing.</p> <ol style="list-style-type: none"> <li>1) In accordance with GDPR</li> <li>2) Openly and honestly</li> <li>3) With consent where appropriate</li> <li>4) Advice is sought where necessary</li> <li>5) Consider safety and wellbeing</li> <li>6) Necessary, proportionate, relevant, accurate, timely and secure.</li> <li>7) Record kept of decisions and the rationale</li> </ol>
3	<p><u>Purpose of meeting:</u></p> <p>This meeting is held to consider the allegation(s) made against (DBTH employee) by (person) on (date). The allegation/Concern involves a Person in Position of Trust (PiPoT). This meeting will consider the allegation(s) and whether they fall into the scope of the PiPoT/LADO procedures</p>
4	Conflicts of interest
5	Minutes from previous meeting & Action Log
6	Details of the allegation(s)
7	<p><u>Details of the alleged individual:</u></p> <ul style="list-style-type: none"> <li>• Work history</li> <li>• Nature of work undertaken</li> <li>• DBS – date of last check</li> <li>• Previous concerns/complaints/allegations/datix</li> <li>• Analysis of risks and actions to be proposed (considering risk assessment template)</li> <li>• Training</li> <li>• Support needs</li> </ul>
8	Evidence
9	<u>Details of the person who has made allegations</u>

	<p>Does this person work within the trust?          Are there any concerns that this person lacks mental capacity?          Who is supporting the individual?          Has the person who has made the allegation reported this to the police?</p>
10	<p><u>PiPoT criteria considered (using the decision making tool):</u></p> <ul style="list-style-type: none"> <li>• Person has behaved in a way that has harmed or may have harmed an adult or child</li> <li>• Person has committed a criminal offence against, or related to, an adult or child.</li> <li>• Person has behaved towards an adult or child in a way that indicates they may pose a risk of harm to adults with care and support needs.</li> <li>• Person may be subject to an investigation by police as a perpetrator of domestic harm.</li> <li>• A person has behaved (or is alleged to have behaved) towards children in a way that indicates that they may pose a risk of harm to adults with care and support needs.</li> <li>• Person has behaved in a way which questions their ability to work with children or provide services to adults at risk.</li> <li>• A person is subject of a formal safeguarding enquiry into allegations of abuse or neglect which have occurred in one setting. However, there are also concerns that the person is employed, volunteers or is a student in another setting where there are adults with care and support needs who may also be at risk of harm.</li> </ul>
11	Interface with LADO procedure (using the decision making tool)
12	<p><u>Wider considerations.</u></p> <p>These actions may be under consideration at other meetings and decisions at this time may not be absolute/known</p> <ul style="list-style-type: none"> <li>• Police Involvement</li> <li>• Section 42 Enquiry</li> <li>• Children's Safeguarding Referral</li> <li>• HR Procedures</li> <li>• Support for patient/victim</li> <li>• Support the person whom the allegation is about.</li> </ul>
13	Media interest & how this will be managed
14	Discussions and actions (Please ensure it is recorded who will complete the actions and a timescale in which actions need to be completed.)
15	Recommendation: including redeployment/suspension (Supported by HR)
16	Date of next meeting

**APPENDIX 4 – PIPOt MEETING NOTES**



**PiPoT Meeting Notes: insert date/time**

Attendees			Apologies		

Name of PiPoT:

Notes / Actions	Responsible for action/s

Notes / Actions	Responsible for action/s
<p>Summary of actions agreed by all attendees:</p> <ol style="list-style-type: none"> <li>1.</li> <li>2.</li> <li>3.</li> </ol>	

## APPENDIX 5 – PIPOT RISK ASSESSMENT

### PiPoT Risk Assessment: Allegation against a person working at DBTH.

This risk assessment can be undertaken/repeated at any point in the process. Consideration to risk assessment should be given at the scoping meeting.

**Name of the PiPoT:**

Summary of allegation(s) against employee:

--

Does this allegation warrant consideration of suspension/dismissal if the offences are substantiated?

YES	No
-----	----

#### Assessment of Risk

<u>Potential Risk</u>	Very Low	Low	Moderate	High	Very High
Potential risk to others Detail:					
Is there a risk to the individual's safety & welfare? Detail:					
Is there a risk to DBTH Premises or property? Detail:					
Is there any risk to investigation including interference with witness, evidence or patient records? Detail:					
Is there a risk to DBTH reputation if the person is allowed to continue work?					
Other risks identified:					

Consideration for alternatives to suspension



Please consider if there are alternatives to suspension that would still minimise risks. Please consider redeployment to another area/department, non-patient facing roles, and restriction on duty, home working, and changes to working hours.

Details of alternatives appropriate in this case:

Overall Assessment/Immediate Actions:

(Please ensure liaison with HR if appropriate at this time)

Others consulted when completed Risk Assessment:

Name	Role	Contact

Risk Assessment completed by:		
Role:		
Date:		

(Please ensure this form is completed and saved in a secure file)

## APPENDIX 6 – PIPOT CLOSURE FORM

### Name of PiPoT:

To be used when concluding the PiPoT Process. A meeting should be held either face-to-face or virtually to capture the panels discussions and should be recorded on this form. If the meeting is held virtually please ensure all panel members have submitted their recommendation and rational in written format and then all responses should be collated and attached to this form.

Start Date	
Case Chair	
Meeting/s held	Face to Face/Virtual
Brief Details	

### Outcomes of investigation

HR	
Police	
Safeguarding Concern (referral to Children’s Social Care and/or Safeguarding Adult referral Datix)	
Referral to LADO	
Referral to DSAB / NSAB or other relevant area Adult Board.	

### Outcome of the PiPoT – record details of decisions from all panel members

False	
Substantive	
Unsubstantiated	
Malicious	
Rational for recommendation	

### Action Checklist

Action	Yes	No	N/A
No further action			
Referral to Professional body			
Referral to DBS			
Action plan in place			
Performance Responsibility Framework			
Informing involved partner agencies			
Addition training requirement			
Duty of Candour			
Other			

### Action Plan

Action	Person Responsible	Deadline	RAG Rating

## APPENDIX 7 – LOCAL AUTHORITY DESIGNATED OFFICER - LADO

### Local Authority Designated Officer – LADO

The Local Authority Designated Officer (LADO) is responsible for managing and overseeing concerns, allegations or offences relating to employees and volunteers in any organisation across a local authority area. All safeguarding allegations about people who work with children, in statutory or voluntary organisations, must be referred to the LADO. A referral into LADO is an addition to the process of managing an allegation against a person in a position of trust (PiPoT) at DBTH and all steps outlined in this policy should still be followed with guidance from the LADO.

Working Together to Safeguard Children (2023) states a referral into LADO should be made where it is alleged a person working 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 towards a child or children in a way that indicates they may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

This may relate to their personal or professional life and therefore regardless of whether the allegation relates to someone who works directly with children (which may have implications on their professional role) or about a child they may care for in another capacity, a referral should be made within 24 hours of the information being shared with yourself.

**If you are concerned that a child may be at risk of immediate harm do not wait for a response from the LADO please immediately contact Doncaster LADO 01302 737332/Nottinghamshire 0115 977 3921 (Safeguarding Assurance and Improvement Team) and the Police. For non-urgent reporting phone 101 or in an emergency 999.**

There may be up to 3 strands in considering a concern or an allegation:

- A Police investigation of a criminal offence;
- Enquiries and assessment by the Children's Services to ascertain whether a child or young person is in need of protection or is in need of services, seek support from DBTH Safeguarding Team.
- Consideration by an employer of disciplinary action in respect of the individual (Please refer to DBTH Disciplinary Procedure and seek support from HR)

**Useful Contacts**

**Doncaster City Council:**

**LADO Tel:** 01302 737748

**LADO Administrator Tel:** 01302 737332

**Email:** [LADO@doncaster.gov.uk](mailto:LADO@doncaster.gov.uk)

[LADO Referral Form](#) - This form must be completed WITHIN 24 HOURS and sent to the Local Authority Designated Officer (LADO) in Doncaster Children's Services.

**Nottinghamshire County Council:**

**Nottinghamshire Safeguarding Assurance & Improvement Team:** 0115 977 4247

**Email:** [LADO@nottinghamcity.gov.uk](mailto:LADO@nottinghamcity.gov.uk)

[Submit a LADO contact form - Advice and guidance - Section 1 - config - Nottinghamshire County Council](#) – Only online referral forms will now be accepted and should be sent within 24hours of receiving the information.

A copy of LADO referrals should be shared with DBTH Safeguarding team:

[dbh-tr.safeguarding@nhs.net](mailto:dbh-tr.safeguarding@nhs.net)

See Appendix 8 below for LADO Decision Making Support Tool

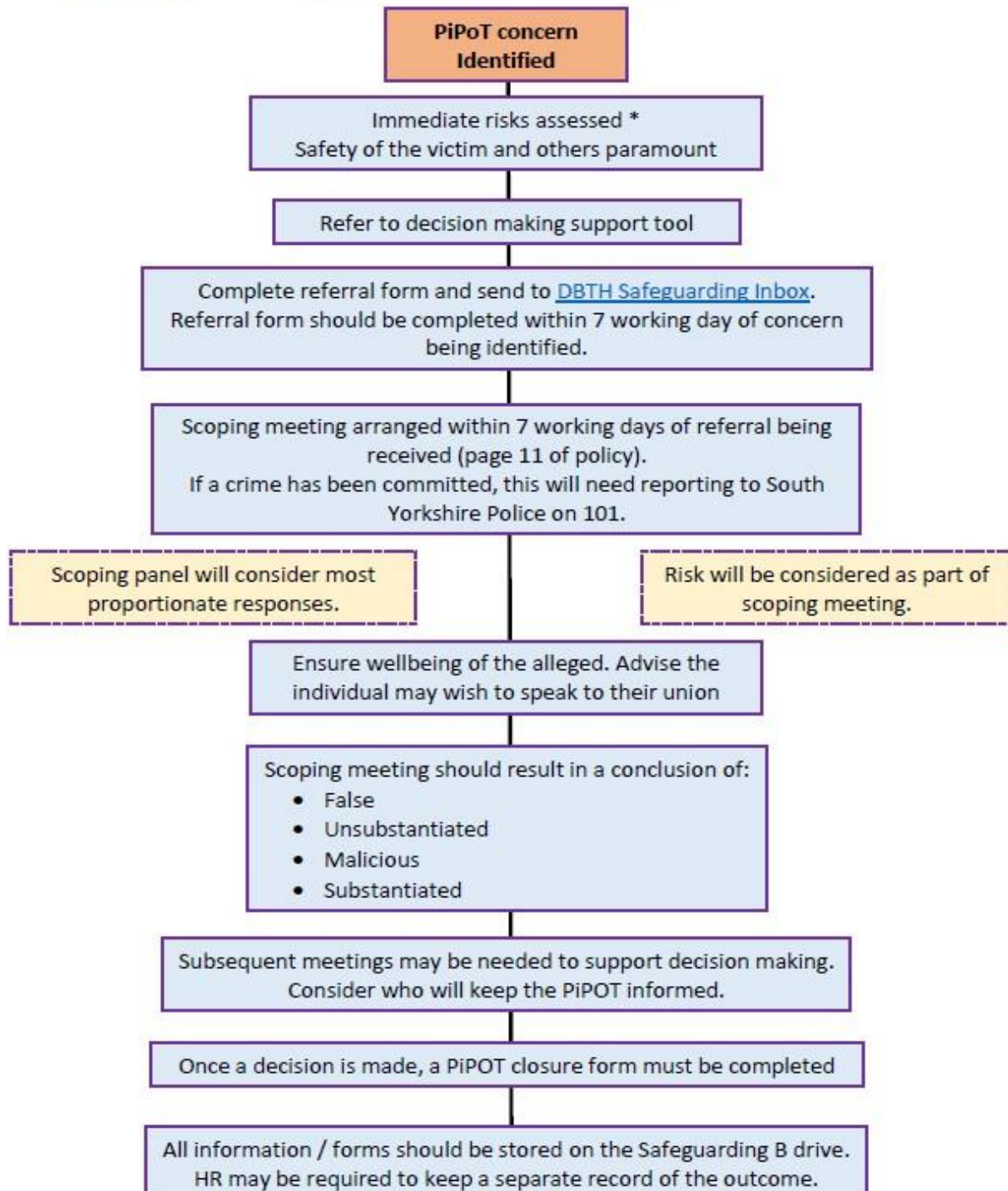
## APPENDIX 8 – DECISION MAKING TOOL - LADO

<u>Consider</u>	<u>No Concern</u>	<u>Some Concerns – require further enquiry</u>	<u>Significant Cause for Concerns</u>
Has the person behaved in a way that has harmed or may have harmed a child?	No concerns of harm or potential harm	Some concerns of harm or potential harm	Serious harm or potential harm
Has the person possibly committed a criminal offence against or related to a child or adult at risk?	No	No harm towards a child or adult with care and support needs but a crime has been committed	Yes
Has the person reacted in a way that is deemed inappropriate, towards a child or an adult at risk, and may indicate unsuitability to work with children?	No	Yes	Yes
Has the person behaved in a way which means their ability to support, care for or treat children must be reviewed?	No	Yes	Yes
Has the person behaved in a way which questions their ability to work with children? e.g. risk taking behaviours, substance misuse, conviction for assault outside the work environment.	No	Yes	Yes
	Safeguarding/LADO criteria not met for referral	LADO referral criteria met	LADO referral criteria met

## APPENDIX 9 – ALLEGATION PROCESS GUIDANCE



## Allegation Process Guidance



\*use the risk assessment template (appendix 4). Risk should be assessed by the most appropriate person, this may be a senior colleague or line manager. Risk assessment should be considered at the scoping meeting.

## APPENDIX 10 – PIPOT REVIEW MEETING: AGENDA

### PiPoT Review Meeting: Agenda

Date	
Time	
Venue	
Meeting number	
Chair of meeting	
Meeting relates to (PiPoT details)	

1	Attendees & Apologies
2	<p><u>Confidentiality &amp; Information Sharing.</u></p> <p>Information discussed throughout this meeting is strictly confidential. Information is shared within accordance with legislation and guidance. Information will be shared in accordance with the seven golden rules of information sharing.</p> <ol style="list-style-type: none"> <li>1) In accordance with GDPR</li> <li>2) Openly and honestly</li> <li>3) With consent where appropriate</li> <li>4) Advice is sought where necessary</li> <li>5) Consider safety and wellbeing</li> <li>6) Necessary, proportionate, relevant, accurate, timely and secure.</li> <li>7) Record kept of decisions and the rationale</li> </ol>
3	<p><u>Purpose of meeting:</u></p> <p>This meeting is held to review ongoing allegation(s) made against the DBTH employee.</p>
4	Conflicts of interest
5	Minutes from previous meeting & Action Log
6	<p><u>Updated information:</u></p> <ul style="list-style-type: none"> <li>• Any additional information to share.</li> <li>• Analysis of risk: Consider completion of risk assessment.</li> <li>• Ongoing support.</li> <li>• Current Working arrangements.</li> <li>• Update of any parallel investigations (HR/LADO /Police /Extremal referrals)</li> </ul>
7	Media interest & how this will be managed
8	Action Summary
9	AOB
10	Date of next meeting

**APPENDIX 11 - EQUALITY IMPACT ASSESSMENT PART 1 INITIAL SCREENING**

Service/Function/Policy/Project/Strategy	Division	Assessor (s)	New or Existing Service or Policy?	Date of Assessment
PAT/PS 28 v1	Corporate Nursing - Safeguarding	Kimberley Holbert	New Policy	February 2025
<b>1) Who is responsible for this policy?</b> Safeguarding Team / P and OD / Speak up Guardian / Education Team				
<b>2) Describe the purpose of the service/function/policy/project/strategy?</b> To provide a safe consistent approach to manage allegations against colleagues				
<b>3) Are there any associated objectives?</b> Legislation, targets national expectation, standards: Safeguarding Accountability & Assurance Framework July 2022				
<b>4) What factors contribute or detract from achieving intended outcomes?</b> – Colleagues not having an awareness of policy.				
<b>5) Does the policy have an impact in terms of age, race, disability, gender, gender reassignment, sexual orientation, marriage/civil partnership, maternity/pregnancy and religion/belief?</b> Details: No				
<ul style="list-style-type: none"> <li>• If yes, please describe current or planned activities to address the impact [e.g. Monitoring, consultation] –</li> </ul>				
<b>6) Is there any scope for new measures which would promote equality?</b> N/A				
<b>7) Are any of the following groups adversely affected by the policy?</b>				
<b>Protected Characteristics</b>	<b>Affected?</b>	<b>Impact</b>		
a) Age	No			
b) Disability	No			
c) Gender	No			
d) Gender Reassignment	No			
e) Marriage/Civil Partnership	No			
f) Maternity/Pregnancy	No			
g) Race	No			
h) Religion/Belief	No			
i) Sexual Orientation	No			
<b>8) Provide the Equality Rating of the service / function /policy / project / strategy – tick (✓) outcome box</b>				
<b>Outcome 1</b> ✓	<b>Outcome 2</b>	<b>Outcome 3</b>	<b>Outcome 4</b>	
*If you have rated the policy as having an outcome of 2, 3 or 4, it is necessary to carry out a detailed assessment and complete a <b>Detailed Equality Analysis form</b> – see <b>CORP/EMP 27</b> .				
<b>Date for next review:</b> February 2028				
<b>Checked by:</b> Amanda Timms		<b>Date:</b> 13 February 2025		