



Thrive at Five

3.1 Safeguarding Policy

Thrive at Five Safeguarding Staff

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Thrive at Five Trustees

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Version History

Version	Reviewed By	Date	Changes
0.1	Gill Carmina (External Consultant), Neel Parti (Staff), Merle Davies (Trustee)	March 2023	Revised version signed off March 2023
0.2	Patrick Myers and Merle Davies	August 2024	Creation of a safeguarding flow chart. Creation of Safeguarding control schedule
0.3	Patrick Myers	June 2025	- Family help section added, - Update to section 4.1 Key Roles - National to Central change of wording

			b. Acknowledgement of additional safeguarding trustee
0.4	Lucy Vidal	February 2026	1. Update to DSL for Redcar and Middlesbrough teams to Nicole Cassidy 2. Formatting updates

1. INTRODUCTION

1.1 Purpose of the policy

Ensuring the safety and protection of our beneficiaries is an essential aspect of Thrive at Five's work. Unless individuals are safe and treated well, with dignity and respect, it is impossible for them to realise their potential or to benefit fully from the work and activities supported by Thrive at Five.

There has been increasing recognition of the way in which vulnerable people can be at risk of harm from organisations and institutions that are intended to help them, either as a result of abuse and exploitation by individuals in positions of trust, or via programme activities in general.

As a consequence, there has been a significant increase in the efforts made by agencies to ensure that no harm comes to beneficiaries or target communities from contact with their staff and associates or as a result of any of the organisation's activities.

This duty of care extends beyond statutory safeguarding requirements. Thrive at Five takes its obligations to operate in such a way as to ensure so far as is possible that its work causes no harm to anyone with whom it engages very seriously. The four core values that underpin Thrive at Five's work are:

- 1) Listening. We make sure that by listening we have understood everyone's perspectives, especially people whose voices are seldom heard before we plan and act.
- 2) Collaboration. We take time to build meaningful relationships founded on

trust and collaboration with parents, communities, and our partners, so we can co-create and achieve more together.

3) Kindness. Through kindness, we befriend, see the best in each other and dispel hostility, so we can get more done

4) Endurance. Lasting change is not straightforward and requires endurance to find what works and can be sustained in communities everywhere

Given these values and in light of widely recognised risks, Thrive at Five has developed this policy to promote the welfare and protection of all those people it comes into contact with including children, families and communities, staff and volunteers within the charity itself as well as the partner organisations with which we work. Many of our staff and volunteers may also be subject to the impact of social and personal factors in their own lived experience that can increase risk and vulnerability. Our approach to safeguarding aims to protect all stakeholders in our work and activities from all forms of harm that might occur as a result of that contact, including abuse, neglect and exploitation and to support positive experiences and outcomes for the families, adults and children who are impacted by our work.

1.2 Scope

This policy is mandatory for all staff including temporary, agency, freelance and contractors (hereafter referred to as 'staff'), trustees and volunteers. It provides clarity around lines of accountability, designated safeguarding roles and the process to follow when concerns arise in order to ensure timely, appropriate and positive responses and access to support and advice. To support implementation of this policy we will ensure that all staff have access to training, learning opportunities, guidance and support which reflects their role and responsibilities.

We will do our best, in so far as we are able, to ensure that organisations with whom Thrive at Five works in partnership with and provides funding to, are aligned with the values and principles set out in this policy. Thrive at Five expects that the principles and approaches already shared with partnership organisations mean that they will fully support the values and commitments set out in this policy. Thrive at Five recognises and expects that many partner

organisations will have policies for safeguarding and protecting children and adults at risk and associated measures in place. When appropriate, we will seek confirmation that this is the case, and if necessary, will signpost to statutory agency support to develop their safeguarding frameworks.

1.3 Outcomes

Thrive at Five is committed to fulfilling its moral and statutory duties to safeguard and protect both children and adults at risk.

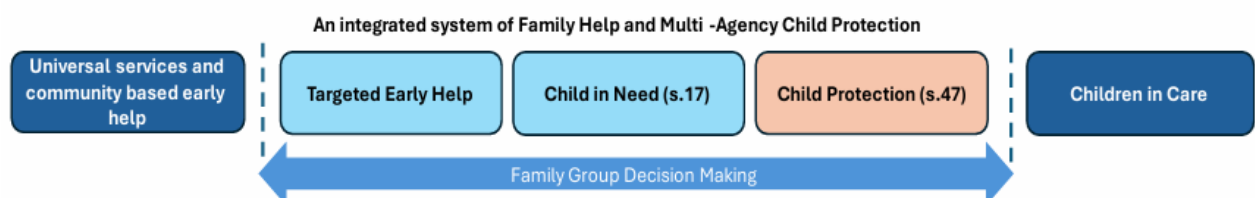
We aim to ensure that we have an aware workforce who can respond positively when concerns arise to ensure appropriate action is taken where additional support and protection is needed. We will do this in partnership with other agencies and organisations and through our policy framework, guidance and training.

This policy and all associated training and guidance also serve to provide staff, trustees and volunteers with the overarching principles that guide our approach and interactions.

2. DEFINITIONS

2.1 Safeguarding – embedding practices throughout the organisation to make sure that the welfare of children and adults at risk is supported and promoted and where they are protected from harm wherever possible. The Government is currently reforming safeguarding practice through its Family First Partnership Programme (FFP) and is redefining the expectations around safeguarding.

Figure 1: Our vision for a reformed system



- **targeted early help:** children and families with multiple and/or complex needs that require a plan to be in place and a lead practitioner appointed.
- **children in Need** (Section 17, Children Act 1989): a general duty for local authorities to safeguard and promote the welfare of children within their area who are in need or are disabled and promote the upbringing of such children by their families by providing a range and level of services appropriate to those children's needs.
- **child protection** (Section 47): the duty on local authorities to investigate where they have reasonable cause to suspect that a child who lives, or is found, in their area is suffering, or is likely to suffer, significant harm.

Family Help

Family Help is for all children, young people and families whose needs multiple and/or complex. This includes those who are currently eligible for targeted early help or receiving support and services as a child in need, and those subject to child enquiries and plans. Where appropriate, it may also include support for children in care – both as part of services they may be receiving while in care, but also as part of planning and support to return home to their families. Families who access Family Help will consent to assessment and the support they receive, unless there are child protection concerns and activity.

By multiple and/or complex, we mean that a family's needs are above the level of universal and community based early help, such as that provided by a Family Hub or in community settings, and they are unable to access and navigate support themselves. In Family Help, these families will be officially recorded in a local area's children's social care case management system and assigned a Family Help Lead Practitioner.

Below is a list of issues or indicators that should be considered in relation to whether Family Help is the most appropriate course of action – it is not exhaustive:

- child and/or adult mental health issues
- child and/or adult substance misuse
- domestic abuse
- neglect
- physical abuse
- emotional abuse
- sexual abuse
- teenage relationship abuse

- a child who is frequently missing/goes missing from care or from home
- a child who is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- a child who is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- a child who is viewing problematic and/or inappropriate content (for example, linked to violence), or developing inappropriate relationships online
- a child who is at risk of radicalisation
- a child who has a parent or carer in custody
- a child who is bereaved
- a child who is a young carer
- a child who is exposed to frequent, intense and poorly resolved parental conflict
- a child who has returned home to their family from care
- a child who has unmet physical and/or developmental needs
- a child who is disabled
- a child who has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- a child who is missing education, persistently or severely absent from school, or not receiving a suitable education
- a child who has experienced multiple suspensions and is at risk of, or has been permanently excluded
- housing insecurity including temporary accommodation and financial insecurity including adult worklessness and youth NEET status

2.2 A child in need – is one where according to the DfE's Families First for Children programme is:

- he or she is unlikely to achieve or maintain or to have the opportunity to achieve or maintain a reasonable standard of health or development without provision of services from the Local Authority.
- his or her health or development is likely to be significantly impaired, or further impaired, without the provision of such services; or
- he or she is a disabled child

2.3 A child at risk – A child is an individual up to and including age of 18 (as defined in the Children Act 1989) who is at risk of significant harm e.g. abuse, neglect, exploitation.

2.4 A Young Person – Whilst there is no legal definition for this term, herein it refers to the upper age range of a child i.e. 16–18 years old.

2.5 An adult at risk – An adult at risk is a person aged 18 years or over who is experiencing or is at risk of abuse, neglect or other kinds of harm and has care and support needs (Care Act, 2014). This may include a person who:

- Is elderly and frail
- Has a mental illness including dementia
- Has a physical or sensory disability, including neurodiversity and communication differences
- Has a learning disability
- Has a severe physical illness
- Is a substance user
- Is homeless/experiencing extreme deprivation and poverty
- Is isolated and without networks of support
- Is subject to coercion and control within an intimate relationship/home
- Is a care leaver
- Is a refugee / displaced person

2.6 Child protection – an activity which is carried out to protect specific children who are suffering, or are at risk of suffering, significant harm.

2.7 Adult protection – protecting an adult’s right to live in safety, free from abuse or neglect, while at the same time making sure that the adult’s wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action.

2.8 Duty of Care – a legal obligation to:

- Always act in the best interest of individuals and others
- Not act or fail to act in a way that results in harm
- Act within your competence and not take on anything you do not believe you can safely do.

2.9 Abuse – a selfish act of oppression and injustice, exploitation and manipulation of power by those in a position of authority. This can be caused by those inflicting harm or those who fail to act to prevent harm.

Abuse is not restricted to any socio-economic group, gender or culture. It can take many forms, including:

- Physical abuse
- Domestic violence and
- Psychological/Emotional
- Financial or material
- Modern slavery
- Harassment / bullying
- Discriminatory abuse
- Organisational abuse
- Neglect and acts of abuse or omission
- Self-neglect abuse
- Sexual Abuse

2.10 Significant harm – There are no absolute criteria on which to rely when judging what constitutes significant harm. For the purposes of Thrive at Five 's response to concerns about children or vulnerable adults, this distinction is the responsibility of children's or adult's services and the police. Any decision about investigating concerns of this nature will therefore be their responsibility but Thrive at Five has a key role in contributing to any investigation.

2.11 Disclosure and Barring Service (DBS) – The DBS was created when the Criminal Records Bureau (CRB) merged with the Independent Safeguarding Authority (ISA) in December 2012. The DBS runs checks at three different levels providing information on an individual's criminal record(s). Those engaged in regulated activity must have a valid DBS check at the required level for the role they are performing.

3. KEY PRINCIPLES

3.1 This policy and corresponding procedure aims to achieve a culture within Thrive at Five in which a proactive approach to safeguarding, promoting and protecting the rights of vulnerable adults and children is taken.

3.2 Thrive at Five will endeavour to ensure that partner organisations conducting work with children and vulnerable adults conduct all

relevant checks and vetting procedures throughout its recruitment and onboarding processes.

- 3.3** All adults and children who either work, volunteer, or use Thrive at Five services have the right to live a life free from abuse, harm, and neglect regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity.
- 3.4** This policy and associated procedure applies to all staff, volunteers, trustees and representatives of Thrive at Five, including contractors and temporary staff.
- 3.5** Thrive at Five is committed to the prevention of, and protection from, abuse and neglect of all adults and children at risk of abuse or neglect who come into contact with the organisation through its staff, volunteers or representatives, in whatever capacity that contact occurs.
- 3.6** Thrive at Five is committed to taking all necessary steps to stop abuse happening, whether staff, volunteers or members of the public perpetrate that abuse.
- 3.7** Thrive at Five is committed to its duty of care to all adults and children it has contact with. If there are concerns about the behaviour or attitudes of staff or volunteers or about potential abuse, it will facilitate any action required to address this without delay. All allegations, concerns or suspicions of abuse or neglect are taken seriously and responded to in line with this policy.
- 3.8** This policy includes actions required to address abusive behaviours and attitudes. Thrive at Five's staff and volunteers are entitled to be treated with respect and to work in a safe environment. We protect our staff and volunteers through requiring compliance with our Code of Conduct (contained in Thrive at Five's Staff Handbook) and Equality and Diversity Statement (contained in Thrive at Five's Statutory Handbook).
- 3.9** On occasions when staff have been dismissed because of concerns about safeguarding, they may be referred by Thrive at Five to relevant professional and statutory bodies including, where appropriate, the Disclosure & Barring Service (DBS).

3.10 Thrive at Five has a duty to share information with and work in partnership with the relevant authorities if there are concerns that an adult/child at risk may be being abused.

3.11 Thrive at Five is committed to ensuring that the right staffing and reporting structure is in place to enable safeguarding concerns to be dealt with effectively and to ensure the correct processes are followed as detailed in the procedure. This includes the escalation to senior staff within Thrive at Five of concerns posing a significant risk to an individual or the charity, and whistleblowing to appropriate external agencies where necessary and appropriate.

4. ROLES AND RESPONSIBILITIES TO SUPPORT SAFEGUARDING

Thrive at Five will undertake the following responsibilities:

- Thrive at Five will ensure staff and volunteers are carefully recruited and necessary checks are made in line with recruitment and vetting good practice guidelines. Where roles and responsibilities meet the definition for regulated activity, this will include criminal records checks through the Disclosure and Barring Service (DBS).
- Thrive at Five is committed to working with stakeholders and the relevant authorities in the localities in which the Thrive at Five initiatives and programmes are run and attended, especially if there are perceived risks or concerns about staff, contractors or volunteers.
- Thrive at Five is committed to ensuring all staff and volunteers, including those with designated responsibilities, have received appropriate levels of up-to-date safeguarding training. This will be a minimum of every two years for the Designated Safeguarding Leads.

4.1 Key Roles

There are key roles within the organisation that support the Safeguarding process:

Central Thrive at Five Team

1. Designated Safeguarding Lead

The Designated Safeguarding Lead (DSL) has overall responsibility for all safeguarding matters within the charity and is mandated to take action in respect of arising safeguarding matters, independent of the CEO. They will be responsible for keeping informed on current legislation and other matters regarding safeguarding. This includes ensuring that safeguarding training for all staff is up to date. The DSL will:

- Keep the CEO updated with any arising safeguarding matters, including actions and decisions taken
- Brief the Board of Trustees on safeguarding matters including volume of activity, location, trends, risks, and actions taken.
- Where appropriate make referrals to external bodies such as the local authority or the police
- Ensure staff are recruited in accordance with relevant HR policy, including (where required) DBS checks
- Ensure that safeguarding is part of every staff induction and inherent in ways of working
- Identify staff who are likely to come into contact with children or adults at risk as part of their role and assess the risk
- Ensure safeguarding training is delivered, and attended by all
- Ensure that all are aware of how to report safeguarding concerns and to whom
- Ensure that all are aware of Thrive at Five's Whistleblowing policy and where to access support
- Ensure that all are aware that they must conduct themselves in a manner which safeguards and promotes the safeguarding practices at Thrive at Five
- Ensure all staff are provided with guidance about safeguarding concerns as required.

2. Deputy Designated Safeguarding Lead

The Deputy DSL will support the DSL in any arising safeguarding matters and in all roles outlined above. Along with the DSL, the Deputy DSL will be responsible for keeping informed on current legislation and other matters regarding safeguarding. If the DSL is unavailable for any reason, the Deputy DSL will assume responsibility for any arising safeguarding matters.

3. Designated Safeguarding Trustees

Whilst safeguarding is the collective responsibility of all Thrive at Five Trustees, two Designated Safeguarding Trustees will be the point of contact for arising safeguarding concerns and all whistleblowing allegations (as and when needed).

Thrive at Five Pathfinder Sites

1. Local Designated Safeguarding Officer

Each Thrive at Five pathfinder site will have a Designated Safeguarding Officer (DSO), who is primarily responsible for safeguarding matters arising within the charity, within that particular pathfinder. The DSO will:

- Work in partnership with the DSL and Deputy DSL on all arising safeguarding matters within the pathfinder site
- Where appropriate make referrals to external bodies such as the local authority or the police
- Ensure staff are recruited in accordance with relevant HR policy, including (where required) DBS checks
- Ensure that safeguarding is part of every staff induction and inherent in ways of working

- Identify staff who are likely to come into contact with children or adults at risk as part of their role and assess the risk
- Ensure safeguarding training is delivered, and attended by all T@5 staff within the local pathfinder site
- Ensure that all staff in the pathfinder site are aware of how to report safeguarding concerns and to whom
- Ensure that all staff in the pathfinder site are aware of Thrive at Five's Whistleblowing policy and where to access support
- Ensure that all staff in the pathfinder site are aware that they must conduct themselves in a manner which safeguards and promotes the safeguarding practices at Thrive at Five
- Ensure all staff in the pathfinder site are provided with guidance about safeguarding concerns as required.

When Thrive at Five staff report a safeguarding issue or an incident that warrants partners attention it must be reported on the Safeguarding Report Form or the Incident Report Form. This should be shared with the DSL who will then ensure the National DSL is made aware. Once reported you must seek confirmation that it has been acted upon so that Thrive at Fives monitoring is compliant. Personal details will not be recorded.

2. Event Designated Safeguarding Person

For any events that are held locally for children and families, where Thrive at Five has a coordinating responsibility, there will be a named Thrive at Five Designated Safeguarding Person (DSP). This is likely to be the Designated Safeguarding Officer, although it might not be in all instances. The DSP will:

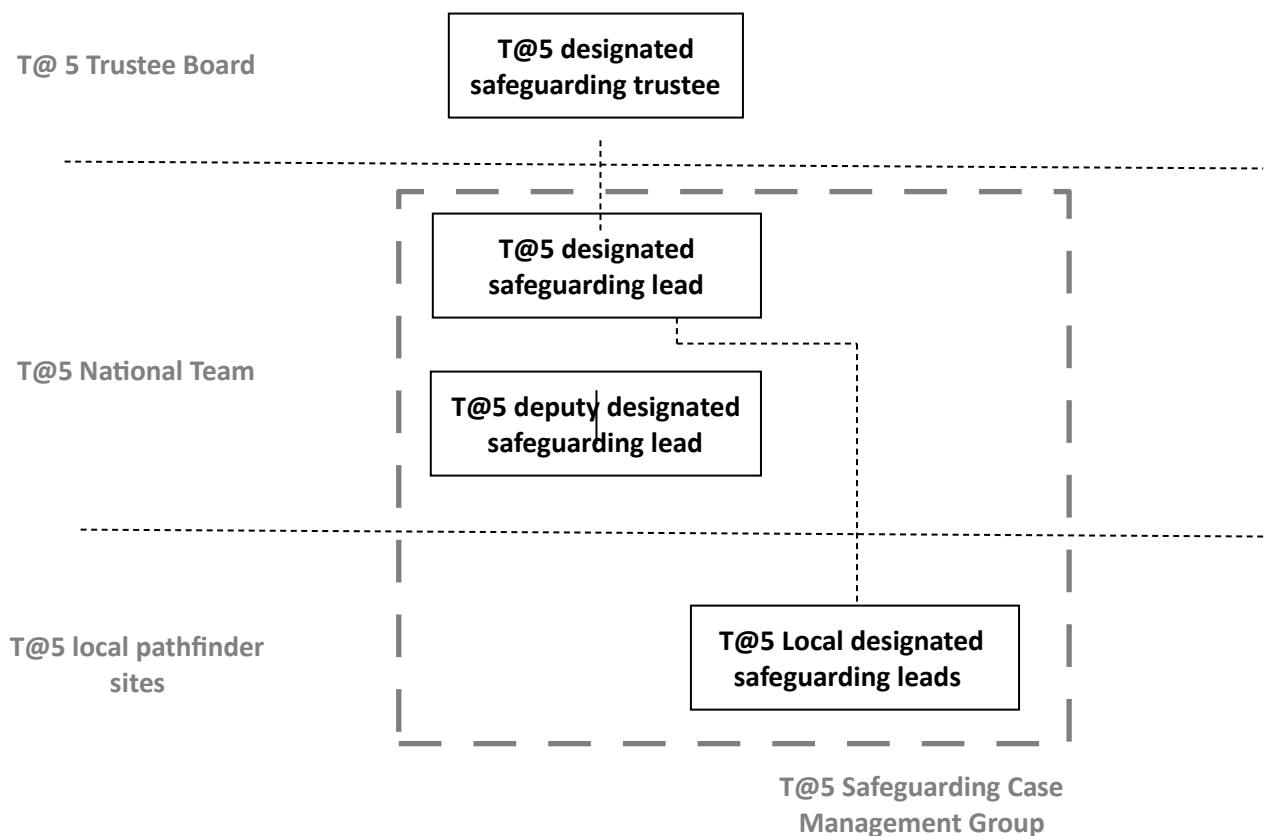
- Ensure partner organisations staff hold the relevant criminal record checks and up to date safeguarding training
- Assume overall safeguarding responsibilities at the event, ensuring all event staff are aware of Thrive at Five's safeguarding policy and procedures
- Respond to any arising safeguarding matters, and where appropriate, liaising with and/or making referrals to external bodies such as the local authority or the police
- Ensure that the DSL and/or Deputy DSL are kept updated with any arising safeguarding matters

4.2 Case Management Group

The DSL, Deputy DSL and relevant local safeguarding lead(s) from one or more Thrive at Five pathfinder sites will form Thrive at Five's Case Management Group.

This group is responsible for ensuring that all allegations, incidents, or referrals related to the safeguarding of children, young people and adults at risk are dealt with fairly and equitably within appropriate timescales. This includes criminal records disclosure (DBS) information being considered and decided on a consistent and equitable basis.

4.3 Safeguarding Governance Structure



5. RISK ASSESSMENT

Should this policy be ignored or disregarded, the possible outcomes are:

- For vulnerable adults/children at risk of abuse or neglect – placed at further risk of harm and neglect.
- For staff and volunteers – potentially subjected to inquiry, investigation internally or externally for failing to take appropriate steps, which may then lead to a disciplinary process.
- For the Designated Safeguarding Lead, the Chief Executive and Board of Trustees – possible inquiry and report from the Charity Commission and regulators or recommendation from local authorities to regulators.
- For Thrive at Five – possible risk of public scrutiny and ultimately risk of prosecution.

All of the above can lead to negative media attention and damage to the reputation of Thrive at Five. The public and organisations/individuals who fund Thrive at Five may lose confidence in Thrive at Five as an organisation resulting in failure to deliver our charitable objectives.

6. PROCEDURES

6.1 Safer recruitment

There are a number of Thrive at Five roles that would constitute 'regulated activity' as defined by the DBS and these individuals will be required to undertake an enhanced level criminal records check through the Disclosure and Barring Service. These include all the Thrive at Five safeguarding roles (National Designated Safeguarding Lead, Deputy Designated Safeguarding Leads and Designated Safeguarding Officers in any of Thrive at Five's pathfinder sites) and may in the future also include Thrive at Five's Community Champions (role title subject to change). This list is not intended to be exhaustive; further roles will be added as the organisation evolves.

In the future, where staff or volunteers work directly with children, vulnerable adults or young people, they must be checked by the Disclosure and Barring Service prior to their employment and hold a valid DBS certificate. Thrive at Five

will renew the certificate every 3 years. Contractors and external agencies must produce their own valid DBS certificates. Advice will be sought from the Disclosure and Barring Service to ensure recruitment in this area follows best practice.

6.2 Training

All staff will attend safeguarding training and will be provided with learning opportunities, guidance and supervision appropriate to their roles and responsibilities. They will be made aware of their responsibility to comply with current legislation and guidance and any new relevant legislation as it is implemented. Designated leads in safeguarding are expected to keep up to date and informed about any changes in this area.

Training will be refreshed every 3 years – or earlier where legislation or practices changes. Information regarding this training will be logged.

6.3 Responding to Concerns

If an individual shares a concern about someone's behaviours, attitudes or potential abuse with a member of staff, or an allegation is made against a member of Thrive at Five, they should contact the National Thrive at Five Designated Safeguarding Lead (DSL) or Deputy DSL without delay. Ideally the 'rule of two' should be followed wherever possible – in most situations it's best practice to have at least two staff members present when working/meeting with children and young people or adults from the community. Should this not be possible, one staff member should try and ensure that they are working with at least two children and young people or adult community members.

6.4 Responding to complaints and alleged or suspected incidents

Any and all complaints should always be investigated. Where there are concerns about potentially criminal activities, abuse or online communication, Thrive at Five will seek statutory agency guidance, if required, before instigating any internal investigation. Temporary suspension of a member of staff or volunteers is a neutral act (not indicating guilt or any judgement of the concerns shared) and may be necessary for the protection of all parties whilst clarification of concerns and/or investigation is

undertaken. All parties rightly need to have confidence that the complaint or allegation is being responded to in an appropriate and timely manner.

Equally, any employee who has an allegation raised against them requires confidence that Thrive at Five will act in a careful and measured way, protecting confidentiality appropriately and working in partnership with appropriate agencies for advice and support.

Complaints or cases of alleged or suspected incidents should be reported, verbally and in writing to the National Thrive at Five Designated Safeguarding Lead. If the National Designated Safeguarding Lead is not available or is the subject of the complaint, it should be made to Thrive at Five's Deputy Designated Safeguarding Lead or CEO.

6.5 How complaints are processed

Any complaint received should be jointly considered by the National Designated Safeguarding Lead and CEO, who are together responsible for taking appropriate action. Complaints must be considered through a safeguarding lens, prioritising the welfare of the person who's made the disclosure or allegation of harm. If a safeguarding issue is identified, then this should be the paramount consideration – the complaint process must be 'held' whilst the safeguarding process is being completed. If there are no safeguarding issues identified, then the disciplinary process should be followed. If the National Designated Safeguarding Lead and CEO are unable to agree on a course of action, the Designated Safeguarding Trustee is responsible for the supporting an agreed decision to be reached.

Thrive at Five is committed to reporting any incidents to the appropriate regulatory bodies including the UK Charity Commission and government departments or funding bodies, as required. Where there is evidence that criminal activity may have taken place, Thrive at Five will report to the relevant police and/or safeguarding authorities as appropriate.

Reports to the Charity Commission shall be made by the Chief executive in consultation with the board of trustees and Thrive at Five's Serious Incident Reporting policy.

If it is assessed that there is evidence of an incident, or the potential for imminent significant harm, appropriate action will be taken, where possible, on the day the Chief Executive officer receives the information concerning a reportable incident.

6.6 Internal Investigations

Thrive at Five have implemented a Whistleblowing Policy aimed at encouraging a culture of openness and accountability wherein staff are confident that they can raise any matter of genuine concern without fear of reprisal in the knowledge that they will be taken seriously and that matters will be investigated appropriately and regarded as confidential. Should staff need to, they can seek support around whistleblowing from the following organisations:

- Protect (speak up, stop harm) Whistleblowing Advice Line – 020 3117 2520
- NSPCC Whistleblowing Advice Line – 0808 800 5000

In the case of allegations made against employees of the Thrive at Five, there should be a full and timely investigation.

Any investigation should be alert to the fact that allegations relating to a failure or breach of safeguarding are both potentially serious criminal offences, but if unfounded such allegations can still carry a stigma and aftermath which could have a significant negative impact on an individual's personal and professional life. During any initial investigation the identity of both the accuser and the accused should only be disclosed to those who need to know about it and a high degree of sensitivity is required.

The investigation body will ordinarily be the National Thrive at Five Designated Safeguarding Lead and Designated Safeguarding Trustee. Any investigation should be completed as rapidly as possible, consistent with its effective conduct. The exception to this is in the case of potential criminal activity where the Police should be called in as a matter of routine.

6.7 Unsubstantiated and/or unfounded allegations

On very rare occasions, it is possible that an individual could raise an allegation(s) that upon investigation can be found to be unsubstantiated or unfounded.

If a report is found to be demonstrably false, this behaviour may be indicative of an underlying issue elsewhere which may require further investigation. In such circumstances this should in the first instance be reported to the Chief Executive who will consider whether a further referral should be made to another authoritative body such as the Police or the Social Services.

In the event that a report is found to be malicious or deliberately misleading, a decision will be made in consultation with the Designated Safeguarding Lead and Chief Executive as to whether this should be investigated through the Disciplinary Policy and Procedure or even reported to the Police.

If it is established that the allegations were unfounded or malicious, the Chief Executive will:

- Make it clear to those involved that the accused has been exonerated.
- Consider whether counselling for the accused and/or accuser is appropriate.
- Consider further steps to support the accused.

6.8 Substantiated allegations

Should an allegation be investigated and found to be true resulting in the person being dismissed by Thrive at Five, leaving via their own resignation or dismissal for a statutory safeguarding reason, then Thrive at Five has a legal obligation to make a referral to the appropriate bodies, including Disclosure and Barring Service (DBS) which was established under the Protection of Freedoms Act 2012. A resignation will not be accepted until after any disciplinary process is complete.

The National Thrive at Five Designated Safeguarding Lead has the duty to report this, including a full report of the investigations and process followed to reach this conclusion, within one month.

6.9 Management of Information

The Thrive at Five complies with the principles of GDPR and all current UK data protection legislation in the way it collects, holds and disposes of personal information.

7. POLICY REVIEW

This policy, its accompanying procedures and any supporting documents will be reviewed every year or sooner in response to any relevant learning from practice and concerns managed, changes in legislation and/or new government guidance.

Date: March 2023

Review date: June 2025

Reviewed by: Patrick Myers NSL and Merle Davis Safeguarding Trustee

Next Review Date: June 2026