

14 Internal Investigation Guide

How to conduct an internal safeguarding investigation — stages, principles and case management

Purpose and scope

Not every safeguarding concern requires a formal internal investigation. This guide tells you when one is appropriate, how to manage the four stages, what principles apply throughout, and what the possible outcomes are.

Read this guide alongside: I3 (Response Flow Charts) — which may trigger an investigation; I1 Part B (Case Log) — where all investigation decisions are documented; P2 (DSL Responsibilities) — for the DSL's role; F0 Section J (policy authority). Use this guide alongside, not instead of, specialist support for complex cases.

1. When NOT to Investigate Internally

IMPORTANT — read this section before deciding to investigate

There are situations where an internal investigation must not begin, or must not begin until you have consulted statutory authorities:

- **A CRIME MAY HAVE BEEN COMMITTED:** sexual assault, physical assault, trafficking, FGM, serious harassment. Refer to police and/or child protection services immediately. Take precautionary action. Cooperate with the statutory investigation. Do not investigate in parallel — this can compromise the statutory process.
- **A CHILD IS AT RISK OF SIGNIFICANT HARM:** refer to statutory child protection authorities in the country where the child is located. Do not investigate independently.
- **A STATUTORY INVESTIGATION IS ALREADY UNDERWAY:** contact your external safeguarding advisor for guidance on what your organisation can and cannot do while statutory authorities are acting.

The appropriate authority for these exceptions is the duty of care obligation under the legal framework in the relevant country, combined with the principle that statutory investigations must not be compromised by parallel processes. Consult your external safeguarding advisor if you are uncertain which situation applies.

In all three situations: precautionary action is still appropriate and must still happen.

2. The Four Stages of an Internal Investigation

Stage	
STAGE 1 CONCERN	The concern is received and logged in I1 Part B. DSL (with Alternate DSL or external backup) decides: is this an internal investigation, a statutory referral, or both? This is the triage decision. Document the decision and reasoning before acting.
STAGE 2	Information gathering. Conducted by the DSL, or in complex cases a small case team: DSL + Alternate



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ENQUIRY	DSL + (if available) external safeguarding advisor. Separately and privately: review all written records; speak with the person who raised the concern; speak with the person at risk; speak with relevant witnesses. Seek clarification on specific points. Do not ask anyone to repeat the full account from scratch. Document every conversation and its outcome in I1 Part B.
STAGE 3 REVIEW	The DSL and Alternate DSL review all the information gathered together. This is a mandatory dual review — the DSL must not act as sole reviewer at this stage. Where either the DSL or Alternate DSL has a conflict of interest, the review is conducted by the remaining DSL with an external safeguarding advisor. Apply the balance of probability standard: is it more likely than not that the concern is substantiated? Three possible findings: - SUBSTANTIATED: more likely than not to have occurred. Move to Stage 4. - UNSUBSTANTIATED: cannot be confirmed on the information available. Does not mean it did not happen. Document with full reasoning. The case remains on file. - MALICIOUS OR UNFOUNDED: clear evidence the concern was raised in bad faith. Document. Consider what action (if any) is appropriate.
STAGE 4 CLOSURE	Communicate the outcome within confidentiality limits. Take agreed action (disciplinary process, referral to regulatory body, no further action). Document the full decision and reasoning in I1 Part B. Feed learning into R0 (risk register) and P4 (training plan). See Section 4 for closure criteria.

3. Managing the Alleged Perpetrator

The alleged perpetrator has rights throughout the investigation process. These must be respected while also ensuring the safety of participants and the integrity of the process.

Stage	
Before Stage 2 (Enquiry)	In most cases, to know that a concern has been raised about them, at the point when precautionary action is communicated. Exceptions: if the police have asked for a delay; if informing them would put the person at risk in immediate danger; or if informing them immediately would compromise a statutory investigation. The DSL decides timing after consulting the Alternate DSL.



During Stage 2 (Enquiry)	To know the general nature of the concern (but not necessarily all the details). To be given an opportunity to respond to specific points if the DSL considers this appropriate. To be treated with dignity and as a person who is alleged — not proven — to have caused harm.
After Stage 3 (Review)	To be informed of the outcome. To be told what action is being taken and why, within the limits of confidentiality. To access the organisation's formal appeals or grievance process if they dispute the finding.

Misconduct Disclosure Scheme

When a concern involves a member of staff or volunteer, consider whether to check or contribute to the Misconduct Disclosure Scheme (misconduct-disclosure-scheme.org). This is a scheme that enables organisations to check whether a person being hired or deployed has previous safeguarding concerns recorded against them, and to contribute information about substantiated concerns. Participation is voluntary but strongly encouraged. See the scheme website for guidance.

4. Investigation Principles

Principle	
CONFIDENTIALITY	Information is shared only with those who need it to manage the investigation. Not in team meetings. Not with the alleged perpetrator before Stage 2 is appropriately advanced. Not with partners unless directly involved. Document every sharing decision.
RISK-BASED	At every stage, ask: are current protective measures sufficient? Has anything changed that requires additional precautionary action? The investigation does not pause protective measures.
VICTIM/SURVIVOR-CENTRED	The needs of the person at risk are the primary consideration throughout. They are kept informed within confidentiality limits. Their wishes about next steps are sought and respected wherever legally possible.
OBJECTIVE AND IMPARTIAL	If the DSL or Alternate DSL has a conflict of interest, they step back immediately. The remaining DSL leads, with an external safeguarding advisor where possible. Document the step-back.
TIMELY	Investigations should not be unnecessarily prolonged. Each stage has a working target: Stage 1 within 24 hours; Stage 2 within 5-10 working days (complex cases may take longer); Stage 3 within 5

	working days of completing Stage 2; Stage 4 within 5 working days of Stage 3.
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5. Case Closure

A case is formally closed when all of the following are true:

All agreed actions have been completed.

The person at risk has been informed of the outcome within confidentiality limits.

Where appropriate, the person at risk has confirmed they feel safe.

The closure decision and full reasoning are documented in I1 Part B.

Any required external reports (programme body, funder, regulatory authority) have been submitted.

Both the DSL and Alternate DSL have reviewed and agreed the closure. "No further action" is a closure decision — document it with the same rigour as any other outcome.

References

I1 Incident Form and Log. I2 Safeguarding Reporting System. I3 Response Flow Charts.
P2 DSL Responsibilities Guide.

F0 Safeguarding Policy Framework Sections J, K, L. O3 GDPR and Safeguarding Data Handling.

IASC Investigators' Manual (February 2025): interagencystandingcommittee.org

Misconduct Disclosure Scheme: misconduct-disclosure-scheme.org

Glossary of Key Terms (Safe Spaces) — for definitions of all bolded terms in this document.



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