



The Harrow Club

Safeguarding Policy

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Relevant Legislation

This Policy operates in accordance with the following legislative frameworks:

- [Education and Training \(Welfare of Children\) Act \(2021\)](#) ¹
- [Care Act \(2014\)](#) ²
- [Safeguarding Vulnerable Groups Act \(2006\)](#) ³
- Children's Act ([1989](#) ⁴ & [2004](#) ⁵)
- [Equality Act \(2010\)](#) ⁶

Relevant Guidance

This policy follows and works within guides:

- [Working Together to Safeguard Children \(2023\)](#) ⁷
- [Keeping Children Safe in Education \(2023\)](#) ⁸
- [Working together to safeguard children \(2023\)](#) ⁹
- [Child Focused Approach to Safeguarding \(2023\)](#) ¹⁰
- [Threshold Document: Continuum of Help and Support \(2023\)](#) ¹¹
- [National Youth Work Curriculum \(2020\)](#) ¹²
- [Local Safeguarding Children Partnership Arrangement \(2019\)](#) ¹³

Related Harrow Club Policies

In addition, the following policies also impact our approach to safeguarding.

- Safer Recruitment Policy
- DBS Policy
- Whistleblowing Policy
- Online Safety Policy
- Behaviour Management Policy
- Social Media Policy
- Code of Conduct
- General Data Protection Regulation (GDPR)
- Data Policy
- Privacy Policy

Copies are available on request by contacting info@harrowclub.org and are explained in staff inductions.

Relevant legislation

¹ <https://www.legislation.gov.uk/en/ukpga/2021/16/enacted>

² <https://www.legislation.gov.uk/ukpga/2014/23/contents/enacted>

³ <https://www.legislation.gov.uk/ukpga/2006/47/contents>

⁴ https://assets.publishing.service.gov.uk/media/60e6fb43d3b7f7f56896127e5/The_Children_Act_1989_guidance_and_regulations_Volume_2_care_planning_placement_and_case_review.pdf

⁵ <https://www.legislation.gov.uk/ukpga/2004/31/contents>

⁶ <https://www.gov.uk/guidance/equality-act-2010-guidance>

Relevant guidance

⁷ <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

⁸ <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

⁹ <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

¹⁰ https://www.londonsafeguardingchildrenprocedures.co.uk/child_focussed.html

¹¹ <https://www.londonsafeguardingchildrenprocedures.co.uk/thresholds.html>

¹² <https://s3.eu-west-1.amazonaws.com/assets.nya2.joltrouter.net/wp-content/uploads/20210414232918/5.3.1-0923-NYA-Youth-Work-Curriculum-DIGITAL1.pdf>

¹³ <https://www.rbkc.gov.uk/lscp/sites/default/files/atoms/files/LSCP>

1. Safeguarding at the Harrow Club

The purpose of this Policy is:

- to protect children and young people who receive the Harrow Club's services from harm; and
- to provide staff, contractors and volunteers, as well as children, young people and their families, with the overarching principles that guide our approach to safeguarding.

This policy applies to anyone working on behalf of the Club, including senior managers and the board of Trustees, paid staff, volunteers, sessional workers, agency staff and students.

We base our approach to our work on **Five Principles**:

a. Safety first

b. Change for good

c. Young person focused and guided

d. Fair use of resources

e. Transparency

This document is focused on the first principle; but supports the other four. There are three methods that we use to ensure that young people are safe :

1. Prevention and early intervention

We believe in effective planning and early engagement.

We do this through continuous training, running a traffic light system, alongside a near miss reporting model, and weekly reviews of all children we work with.

2. Act fast and effectively

We believe that when action is needed it should follow procedure and be swift.

We ensure this happens by having a dedicated team with their own reporting line and transparent communication methods.

3. Oversight and review

We believe that we should challenge ourselves to be better, and through regular reviews, reflections with outside agencies, end of case reviews, and red team events we can improve the safety of our children.

2. Introduction to the Policy

The Harrow Club believes that no child, young person, adult, or any other member of society, should ever be subjected to any form of Maltreatment (see definitions at Section 10).

Our commitment is reflected in the following objectives of this Policy:

1. Ensuring the protection and well-being of children, young people, and adults who engage with the Harrow Club.
2. Providing a transparent and easily understandable outline of our approach to safeguarding.
3. Adherence to relevant statutory obligations and guidelines.
4. Ensuring clarity in safeguarding responsibilities and providing guidance on reporting concerns related to children, young people, or adults.
5. The Harrow Club reserves the right to amend this policy at its discretion and in alignment with legislative changes and best practice approaches.

3. Scope of the Policy

This Policy applies to all employees, contractors, volunteers, Trustees, and any other external parties who, through their association with the Harrow Club, engage with children, young people, or adults. This Policy is to provide a framework to inform and guide practice, with the goal of ensuring the promotion of the welfare and protection of all our beneficiaries. The Policy applies across all our sites and to our activities outside our sites, and whenever we (our staff, contractors, and volunteers) interact with our beneficiaries.

The Harrow Club acknowledges the following principles from our Staff Handbook Code of Conduct:

1. The utmost priority is the welfare of every child, young person, and adult.
2. We cultivate a culture of respect, promoting positive interactions, advancing equality of opportunities, and upholding good relationships.
3. We strive to instil and maintain a culture of vigilance in our approach, continuously augmenting our knowledge and methods.
4. Irrespective of age, background, ability, culture, disability, gender, language, religious beliefs, or sexual identity, everyone has the right to protection against maltreatment.
5. All suspicions and allegations of maltreatment and/or improper conduct are treated seriously and handled swiftly and appropriately.
6. When there is a potential for maltreatment or neglect, it is the responsibility of all individuals to promptly report their concerns to the relevant authority, in accordance with the approaches outlined in this Policy.
7. Determining whether maltreatment has occurred is not the role of any individual working or volunteering at the Harrow Club. Rather, their responsibility lies in reporting concerns to the appropriate person.
8. We provide support to those who report concerns about maltreatment in good faith, conducting investigations and making referrals as necessary.
9. We are committed to employing all available measures to facilitate the best possible outcomes for every child, young person, or adult.
10. Safeguarding encompasses not only shielding individuals from deliberate harm and neglect, but also broader aspects of care, including administering first aid, supporting those with special educational needs and disabilities, ensuring online safety where needed and creating a safe and supportive environment, which enhances wellbeing.

4. Responsibilities

At the Harrow Club, we collectively share the responsibility of identifying children, young people, and adults who may require additional assistance or are undergoing, or at risk of enduring, maltreatment. This commitment is integral to our organisational ethos, as we foster a "culture of vigilance" across all stakeholders and the communities we engage with. As an extension of this culture, we analyse risks and concerns within a broader context to understand the potential social contexts from which our learners, including apprentices, originate.

Our objective is to integrate a safeguarding culture throughout the Harrow Club, by providing practical guidelines that align with the principles and objectives of this Policy. These guidelines are reinforced through e-Learning training, accessible to all employees, contractors, volunteers, and Trustees. This approach ensures that our methodology is robust and upholds the standards of best practice. Everyone is encouraged to prioritise the well-being of children, young individuals, and adults, seeking guidance from our local safeguarding officers whenever uncertainties arise in addressing a safeguarding matter.

The implementation of this policy is mandatory across all areas of our operations.

Specific responsibilities are outlined below:

Board of Trustees

The Board of Trustees at the Harrow Club is ultimately responsible for creating and overseeing the policies and procedures that guide the Club's activities.

Lead Safeguarding Trustee

A Trustee is assigned the role of Lead Safeguarding Trustee and leads a subcommittee consisting of at least two other Trustees. They are responsible for ensuring that the Harrow Club follows its established procedures and policies.

The current Lead Safeguarding Trustee is Chris Martin, chris@harrowclub.org.

Leadership Team

The Leadership Team of the Harrow Club has the main responsibility for effectively and wisely implementing our safeguarding Policy and in particular, responsible for ensuring:

- the resources available to support staff on safeguarding/child protection issues are adequate;
- that safeguarding implications are constantly reviewed across the scope of the work the Club delivers to young people, and are fully considered in the development of all new pieces of work;
- the continued development of the Club's approach to safeguarding, considering, and authorising, any immediate changes in operational policy required due to a safeguarding incident or a near miss; and
- safeguarding is considered in all appointments of staff (to include trustees, volunteers, freelance staff etc.). Training of staff is delivered as regularly as is necessary for their needs.

Head of Children and Families

The Head of Children and Families is a member of the Leadership Team and has been authorised by the Board of Trustees as the Designated Safeguarding Lead (DSL). They work to ensure that the policies and procedures align with our commitment to equality, diversity, and inclusion.

The Head of Children and Families is Mathilde Glossop, mathilde@harrowclub.org.

Safeguarding Officer

Designated Safeguarding Officers (DSOs) of the Harrow Club hold the responsibility of ensuring that the policies and procedures are adhered to within the projects and programmes. Every project or programme will have a Designated Safeguarding Officer (DSO).

Line Managers

All Line Managers at the Harrow Club are responsible for making sure that all employees, contractors, and volunteers understand and comply with this Policy. In particular:

- ensuring that staff, contractors, Trustees and volunteers are able to discuss safeguarding, child protection, and Maltreatment issues confidentially, and receive guidance and support on what to do should a potential situation arise;
- ensuring the Safeguarding Policy is fully implemented locally and that procedures to support the policy are set up as

outlined, complied with, and communicated;

- ensuring the referral of all safeguarding and child protection issues to the DSO. (This may be as simple as discussing a hypothetical issue to protect identities);
- ensuring all staff and volunteers are aware of their roles and responsibilities under this policy in their induction and ongoing training;
- ensuring staff and volunteers undertake appropriate and required induction and training in safeguarding/child protection, at the required level relevant to their role; and
- ensuring that following the Safer Recruitment Policy guidelines, all new and existing staff and volunteers have the required disclosure certificate (DBS) in place before commencing any work at the Club.

All Employees and Volunteers

Every person who serves as an employee, or volunteer, or contractor at the Harrow Club is expected to follow the established safeguarding policies and procedures of the Club. Every person plays an active role in promoting excellent safeguarding practices throughout the organisation.

5. Roles and Tasks

This section sets out the relevant roles and responsibilities for all members of our organisation.

All employees, contractors, and volunteers

All members of the Harrow Club community are expected to acquaint themselves with and adhere to this Policy and its accompanying procedures consistently.

Contractors and partners should adhere to the guidelines laid out in this policy. Adequate guidance and training will be provided before the commencement of a contract to ensure proper handling and recording of sensitive data inline with the Club's safeguarding GDPR policies.

Any concerns relating to the safety of a child, young person, or adult, must be confidentially shared as soon as possible with the DSL or a DSO. In case you have concerns regarding a child, young person, or adult, and suspect potential harm, it is important to confidentially share this concern with a DSO promptly, even for low-level concerns.

Prompt sharing of concerns is essential. If the local DSO and DSL is unavailable this should not delay necessary action, contact any DSO immediately. Shared information should always be accurate, up-to-date, and shared appropriately and securely, limited to those who require the information for the intended purpose. Completion of the mandatory Safeguarding training is required to enhance understanding of safeguarding issues.

For further information Safeguarding training, contact the Head of Training Emma Davis, emma.training@harrowclub.org

Contracted Workers and Visitors

The Harrow Club believes that contracted workers and visitors have the potential to enhance and enrich our educational programmes and various aspects of our operations by providing additional insights and perspectives across a spectrum of topics.

In alignment with this stance, the Club's policy mandates that contracted workers:

- adhere to the same sign-in protocols as other visitors;
- not be unaccompanied with learners, children, young people, or adults;
- have completed Level 1 Safeguarding Awareness; and
- report any concerns to the DSO or DSL and have a copy of this policy so that they can understand the correct processes.

Support and Administration

The Administration Team will provide assistance in alignment with the Club's safeguarding approach and action plans. This includes:

- identifying suitable training providers for safeguarding eLearning modules and in-person training;
- assisting with logistical aspects of safeguarding eLearning module deployment;
- providing ongoing support for eLearning completion reporting, including guidance on recording training and generating reports, reminders for renewals, etc;
- overseeing and regulating appropriate access to online resources for learners;
- establishing and maintaining robust online safeguarding measures;
- ensuring the suitability of security settings and provisions; and
- ensuring that all Harrow Club locations are well-suited for their intended purpose.

Line Managers

Uphold the Club's safer recruitment practices, as outlined in the Safer Recruitment Policy.

Support and ensure completion of the mandatory Safeguarding Training.

Ensure their direct reports engaged in regulated activities have read and understood the guidance found on page 3.

Promote the Harrow Club's culture of vigilance and lead by example ethos.

Board of Trustees and the Leadership Team

The Board of Trustees and the Leadership Team are responsible for understanding the nature of safeguarding risks and threats within the Harrow Club.

They ensure effective risk management and proper handling of safeguarding issues by:

- promoting an ethos that prioritises shared responsibility and well-being, upholding values of respect, equality, diversity, inclusion, and understanding;
- implementing transparent safeguarding practices that uphold, support, and safeguard individuals;
- sharing safeguarding information and good practices with external agencies and key stakeholders;
- providing training opportunities for continuous safeguarding knowledge updates among staff, self-employed contractors, volunteers, and the Board; and
- supporting effective staff, self-employed contractor, and volunteer management through supervision, support, and training.

Designated Safeguarding Lead (DSL) – Mathilde Glossop

The DSL is responsible for the Harrow Club's overall safeguarding approach. This position is held by the Head of Children and Families who sits on the Leadership Team and reports to the Board of Trustees on safeguarding issues.

The DSL will meet weekly with the DSO of each project and programme and regularly with our partners within the local authority safeguarding teams to ensure best practice.

They will organise and deliver a [Section 11](#)¹⁴ audit annually, working with an external provider to ensure oversight.

This role provides support, advice, and guidance to Trustees, board members, and staff on an ongoing basis, including specified Prevent (The Prevent programme supports people who are at risk of becoming involved with terrorism through radicalisation) issues when needed. Additional responsibilities include:

- ensuring compliance with legal and statutory requirements;
- conducting comprehensive assessments of safeguarding risks and effective management;
- ensuring proper incident handling through robust policies aligned with best practices and regulatory standards;
- conducting annual reviews of safeguarding policies;
- ensuring full implementation of safeguarding policies and procedures, extending to staff, contractors, volunteers, children, young people under 18, and adults;
- confirming completion of the safeguarding eLearning for all staff, self-employed contractors, and volunteers.
- collaborating with local safeguarding officers to review safeguarding strategies, action plans, and policies, reporting findings to the Board;
- ensuring clear communication and easy access to safeguarding policies and procedures;
- monitoring the effectiveness of safeguarding practices through regular reporting and oversight;
- providing comprehensive advice and training to enhance safeguarding responsibilities for staff, self-employed contractors, volunteers, and the Board;
- guiding proper response to incidents and reporting as required to relevant authorities;
- providing induction for new staff, contractors, and volunteers on the Club's safeguarding approach;
- updating the Lead Safeguarding Trustee on safeguarding issues for discussion of the Board;
- conducting thorough incident analysis, reporting regularly to the Board of Trustees, and conducting an annual in-depth review;
- supporting, supervising, and advising DSO facing severe safeguarding concerns;

¹⁴ Children's Act (2004) S11

- addressing allegations against staff, contractors, Trustees, or volunteers, referring to the Local Authority Designated Officer (LADO) when necessary;
- being aware of learners engaged with social or care workers; and
- ensuring that up to date contact details for the Designated Safeguarding Lead, Designated Safeguarding Officers and Lead Safeguarding Trustee can be found on the Club's intranet and on our website.

Designated Safeguarding Officers (DSOs)

DSOs support the Club's safeguarding approach at the engagement level. Every club, programme or project will have a DSO who reports to the DSL on all relevant safeguarding matters.

Where the DSL is not available or contactable, a DSO is appointed to fulfil that role by the Lead Safeguarding Trustee. These officers are responsible for safeguarding children, young people under the age of 18 years, and adults within their projects. They offer advice and support to staff, volunteers, and contractors, and are responsible for liaising with statutory children's services agencies and local safeguarding partners. Additional responsibilities include:

- managing safeguarding cases and issues within their project;
- referring and liaising with appropriate agencies regarding safeguarding concerns;
- managing referrals and communication with entities like the DBS or Police as required;
- ensuring comprehensive information accompanies referrals, provided in writing under confidential cover as promptly as possible (e.g., within one working day);
- maintaining thorough, accurate, and secure written records of safeguarding;
- ensuring that relevant information is readily available at the time of a referral, and that the referral is promptly confirmed in writing, maintaining confidentiality (e.g., within one working day).
- keeping comprehensive and accurate written records of safeguarding concerns, as appropriate (including a chronology of concerns, referrals, meetings, phone calls, or emails), which are documented on the child records. This encompasses any low-level concerns;
- recording incidents and actions on the membership system, regardless of their severity;
- maintaining connections with local safeguarding partners, referral agents, and families known to or collaborating with a social/social care worker;
- maintaining familiarity with local referral procedures and knowing how to establish links with the local authority or police;
- actively supporting the implementation of the Club's safeguarding approach and action plans;
- participating in all safeguarding committee meetings, whether in person or remotely, and following through on committed actions and other pertinent tasks;
- assisting the Designated Safeguarding Lead in creating reports and case studies;
- offering support, supervision, and advice to any staff member, contractor, volunteer, visitor, child, young person, or adult with a safeguarding concern;
- ensuring effective and consistent communication, as well as integration of safeguarding policies and practices within their respective project or programme;
- providing regular briefings and updates during staff meetings to keep all staff informed and regularly reminded of their responsibilities;
- ensuring that all members within their projects or programme have access to and understand the Club's safeguarding policy;
- ensuring that all staff, contractors, and volunteers are aware of how to raise concerns about vulnerable or at-risk individuals;
- confirming completion of the safeguarding eLearning for all staff, self-employed contractors, and volunteers;
- delivering regular face-to-face training for those engaged in regulated activities;
- participating in regular training and networking events related to safeguarding issues;
- effectively addressing any potential aftermath of an incident within the Club;
- maintaining awareness of vulnerable service users within their region/operation;
- encouraging a culture of listening to children and incorporating their perspectives and preferences into policies and practices;
- educating users, learners, parents, children, staff, and volunteers on how to report concerns and seek support and guidance; and

- read and understand the following:
 - [Working Together to Safeguard Children \(2023\)](#) ¹⁵
 - [Keeping Children Safe in Education \(2023\)](#) ¹⁶
 - [Working together to safeguard children \(2023\)](#) ¹⁷
 - [Child Focused Approach to Safeguarding \(2023\)](#) ¹⁸
 - [Threshold Document: Continuum of Help and Support \(2023\)](#) ¹⁹,
 - [National Youth Work Curriculum \(2020\)](#) ²⁰
 - [Local Safeguarding Children Partnership Arrangement \(2019\)](#) ²¹ :

A complete list of contact details for Designated Safeguarding Officers can be found on our [website](#) ²² and at each of our clubs.

¹⁵ <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

¹⁶ <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2> ,

¹⁷ <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2> ,

¹⁸ https://www.londonsafeguardingchildrenprocedures.co.uk/child_focussed.html

¹⁹ <https://www.londonsafeguardingchildrenprocedures.co.uk/thresholds.html>

²⁰ <https://s3.eu-west-1.amazonaws.com/assets.nya2.joltrouter.net/wp-content/uploads/20210414232918/5.3.1-0923-NYA-Youth-Work-Curriculum-DIGITAL1.pdf>

²¹ <https://www.rbkc.gov.uk/lscp/sites/default/files/atoms/files/LSCP>

²² <https://harrowclub.org/safeguarding/>

6. Training

The Harrow Club provides comprehensive training in safeguarding to all staff members, Trustees, volunteers, and contractors.

Support is offered to ensure that staff members are well-informed and confident in taking appropriate preventive and responsive measures. Timely and updated information, advice, and guidance will be accessible through briefings during staff meetings and training sessions.

Emphasis will be placed on training and support for correct reporting and response to harmful behaviours. This includes ensuring that all safeguarding personnel understand the guidance outlined in Section 5, 'Child-on-child sexual violence and sexual harassment,' of the 'Keeping Children Safe in Education' document on the Club's intranet.

Induction for all staff, contractors and volunteers will occur before working with young people, this will include training on all policies and a safeguarding induction on best practice which will contain an explanation and instruction of our safeguarding practice and our Code of Conduct.

Termly surveys will be conducted among the users and the users' carers to gather feedback on their sense of safety and understanding of reporting procedures. Responses will inform enhancements in guidance and practices.

e-Learning Modules

All individuals engaging with the Harrow Club, including Trustees, are required to successfully complete the mandatory annual safeguarding e-Learning modules. New staff members, volunteers, contractors will receive this training during their induction.

Individuals engaged in regulated activities will undertake enhanced e-Learning modules, while others will complete standard modules, ensuring the correct knowledge levels for each individual.

The Leadership Team are also obligated to complete the Safer Recruitment in Education e-Learning modules, with detailed procedures outlined in the Recruitment Policy and Disclosure and Barring Service Policy available on the Club's intranet.

Face to Face Training

In addition to e-Learning modules, individuals involved in regulated activities, especially those within Delivery and Training operations, and those working with children, young people, and adults at the Club, will undergo face-to-face training.

The Head of Training will administer update training tailored to specific teams, and these regular updates will complement face-to-face training.

7. Required Training Schedule

Role	Type of Safeguarding Training	Duration of Training Review
Head of Children and Families	Designated Safeguarding Lead Level 4	2 years
Designated Safeguarding Officers	Level 3	2 years
Lead Trustee Safeguarding	Level 3	2 years
Delivery Team	Level 2	2 years
Leadership Team	Safer Recruitment Training and Level 2, Meet the Lado Training	2 years
Supervisors of the DSL	Internal Level 3 DSL, and External level 4	2 years
Admin staff	Combined Safeguarding Children Awareness (Level 1 and 2)	2 years
Volunteers	Combined Safeguarding Children Awareness (Level 1)	2 years
Trustee Sub-committee members	Combined Safeguarding Children Awareness (Level 1 and 2)	2 years
Trustees	Safeguarding Training for Trustees' course and level 2	2 years
Partners	Level 1 Safeguarding Training	2 years
Contracted Workers	Level 1 Safeguarding Training	2 years

8. Online Social Media

The utilisation of technology has emerged as a significant factor in various safeguarding concerns. Technology can serve as a platform that enables harm, encompassing issues such as sexual exploitation of children, young people, and adults, radicalisation, predatory behaviour, and the promotion of prejudiced, homophobic, and extremist perspectives.

The Harrow Club is committed to imparting knowledge about online safety to children, young people, and adults involved with us. This commitment is demonstrated through the placement of awareness-raising posters in relevant areas and the integration of online safety considerations into a well-rounded and comprehensive curriculum whenever appropriate.

The Harrow Club is dedicated to taking reasonable measures to minimise children, young people, and adults' exposure to inappropriate content via the organisation's IT systems. This involves the implementation of suitable filters and monitoring mechanisms.

All learners and staff are required to be informed about the potential risks associated with online availability of extremist ideologies and to be vigilant regarding the possibility of radicalisation.

Efforts will be made to render such material inaccessible through appropriate filtering mechanisms. In cases where these measures are ineffective, any engagement with extremist websites or materials should be documented and reported. Subsequently, the DSL will initiate a conversation with the young person or staff member, followed by appropriate actions.

Given the rapid evolution of technology, the Harrow Club is committed to conducting ongoing assessments to ensure the currency and appropriateness of these systems.

For further details, please consult the Harrow Club's Online Safety Policy on the Club's intranet.

Mobiles

The use of mobile phones by members of the team is prohibited during any of the Club's programmes, unless permitted under specific operational guidelines for the management of a specific project or programme.

This rule is applicable to all staff, contractors, volunteers, and Trustees, except in cases of emergencies.

9. Extremism and Radicalisation

The Club has a zero tolerance policy with regards to Extremism and Radicalisation. This applies to third parties looking to sub-let the Club's premises.

Staff and volunteers should be vigilant of children vulnerable to radicalisation. Children can become exposed to extremist material and views associated with terrorist groups online. There is a risk that they will share this harmful content with their peers. You should also be vigilant to the risk of other staff members being vulnerable to radicalisation or staff members promoting extremist views to the children in your setting. This exposure may be through the sight of criminal acts that encourage or justify violence. It could also be through the distribution of inflammatory materials or information that:

- glorifies or incites terrorism;
- calls for the deaths of members of the British armed forces; and
- actively promote hatred towards other people or groups based on their belief, opinion or background.

If you have extremism-related concerns, contact your local authority's Prevent lead or designated officer at prevent3@rbkc.gov.uk. You can find more information on Prevent training at [Educate Against Hate](https://www.educateagainsthate.com/)²³ or contact the Club's Head of Training.

²³ <https://www.educateagainsthate.com/>

10. Dealing with a concern about a staff member

The Harrow Club has established procedures to handle any safeguarding concerns involving its staff members, which includes employees, contractors, volunteers, and Trustees.

Should a staff member, child or parent raise a safeguarding concern or if an allegation is made against another staff member (encompassing staff, contractors, volunteers, and Trustees) regarding potential harm to children or adults, the matter should immediately be referred to the DSL.

In instances where concerns or allegations involve a DSO or DSL, such cases should be reported to the Head of HR (Ed Simpson, ed@harrowclub.org) or the Lead Safeguarding Trustee (Chris Martin chris@harrowclub.org), following the guidelines outlined in the Club's Whistleblowing Policy.

In the event that the concerns or allegations pertain to Ed Simpson or Chris Martin, or if there exists a conflict of interest in reporting the matter to either of them, the matter should be directly reported to the designated officers of the local authority (LADOs). The contact information for the appropriate LADOs can be accessed on each local authority's respective website or found in the flow chart as a part of this document.

Initial Actions for Addressing Allegations or Concerns Regarding a Staff Member

You must:

- create a written account of the details, preferably using the direct words of the involved young people or adults. Include pertinent information such as the incident's time, date, location, individuals present, and the exact dialogue;
- sign and date the written account to establish a record; and
- swiftly notify the DSL about the matter. In case of their absence, or if they are the subject of the allegation, report to Ed Simpson, ed@harrowclub.org or LADO.

Remember, documenting precise details and promptly involving the appropriate senior personnel is crucial in handling such situations effectively.

11. What is Maltreatment?

Maltreatment is a word we use, while others might use abuse, and safeguarding describes the actions we take to ensure the safety and well-being of children, young people, apprentices, and adults in our care. Somebody may suffer from maltreatment or neglect by inflicting harm or by failing to act to prevent harm. Maltreatment can take place wholly online, or technology may be used to facilitate offline maltreatment. Children may be maltreated by one or more adults, or one or more children.

Physical

Actual or likely physical harm and/or failure to prevent physical injury (or suffering), including fabricated or induced illness (FII).

Sexual

Involves forcing or enticing a child, young person or adult to take part in sexual activities in person or virtually and not necessarily involving a high level of violence, whether or not they are aware of what is happening. Please see [NSPCC guidance](#)²⁴ for more information.

Emotional

Persistent emotional maltreatment of a child, young person or adult which may cause severe and adverse effects on the child's emotional development.

Bullying and Harassment

Bullying and harassment is behaviour that makes someone feel intimidated or offended. Bullying and harassment can happen face-to-face, online, by email or by phone. Harassment is against the law when unwanted behaviour relates to a protected characteristic included but not limited to age, sex, disability, race, religion or belief, gender identity or sexual orientation.

Neglect

Persistent failure to meet a child's, young person or adult's basic physical and/or psychological needs, likely to result in the serious impairment of the child's mental and physical health or development. It may also include neglect of, or unresponsiveness to, a child's, young person or adult's basic emotional needs.

Harm

The ill treatment or impairment of health or development, including impairment suffered from seeing or hearing the ill-treatment of another.

Child Sexual Exploitation and Child Criminal Exploitation

Child sexual exploitation is a form of child sexual maltreatment. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity:

- (a) in exchange for something the victim needs or wants, and/or
- (b) for the financial advantage or increased status of the perpetrator or facilitator.

Sexually exploitation occurs even if the sexual activity appears consensual. Children and young people are often tricked into believing they're in a loving and consensual relationship so the sexual activity may appear consensual. This is called [grooming](#)²⁵ and is a type of Maltreatment. They may trust their abuser and not understand that they're being maltreated. Child sexual exploitation does not always involve physical contact, it can also occur through the use of technology. Like all forms of child sex Maltreatment, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year-olds who can legally consent to have sex.
- can still be maltreatment even if the sexual activity appears consensual.
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity.
- can take place in person or via technology, or a combination of both.
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence

²⁴ <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/child-%2520sexual-abuse/>

²⁵ <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/grooming/>

or threats of violence.

- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media); and
- can be perpetrated by individuals or groups, and children or adults, regardless of gender identity. The maltreatment can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised maltreatment; and is typified by some form of power imbalance in favour of those perpetrating the maltreatment.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Sexual violence and Maltreatment

Sexual violence and Maltreatment is where any behaviour thought to be of a sexual nature is unwanted and takes place without consent. Sexual violence and Maltreatment can be physical, psychological, verbal or online. Any behaviour of a sexual nature that causes distress is considered sexual violence or Maltreatment. Sexual Violence is physical sexual acts without the consent of the other person or when the other person is unable to give consent and can appear to be consensual especially a situation where sexual exploitation is suspected.

Harmful Sexual Behaviour

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive, and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. The term "harmful sexual behaviour" (HSB) is used to describe this. HSB can occur online and/or face-to-face and can also occur simultaneously between the two.

Domestic Maltreatment

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or Maltreatment between those aged 16 or over who are, or have been, intimate partners, family members, or part of shared households, regardless of gender or sexuality. The Maltreatment can encompass, but is not limited to:

- psychological
- physical
- sexual
- financial
- emotional

Exposure to domestic Maltreatment and/or violence can have a serious, long lasting emotional and psychological impact on children and adults affected. In some cases, a child or adult may blame themselves for the Maltreatment or may have had to leave the family home as a result. Domestic Maltreatment affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Child on Child Maltreatment

Children can Maltreatment other children, young people, and adults. This is generally referred to as child-on-child Maltreatment and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical Maltreatment such as hitting, kicking, shaking, biting, hair pulling, upskirting or otherwise causing physical harm, sexting, and initiating/hazing type violence and rituals.

Serious Violent Crime

Unexplained gifts/new possessions can indicate that children, young people or adults have been approached by/ become involved with individuals associated with criminal networks/gangs. Other potential signs could be increased absence from school/ college, a change in friendship/ relationships with others/groups, a significant decline in performance, signs of self-harm/a significant change in wellbeing or signs of assault/unexplained injuries.

Cuckooing

Cuckooing is a practice where people take over a person's home and use the property to facilitate criminal activity and/or exploitation. There are different types of cuckooing:

- using the property to deal, store or take drugs;
- using the property for sex work;

- taking over the property as a place for them to live; and
- taking over the property to financially Maltreatment the tenant.

The most common form of cuckooing is where a drug dealer or gang takes over a person's home through intimidation and use it to store or distribute drugs.

County Lines

County Lines is a term used to describe gangs and organized criminal networks involved in exporting illegal drugs into one or more importing areas within the UK. A common feature in county lines drug supply is the exploitation of young and vulnerable people. The dealers will frequently target children and adults – often with mental health or addiction problems – to act as drug runners or move cash so they can stay under the radar of law enforcement. County Lines operations are most often involved with moving drugs or services from within urban areas to non-urban areas.

Sexual Consent

Sexual Consent (Consent) is an agreement between participants to engage in sexual activity. Consent should be clearly and freely communicated. A verbal and affirmative expression of consent can help both partners to understand and respect each other's boundaries. It should happen every time for every type of activity. Consenting to one activity, one time, does not mean someone gives consent for other activities or for the same activity on other occasions.

- Consent cannot be given by individuals who are underage, intoxicated, incapacitated by drugs or alcohol, asleep, or unconscious. If someone gives consent under pressure of intimidation or threats, consent has not been given and the activity should be considered as non-consensual.
- Consent must be freely given, therefore if there is an unequal power imbalance between two parties, such as between a manager and a direct report, a teacher and student etc. it is not possible for consent to be given and should be considered as non-consensual.

Female Genital Mutilation

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child Maltreatment with long-lasting harmful consequences. There is a statutory duty to report to the police where FGM is a possibility and appears to have been carried out on a girl under 18 (either through disclosure by the victim or visual evidence). Please call 999 as soon as possible. Here is a useful [NHS guidance](#).²⁶

So-called 'Honour-Based' Violence

So-called 'honour-based' violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as [breast ironing](#)²⁷. Maltreatment committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are Maltreatment (regardless of the motivation) and should be handled and escalated as such.

Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical, financial, or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children and young adults from forced marriage. It is important to note that since February 2023 that marriage is illegal for anyone under 18 even with parental consent.

Online Maltreatment

Online Maltreatment is any type of Maltreatment that happens on the internet in any form. This includes but is not limited to malicious activity relating to text messages and messaging apps, social media, emails online chats, online gaming, and live streaming sites. It can happen across any device that's connected to the web, like computers, tablets, and mobile phones. Children, young people, and adults can be at risk of online Maltreatment from people they know or from strangers. It might be part of other Maltreatment which is taking place offline, like bullying or grooming. However, the Maltreatment might only be limited to online Maltreatment. Children, young people and adults may experience different types of online

²⁶ <https://www.england.nhs.uk/north/wp-%2520content/uploads/sites/5/2016/01/fgm-hp-guide.pdf>

²⁷ <https://www.met.police.uk/advice/advice-and-information/caa/child-abuse/breast-ironing-flattening/>

Maltreatment such as; cyberbullying, emotional Maltreatment, grooming, sexting, sexual Maltreatment, and sexual exploitation or several of the above concurrently. Maltreatment can occur in a family, institutional or community setting by someone they know, or more rarely, by a stranger.

Reference Documents and Additional Guidance Resources

[Government advice on Safeguarding Children](#) ²⁸

[Safeguarding and protecting people for charities and trustees](#) ²⁹

[Government Factsheet on the Care Act \(incl. Safeguarding Adults\) Care Act 2014](#)

³⁰

Guidance on Collecting Information from Young People and Service Users to Aid in Reporting Safeguarding Concerns

The following points serve as a helpful framework for facilitating the reporting of safeguarding concerns. Rather than acting as an exhaustive list, this should serve as a reference, as in some circumstances we may need additional information for making referrals to external agencies, such as Social Services.

- Provide contextual details regarding the alleged incident.
- Specify the date and time of the incident.
- Indicate the frequency of the incident, particularly for recurring-incidents such as self-harm which may occur over time.
- Describe the location where the incident occurred.
- Explain the circumstances or background leading up to the incident.
- Note any individuals present during the incident, including other young people and service users who may have witnessed it.
- Assess whether others might be at risk of harm, such as younger siblings.
- Include any other pertinent information you believe should be mentioned.
- Inquire about any prior support the individual has received, either at Harrow Club or at school or from another agency. This might encompass mentoring, GP visits, CAMHS consultations, victim support, counselling (e.g., CAN or general counselling), etc. please include details even if they are unrelated to the current concern.
- Document any steps that have already been taken, including referrals made, consultations sought for guidance, and any communication with an external service provider i.e. the Police, Council, school etc.

This comprehensive information-gathering process will help ensure that safeguarding concerns are properly addressed and reported, with the ultimate aim of promoting the safety and well-being of our young people and service users.

Please use this online form [here](#) or the one found at the end of this policy.

Guidelines for Harrow Club Staff Handling Disclosures of Maltreatment or Safeguarding Concerns

DO!:

- Promptly listen attentively to the person.
- If there is an immediate risk, contact the DSL and the Police.
- If the allegation is made against a Staff Member contact the DSL immediately.
- If the allegation is made against the DSL contact Ed Simpson ed@harrowclub.org immediately.
- Use the flowchart provided to guide you through the process.
- Offer reassurance and acknowledge their courage in speaking out.
- Ensure the person is comfortable and secure in a private setting.
- Take their account seriously and provide practical assistance if needed.
- Clarify that your duty is to follow Harrow Club's safeguarding procedure to ensure their safety and support. Inform them that the information will only be shared with the DSO or DSL.
- Explain the subsequent steps that will be taken after consulting the designated person.

²⁸ https://assets.publishing.service.gov.uk/media/65803fe31c0c2a000d18cf40/Working_together_to_safeguard_children_2023_-_statutory_guidance.pdf

²⁹ <https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>

³⁰ <https://www.gov.uk/government/publications/care-act-2014-part-1-factsheets/care-act-factsheets>

- Promptly refer the matter to the designated person.
- Accurately document the disclosure details using the provided online form here or the one found at that end of this document.
- Record the time, location, date.

DO NOT!:

- Promise confidentiality or secrecy.
- Display shock or distress, even if the disclosed information is distressing.
- Physically touch or comfort the person.
- Probe excessively about the alleged Maltreatment, only seek necessary clarification.
- Provide false assurances to console the person.
- Arrange for the person to return home.
- Engage the police or local authority without involving the DSL unless there is an immediate risk.

It is crucial to promptly report concerns or disclosures to the DSO or DSL without any delay. This helps minimise risks to service users and other individuals. In cases where Maltreatment or safeguarding concerns are suspected but not directly disclosed by the service user, staff should still report their concerns to the DSO or DSL.

Remember to discuss with the DSL or DSO if you require any support throughout this process.

12. Safeguarding Procedures

When	Action	Notes
Concern	A concern is flagged to or by a DSO, the DSL will within one working day make a decision on what actions need to be taken, they will consult with the DSOs and the wider staff team as required. Every concern will have a lesson learnt and preventive review and reflected during technical supervision sessions	It is everyone's duty to ensure that the young people in our care are safe, the DSOs are tasked with supporting the young people and staff in this matter. The DSL and DSOs will implement any changes recommended from the lesson learnt.
Activity / Event	The DSOs will before any activity review all notes and cases that are relevant to the young people who are with them. Afterwards they will make any notes needed for the weekly meeting with the DSL.	Each young person will have a page in the membership system which will include notes on them, that include, open cases, near misses and other issues. This will be only accessible by DSOs and the DSL.
Weekly	At the weekly meeting the DSOs and DSL will meet to review all near misses, reflect on ongoing cases, training options and concerns arising.	We will be using a traffic light system with Amber being the default.
Quarterly	Working with RBKC officers we will reflect on the policy, our procedures, and cases.	We will be working with RBKC to develop an effective partnership system of oversight
Quarterly	The DSL will present to the Trustee Sub Committee a report on the ongoing cases and reflect on lesson to be learned for prevention in the future.	The Committee will review training records, open cases, and any issues arising.
Annually	We will complete a section 11 audit working with an external safeguarding partner. This will be shared with the Trustees and RBKC.	This will be led by a Trustee working with DSL and DSOs.
Annually	We will invite a selection of partners to 'red team' our policies and procedures so that we can rewrite the policy in line with best practice.	We will actively seek to test and improve in our safeguarding policies and procedures. This will be led by an appointed member of the Leadership Team.

13. Working with Parents and Carers

When working with parents and carers we follow the four principles from the NSPCC, they are:

- **Effective** partnership and the importance of building strong, positive, trusting and co-operative relationships;
- **Respectful**, non-blaming, clear and inclusive verbal and non-verbal communication that is adapted to the needs of parents and carers;
- **Empowering** parents and carers to participate in decision making by equipping them with information, keeping them updated and directing them to further resources; and
- **Involving** parents and carers in the design of processes and services that affect them.

In practice this means:

1. Think about the Child's needs at all times, and ensure that their voice is heard and listened to.
2. The child is a part of a family, and we need to see the Child's needs as a part of the family needs.
3. We engage with family since they are part of the Child.
4. The family are part of solution and need to help design the solution.
5. We follow the principles above and ensure that the child is safe.

Considering family needs in the context of early help

- Assessments for early help should consider how the needs of different family members impact each other. This includes needs relating to education, mental and physical health, financial stability, housing, substance use and crime.
- Specific needs should be considered such as disabilities, those whose first language isn't English, fathers or male carers, and parents who identify as LGBTQIA+.
- Early help services may focus on improving family functioning and developing the family's capacity to establish positive routines and solve problems.

Safeguarding incident or concern: If there is immediate safety concern for a child call 999.

This form is designed to report any safeguarding incidents or concerns. It should be completed by the worker who has been disclosed to, who witnessed the incident, was most directly involved or who provided first aid if relevant. Once completed it must be submitted as per the organisation's reporting protocols.

**REFERENCE
NUMBER**

Name & role of person completing this form:	
Programme name:	Date form is completed:

Details of child, young person or adult at risk:

Name:	Address:
Contact number:	Gender:
Date of birth:	Our relationship with them:

Medical or additional needs information: le ADHD,	
Which services know the young person: Chamms, Care System, School, other youth clubs etc.	
The strengths and interests of the young person	

Parents/carers details:

Name:	Address:
Contact number:	Email address:
Have parents/carers been notified of the incident?: Yes / No , if no why ?	If yes, please provide details:

Any siblings? Names and relationship if known	Any other information that would be useful;
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Details of reporter:

Are you reporting your own concerns or responding to concerns raised by someone else?	Reporting my own concerns	•
	Responding to someone else's concerns	•
If responding to someone else's concerns, please provide their details below:		
Name:		
Relationship to child, young person or adult at risk:		
Email address:		
Contact number:		

Incident Details:

Date/ Time:	Group name (if applicable):
Location of incident:	
Description of the incident or concern: <i>(Include relevant information such as what happened and how it happened, description of any injuries sustained, behaviour witnessed and whether the information provided is being recorded as fact, opinion or hearsay)</i>	
Details of any previous concerns, incidents or relevant safeguarding records:	
Child, young person or adult at risk account of the incident or concern: <i>(use their own words)</i>	
Witness account of incident or concern: <i>(include further accounts on separate sheets as necessary. Include reference number on each accompanying account)</i>	

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Details of any witnesses:

<p>Name(s): <i>(Consider anonymising where this will not negatively impact the ability to take immediate response actions)</i></p>	<p>Relationship to child, young person or adult at risk:</p>	<p>Contact details:</p>
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Details of any persons involved in the incident or alleged to have caused the incident, injury or presenting risk:

<p>Name(s): <i>(Consider anonymising where this will not negatively impact the ability to take immediate response actions)</i></p>	<p>Relationship to child, young person or adult at risk:</p>	<p>Contact details:</p>
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Outcome of incident & immediate actions taken: (tick box where relevant)

<ul style="list-style-type: none">• Ambulance required? Y/N• Name of hospital / medical facility attended if applicable: • Police/fire/rescue services attended? Y/N <p>Notes:</p>	<p>First aid treatment provided: and by whom</p>	<p>Medication given:</p>
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Any resulting change of plans or disruption to the programme, if applicable:	Disciplinary procedures enacted:	Were any immediate changes to risk management procedures made?
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Signed By Author:	Name:	Date:
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Reporting to the Designated Safeguarding Lead (DSL) section: (to be completed by DSL)

Date & time DSL notified of incident/concern:
Date & time this form passed on to DSL (if different from above):
DSL comments: <i>(actions taken / impact on rest of programme / external agency involvement / initial lessons learned / follow-up actions required):</i>

External agency referral: (tick box where relevant)

• Social services notified	• LADO notified	• Other referral made
Date & time of referral:	Date & time of referral:	Agency:
Name of contact person:	Name of contact person:	Date & time of referral:
Contact number / email:	Contact number / email:	Name of contact person:
Agreed action or advice given:	Agreed action or advice given:	Contact number / email:
		Agreed action or advice given:

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Signed By DSL:	Name:	Date:
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For Office Use Only:

Follow-up action required:		
Action:	Due date:	Whom responsible:

Safeguarding Management



Responsible

Trustee Lead
C.Martin

Review and Oversight

Trustee Sub committee
L.Guyton, T.Moy
M.Watkins

Annual External Review

RBKC, contract reporting and an annual section 11 report for each Council

Designated Safeguarding Lead

Head of Children and Families (DSL)
M.Glossop

Designated Safeguarding Officers

Deputy Team Leader A
E.Campbell

Deputy Team Leader B
C.Mensah

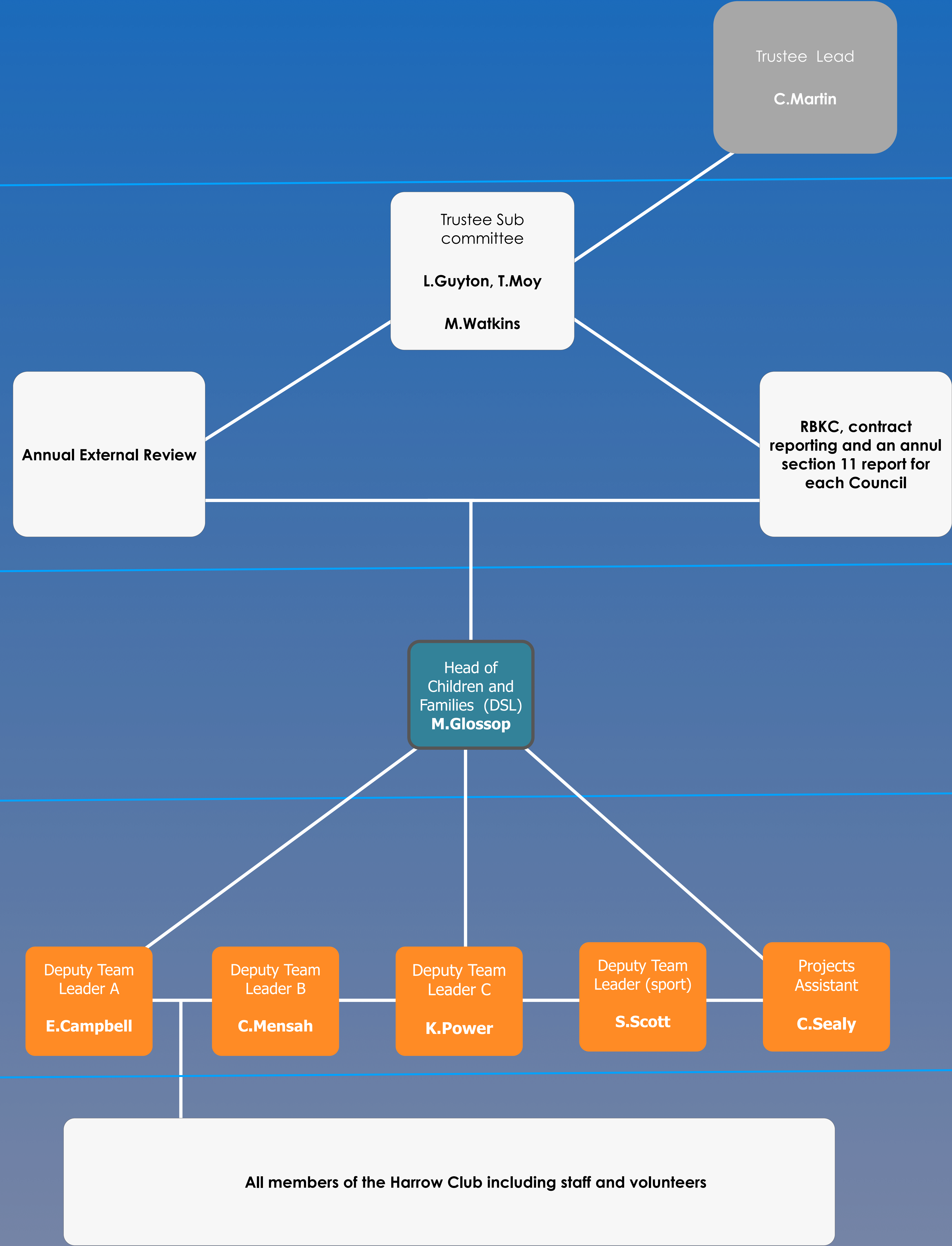
Deputy Team Leader C
K.Power

Deputy Team Leader (sport)
S.Scott

Projects Assistant
C.Sealy

Everyone

All members of the Harrow Club including staff and volunteers



Flowchart of procedures for responding to safeguarding concerns

