

Safeguarding and Child Protection Policy



DSLs

FLO: Sam Williams

FLO: Sarah Harvey

Chair of Trustees: Mark Jenkins

At a glance

This policy sets out Harry's Rainbow's approach to safeguarding and child protection, including the principles, responsibilities and reporting procedures that help keep children and young adults safe.

Who this policy applies to

This policy applies to all staff, trustees and volunteers at Harry's Rainbow, including anyone employed by the charity, contracted to work for the charity, volunteering for the charity or acting on its behalf.

Policy status

This policy is owned by the Board of Trustees and CEO. It is non-contractual and may be updated at any time to reflect changes in legislation, safeguarding guidance or organisational practice. The policy will be reviewed annually. All colleagues are responsible for keeping up to date with policy changes.

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Overview

This policy explains Harry's Rainbow's safeguarding and child protection responsibilities, the standards expected of staff, trustees and volunteers, and the steps to take when a safeguarding concern, allegation or disclosure is raised.

Safeguarding is everybody's business. At Harry's Rainbow, we are ambassadors for the charity and live by our values of integrity, dedication and compassion. Our mission is to give bereaved children a

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brighter tomorrow. Staff, volunteers, trustees and families all have a duty of care to safeguard and promote the welfare of the children and young adults we support. Vigilance is central to how we meet that duty.

Safeguarding and promoting the welfare of children is defined as:

- Protecting children from maltreatment
- Preventing impairment of children's health or development
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

If a child or young person is at immediate risk of harm, contact emergency services on 999. If there is a safeguarding concern but no immediate danger, record the concern and report it to the DSL as soon as possible, following the process set out in this policy.

Although Harry's Rainbow is not subject to the statutory Keeping Children Safe in Education framework, we use it as a useful reference point. Everyone involved with Harry's Rainbow beneficiaries should read the annual updates. The 2026 Part One guidance is available here: [Keeping children safe in education 2026: Part one](#).

Policy Purpose

The purpose of this policy is to set out Harry's Rainbow's approach to safeguarding. It applies to everyone working for, volunteering for or acting on behalf of Harry's Rainbow. It explains the safeguarding principles, policies, procedures, roles and responsibilities that help everyone understand what to do to safeguard children and young adults, and who to contact for advice.

Our Approach to Safeguarding

Safeguarding is at the heart of all we do and is informed by law, governance and charity values, behaviours and structures. Amendments to the policy will be reactive to any changes in law.

Safeguarding children is the action we take to promote the welfare and wellbeing of children and protect them from harm.

Child protection is part of safeguarding. It focuses on the action taken to protect individual children who are suffering, or are likely to suffer, significant harm. For the purposes of this policy, a child is anyone from pre-birth to age 18, and a young adult is anyone aged 18 to 25.

Safeguarding Principles

Harry's Rainbow safeguarding principles are informed by the UN Convention on the Rights of the Child, relevant legislation and guidance, and by our understanding of best practice.

Principle 1 All children have a right to protection from harm and abuse, regardless of age, ability,

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gender, racial heritage, religious beliefs, sexual orientation, identity or additional vulnerabilities.

Principle 2 The best interests of the child are paramount in all considerations about their welfare and protection, including when to maintain confidentiality and when to share information about them.

Principle 3 Children have a right to participate in decisions about their lives. Their views, wishes, feelings and experiences are evident in our work with them.

Principle 4 Working together with children, their parents, carers and other agencies is essential to promoting children's welfare and wellbeing and ensuring their protection. In some limited circumstances, it will not be appropriate to engage with parents and carers to protect the child.

Principle 5: When working with other professionals, we expect them to act on safeguarding concerns. Where necessary, we will escalate concerns until we are satisfied that appropriate action has been taken to protect the child.

Scope

Safeguarding comprises:

Safe recruitment: We apply a fair and consistent approach to the recruitment of staff and volunteers. Harry's Rainbow is committed to safeguarding children and adults at risk. We have robust recruitment procedures, including DBS checks, to minimise the risk of engaging any staff member, trustee or volunteer who may pose a risk to children.

Policies: We have a robust induction programme for staff, trustees and volunteers, and all are required to undertake TES safeguarding training every two years with an annual refresher, or earlier if legislation changes.

Procedures: All staff, trustees and volunteers must understand and follow our safeguarding procedures. Concerns should be reported to the DSL or, where appropriate, directly to MASH. Early help and MARF forms are now online only and can be accessed through the MASH link.

Actively managing safeguarding risk: Risk assessments are completed to actively manage risks. Working within a multi-agency approach, we escalate concerns as necessary to be satisfied that the child or vulnerable adult has been protected.

[Safeguarding adults and children | Milton Keynes City Council \(milton-keynes.gov.uk\)](https://milton-keynes.gov.uk/safeguarding-adults-and-children)

Roles and Responsibilities

Family Liaison Officers: oversee Harry's Rainbow's safeguarding and child protection policies and procedures, ensure they are reviewed and updated in line with the agreed schedule, and ensure that

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new staff, trustees and volunteers receive appropriate safeguarding induction and training. They are also the point of contact for allegations against staff.

DSL: take responsibility for reporting safeguarding disclosures to the appropriate body and maintaining records in line with this policy and agreed retention periods. The DSL must inform the Beneficiary Lead and CEO of any open safeguarding cases. The DSL is also the point of contact for allegations against volunteers.

Trustees: the Board of Trustees is responsible for monitoring the safeguarding and child protection policy and procedures, remaining aware of any open cases, and providing support to the DSL, Beneficiary Lead and CEO.

Chair of Trustees: point of contact for allegations against the CEO.

Staff, trustees and volunteers: safeguarding is everybody's responsibility. Record disclosures as set out in this policy and report them to the DSL.

Parents and young adults: be aware of the safeguarding and child protection policy and report any concerns to a Harry's Rainbow staff member or volunteer.

Types of Abuse

Harry's Rainbow expects all staff, trustees and volunteers to familiarise themselves with types of abuse through TES safeguarding training and the NSPCC website, Child abuse and neglect | NSPCC Learning. These include:

Emotional	Bullying
Physical	Peer on Peer
Sexual	Sexting
Domestic	Child trafficking and modern slavery
Neglect	FGM
Online	Child sexual exploitation
Protection from grooming - Prevent	Protection from county lines

What is Intra-familial Harm

Intra-familial harm refers to harm caused by someone within a child's family or household, or by someone the child regards as family and who holds a position of trust or authority over them. This can include relationships connected by blood, adoption, fostering, marriage or living together as partners.

- Likely to start at a younger age
- Can be hidden from other family members
- Continues over multiple years

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- Child is less likely to disclose
- Child is less likely to be believed by family members
- High levels of secrecy, shame and humiliation
- Female perpetrators not always identified
- Cultural perceptions.

What is Extra-familial Harm

Extra-familial abuse is linked to contextual safeguarding or complex safeguarding. It refers to harm that occurs outside a child's family system, often during adolescence when social networks widen. These networks can influence a young person's understanding of social norms. Because exploitation can take place in public spaces such as parks, stairwells and high streets, safeguarding responses may need to focus on the places and peer groups around the child, rather than only on the child and their family.

- More prevalent in older children
- Parent/child relationship impacted
- Child believed they are in real relationship
- Teenage Domestic abuse
- Physical aggression to parent common
- Parents often blame themselves
- Missing incidents
- Unexplained belongings
 - Threats to family from perpetrators
- Used to recruit others
- Online and face to face linked
- Professionals attitude may see child as the problem not the abuse

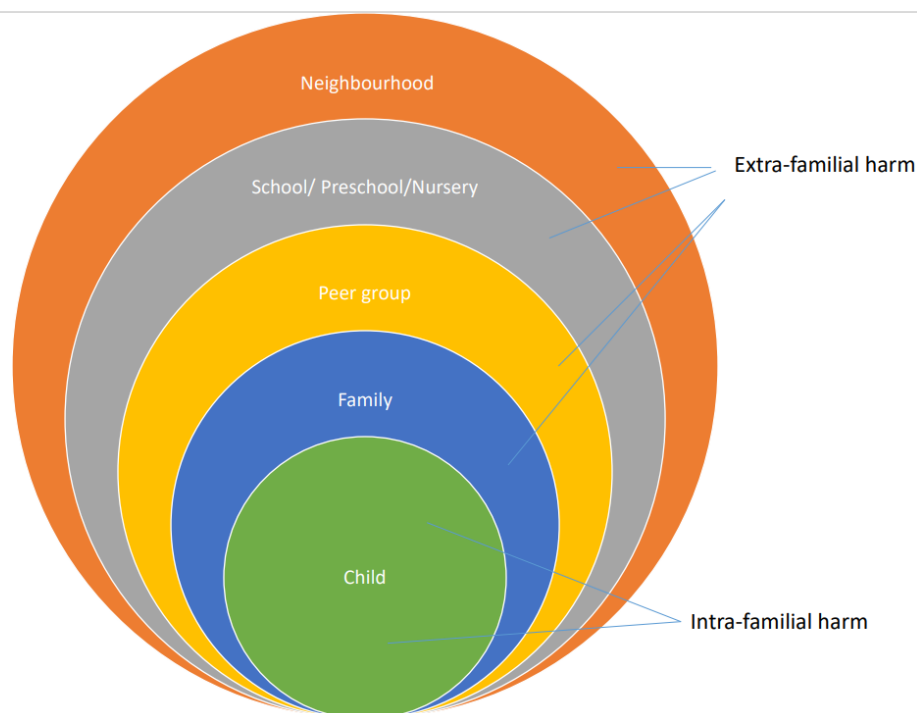
Contextual or complex safeguarding

Children may be vulnerable to abuse or exploitation outside their families. Extra-familial threats may arise in schools or other educational settings, within peer groups, in the wider community or online. These threats can take a variety of different forms and children can be vulnerable to multiple threats, including:

- exploitation by criminal gangs
- organised crime groups such as county lines;
- trafficking,
- online abuse;
- sexual exploitation
- influences of extremism leading to radicalisation considered

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All staff, volunteers and trustees must make themselves aware of FGM (female genital mutilation) and CSE (child sexual exploitation).

FGM

Female genital mutilation (FGM), sometimes referred to as cutting or closed, is a collective term for procedures involving the partial or total removal of external female genitalia for cultural or other non-therapeutic reasons. In the UK, FGM is considered child abuse and is illegal. It is illegal to carry out FGM, assist FGM to take place, take a child abroad for FGM, or allow a girl to carry out FGM on herself.

NSPCC HELPLINE 0800 028 3550

Mental Health

At Harry's Rainbow, we remain vigilant in supporting beneficiary mental health. We use questionnaires, conversations and observations to help identify when families may need signposting to mental health support through our preferred list of therapists. The NSPCC also provides resources connected to safeguarding children and young people:

[NSPCC Resources](#) | [NSPCC Learning](#)

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Responding to allegations/disclosures



How disclosure happens

Children and young people may disclose abuse in a variety of ways, including:

- **directly** – making specific verbal statements about what's happened to them
- **indirectly** – making ambiguous verbal statements which suggest something is wrong
- **behaviourally** – displaying behaviour that signals something is wrong (this may or may not be deliberate)
- **non-verbally** – writing letters, drawing pictures or trying to communicate in other ways.

There are six rules for responding to allegations and disclosures. The NSPCC poster below can help staff, trustees and volunteers remember them.

1. Listen only
2. Don't ask leading questions – stick to facts
3. Paraphrase back 'what I heard is
4. Record the exact words, time, location, who was involved in the conversation, your name and position IMMEDIATELY after the disclosure.
5. Keep the record confidential and pass to the DSL, Beneficiary Lead, CEO or Trustees as appropriate.
6. If you feel the child may be in immediate danger, call the MASH team on **01908 253169 or 253170 for advice**

DSL/Beneficiary Lead: after receiving a record of a disclosure, call the MASH team for advice before holding any further discussions.

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A **safeguarding resource** to help you show children and young people that, whatever they want to share, you're ready to listen.
There are three simple directions to remember...

- **Show you care, help them open up**
 Give them your full attention and keep your body language open and encouraging. Be compassionate, be understanding and reassure them their feelings are important. Phrases like "you've shown such courage today" help.
- **Take your time, slow down**
 Respect pauses and don't interrupt them – let them go at their own pace. Recognise and respond to their body language. And remember that it may take several conversations for them to share what's happened to them.
- **Show you understand, reflect back**
 Make it clear you're interested in what they're telling you. Reflect back what they've said to check your understanding – and use their language to show it's their experience.




Disclosure made to:

1.	Volunteer - listen – record – pass to DSL
2.	Parent – listen – record – pass to DSL
3.	Staff member – listen – record – pass to DSL
4.	DSL – listen – record – call MASH team and inform Beneficiary Lead
5.	Beneficiary Lead – listen – record – pass to MASH team and inform DSL/ keep CEO, Trustees up to date
6.	Visitor – report to staff member

DSL – date of training
Deputy DSL - Sam Williams – Nov 6 th 2024
Deputy DSL - Sarah Page – Sept 12 th 2024

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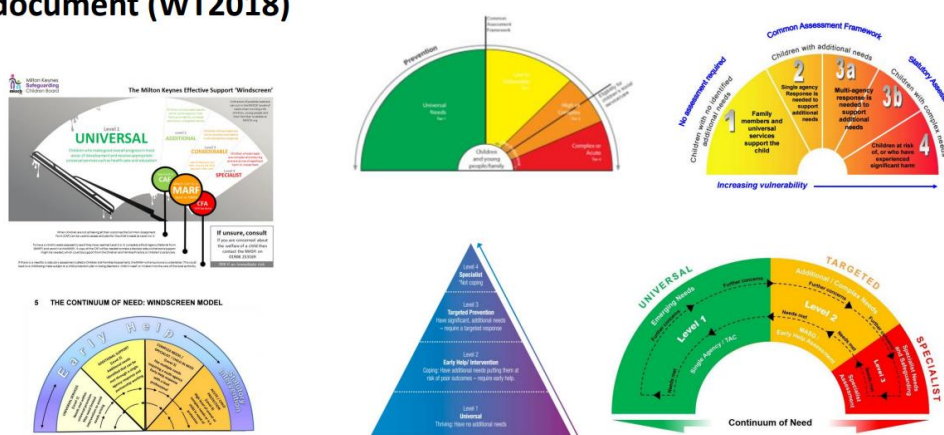
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DSL – MUST contact the education establishment and speak to the DSL to ascertain if a safeguarding file is already open. Take advice from the education establishment and refer up accordingly.

MASH: the MASH team may be known by different names in different counties. The DSL must contact the safeguarding team in the county where the child or young person lives. Search for the relevant local safeguarding hub to find the correct contact details. Each MASH team uses its own threshold guidance or level-of-concern framework.

Thresholds – All local authorities are required to have a threshold document (WT2018)



Record Keeping

Recordings of disclosures/allegations must be on the safeguarding record template.

All safeguarding records must be kept in the designated safeguarding folder, in a secure location known only to the DSL, Beneficiary Lead and CEO. Paper records must be stored in a locked cabinet. Records must be retained in line with the record retention policy.

Once a safeguarding record has been created, it must be triaged using the form in the appendices. The triage outcome must record one of the following:

- No further action
- Manage support internally
- Early help assessment (CAF)
- Refer to statutory services
- Educational establishment contacted

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This policy must be read alongside the following documents:

- Record and retention policy
- Whistleblowing
- Rainbow Group Policy
- Safeguarding record template
- Safer recruitment policy
- GDPR

The following TES training must be completed alongside this policy:

Training	Who?
Child Protection	Volunteer/DSL/Trustees/employee
Safeguarding Adults	Volunteer/DSL/Trustees/employee
Trafficking and modern slavery	Volunteer/DSL/Trustees/employee
Safer recruitment	Trustee/employee
Prevent	Volunteer/DSL/Trustees/employee

Resources

[Worried about a child? \(nspcc.org.uk\)](https://nspcc.org.uk)

[Safeguarding children and child protection | NSPCC Learning](#)

[Home | mk-together \(mktogether.co.uk\)](https://mktogether.co.uk)

[september 2023 all The Role of the Designated Safeguarding Lead MK .pdf](#)

NHS Safeguarding APP - [NHS Safeguarding Guide – Apps on Google Play](#)

Appendices

Triage

Name	
No further action	
Manage support internally	
Early help assessment complete (CAF)	
Refer to statutory services	
Educational establishment contacted	

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