



Harlequins Foundation Recording Concerns and Information Sharing Policy

1. Our Aim for this Policy.

The Harlequins Foundation believe it is the right of all children to be free from all forms of abuse or neglect and they have the right to enjoy sport in a safe environment. As such, The Harlequins Foundation acknowledges its responsibilities and is committed to protecting the welfare and safety of all children that engage with our organisation.

As a result, we are committed to keeping up-to-date and accurate records of all safeguarding concerns related to the children, young people and adults who participate in our programmes. This is to ensure:

- We can identify concerns at an early stage.
- We can identify patterns of concern.
- We can record seemingly minor issues to build a more complete picture of what a person may be experiencing.
- We can monitor and manage our safeguarding practices, including decision making, actions taken and agreed joint strategies with other agencies.
- We can build an evidence base to support any actions taken both within our organisation and when working with external agencies.
- We can demonstrate any action taken to reduce impact of harm.
- We have continuity when staff or volunteers change or are unavailable.

2. Types of Records.

For each concern we will have three types of records, all of which will be password protected and accessible via the shared drive to the following members of staff only:

- Head of Foundation.
- Nominated Child Protection Lead.
- Deputy Child Protection Lead.

The types of records will be:

The Harlequins Foundation Incident Report Form – This is a simple form used to report the concern by the initial member of staff or volunteer who has raised the concern in the first instance. This form includes basic information such as who is making the report, when it was made and what the concern is. As per our reporting procedure this is reported via email to the Nominated Safeguarding Lead via the member of staff or volunteers immediate line manager.

Safeguarding Case File – This will serve as the primary record of the concern and will include any decisions made, actions taken or relevant information to the concern. This will include:

- The name of the Nominated Safeguarding Lead.
- The date the concern was received.
- A record of who is aware of the concern.
- Any actions taken in relation to the concern.

- A rationale or narrative for decision making.
- A record of all referrals to external agencies.
- A record of any information that has been shared.

Safeguarding Concerns Log – Separate from case files the concerns log will act as a tool to track all safeguarding concerns reported. As a top-level overview of concerns the concerns log will give a quick guide to outstanding cases and actions. This will also serve as a reporting tool internally and externally and enable us to track the types of concerns and identify any trends.

3. Record Management.

Data protection principles underpin our management of records relating to child protection or safeguarding concerns. As a result, we will:

- Ensure records are adequate, relevant and not excessive for the purpose(s) for which they are held.
- Ensure our records are accurate and up to date.
- Ensure we only keep records for as long as necessary.
- Ensure the appropriate staff are aware as to why we are keeping records.
- Regularly assess how long the records need to be kept on file for.
- Have a plan in place for the appropriate destruction of records.

As per the Information and Record Management Society (2016) guidance we will keep files relating to child protection concerns until the child is 25 (seven years after reaching schools leavers age).

4. Concerns About Adult Conduct.

We will ensure that we also keep a record of concerns raised about our staff and/or volunteers that work with children and young people. In particular if they have:

- Behaved in a way that has harmed, or may have harmed, a child
- Committed a criminal offence against, or related to, a child
- Behaved in a way that indicated they are unsuitable to work with children and young people.

These records will include:

- What the allegations were
- How the allegations were followed up
- How things were resolved
- Any action taken
- Decisions reached about the person's suitability to work with children and young people.

These records will be kept in the persons confidential personnel file.

If concerns are raised about an adults conduct around children and young people as per the Information and Record Management Society (2016) guidance, we will keep a record in their personnel file until they reach the age of 65 or for 10 years, whichever is longer. This will be the case regardless of if they still work or volunteer at The Foundation. If, however, the allegation is ultimately found to have been malicious it will be destroyed immediately.

5. Destruction of Child Protection Records

When the retention period is finished, confidential records will be incinerated or shredded in the

presence our Head of Foundation or entrusted to a 3rd party specialising in the destruction of confidential material. At the same time, any electronic versions or records will be purged.

If The Foundation ceases to exist, we will make arrangements for the ongoing management of records. This includes their review, retention and disposal.

6. Information Sharing.

The Harlequins Foundation recognise that safeguarding involves sensitive information that directly affects the welfare and safety of children and young people. In order to keep children and young people safe, this information will at times need to be shared. Reasons for sharing this information might include:

- Concerns about a child being received from either within or outside of The Foundation
- Concerns about a person in a position of trust, such as a volunteer – this could include information on a Disclosure & Barring Service (DBS) check.
- Concerns about a member of our programmes.

Critical to any decision making about the decision of who to share information with. This may include:

- **Statutory organisations** – The Police and/or Children’s Services must be informed about child protection concerns; Designated Officers should be consulted where there are concerns about someone in a position of trust.
- **Disclosure & Barring Service** – Must be informed of any concerns about someone in regulated activity who is suspended or expelled from the organisation.
- **Other clubs and other sports organisations** – Informing other organisations need to be considered according to the principles below in order that they can safeguard children in their care who may be at risk of harm.
- **Individuals within the organisation** – This will be decided on the basis of who needs to know what information in order to keep children safe according to the principles below.

In the event of needing to share information, The Foundation will always apply, ‘The Seven Golden Rules of Information Sharing’ outlined in ‘Information Sharing – Advice for Practitioners’ (2018), which are:

- Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
- Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
- Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
- Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal

information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.

- Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
- Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and upto-date, is shared in a timely fashion, and is shared securely (see principles).
- Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

7. Dates and Review:

This policy came into force on 01/03/2021

We are committed to reviewing this policy and practices annually.

This policy was last reviewed on 01/03/2021

Signed:



Name: Marc Leckie

Position: Head of Foundation

Date: 01/03/2021