

The Spearhead Foundation  
Unit K, North Stage  
72 Broadway  
Salford Quays  
M50 2UW

## **Safeguarding Policy for The Spearhead Foundation based in Greater Manchester**

### **1. Purpose**

The Spearhead Foundation is committed to safeguarding and promoting the welfare of all children, young people, and vulnerable adults. This policy outlines the measures we take to protect those we work with from harm, in line with the statutory guidance of the United Kingdom, particularly Working Together to Safeguard Children (2018), Keeping Children Safe in Education (2023), and other relevant local and national legislation.

### **2. Scope**

This policy applies to all staff, volunteers, trustees, and anyone working on behalf of The Spearhead Foundation. It is essential that everyone understands their responsibilities to safeguard children, young people, and vulnerable adults.

### **3. Definitions**

- Child: Anyone under the age of 18.
- Young Person: A person aged 16 to 18.
- Vulnerable Adult: Someone aged 18 or over who, due to factors such as mental health issues, learning disabilities, or physical impairments, is unable to protect themselves from harm.

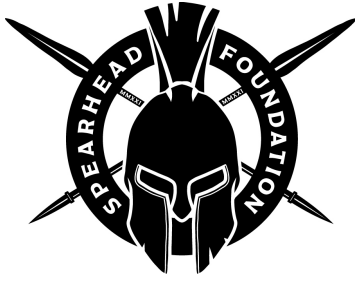
### **4. Legal Framework**

This policy is guided by the following UK legislation and guidelines:

- Children Act 1989 and 2004
- Safeguarding Vulnerable Groups Act 2006
- Care Act 2014
- Working Together to Safeguard Children (2018)
- Keeping Children Safe in Education (2023)
- The Data Protection Act 2018 and UK GDPR
- Prevent Duty (Counter-Terrorism and Security Act 2015)

### **5. Key Principles**

- Zero Tolerance: The Spearhead Foundation has a zero-tolerance approach to abuse, neglect, and exploitation.
- Best Interests: The safety and well-being of children, young people, and vulnerable adults are paramount.
- Empowerment: We will empower those we work with by ensuring they are fully aware of their rights to protection and how to report concerns.
- Accountability: Everyone in the organisation has a role to play in safeguarding, with clear lines of responsibility and reporting.



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## 6. Roles and Responsibilities

- Trustees: Ensure that safeguarding policies and procedures are in place and reviewed regularly. Trustees also have overall accountability for safeguarding practices.
- Staff and Volunteers: Must follow safeguarding procedures, complete relevant training, and report concerns.
- Designated Safeguarding Lead (DSL): The Foundation's main safeguarding point of contact is [trustees@thespearheadfoundation.com](mailto:trustees@thespearheadfoundation.com). The DSL is responsible for addressing all safeguarding concerns, ensuring that appropriate action is taken in line with this policy, and liaising with external safeguarding agencies where necessary.

## 7. Safer Recruitment

We will follow safer recruitment practices by:

- Conducting DBS (Disclosure and Barring Service) checks on all staff, trustees, and volunteers.
- Requesting references for all positions involving work with children, young people, and vulnerable adults.
- Ensuring all new staff and volunteers undergo appropriate safeguarding induction and training.

## 8. Training

All staff, volunteers, and trustees will receive appropriate safeguarding training annually. This training will cover:

- Identifying signs of abuse, neglect, or exploitation.
- Understanding the procedures for reporting safeguarding concerns.
- Awareness of specific safeguarding issues such as radicalisation, child sexual exploitation, domestic abuse, and mental health.

## 9. Recognising Abuse and Neglect

Abuse can be physical, emotional, sexual, or neglect. Key indicators of abuse or neglect include:

- Unexplained injuries or changes in behaviour.
- Withdrawal or fearfulness around certain individuals.
- Sudden decline in health, mental state, or development.

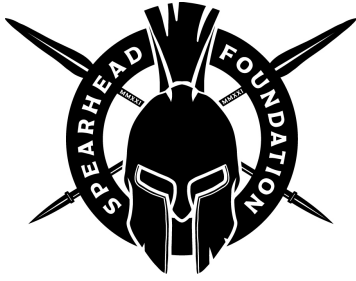
Staff and volunteers should remain vigilant for any signs that a child, young person, or vulnerable adult is experiencing abuse or neglect.

## 10. Reporting Concerns

Any staff member, volunteer, or trustee who suspects abuse or has concerns about the safety or well-being of a child, young person, or vulnerable adult must:

1. Report the concern immediately to the Designated Safeguarding Lead (DSL) at [trustees@thespearheadfoundation.com](mailto:trustees@thespearheadfoundation.com).
2. If immediate harm is suspected, contact the local safeguarding board or the police.

All reports will be treated confidentially and only shared with appropriate individuals or agencies when necessary to protect the individual at risk.



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### **11. Responding to Allegations Against Staff or Volunteers**

If an allegation is made against a staff member, volunteer, or trustee, the following procedures must be followed:

1. The DSL will be notified immediately.
2. A full investigation will be carried out, following advice from the Local Authority Designated Officer (LADO).
3. The individual against whom the allegation is made may be suspended during the investigation to ensure the safety of the alleged victim.
4. If necessary, external agencies such as the police or social services will be involved.

### **12. Confidentiality and Information Sharing**

We will ensure that all safeguarding concerns are handled confidentially. Information will be shared on a need-to-know basis in line with the Data Protection Act 2018 and UK GDPR. Any decisions to share information will be made in the best interests of the individual involved and with regard to their safety and well-being.

### **13. Whistleblowing**

All staff, volunteers, and trustees have a duty to report any concerns about malpractice or wrongdoing, including safeguarding concerns. The Spearhead Foundation encourages open reporting and ensures that whistleblowers will be protected from victimisation. Concerns can be reported to the DSL or an independent authority, such as the NSPCC Whistleblowing Advice Line (0800 028 0285).

### **14. Prevent Duty**

In line with the Counter-Terrorism and Security Act 2015, we recognise our responsibility to safeguard individuals from being drawn into terrorism. Staff and volunteers will receive Prevent training and any concerns related to radicalisation will be reported to the DSL and appropriate authorities.

### **15. Review of Policy**

This policy will be reviewed annually by the trustees to ensure it reflects any changes in legislation or local safeguarding procedures. Any changes will be communicated to all staff, volunteers, and stakeholders.

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For further information or to report any safeguarding concerns, please contact the Designated Safeguarding Lead (DSL) at:

[trustees@thespearheadfoundation.com](mailto:trustees@thespearheadfoundation.com)



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## The Spearhead Foundation Financial Policy

**1. Introduction** The Spearhead Foundation (hereafter referred to as "the Foundation") is committed to ensuring that its financial management is conducted in accordance with best practices and in compliance with UK charity laws, including the Charities Act 2011. This policy outlines the key financial controls, responsibilities, and processes to ensure transparency, accountability, and proper stewardship of the Foundation's resources.

### 2. General Principles

- The Foundation operates on a non-profit basis, ensuring that all funds received are used to further its charitable objectives.
- No individual involved in the Foundation shall receive a salary, dividends, or any form of personal financial gain from the Foundation's funds. This is in line with the Foundation's charitable status under UK law.
- All financial transactions, records, and statements shall be transparent and available for review by the trustees, donors, and other authorised parties.

**3. Bank Transactions** To safeguard the Foundation's funds, the following rules apply to all bank transactions:

- **Transactions Over £250:** Any bank transaction exceeding £250 must be authorised by at least two signatories from the list of approved signatories. These signatories must be trustees or authorised individuals appointed by the Board of Trustees. No one signatory should approve a transaction independently over this threshold to ensure proper oversight.
- The list of approved signatories will be reviewed and updated annually by the Board of Trustees, ensuring that it remains up to date and that all signatories are trusted individuals with the Foundation's best interests in mind.

### 4. Salary and Dividends

- The Foundation operates on a strictly voluntary basis, and no trustee, employee, volunteer, or any other individual involved with the Foundation will receive a salary, wages, or any form of dividend from the Foundation's funds.
- Reasonable expenses incurred while carrying out duties on behalf of the Foundation may be reimbursed (see Section 5), but there will be no personal profit from the Foundation's activities.



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## 5. Expenses Policy

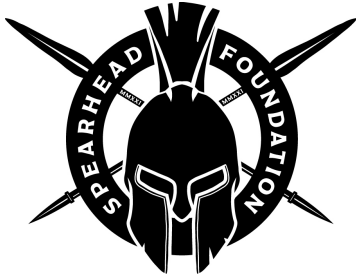
- **Eligibility:** Any trustee, volunteer, or authorised individual may claim reasonable expenses that have been directly incurred while performing tasks on behalf of the Foundation. Examples of eligible expenses include travel costs, office supplies, or other costs related to the Foundation's operations.
- **Claims Process:**
  - Expenses must be claimed within **30 days** of the expense being incurred. Claims made outside this timeframe may not be reimbursed, unless exceptional circumstances are approved by the Board of Trustees.
  - All claims must be accompanied by valid receipts and any other relevant supporting documentation. In cases where receipts are unavailable, written explanations and approval by at least two trustees will be required.
  - Expense claims must be submitted to the Treasurer, who will review them for accuracy and ensure they align with the Foundation's policies.
- **Affordability:** Expense claims will only be reimbursed if the Foundation has sufficient funds to do so without impacting its ability to achieve its charitable objectives. The Treasurer, in consultation with the Board of Trustees, will assess whether the Foundation can afford the claims.
- Any disputes regarding expense claims will be reviewed by the Board of Trustees, whose decision will be final.

## 6. Financial Reporting and Record Keeping

- The Foundation shall maintain accurate and up-to-date financial records in line with UK charity law. These records shall include all income, expenditures, and transactions.
- Annual accounts shall be prepared and made available to the Charity Commission, donors, and other stakeholders as required by law.
- The Foundation's financial records shall be subject to an annual independent examination or audit in accordance with Charity Commission guidelines, based on the size and income level of the Foundation.

## 7. Accountability and Governance

- The Treasurer is responsible for the day-to-day financial management of the Foundation, including the maintenance of accurate financial records and ensuring compliance with this policy.
- The Board of Trustees is responsible for overseeing the financial operations and ensuring that the Foundation's resources are used exclusively for its charitable purposes.
- All trustees will receive periodic financial updates and have the opportunity to review the financial status of the Foundation at trustee meetings.



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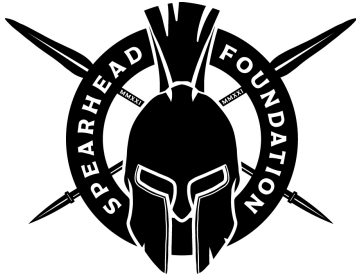
**8. Review of the Financial Policy** This Financial Policy shall be reviewed annually by the Board of Trustees to ensure it remains fit for purpose and compliant with any changes in charity law or the Foundation's operating environment. Amendments to this policy can only be made with the approval of the Board of Trustees.

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**Policy Approval** This policy was approved by the Board of Trustees on 5<sup>th</sup> June 2024 It shall take effect immediately and remain in force until further notice.

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This policy ensures compliance with the Charity Commission's guidelines and aligns with the expectations for transparent and ethical financial management for charitable organisations in the UK.



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### **Voting and Trustee/Management Structure:**

The Spearhead Foundation operates a strict voting policy to ensure no decision is made alone, or without the best interest of the organisation and those we support.

EG- If (A) wants to organise an event he needs (B), (C), (D) to say yes for it to go ahead, if you (D) say no said event could go ahead but if (C) and (D) say no then the event can't go ahead.

This system is in place for all decisions and payments/purchases/bank transfers. Those with voting rights are only members of the board.

The board currently consists of the following members:

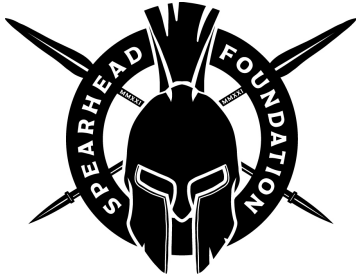
Craig Monaghan  
Jason New  
Eric Cooper  
Dennis Sumner  
Rodney Lewis  
Guinevere Lewis  
Curtis McMullen  
Alexander Halliwell

The founder of the foundation is Craig Monaghan. He doesn't have majority voting rights. His voting right is 1 of 7.

Craig Monaghan does own, the trademark, domain name and logo rights along with assets within the organisation.

The motorsport founder of the foundation is Jason New, He doesn't have majority voting rights. His voting right is 1 of 7. Jason owns the motorsport and its assets.

The Spearhead Foundation currently in 2024 has 14 volunteers including the board members.



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### **Asset list and leases:**

The Spearhead Foundation currently holds leases in two areas.

- I. The Spearhead HQ aka Unit K in Salford Quays
- II. The Spearhead Motorsport/Drift Inability in Woodford.

The total value combined of all leases per month/annually is: £3,500.00/£42,000.00

Broken down these leases are inclusive of VAT and are as follows:

- I. £25,000pa
- II. £17,000pa

### **Asset Register:**

Not owned but responsible for the maintenance is:

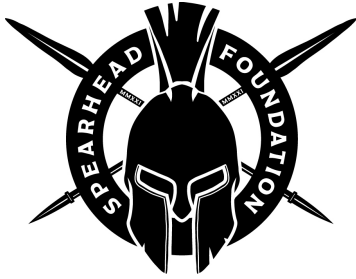
- Black Cab Taxi - £1,250.00
- Vauxhall Vivaro - £3,225.00
- Four Black Sofas - £400.00
- One Black Sofa Bed - £150.00
- Street Fighter Game - £120.00
- Marvel V Comicon Game - £300.00
- Foosball Table - £399.99

### **Assets Owned:**

- LG 55 inch TV - £1,995.00
- PS4 - £300.00
- 3 Coffee Tables - £78.00
- Fridge Freezer - £39.00
- Industrial Coffee Drip Pot - £157.99
- Industrial Coffee Machine - £2,217.00
- 5 Desks - £650.00

Up to date as of 5<sup>th</sup> September 2024.





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## GDPR Policy of The Spearhead Foundation

### 1. Introduction

The Spearhead Foundation (“we”, “our”, “us”) is committed to protecting and respecting the privacy of our supporters, beneficiaries, staff, volunteers, and all individuals whose personal data we handle. This policy sets out how we collect, use, and protect personal data in compliance with the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

### 2. Who We Are

The Spearhead Foundation is a registered charitable organisation based in Manchester, dedicated to supporting emergency workers, armed forces and humanitarian work.

### 3. Purpose of This Policy

This policy outlines:

- The type of personal data we collect
- How we use, store, and protect that data
- Your rights in relation to your personal data

### 4. Data Controller

The Spearhead Foundation is the data controller responsible for the processing of personal data for our charitable activities. If you have any questions about this policy or how we handle your data, you can contact us at:

#### The Spearhead Foundation

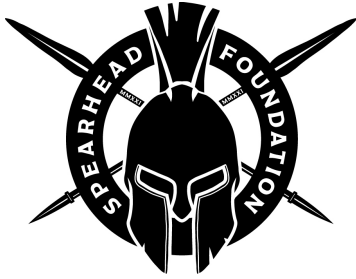
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[Info@thespearheadfoundation.com](mailto:Info@thespearheadfoundation.com)

### 5. Personal Data We Collect

We collect the following types of personal data, depending on your interaction with us:

- **Supporters and Donors:** Name, contact information (email, phone number, address), donation history, Gift Aid information.
- **Beneficiaries:** Name, contact details, demographic information, health-related data (if necessary for service provision), and any other relevant information to deliver our services.
- **Employees and Volunteers:** Name, address, contact details, employment history, references, national insurance number, and other relevant data.
- **Event Participants:** Name, contact details, and any specific requirements you may have for participation in events or fundraising activities.
- **Website Visitors:** IP address, cookie data, and browsing information if you use our website.



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We only collect the personal data that is necessary for our charitable purposes and to ensure that we provide the best possible service.

## 6. How We Use Personal Data

We will use your personal data for the following purposes:

- To manage donations and fundraising activities.
- To communicate with supporters, beneficiaries, and partners.
- To provide support services to our beneficiaries.
- To manage employee and volunteer records.
- To process Gift Aid claims.
- To comply with our legal obligations.
- To improve our services and enhance user experience on our website.

## 7. Legal Basis for Processing

We process personal data on the following legal bases:

- **Consent:** We will obtain your explicit consent to process certain personal data (e.g., for marketing communications or sensitive data like health information).
- **Contractual Obligation:** To fulfil any contracts entered into (e.g., employment contracts).
- **Legal Obligation:** To comply with legal and regulatory requirements (e.g., HMRC Gift Aid claims).
- **Legitimate Interests:** For certain activities, we may rely on our legitimate interest to process personal data, provided that such interests do not override your fundamental rights and freedoms.

## 8. Data Retention

We retain personal data only as long as necessary to fulfil the purposes for which it was collected, or as required by law. For example:

- Donation and Gift Aid records: Retained for at least 6 years to comply with tax regulations.
- Employee records: Retained for the duration of employment plus 6 years.
- Beneficiary records: Retained for as long as necessary to provide services and comply with safeguarding requirements.

## 9. Data Sharing

We will not sell, rent, or lease your personal data to third parties. However, we may share your personal data with the following, where necessary:

- HMRC for Gift Aid purposes.
- Service providers (e.g., IT support, cloud storage providers) who help us manage our operations. They are bound by confidentiality agreements and only process data on our instructions.
- Legal authorities if required by law, for example in response to a court order or government request.
- Partner organisations involved in delivering services to beneficiaries (with explicit consent).



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## 10. Data Security

We have implemented appropriate technical and organisational measures to protect your personal data from accidental loss, misuse, unauthorised access, alteration, and disclosure. These measures include:

- Encryption of sensitive data.
- Regular security audits of our systems.
- Access controls to limit who can access personal data.
- Secure destruction of records when no longer needed.

## 11. Your Data Rights

Under GDPR, you have the following rights:

- **Access:** You have the right to request a copy of the personal data we hold about you.
- **Rectification:** You can request that we correct any inaccurate or incomplete data.
- **Erasure:** In certain circumstances, you have the right to request that we delete your personal data (e.g., if it is no longer necessary for the purpose it was collected).
- **Restriction of Processing:** You can ask us to limit how we use your personal data in certain situations.
- **Data Portability:** You have the right to receive your personal data in a structured, commonly used format and transfer it to another organisation.
- **Object to Processing:** You can object to us processing your data for certain purposes, such as direct marketing.
- **Withdraw Consent:** Where consent is the basis for our processing, you have the right to withdraw it at any time.

To exercise any of these rights, please contact us at the details provided in Section 4.

## 12. Complaints

If you have any concerns about how we handle your personal data, we encourage you to contact us so we can resolve the issue. However, you also have the right to lodge a complaint with the Information Commissioner's Office (ICO) at [www.ico.org.uk](http://www.ico.org.uk) if you believe we have not complied with data protection laws.

## 13. Policy Review

We may update this policy from time to time to reflect changes in legal requirements or our data processing practices. Any changes will be posted on our website, and we will notify you of significant changes where appropriate.

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**Date:** 5<sup>th</sup> September 2024



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## **The Spearhead Foundation Objectives:**

### **Objectives as an organisation:**

- To create a community and friendships amongst the Armed forces and Emergency Services.
- To provide a safe space for those suffering with mental illness and needing a place to hide away for five and be with people who understand.
- To provide wellness activities to Armed Forces personnel/Veterans and Emergency Service personnel/Veterans.
- To stem suicide and mental illnesses within our community including the armed forces and emergency services through counselling and social inclusion events.
- To create purpose to those who feel they have none, providing this through our drift team, through our humanitarian team or café by providing volunteering opportunities.
- To provide support to those who are disabled, whether mentally or physically into employment or volunteering roles.
- To provide financial support, emergency grants and advice to those who require it through our grant scheme.
- To provide opportunities to qualified veterans within our humanitarian team.

### **Objectives of our humanitarian team:**

- To help in times of crisis through humanitarian support, whether domestic or internationally.
- Providing medical support in disasters through our humanitarian team.
- To provide high level training to organisations in disasters through our humanitarian team.
- To assist in hostile environments with the evacuations/medical support by providing military trained and hostile environment medical teams to missions.
- To provide food, water and specialist equipment where required to support wider operations.