

Harrow Monitoring Group

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20 January 2026

Early Years safeguarding - Commons call for evidence submission (public)

Submitted by: Harrow Monitoring Group - a community group with first-hand experience of adult and children safeguarding matters, including direct engagement with families, early years settings, and community-based provision.

Introduction

Safeguarding in the early years must be assessed in the context of the children and families it is intended to protect. Harrow provides a useful illustration of the pressures facing safeguarding systems nationally. As of January 2023, 92% of Harrow's school population is from ethnic groups other than White British, with historic data showing that nearly 82% of under-fives were already from minority ethnic backgrounds in 2011 (Harrow Council, 2023; ONS, 2011). The borough is projected to have approximately 15,500 children aged 0–4 in 2024, with particularly high proportions of Asian (Indian and Other Asian) and White (British and Other) children (Harrow Council, 2023). Alongside this demographic scale and diversity, 12.3% of children in Harrow, around 6,500, live in income-deprived households (IDACI, 2019).

Harrow's Early Years webpage highlights the role of the local authority in supporting regulated early years providers and childminders, promoting quality standards, and offering training and guidance to ensure children's learning, development, and welfare are supported in line with statutory requirements ([Harrow Council, 2026](#)). This combination of population size, ethnic diversity, socio-economic vulnerability, and mixed provision reflects conditions present in many urban authorities and highlights why safeguarding policy must be examined not only for statutory compliance but for real-world effectiveness.

1. What are the main safeguarding risks in early years settings?

Evidence from Harrow illustrates that safeguarding risks are compounded by the combination of population diversity, socio-economic vulnerability, and a mixed economy of early years provision. Children frequently attend a combination of regulated nurseries, childminders, community-run groups, supplementary cultural activities, and places of worship. Some of these settings are regulated, others exempt, and many sit entirely outside formal oversight (Harrow Council, 2023; [Harrow Council, 2026](#)). While unregulated provision may offer valuable cultural and social support, it also creates gaps in safeguarding coverage, leaving children exposed to inconsistent protection.

Risks are further intensified by deprivation, with approximately 12.3% of children in Harrow living in income-deprived households. Poverty, housing instability, and parental stress can contribute to neglect, developmental delay, and emotional harm, often emerging gradually and below statutory thresholds (Department for Education, 2019). Children attending multiple settings may have vulnerabilities that remain invisible unless robust multi-agency information sharing and early help pathways exist.

2. Are current safeguarding requirements fit for purpose?

The Early Years Foundation Stage (EYFS) safeguarding and welfare requirements provide a statutory baseline for regulated provision (Department for Education, 2021). While necessary, evidence from areas like Harrow suggests that they are insufficient on their own. The framework does not explicitly require cultural competence, linguistic accessibility, or strategies for engaging diverse communities. These factors are critical in boroughs with very high ethnic diversity, where safeguarding concerns may present differently and where parental engagement with statutory services may vary.

Local authorities such as Harrow provide additional guidance and support to ensure EYFS standards are met. Harrow's Early Years Team promotes training, advice, and partnership working across all regulated early years providers and childminders, yet publicly available guidance does not detail how safeguarding oversight is monitored across unregulated community or faith-linked provision/ cultural activities ([Harrow Council, 2026](#)).

Furthermore, EYFS applies only to regulated provision, leaving gaps in oversight for unregulated, community, and faith-based settings. Children's lived experiences span multiple settings, yet current safeguarding frameworks largely assume protection is delivered through a single, regulated environment. This misalignment undermines the effectiveness of existing requirements in practice.

3. How effective are inspection and oversight arrangements?

Inspection and oversight arrangements are limited by design and resourcing. Ofsted inspections are periodic and focus on registered provision, providing only intermittent assurance (Ofsted, 2022). Local authorities, while responsible for supporting early years safeguarding, have statutory powers primarily over regulated settings. Engagement with unregulated community and faith-based provision often depends on informal relationships rather than statutory authority.

In Harrow, this creates a fragmented landscape where children may move daily between multiple settings, and safeguarding risks may not be consistently identified or addressed. Harrow's Early Years Team provides training and guidance to regulated providers and offers support across the borough, but this does not fully capture the unregulated sector ([Harrow Council, 2026](#)). Resource constraints also limit proactive monitoring, reducing the ability of local authorities to ensure uniform safeguarding practice across diverse and mixed provision.

4. How do workforce issues impact safeguarding?

Workforce stability and competence are critical to safeguarding quality. In high-demand and diverse boroughs such as Harrow, recruitment and retention challenges are common, and reliance on agency or temporary staff is frequent. High turnover undermines continuity of safeguarding knowledge and weakens organisational culture.

Training is often focused on minimum compliance rather than developing professional judgement, cultural awareness, and confidence to challenge poor practice. Staff in unregulated, voluntary, or faith-based provision may have limited access to safeguarding training, despite regular contact with children. Consequently, safeguarding culture may depend on informal norms or hierarchical authority rather than reflective supervision, clear escalation routes, and accountability (National Foundation for Educational Research, 2020; [Harrow Council, 2026](#)).

5. How effective are early help, information-sharing and multi-agency working arrangements?

Early years providers are uniquely positioned to identify emerging vulnerability, but their ability to act is constrained by inconsistent early help pathways and uneven information sharing across education, health, and social care. Children attending unregulated settings may lack a formal safeguarding lead or referral route at all.

In Harrow, where approximately 12.3% of children live in income-deprived households, this results in uneven protection. Multi-agency coordination and timely intervention are critical but are not consistently applied, particularly across unregulated, community, or faith-linked provision. On this basis, the current national system risks failing the very children whose early years experiences are most complex and diverse.

6. What improvements are needed?

Evidence from Harrow and similar areas indicates that early years safeguarding requires systemic reform. National policy should explicitly recognise the mixed economy of provision and establish safeguarding expectations for all organisations providing regular care to under-fives, including community and faith-based settings.

The EYFS should be strengthened to include explicit requirements for cultural competence, engagement with diverse communities, linguistic accessibility, and recognition of deprivation-related risk. Local authorities should be resourced and empowered to engage proactively with all types of provision and to take statutory action where necessary. Workforce development should prioritise safeguarding supervision, reflective practice, specialist expertise, and culturally responsive training across all early years settings.

Early help systems must be strengthened with consistent referral pathways and reliable multi-agency information sharing. Funding models should reflect uneven safeguarding demand, with additional resources allocated to areas with high child population density, diversity, and

deprivation. Finally, whistleblowing arrangements should be visible, independent, and trusted, ensuring that all staff feel safe to raise concerns.

Conclusion

Harrow demonstrates that safeguarding challenges in early years are structural rather than exceptional. Children's experiences span regulated, exempt, and unregulated settings, and policy must reflect this reality to provide consistent protection. Without recognition of mixed provision, workforce pressures, funding limitations, and cultural complexity, safeguarding remains uneven and reactive. The Committee's inquiry provides an opportunity to line up safeguarding policy with lived reality and ensure that all children, regardless of setting or background, receive consistent and effective protection in their earliest years.

Submitted by
Husain Akhtar
Coordinator
Harrow Monitoring Group
also former Harrow Councillor, and former Inspector of Schools (Ofsted)

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