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# SAFEGUARDING & CHILD PROTECTION POLICY

## Academic Year 2024-25

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**Imbue Ventures Ltd**

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This Safeguarding & Child Protection Policy is available on the Imbue Ventures Ltd website and is reviewed and ratified annually by the Board of Management or as events or legislation require. Any deficiencies or weaknesses identified will be remedied without delay.

<b>Academic year</b>	<b>Designated Safeguarding Lead</b>	<b>Deputy Designated Safeguarding Lead/s</b>	<b>Chair of Board of Management</b>
2024-25	Rebecca Wetherill	Sabha Mahmood	Donald Faluyi

<b>Policy Review date</b>	<b>Date Ratified by Board of Management</b>	<b>Date Shared with the staff</b>
September 2025	September 2025	October 2025

Imbue Ventures Ltd Child Protection and Safeguarding Advice  
Contact List – 2024/25

<b>Role / Agency</b>	<b>Name and role</b>	<b>Contact Details</b>
<b>Designated Safeguarding Lead (DSL) / Child Protection Coordinator</b>	Rebecca Wetherill Centre Manager	01332 479 447 <a href="mailto:Becky@imbueventures.com">Becky@imbueventures.com</a>
<b>Deputy DSL</b>	Sabha Mahmood Senior Mentor	01332 479 447 <a href="mailto:admin@imbueventures.com">admin@imbueventures.com</a>
<b>Management with responsibility for Child Protection and Safeguarding</b>	Donald Faluyi	01332 479 447 <a href="mailto:admin@imbueventures.com">admin@imbueventures.com</a>
<b>Board of management</b>	Donald Faluyi	01332 479 447 <a href="mailto:admin@imbueventures.com">admin@imbueventures.com</a>
<b>Online Safety Coordinator</b>	Rebecca Wetherill Centre Manager	01332 479 447 <a href="mailto:admin@imbueventures.com">admin@imbueventures.com</a>
<b>Derby City Safeguarding Team</b>	Urgent Child Protection concerns / initial referral	01332 641172 <a href="mailto:DCCcareLine@derby.gov.uk">DCCcareLine@derby.gov.uk</a> .
<b>Adult and Child Social Care Team</b>	Urgent Child Protection concerns / initial referral for adults/young adults	01332 640777 <a href="mailto:DCCcareLine@derby.gov.uk">DCCcareLine@derby.gov.uk</a> .
<b>Safeguarding (out of hours)</b>	Urgent Child Protection	01332 956606 <a href="mailto:DCCcareLine@derby.gov.uk">DCCcareLine@derby.gov.uk</a>
<b>Derbyshire Safeguarding Team</b>	Urgent Child Protection concerns / initial referral	01629 533 190 <a href="mailto:starting.point@derbyshire.gov.uk">starting.point@derbyshire.gov.uk</a>
<b>NSPCC Whistleblowing Helpline</b>	Allegations against adults in school	0800 800 5000 <a href="mailto:help@NSPCC.org.uk">help@NSPCC.org.uk</a>
<b>PREVENT Team</b>	Prevent training/advice	<a href="mailto:cpt@derbyshire.pnn.police.uk">cpt@derbyshire.pnn.police.uk</a>
<b>Local Authority Designated Officers</b>	Allegations against staff/volunteers	01332 642376 <a href="mailto:CPMduty@derby.gov.uk">CPMduty@derby.gov.uk</a>
<b>Safeguarding Children Board</b>	Worries about children/ support.	01332 642351 <a href="mailto:dscb@derby.gov.uk">dscb@derby.gov.uk</a>
<b>Samaritans</b>	Family Support/ Mental Health	116 123 <a href="mailto:jo@samaritans.org">jo@samaritans.org</a>
<b>Derby and Derbyshire Safeguarding Children Partnership DDSCP</b>	Advice / Training / Safeguarding Audit	01332 642351 <a href="mailto:ddscp@derby.gov.uk">ddscp@derby.gov.uk</a>

Imbue Ventures Ltd is committed to safeguarding and promoting the welfare of children and young people and expects all staff, volunteers, contractors and visitors to share this commitment.

**All staff** refers to all adults, volunteers (including Management) or students on placement, working in any capacity in Imbue Ventures Ltd or in activities organised by the Imbue Ventures Ltd which brings them into contact with pupils.

**Child Protection** refers to the multi-agency arrangements to identify and protect children who are or may be at risk of or suffering significant harm.

**Safeguarding** refers to the protection, safety and promotion of the welfare of all pupils including when in off-site provision or activities and using ICT. This includes the building of resilience and awareness of risk through the formal and informal curriculum.

**Child** is any pupil under the age of 18 and adults with additional needs under the age of 25.

## Glossary

- DSL            Designated Safeguarding Lead
  - DDSL         Deputy Designated Safeguarding Lead
  - SENDCo      Special Education Needs and Disabilities Coordinator
  - DT             Designated Teacher for Looked After and previously Looked After Children.
  - PSHE         Personal, social, health and economic
  - RSE           Relationships and Sex Education
  - CSWS         Children's Social Work Services
  - KCSIE         Keeping Children Safe in Education (DfE, September 2024.)
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# Imbue Ventures Core Safeguarding Policy

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## Purpose

This policy sets out Imbue Ventures' approach to safeguarding and promoting the welfare of children and vulnerable adults. It applies to all aspects of our work and to everyone working for Imbue Ventures Ltd, including permanent and temporary employees and contractors.

## Strategic context

Imbue Ventures Ltd's strategy (as set out by Ofsted) for 2022 to 2027 is underpinned by 4 core principles:

- children and learners first.
- independence.
- accountability and transparency.
- evidence-led

This means that everything we do should be in the interests of children and young people.

## Definitions

Imbue Ventures Ltd uses definitions of the term 'safeguarding' from statutory guidance. Safeguarding children is defined in Ofsted's 'Working together to safeguard children' 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

Safeguarding vulnerable adults is defined in Ofsted's 'Care and support statutory guidance' issued under the Care Act 2014 (and 2024 amendment) as:

- protecting the rights of adults to live in safety, free from abuse and neglect
- people and organisations working together to prevent and stop both the risks and experience of abuse or neglect
- people and organisations making sure that the adult's wellbeing is promoted including, where appropriate, taking fully into account their views, wishes, feelings and beliefs in deciding on any action
- recognising that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances and therefore potential risks to their safety or well-being

## Recruitment

Imbue Ventures Ltd carries out safe recruitment checks on everyone who works for us. All roles require a Disclosure and Barring Service (DBS) check and references before the individual joins us. Many individuals, including all directors, will be subject to an enhanced DBS check and a check of social media because their role may bring them into regular contact with children and vulnerable adults. Anyone interviewed for a post with Imbue Ventures Ltd, either internally or from outside the organisation, will need to show an understanding of safeguarding that is relevant to the role that they are applying for.

## **Expectations of staff**

Everyone working for Imbue Ventures Ltd has a responsibility to familiarise themselves with this safeguarding policy and the procedures that go with it. They must maintain a proper focus on the safety and welfare of children and vulnerable adults in all aspects of their work. Anyone who works for Imbue Ventures Ltd must inform their manager if they or any adult living in their household become(s) the subject of an allegation of abuse against a child or vulnerable adult or a police enquiry, irrespective of the nature of that enquiry. Any allegations of misconduct towards children and/or vulnerable adults by those working for Imbue Ventures Ltd will be managed using the procedure in 'Management of safeguarding complaints made against a worker' (Ofsted internal guidance, 2017).

## **Safeguarding training**

Imbue Ventures Ltd is committed to ensuring that everyone who works for us understands their safeguarding responsibilities and keeps their knowledge up to date. All staff, volunteers and contracted personnel must complete an online safeguarding training package within 3 months of taking up post, and after that at 3-yearly intervals. There will also be regular refresher training for more senior personnel on safeguarding children and vulnerable adults, including on specific areas of risk and safeguarding practice.

## **Acting on safeguarding concerns**

No one working for Imbue Ventures Ltd should investigate concerns about individual children or vulnerable adults who are or may be being abused or who are at risk. However, this does not mean that we should do nothing when we learn of a concern. We all have a responsibility to make sure that concerns about children and vulnerable adults are passed to the agency that can help them without delay.

If anyone is concerned that a child or vulnerable adult is at risk of being abused or neglected, they should not ignore their suspicions and should not assume that someone else will take action to protect that person.

Concerns about children should be referred to the children's social care department of the local authority where the child lives. Similarly, concerns about vulnerable adults should be referred to local authority adult services.

If anyone working for Imbue Ventures Ltd is in any doubt about what to do, they should consult their line manager or duty team.

Anyone working for Imbue Ventures Ltd who has concerns about the behaviour of a colleague must always raise this with their line manager or the Head of HR as quickly as possible.

## **Learning and improving**

We are determined to keep improving our knowledge and understanding of how best to protect children and vulnerable adults. We will review our own practice regularly to check that we are placing the right emphasis on safeguarding in our work.

We will carry out in-depth reviews of our actions in cases where children suffer serious harm. The main purpose of the reviews is to learn lessons about when our systems need to improve to protect children better in future. We will also promote a culture in which we are able to highlight and review near misses to learn and improve our practice.

*Imbue Ventures Ltd incorporate large sections of the Derby and Derbyshire Safeguarding Children Procedures and Guidance. With regard to the fact that we are not a school nor college, therefore some sections and parts may not be applicable to us. The following are suggested pro-forma for us to adapt to support Imbue Ventures Ltd's own in-house safeguarding arrangements.*

## Part One:

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### 1. Aims

1.1 Imbue Ventures Ltd aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- All staff are aware of their statutory responsibilities with respect to safeguarding, identifying children in need of early help, at risk of harm or those that have been harmed
- Staff are properly trained in recognising and reporting safeguarding issues
- A culture of vigilance is created and maintained to ensure that we will also act in the best interests of children to protect them online and offline.
- Systems for reporting abuse are well promoted, easily understood and easily accessible for children

1.2 The Board of Management and staff of Imbue Ventures Ltd take as our first priority the responsibility to safeguard and promote the welfare of our pupils, to minimise risk and to work together with other agencies to ensure rigorous arrangements are in place within our organisation to identify, assess and support those children who are suffering harm and to keep them safe and secure whilst in our care.

1.3 The responsibilities set out in this policy apply (as appropriate) to all members of the Imbue Ventures Ltd community including pupils, staff, management, visitors/contractors, volunteers, supply staff, students on placement and trainees working within the school. It is fully incorporated into the whole Imbue Ventures Ltd ethos and is underpinned throughout the teaching of the curriculum, within PSHE and within the safety of the physical environment provided for the pupils.

### 2. Legislation and guidance

2.1 This policy is based on the Department for Education's statutory guidance, Keeping Children Safe in Education (KCSIE) 2024 and Working Together to Safeguard Children (WTTSC 2023) and the Maintained Schools governance guide. We comply with this guidance and the procedures set out by the Derby and Derbyshire Safeguarding Children Procedures (DDSCP).

2.2 This policy is also based on the following legislation and guidance:

Part 1 of the schedule to the [Non-Maintained Special Schools \(England\) Regulations 2015](#), which places a duty on non-maintained special schools to safeguard and promote the welfare of pupils at the school

[The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children



Section 5B(11) of the [Female Genital Mutilation Act 2003](#), as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

[Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

[The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children

Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children

Statutory [Guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

Guidance for safer working practice for those working with children and young people in education settings (GSWP Safer Recruitment Consortium Feb 2022) <https://c-cluster-110.uploads.documents.cimpress.io/v1/uploads/d71d6fd8-b99e-4327-b8fd-1ac968b768a4~110/original?tenant=vbu-digital>

[Sharing nudes and semi-nudes: advice for education settings working with children and young people \(Department for Digital, Culture, Media & Sport and UK Council for Internet Safety 2024\)](#)

[Safeguarding and remote education during coronavirus \(COVID-19\) \(DfE, 2022\)](#)

[Children Missing Education – Statutory guidance for local authorities \(DfE February 2024\)](#)

[When to call the police – Guidance for schools and colleges \(NPCC – 2020\)](#)

[Education and Training \(Welfare of Children\) Act 2021](#)

Schools and colleges are under a statutory duty to cooperate with the published DDSCP arrangements. This policy conforms to locally agreed inter-agency procedures [DDSCP-Local Safeguarding Children Policies, Procedures and Guidance](#) and has been ratified by the DDSCP Officer Group. It is available to all interested parties on our website and on request from the main office. It must be read in conjunction with other relevant policies and procedures and KCSIE (DfE 2024). <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

This policy also complies with our funding agreement and articles of association.

This policy should also be read in conjunction with the school's Online Safety Policy, The Acceptable Use Policies for Staff, Students and Visitors which set out the acceptable use of ICT, including the use of 3/4/5G devices on site.

## Definitions

3.1 **Safeguarding and promoting the welfare of children** means:

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

3.2 **Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

3.3 **Definitions and indicators of abuse** explains the different types and indicators of abuse.

3.4 **Children** includes everyone under the age of 18.

3.5 **Child** includes adults with additional needs under the age of 25.

## 4. Equality statement

4.1 Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

4.2 We give special consideration to children who:

- Have special educational needs or disabilities or health conditions
- Are young carers
- May experience discrimination due to their race, ethnicity, disability, religion, gender identification, sex or sexual orientation.
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are missing from education
- Children who are in care, previously looked after or any children not growing up with their birth family (this covers private fostering and all kinship arrangements)
- Whose parent/carer has expressed an intention to remove them from school to be home educated

## 5. Roles and responsibilities

5.1 Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff (including those not directly employed by Imbue Ventures Ltd), volunteers, contractors and management in the organisation. Our policy and procedures also apply to extended school and off-site activities. All staff are expected to read this policy as part of their induction arrangements as well as the documents referenced in section 5.2 (All staff) below and any updates therein.

## 5.2 All staff

5.2.1 All staff working directly with children will read and understand their statutory responsibilities outlined in Part 1 and Annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.

5.2.2 Staff who do not work directly with children will read either Part 1 or Annex A as determined by the DSL; dependent on their roles, responsibilities and contact with children.

5.2.3 All staff will be aware of:

- Our systems which support safeguarding, including reading and understanding their professional responsibilities as outlined in Guidance for Safer Working Practice (2022) understanding the role of the designated safeguarding lead (DSL/DDSL), reading and understanding the school behaviour policy and their safeguarding responses to children who go missing from education during the school day or otherwise and reading and understanding the school's online safety policy.
- The early help process and their role in it, including being alert to emerging problems that may warrant Early Help intervention, particularly those identified in Part 1 of KCSIE. All staff should be reporting emerging problems that may warrant early help intervention to the Designated Safeguarding Lead/ Centre Manger
- That children's behaviours can be indicative of their emotional wellbeing and can be linked to mental health. They should be aware of behaviours that may communicate that poor wellbeing can be an indicator of factors such as abuse, neglect or exploitation. Staff should understand the children's experiences such of abuse, neglect, trauma and adverse childhood experiences can impact on children's mental health, behaviour & education.
- The process for making referrals to local authority Children's Social Care (CSC) and for statutory assessments that may follow a referral, including the role they might be expected to play. Fig 1: (Page 15) illustrates the procedure to follow if you have concerns about a child's welfare. Wherever possible, speak to the DSL, DDSL or Centre Manger (in the absence of a DSL) first to agree a course of action. In the absence of a DSL or Centre Manager being available, staff must not delay in directly contacting children's social work Duty and Advice team or the police if they believe a child is at immediate risk of significant harm.
- Our work in partnership with other agencies in the best interests of the children. Requests for service to CSWS will (wherever possible) be made by the Safeguarding Designated Staff, to the Childrens Social Care team (0133 2641172). Where a child already has a child protection social worker, the school will immediately contact the social worker involved or in their absence, the team manager of the child protection social worker.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as Female Genital Mutilation (FGM), and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.

- Imbue Ventures Ltd procedures for recording any cause for concerns and passing information on to DSLs in accordance with school's recording systems.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), child criminal exploitation (CCE) FGM, radicalisation, child-on-child sexual abuse and serious and violent crime. All staff to be aware safeguarding incidents/ behaviours can occur outside school or college or be associated with outside factors CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.
- Children missing education/absconding during the school day can also be a sign of CCE, including involvement in County Lines.
- Children may not feel ready or know how to tell someone that they are being abused, exploited, neglected, and/or they may not recognise their experiences as harmful.

### **5.3 The designated safeguarding lead (DSL) and deputy designated staff.**

- 5.3.1 Our DSL is Rebecca Wetherill. The DSL takes lead responsibility for child protection and wider safeguarding.
- 5.3.2 The optimal scenario is to have a trained DSL or DDSL available on site. Where this is not possible (e.g. due to self-isolating), a trained DSL or DDSL will be available to be contacted via phone or online video – for example when working from home.
- 5.3.3 During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. Where a trained DSL (or deputy) is not on site, in addition to the above, a senior leader will assume responsibility for co-ordinating safeguarding on site. DSL can be contacted via [Becky@imbueventures.com](mailto:Becky@imbueventures.com).
- 5.3.4 When the DSL is absent, the [deputy/deputies] – Sabha Mahmood will act as cover.
- 5.3.5 If the DSL and deputy are not available, Centre Manager will act as cover (for example, during out-of-hours/out-of-term activities).
- 5.3.6 The DSL will be given the time, training, resources and support to:
- Provide advice and support to other staff on child welfare and child protection matters
  - Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
  - Contribute to the assessment of children by providing as much information as possible as part of the referral process to help social care assessments consider contexts outside the home and enable a contextual approach to harm.
  - Refer suspected cases, as appropriate, to the relevant body (children's social care Duty and Advice team, Channel programme, Disclosure and Barring Service, Teaching Regulation Agency and/or police), and support staff who make such referrals directly. Provide support for staff to comply with their mandatory reporting duties in cases where FGM has been identified.
  - Manager will ensure that all staff involved in direct case work of vulnerable children, where there are child protection concerns/issues, have access to regular safeguarding supervision. (Ref: [Derby City Council Children's Social Care Procedures, Supervision Policy \(2024\).](#)).

- The DSL will also keep the Centre Manager informed of any issues and liaise with local authority officers and relevant professionals for child protection concerns as appropriate.
- The DSL is responsible for responding to domestic abuse notifications from the local authority and providing support to children and their families as appropriate
- The school will ensure representation at appropriate inter-agency meetings such as Initial and Review Child Protection Conferences, and Planning and Core Group meetings, as well as Family Support Meetings.
- Provide reports as required for meetings. Reports will, wherever possible, be shared with parents/carers at least 24 hours prior to the meeting.
- Where a child in school is subject to an inter-agency child protection plan or any multi-agency risk management plan, the DSL will contribute to the preparation, implementation and review of the plan as appropriate.
- The designated safeguarding lead and any deputies should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children (2023). When to call the police (NPCC 2020) should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.
- Promote the educational outcomes of children with a social worker and other pupils deemed vulnerable. It is essential therefore that the DSL works in close collaboration with the authority as children who are in need of help and protection must also have their learning needs prioritised in planning to ensure education is a protective factor and not only by way of regular attendance at school.

**The full responsibilities of the DSL are set out in Annex C of KCSIE – Role of the designated safeguarding lead. All designated safeguarding leads and deputy safeguarding leads must read and comply with this.**

## **5.4 The Board of Management**

- 5.4.1 The board of management will approve this policy at each review and hold the Centre Manager to account for its implementation and any actions/recommendations made by the Local Authority in respect to strengthening the Imbue Ventures Ltd safeguarding arrangements.
- 5.4.2 The board of management will complete the LA safeguarding and child protection briefing on their strategic roles and responsibilities every three years including online safety training. The governing board will ensure that all policies, procedures and training are effective and comply with the law at all times.
- 5.4.3 The board of management will appoint a lead manager to monitor the effectiveness of this and other related safeguarding policies (i.e. online safety, whistleblowing, behaviour etc.) in conjunction with the full governing body. Staff cannot be the lead manager with responsibility for safeguarding and child protection. Lead manager should access the LA designated safeguarding training every three years including online safety training.
- 5.4.4 In the event that safeguarding concerns, or an allegation of abuse is made against the Centre Manager, the Board of Directors will act as the 'case manager'. Refer also to Section 16.2.
- 5.4.5 The board of management will ensure that the Imbue Ventures Ltd has relevant IT filtering and monitoring systems in place and should be informed in part, by the risk

assessment required by the Prevent Duty in order to limit children's exposure to online risks.

5.4.6 The board of management, along with the Imbue Ventures Ltd senior leadership team, are responsible for satisfying themselves and obtaining written assurances from any relevant school lettings and alternative/off site providers and provisions that their safeguarding arrangements are secure, in keeping with the requirements set out in KCSIE. This includes ensuring that the provision has effective safeguarding policy/procedures/training in place for all staff. The provision follows safer recruitment processes and have clear allegation management processes. Pupils who attend alternative provisions can often have complex needs and it is important that these settings are aware of the additional risk of harm that their pupils may be vulnerable to and appropriate risk assessments/support plans are in place where pupils access provision offsite.

5.4.7 The board of management will supply information as requested by the Derby and Derbyshire Safeguarding Children Partnership Local Authority Safeguarding Team.

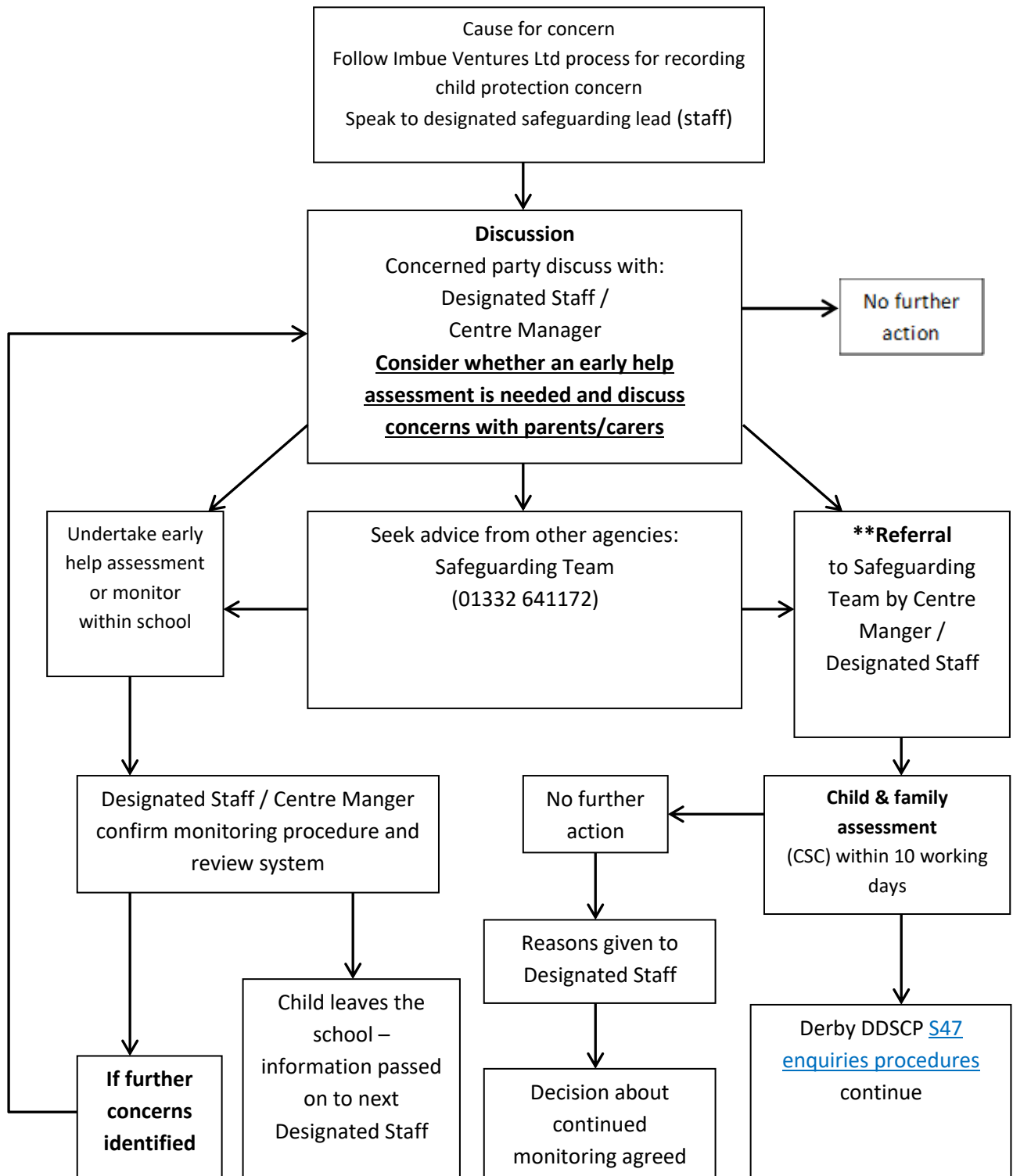
**The full responsibilities of the board of management are set out in Part Two of KCSIE – The management of safeguarding. The board of management will ensure that Imbue Ventures Ltd is fully compliant with their statutory safeguarding responsibilities.**

## **5.5 The Centre Manager**

5.5.1 The Centre Manager is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary and supply staff) and volunteers are informed of this policy as part of their induction
- Communicating this policy to parents when their child joins the school and via the school website
- Ensuring that the roles and responsibilities of the DSL/DDSL as referenced in Annex C of KCSIE (2024) are reflected in their job description.
- Ensuring that the DSL has appropriate time, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that they complete the one day LA course for head teachers/principals on safeguarding and child protection and that all staff undertake appropriate safeguarding and child protection training and update every three years.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff (including supply staff) or volunteer, where appropriate.
- Ensuring that all recommendations made by the Local Authority in relation to strengthening board of management safeguarding arrangements are actioned in a timely fashion.

**Fig 1: Imbue Ventures Ltd procedures to follow where there are concerns about a child**



**\*\* If unhappy about the outcome of the referral to Children’s Social Care, please refer to: Derby DDSCP Local Protocol.**

## **6. Confidentiality and Information Sharing**

- 6.1.1 Confidentiality is an issue that needs to be understood by all those working with children, particularly in the context of safeguarding.
- 6.1.2 Imbue Ventures Ltd recognises that the only purpose of confidentiality in this respect is to benefit the child. Staff/volunteers and visitors to Imbue Ventures Ltd should never promise a child that they will not tell anyone about an allegation/report of abuse and must pass any cause for concerns immediately to a designated safeguarding lead.
- 6.1.3 Confidentiality is addressed throughout this policy with respect to record-keeping (see section 18), dealing with reports of abuse, allegations of abuse against staff (see section 16.2), information sharing and working with parents (see section 6.2).
- 6.1.4 Timely information sharing is essential for effective safeguarding. Imbue Ventures Ltd will share safeguarding information as appropriate in keeping with the principles outlined in the government guidance document, [Information sharing: Advice for practitioners providing safeguarding services to children, Young People, parents and carers \(DfE 2024\)](#). This guidance has been produced to support practitioners in the decisions they take to share information, which reduces the risk of harm to children and young people and promotes their well-being.
- 6.1.5 Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.
- 6.1.6 All staff must have due regard for the relevant data protection principles which allow them to share (in the context of their role) and withhold personal information, as provided for in the Data Protection Act 2018 and GDPR.
- 6.1.7 In order to promote positive educational outcomes for vulnerable children, including children with social workers information that can help to support positive outcomes being achieved will be shared with colleagues in Imbue Ventures Ltd that are not DSLs or DDSLs as appropriate.
- 6.1.8 If staff are in any doubt about sharing information, they must speak to the designated staff, or the Centre Manager.

## **6.2 Working with parents and other agencies to protect children**

- 6.2.1 Parents/carers will be made aware of Imbue Ventures Ltd procedures in respect to taking any reasonable action to safeguard the welfare of its pupils. In cases where Imbue Ventures Ltd has reason to be concerned that a child may be suffering significant harm, ill treatment, neglect or other forms of harm, staff will follow the procedures for responding to suspected cases of child abuse or neglect outlined in this policy document and contact the CSC team to discuss their concerns.
- 6.2.2 In keeping with KCSIE, we will endeavour wherever possible to obtain at least two emergency contacts for every child in the school in case of emergencies, and in case there are welfare concerns at the home.
- 6.2.3 In general, we will discuss concerns with parents/carers before approaching other agencies and will seek to inform parents/carers and receive their consent when making a



referral to another agency. Appropriate staff will approach parents/carers after consultation with the DSL. The exception to this rule will be in situations where a member of staff has reasonable cause to believe that informing parents/carers of a referral to another agency may increase the risk of significant harm to the child.

6.2.4 Parents/carers are informed about our Safeguarding & Child Protection policy through Imbue Ventures Ltd prospectus, website, newsletters etc. A safeguarding & child protection statement is prominent in the Imbue Ventures Ltd foyer/reception area.

6.2.5 Where a parent/carer has expressed their intention to remove a child from full time education/school with a view to educating at home, the school will, working in partnership with the LA and other key professionals invite parents/carers to a meeting where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of the child. This is especially important where a child has SEND, is vulnerable, and/or has a social worker.

### **6.3 Multi-agency work**

6.3.1 We will co-operate with CSC in accordance with the requirements of the Children Act 1989 and allow access to child and child protection records for them to conduct section 17 or section 47 assessments.

6.3.2 In the best interests of our pupils, we will work with all relevant professionals and agencies as required to safeguard children and promote their welfare.

## **7. Opportunities to teach safeguarding – Preventative Curriculum**

### **7.1 Our role in the prevention of abuse**

We will identify and provide opportunities for children to develop skills, concepts, attitudes and knowledge to promote their safety and well-being.

7.1.1 We will ensure that children are taught about safeguarding, including online safety, and recognise that a one size fits all approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children may be needed.

7.1.2 Although not fully applicable to us, we will work with schools and organisations in providing a broad and balanced curriculum, relevant issues addressed through their PSHE curriculum, including self-esteem, emotional literacy, assertiveness, power, relationship and sex education, online safety, online bullying, sexting, child exploitation (CSE/CCE), sharing nudes and semi-nudes, female genital mutilation (FGM), preventing radicalisation, child on child abuse, consent, online safety, anti-bullying, unhealthy and abusive family relationships.

7.1.3 Relevant issues will be addressed through other areas of the curriculum. For example, Social Learning, ImmEducation and Life Skills.

## **7.2 Other areas of work**

- 7.2.1 All our policies that address issues of power and potential harm, e.g. Anti- Bullying, Equalities, Positive Handling, Behaviour, On-line Safety will be linked to ensure a whole school approach.
- 7.2.2 Our Safeguarding and Child Protection policy cannot be separated from the general ethos of the Imbue Ventures Ltd which is to ensure that children are treated with respect and dignity, feel safe, and are listened to.
- 7.2.3 Imbue Ventures Ltd online safety policy is reflective of the requirements set out in KCSIE (2024) in regard to content, contact, conduct and commerce. Imbue Ventures Ltd online safety policy is aligned to the Imbue Ventures Ltd Behaviour Policy and reflects our approach to issues of online safety (including the sharing of nudes and semi-nudes) that empowers us to protect and educate the whole Imbue Ventures Ltd community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate.

## **8. Our role in supporting children**

**We will offer appropriate support to individual children who have experienced abuse or who have abused others.**

- 8.1 In cases where children have experienced abuse/abused others, the DSL will ensure that appropriate support is offered. An individual support plan will be devised, implemented and reviewed regularly should the individual or others affected require additional pastoral support/intervention. This plan will detail areas of support, who will be involved (i.e. learning mentor, key worker) and the child's wishes and feelings. A copy of the individual support plan will be kept in the pupil's child protection record (SMART PLAN).
- 8.2 For children who have sexually harmed or may have sexually harmed peers, where appropriate an AIM Risk Assessment Management Plan (RAMP) will be completed that includes safety and support planning.

## **9. Children with special educational needs, disabilities, or health issues**

- 9.1 We recognise that while all children have a right to be safe, some children *may* be more vulnerable to abuse e.g. those with a disability, special educational needs, mental health issues or those living with domestic violence or drug/alcohol abusing parents, parents mental health issues, learning disabilities, children who are in care or previously looked after, children having adverse childhood experiences etc.. Additional barriers can exist when recognising abuse and neglect in this group, including:
- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
  - Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
  - The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
  - Communication barriers and difficulties in managing or reporting these challenges

9.2 When Imbue Ventures Ltd is considering excluding, either for a fixed term period or permanently, a vulnerable pupil/a child with additional needs and/or a pupil who has social care involvement is either subject to a S47 Child Protection plan/child in need plan or there are/have previously been child protection concerns, we will undertake an informed (multi-agency where other professionals are involved) risk-assessment prior to making the decision to exclude. Schools would be advised to speak to the named social worker for the child where the exclusion will be to the home to ensure that any risk is assessed and speak to Area Inclusion Partnership for support if required. Schools should note advice in the [DFE Suspension and Permanent Exclusion from maintained schools, academies and pupil referral units in England, including pupil movement 2024](#), Section 3. In situations that a looked after child is at risk of exclusion Imbue Ventures Ltd will notify the Virtual School. In the event of a one-off serious incident resulting in an immediate decision to permanently exclude, the risk assessment must be completed prior to convening a meeting of the board of management.

9.3 All staff have a role in preventing impairment of children's mental health/emotional wellbeing, including promoting positive mental health and identifying where students are struggling with their Mental Health. We regularly communicate messages to students regarding wellbeing and the promotion of positive mental health strategies. Further support can be obtained from the Adults and Children's Social Care (01332 640777 between Monday to Friday from 9am to 5pm (except bank holidays)).

9.4 Concerns regarding a student's mental health/emotional wellbeing should be reported to a member of Imbue Ventures Ltd safeguarding team in keeping with the Imbue Ventures Ltd safeguarding reporting arrangement so that students can be offered appropriate support, this may include local or national online services where appropriate. In addition, Imbue Ventures Ltd are able to make referrals to a wide range of external services to secure additional appropriate support for students.

## **10. Children at risk of specific forms of abuse**

10.1 Imbue Ventures Ltd follows the Derby DDSCP (<https://derbyshirescp.trixonline.co.uk/>) online locally agreed multi-agency procedures, in circumstances where children are at risk of or specific forms of abuse as outlined in Part 1 and Annex of B KCSIE.

## **11 Remote Learning and Remote Welfare**

11.1 If children are being asked to learn online at home, for example because of the coronavirus pandemic, schools and colleges should follow advice from the DfE on [safeguarding and remote education \(DfE, 2022\)](#). In addition to following the Guidance for Safer Working Practice (Safer Recruitment Consortium, 2022)

11.2 Where children are remote learning and the DSL has identified a child to be vulnerable, on the edge of social care support, or who would normally receive pastoral-type support in school, they should ensure that a robust communication plan is in place for that child or young person. The communication plans can include remote contact, phone contact, door-step visits. Other individualised contact methods should be considered and recorded. Details of this plan must be recorded, as should a record of contact made.

11.3 We recognise that Imbue Ventures Ltd is a protective factor for children and situations such as periods of national lockdown can affect the mental health of pupils and their

parents/carers. Staff will be aware of these issues and have due regard for them in setting expectations of pupils' work where they are at home.

## 12 Female Genital Mutilation: The Mandatory Reporting Duty

- 12.1 The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".
- 12.2 FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.
- 12.3 **Any staff** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must immediately (in consultation with the DSL) report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.
- 12.4 The duty above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff must not examine pupils.
- 12.5 **Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.
- 12.6 **Any member of staff** who suspects a pupil is *at risk* of FGM **or over** appears to have been a victim of FGM, must speak to the DSL and follow our [local safeguarding children's partnership procedures](#).

## 13 Radicalisation and Terrorism

- 13.1 Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
- 13.2 If staff are concerned about a change in the behaviour of an individual or see something that concerns them (**this could be a colleague too**) they must seek advice appropriately with the DSL who must contact the Safeguarding Team or the Derbyshire Constabulary Prevent Team: 0300 122 8694 for further advice (see [appendix 9](#)).
- 13.3 Schools and colleges are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. The Safeguarding Team and the Prevent team can advise and identify local referral pathways.
- 13.4 Effective early help relies on all staff to be vigilant and aware of the nature of the risk for children and young people, and what support may be available. Imbue Ventures Ltd will ensure that as far as possible all front-line staff will undertake Prevent awareness training (e.g. Workshop to Raise Awareness of Prevent [WRAP]).

## 14 Channel

14.1 Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the Imbue Ventures Ltd may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

## 15 Child on child abuse

15.1 We recognise that children are capable of abusing their peers and that child on child abuse can manifest in many different ways, including bullying, cyber bullying, criminal and sexual exploitation, sexual harassment and violence, initiation/hazing, sharing of nudes and semi-nudes, up skirting (taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm) and abuse within intimate partner relationships. It is very clear that this type of abuse should always be treated seriously, and never just as banter, part of growing up or boys being boys. Imbue Ventures Ltd has a zero tolerance approach to such attitudes and behaviours.

We will take steps to minimise the risk of child-on-child abuse by ensuring students recognise behaviour that is not appropriate and understand how to stay safe and challenge and report unwanted behaviours. We will also regularly review the Imbue Ventures Ltd site and Imbue Ventures Ltd activities to further minimise the risk of child-on-child abuse occurring.

We recognise that abuse can often go unreported or be reported latterly. We will encourage and support students to report child-on -child abuse to trusted adults in school or the NSPCC helpline.

Most cases of pupils hurting other pupils will be dealt with under Imbue Ventures Ltd Behaviour Policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns.

All concerns around child-on-child abuse will be taken seriously, reported, investigated, recorded and managed in line with the child protection procedures outlined in this policy. Imbue Ventures Ltd will ensure that at least one member of the Imbue Ventures Ltd safeguarding team will complete the 1 day AIM Project training on understanding and managing harmful sexual behaviour in education settings (<https://aimproject.org.uk/product/understanding-managing-hsb-in-education-settings/>) The DSL is responsible for providing support to all children involved in incidents of peer on peer sexual abuse. Where incidents of child-on-child abuse involve children attending another school setting we will liaise with the relevant DSL/DO at the setting to ensure appropriate information is shared.

15.2 We recognise that sexual violence and/or sexual harassment can happen anywhere including educational settings. Where concerns of sexual violence or sexual harassment are witnessed, disclosed or reported to the Imbue Ventures Ltd (including those that have happened outside of Imbue Ventures Ltd or online) the concern will be taken seriously. We recognise that sexual violence and harassment exist on a continuum and may overlap;

they can occur online and face to face (both physical and verbal) and are never acceptable. In responding to such concerns DSL must (where appropriate) always complete an AIM (Assessment, Intervention, Moving On) checklist and contact the Duty and Advice team if appropriate and follow the principles set out in Part 5 of KCSIE.

- 15.3 Children who may have/have sexually harmed others will be considered separately from the needs of those who have/may have been subject to sexual harm. Children who have/may have sexually harmed others will be responded to in a way that meets their needs as well as protecting others within the school community through a multi-agency risk assessment management plan (RAMP). Where appropriate there must be a coordinated multi-agency approach to risk assessment which will include involvement of parent/carers, social care, health, police and youth justice (where appropriate). Further support and advice on AIM Checklists and/or undertaking a RAMP can be obtained from the Safeguarding Team.
- 15.4 We will ensure that all children who may have/have been sexually harmed will be taken seriously and that they will be supported and kept safe. Where appropriate support plans will be put in place for children subjected to sexual harm.
- 15.5 In cases where allegations of sexual violence and/or harassment are found to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child or person who has made the allegation is in need of support or may have been abused by someone else. In cases where the report is found to be deliberately invented or malicious the school will consider whether it is appropriate to take any disciplinary action in keeping with the Imbue Ventures Ltd behaviour management policy.
- 15.6 Where child exploitation (i.e. criminal, sexual, trafficking, modern day slavery etc.), or the risk of it, is suspected, frontline practitioners must notify the designated member of staff for child protection, in line with the child protection policy reporting systems.
- 15.7 The DSL must complete the child exploitation response checklist for partners (Child Exploitation Response Checklist) and refer to the table at the end of the tool to help decide how to proceed. A copy of the completed tool must be kept in the child's child protection records for future reference. The DSL can also refer a pupil to [Catch-22](#), a local service jointly commissioned by Derby City Council, Derbyshire County Council and the Office of Police and Crime Commissioner, working directly with children and young people who are at risk of Child Exploitation through: 07714 614563, or the Local Authority Duty Number at: 01332 641172. Information provided should include: name; date of birth; what the risks are; what has been put in place to lessen the risk; and the plan that the child is subject to. If the child /young person already has an allocated social worker, the DSL must contact them (or their team manager) to discuss any concerns about child exploitation.
- 15.8 A copy of the child exploitation risk identification tool for partners (see Child Exploitation Response Checklist) can be obtained from the [DDSCP Website](#).
- 15.9 We will ensure Imbue Ventures Ltd works in partnership with parents / carers and other agencies as appropriate. This includes facilitating return to home interviews as requested.

## 16 Sharing Nudes and Semi Nudes

### Staff responsibilities when responding to an incident

16.1 If any adult in Imbue Ventures Ltd is made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), they must report it to the DSL immediately.

They must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

### DSL Responsibilities

16.2 Following a report of an incident, the DSL will hold an initial review meeting with appropriate Imbue Ventures Ltd staff – this may include the staff member who reported the incident and the safeguarding or management team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (In most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (In most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or Children's Social Care if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

16.3 If none of the above apply then the DSL, in consultation with the Centre Manager and other members of staff as appropriate, may decide to respond to the incident without

involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

## **17 Children missing from education**

17 A child going missing from education is a potential indicator of abuse or neglect. Where a child is reported to be missing education we will comply with statutory duty to inform the local authority of any pupil who falls within the reporting notification requirements outlined in [Children Missing Education – Statutory guidance for local authorities \(DfE September 2024\)](#) and follow the Derby City Council's Children's Services LA procedure and contact by [cme@derby.gov.uk](mailto:cme@derby.gov.uk) or 01332 641448.

17.1 Children who are absent, abscond or go missing during the school day are vulnerable and at potential risk of abuse, neglect, CSE or CCE including involvement in county lines. Imbue Ventures Ltd staff members must follow the Imbue Ventures Ltd procedures for dealing with children who are absent/ go missing, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future (Missing from School Response Checklist).

## **18 A Safer Imbue Ventures Ltd Culture**

**The board of management will ensure that the following appropriate policies, and procedures are in place and shared with staff at the point of induction, in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare:**

- Whistle Blowing/Confidential reporting policies (guidance to staff and volunteers on how they can raise concerns and receive appropriate feedback on action taken when staff have concerns about any adult's behaviour)
- Imbue Ventures Ltd procedures for managing children who are absent
- Guidance on Safer Working Practices
- Safeguarding and Child Protection policy (including online safety).
- Behaviour policy
- The names, roles and responsibilities of the designated safeguarding lead and any deputies.

## **19 Safer Recruitment, selection and pre-employment vetting**

19.1 Imbue Ventures Ltd pays full regard and commitment to following the safer recruitment, selection and pre-employment vetting procedures as outlined in part three of KCSIE

19.2 Imbue Ventures Ltd will maintain a single central record which demonstrates the relevant vetting checks required including: barred list check, DBS check at the correct level, identity, qualifications and right to work in the UK. (see Part 3 of KCSIE).

19.3 All recruitment materials will include reference to the Imbue Ventures Ltd commitment to safeguarding and promoting the wellbeing of pupils. (see Recruitment and Selection Checklist)



19.4 Imbue Ventures Ltd will ensure that all recruitment panels include at least one person that has undertaken the safer recruitment consortium, safer recruitment training as recommended by the Local Authority/Derby DDSCP.

19.5 For individuals who have lived or worked outside the UK, in addition to the same checks as all other staff, Imbue Ventures Ltd will complete any additional checks required to satisfy themselves that the individual is suitable to work with children. This may include obtaining a letter from the professional regulatory authority in the country (countries) in which the candidate has worked confirming that they have not imposed any sanctions or restrictions, and /or that they are aware of any reason why they are unsuitable to teach where possible.

19.6 Imbue Ventures Ltd / will ensure that written risk assessments are undertaken in situations where information provided on DBS certificates necessitates so. Written risk assessments must be undertaken for all volunteers **not** engaging in regulated activity. Advice and support for carrying out risk assessments can be accessed through the Imbue Ventures Ltd HR Advisor/Provider/Contact or the Education Safeguarding Team.

## **20 Managing allegations or safeguarding concerns against a member of staff or person in Imbue Ventures Ltd procedures.**

20.1 These procedures must be followed in any case in which it is alleged that a member of staff (including supply staff), manager, visiting professional or volunteer has met the harm test, this includes where an adult has:

- a) behaved in a way that has harmed a child or may have harmed a child
- b) possibly committed a criminal offence against or related to a child
- c) behaved towards a child or children in a way that indicates s/he may pose a risk of harm to children
- d) behaved or may have behaved in a way that indicates they may not be suitable to work with children. *(This includes any behaviour that may have happened outside of Imbue Ventures Ltd that might make the individual unsuitable to work with children. This is known as transferable risk.)*

20.2 All adults working in Imbue Ventures Ltd have duty to disclose to the Centre Manager (or chair of board of Directors where appropriate) where their relationships and associations both within and outside of the workplace (including online) may have implications for safeguarding children in Imbue Ventures Ltd.

20.3 Examples of behaviours that would warrant an allegation or safeguarding concern by a member of staff could include:

- Physical, for example intentional use of force as a punishment, slapping, use of objects to hit with, throwing objects or rough physical handling.
- Emotional, for example intimidation, belittling, scapegoating, sarcasm, lack of respect for children's rights, and attitudes which discriminate on the grounds of race, gender, sex, disability, or sexuality.
- Sexual, for example sexualised behaviour towards pupils, grooming, sexual harassment, sexual assault and rape, sending inappropriate messages through social media and other technologies.
- Neglect which may include failing to act to protect a child or children, failing to seek medical attention or failure to carry out appropriate/proper risk assessment etc.

20.4 A safeguarding complaint that meets the above criteria must be reported to the Centre Manager (“case manager”) immediately. If the complaint involves the manager, then the next most senior member of staff must be informed and the Board of Directors. In Imbue Ventures Ltd the named case manager is (Donald Faluyi). They will follow the processes outlined in this section.

20.5 Where a Centre Manager determines that a safeguarding allegation does not meet the harm threshold in line with the criteria above, they will refer the matter to be managed in line with paragraphs 20.8 - 20.9 (inc.) by a designated manager with appropriate safeguarding training. It is important for Centre Managers to carefully consider who in Imbue Ventures Ltd is best placed to manage concerns that do not meet the harm threshold and ensure appropriate action is taken given the sensitive and confidential nature of the information relating to staff over time. In many cases Centre Managers’ may decide to retain this role in the event that they have appropriate safeguarding training.

20.6 All staff must fully understand that any adult behaviours that deviate from the Guidance for Safer Working Practice, including inappropriate conduct outside of work are a concern, even if they are low-level. Low-level concerns are concerns that do not meet the harm test/allegations threshold. Examples of such behaviour include:

- *Being over familiar with children*
- *Having favourites*
- *Taking photographs of children on their mobile phone*
- *Engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or*
- *Humiliating pupils*

20.7 The Case Manager should ensure that the child is not at risk and where appropriate ensure that the child is referred to the Local Authority Duty and Advice team as referenced in Part 1 of KCSIE.

20.8 The Case Manager should gather as much information about the alleged incident as necessary in order to establish whether there is substance to the allegation. In situations where the Case Manager determines that the harm test has not been met the case manager must ensure that there is a clear record of the incident, include any actions (including whether any HR advice had been sought and actioned) taken to address the concern raised. This record must be kept confidential, stored securely and comply with the Data Protection Act 2018 and the UK GDPR (2018). Records of low level concerns will be reviewed so that any patterns of recurring low level concerns can be identified and responded to appropriately, this may include a referral to the LADO where repeated behaviours indicate an individual may not be suitable to work with children.

20.9 All low-level concern records will be kept for at least until the individual leaves their employment.

20.10 In situations where the case manager has sufficient information to suggest that the harm test/allegations threshold has been met, the case manager must use the local authority designated officer (LADO) notification form (see LADO ALLEGATIONS OR CONCERN ABOUT A PERSON WORKING WITH CHILDREN) in order to assess the level of concern, **prior to contacting the LADO**. As part of this initial consideration, the case manager should consult with their Imbue Ventures Ltd HR Advisor/provider/contact or in the case of a supply member of staff the supply agency safeguarding lead/senior manager. The completed LADO notification form must be sent to [CPMduty@derby.gov.uk](mailto:CPMduty@derby.gov.uk) **within one working day of the allegation being made**. This will assist the case manager and

HR/supply agency senior manager in consultation with the LADO to decide on the most appropriate course of action. This includes when to inform the member of staff of the concerns raised. Parents or carers of the child or children involved should be told about the allegation as soon as possible if they do not already know of it.

20.11 The Case Manager **must** not carry out an investigation or **directly interview** any child/ witness/ or the individual whom the concern relates too, until the above process has been duly completed and relevant partners have been consulted. However, statements of any alleged incidents of harm should be obtained as appropriate at the earliest opportunity in order to establish facts from relevant individuals.

20.12 A multi-agency allegations management meeting may be arranged to look at the complaint in its widest context. The case manager must attend this meeting, which will be arranged by the LADO. All issues must be recorded and the outcome reached must be noted to ensure closure.

20.13 In many cases it may be appropriate to provide further training and support to staff/volunteers and ensure that they are clear about the expectations for their conduct.

20.14 In more serious cases, allegations may be investigated under the formal disciplinary procedures and, where allegations are upheld, formal warnings issued as well as specific training and support. In cases where children/young people may be at further risk and/or evidence/witnesses may be compromised and/or the allegations are so serious that they may, if upheld, constitute gross misconduct, suspension of the member of staff/volunteer may be appropriate and should be considered in line with the Imbue Ventures Ltd Disciplinary Policy.

20.16 Any staff/volunteers who are dismissed by Imbue Ventures Ltd for gross misconduct or cumulative misconduct relating to safeguarding of children/young people will be referred to the DBS for consideration of barring. Similarly, where Imbue Ventures Ltd has a reasonable belief that the member of staff/volunteer would have been dismissed by Imbue Ventures Ltd had they been employed at the time of the conclusion of investigations, they will be referred to the DBS. The school will keep written records of all of the above.

- **LADO is contactable at [CPMduty@derby.gov.uk](mailto:CPMduty@derby.gov.uk) or on 01332 642376.**
- **Out of Hours Advice can also be sought from Careline at [DCCCarelinesecure@derby.gov.uk](mailto:DCCCarelinesecure@derby.gov.uk) or on 01332 956 606.**

20.17 Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, staff can contact any of the professionals named in the above paragraph, in addition to other whistleblowing channels which may be open to them.

20.18 The DDCSP Whistleblowing Policy states that concerns can be raised by the following methods:

- Whistleblowing hotline 0808 800 5000 (dedicated hotline answered by a member of the Internal Audit team or an answerphone).
- E-mail [ddscp@derby.gov.uk](mailto:ddscp@derby.gov.uk)
- The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00am to 8:00pm, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

## 21 Training and Support

All staff members will be made aware of systems within Imbue Ventures Ltd that support safeguarding and these will be explained to them as part of our staff induction. This includes: the Imbue Ventures Ltd safeguarding/child protection policy; the Imbue Ventures Ltd safer working practice document and the school's whistleblowing procedures, as well as their responsibilities to read and understand KCSIE Part 1 and Annexe B, this must be done as part of their induction and reviewed annually.

- 21.1 We recognise the stressful and traumatic nature of child protection work. Support is available for any member of staff from the Centre Manager. Access to regular and timely supervision is an essential form of support for all designated safeguarding staff. Derby and Derbyshire Safeguarding Children Partnership (DDSCP) are available for advice and support. (Tel: 01332 642351)
- 21.2 Designated Safeguarding staff must have attended the 3-day Children's Services Education child protection training course. They will attend refresher training at least every two years. The DSL will undertake Prevent Awareness Training (e.g. Workshop to Raise Awareness of Prevent [WRAP]) to enable them to provide advice and support to other members of staff on protecting children from the risk of radicalisation.
- 21.3 Imbue Ventures Ltd will ensure all staff including temporary and volunteers receive induction and an updated Handbook appropriate to their roles and responsibilities, especially staff new to Imbue Ventures Ltd. All staff will access basic child protection training including online safety as part of the Imbue Ventures Ltd induction arrangements and refresher training at least every three years. All staff should have regular safeguarding, child protection training and online safety updates (for example, via email, e-bulletins, staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. Training will include briefings on how to manage a report of child-on-child sexual violence or harassment and on the government's anti-radicalisation strategy, PREVENT, to enable staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Access to training can be via Derby and Derbyshire Safeguarding Children Partnership (DDSCP).
- 21.4 The Centre Manager will attend appropriate 1 day safeguarding training at least every three years.
- 21.5 Management, including the nominated director will attend specific training for their role, updated at least every three years.
- 21.6 Any training accessed through third party/independent providers must reflect the DDSCP protocols and the DDSCP minimum standards checklist. This training will be recorded by Imbue Ventures Ltd on a separate database.
- 21.7 The Centre Manager and at least one member of the management must complete the National Safer Recruitment Training and refresh this training every five years.

## 22 Child Protection Records

- 22.1 **The responsibility to maintain, process, share, transfer and store child protection and safeguarding records in accordance with the Data Protection Act 2018 and the GDPR principles is the responsibility of the DSL and any safeguarding**

**deputies. Child protection information will be held securely, with access being restricted to the DSL and their deputies, centre manager and in cases of Early Help, the nominated lead professional, if this is not a designated safeguarding lead/officer. For further information please see [Early Help](#). The following information must be kept securely with restricted access, whether paper or electronic:**

- Chronology (summary of significant events and the actions and involvement of Imbue Ventures Ltd)
- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome.
- All completed child protection cause for concern records
- Any child protection information received from the child's previous educational establishment
- Records of discussions, telephone calls and meetings with colleagues and other agencies or services
- Professional consultations
- Letters and emails sent and received relating to child protection matters
- Referral forms sent to CSC, other external agencies or education-based services
- Minutes or notes of meetings, e.g. child protection conferences, core group meetings, etc., copied to the file of each child in the family, as appropriate
- Formal plans for, or linked to, the child e.g., child protection plans, Early Help, risk assessments etc.
- A copy of any support plan for the pupil concerned (see SMART Plan)

22.2 Where a pupil leaves their existing provision, we will ensure that the child protection file is transferred securely and separately from the main pupil file to the receiving school/educational establishment (where this is known) as soon as possible and within 5 school days. This is a legal requirement set out under regulation 9 (3) of 'The Education (Pupil Information – England) Regulations 2005. A copy of the chronology must be retained for audit purposes.

22.3 Where there is an existing risk management plan/assessment in place for behaviours that are deemed potentially harmful to the pupil or others (i.e. self-harming or harmful sexualised behaviour), this information must be shared with the destination provision prior to the pupil starting so that appropriate care and control measures can be put in place to mitigate the potential of any risk of further harm occurring. The DSL will also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving, for example prior to a transfer programme.

22.4 Where a child leaves Imbue Ventures Ltd, the child protection file must be transferred to the new school or college if needed. There is no need to keep written or electronic copies of the child protection records, therefore these will be deleted from electronic systems once the successful transfer has been confirmed. The exception to this rule will be in any of the following instances:

- Where a vulnerable young person is moving to a Further Education establishment, consideration will be given to the pupil's wishes and feelings about their child protection information being passed on, in order that the FE establishment can provide appropriate support. In cases where it is deemed appropriate, relevant child protection information must be shared via the FE Safeguarding Information Sharing Form only. The original records will be retained and archived by the school/college. Due consideration must be given to the sharing of any additional information requested by the receiving establishment.

- Where the destination school is not known (*the original records will be retained by Imbue Ventures Ltd*)
- Where the child has not attended the nominated school (*the original records will be retained by the Imbue Ventures Ltd*)
- There is any on-going legal action (*the original file will be retained by Imbue Ventures Ltd and a copy sent*)
- Where a child moves to a different school outside of the Derby authority a copy of the child protection record will be retained for reference.

22.5 Pupil records will be transferred in a secure manner, for example, through secure electronic file transfer or by hand. When hand-delivering pupil records, a list of the names of those pupils whose records are being transferred and the name of the school/college they are being transferred to must be made and a signature obtained from the receiving school/college as proof of receipt. When sending records through secure electronic file transfer, a delivery and read receipt of the must be retained for audit purposes.

22.6 If a pupil moves from Imbue Ventures Ltd, child protection records will be forwarded onto the named DSL at the new school, with due regard to their confidential nature. Good practice suggests that this will always be done with a face-to-face handover between designated staff or a verbal conversation is had over the telephone if a face to face handover is not possible. A signed receipt of file transfer or electronic delivery must be obtained for audit purposes by the delivering organisation.

22.7 If sending by post, children records will be sent "Special Delivery". A note of the special delivery number will also be made to enable the records to be tracked and traced via Royal Mail.

22.8 For audit purposes a note of all pupil records transferred or received will be kept in either paper or electronic format. This will include the child's name, date of birth, where and to whom the records have been sent, and the date sent and/or received. A copy of the child protection chronology will also be retained for audit purposes and kept securely.

22.9 If a pupil is permanently excluded and moves to an alternative or specialist provision, child protection records will be forwarded onto the relevant organisation in accordance with the 'The Education (Pupil Information – England) Regulations 2005, following the above procedure for delivery of the records.

22.10 If a parent chooses to electively home educate (EHE) their child, please contact the EHE team on [education.welfare@derby.gov.uk](mailto:education.welfare@derby.gov.uk) or 01332 641448 for information on where the child protection record must be sent.

22.11 When a DSL member of staff resigns their post or no longer has child protection responsibility, there will be a full face to face handover/exchange of information with the new post holder.

22.12 In exceptional circumstances when a face-to-face handover is unfeasible, it is the responsibility of the Centre Manager to ensure that the new post holder is fully conversant with all procedures and case files.

22.13 All DSLs receiving current (live) files or closed files must keep all contents enclosed and not remove any material.

22.14 All receipts confirming file transfer must be kept in accordance with the recommended retention periods. For further information refer to the archiving section.

## **23 Children's and parents' access to child protection files**

23.1 Under Data Protection legislation (General Data Protection Regulation & Data Protection Act 2018) a pupil or their nominated representative have a number of legal right in respect of information relating to them. These rights include the right to access and the right to rectification of inaccurate data. Therefore all information will be accurately recorded, objective in nature and expressed in a professional manner.

23.2 Any child who has a child protection file has a right to request access to it. However, neither the child nor the parent has an automatic right to see all the information held in child protection records. Information can be withheld if disclosure:

- could cause serious harm or is likely to cause serious harm to the physical or mental health or condition of the child or another person; or
- could reveal that the child or another person has been a subject of or may be at risk of child abuse, and the disclosure is not in the best interests of the child; or
- is likely to prejudice an on-going criminal investigation; or
- information about the child also relates to another person who could be identified from it or the information has been given by another person who could be identified as the source, unless the person has consented to the disclosure or the person providing the information is an employee of the establishment or the Local Authority.

23.3 It is best practice to make reports available to the child or their parents unless the exceptions described above apply. If an application is made to see the whole record, advice can be sought from the Derby Adults, Health and Childrens Information Governance Hub.

Contact email: [DCHST.info.gov@nhs.net](mailto:DCHST.info.gov@nhs.net)

23.4 The establishment's report to the child protection conference will (wherever possible) be shared with the child, if old enough, and parent at least two days before the conference.

## **24 Archiving**

24.1 The school that the pupil attended until statutory school leaving age (or the school where the pupil completed sixth form studies) is responsible for retaining any child protection records they may hold. The recommended retention periods is 35 years from closure when there has been a referral to CSC. If no referral has been made to CSC, the child protection record will be retained until the child's 25th birthday, after which point the file will be destroyed confidentially/deleted from our electronic system. The decision of how and where to store child protection files will be made by the school via the governing board. Due to sensitivity of the information, the records will continue to be held in a secure area with limited access e.g. designated officer or head teacher. The DSL is responsible for ensuring that all child protection files are archived in accordance with the timescales referenced above. The DSL is responsible for ensuring that the appropriate timeframes for archiving and destroying child protection records referenced above are set on

electronic systems accordingly for each pupil. Imbue Ventures Ltd will ensure to have a retention period of a minimum of 10 years.

- 24.2 Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

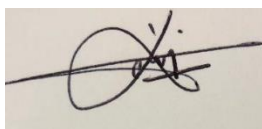
## **25 Safe Destruction of the pupil record**

- 25.1 Where records have been identified for destruction, they will be disposed of securely at the end of the academic year (or as soon as practical before that time). Records which have been identified for destruction will be confidentially destroyed. This is because they will either contain personal or sensitive information, which is subject to the requirements of Data Protection legislation or they will contain information which is confidential to school or the Local Education Authority. Information will be shredded (or deleted as appropriate) prior to disposal or confidential disposal can be arranged through private contractors. For audit purposes the school will maintain a list of records which have been destroyed and who authorised their destruction. This can be kept securely in either paper or an electronic format.

## **26 Safeguarding responsibilities for pupils in transition**

- 26.1 Imbue Ventures Ltd will work with schools during transition.  
It is expected of schools that in the event that a pupil transitions full-time from a primary setting into a high school setting before the end of their academic school year 6, the high school must place a pupil on their admissions register on the first day that the pupil attends and submit a new starter form to the local authority admissions team. Once the pupil is registered at the new school, the previous school can remove the pupil from their register. All safeguarding responsibilities, including attendance management, for the pupil will transfer to the head teacher and/or the senior designated safeguarding lead of the secondary setting. All child protection files, and risk assessments will be transferred in keeping with the guidance outlined in section 18 of this policy – Child Protection Records
- 26.2 Where a vulnerable pupil transitions from a high school setting to a post-16 provision the school must complete the FE Safeguarding Information Sharing Form only. All existing child protection records must be archived in keeping with the guidance outlined in section 18.3 of this policy –Archiving.

Last reviewed September 2024 by

A handwritten signature in black ink, appearing to be 'D. Faluyi', written over a horizontal line.

D.Faluyi (on Behalf of the Board of Directors)