Safeguarding Policy

Approval body:	Mulberry Schools Foundation Trustees
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Policy version:	2

Version Control

Version	Reviewed	Changes since last version
1	June 2019	Original
2	June 2021	Updated in the light if KCSIE 2020 Including: • Adding mental health to safeguarding definition • Adding Child Sexual Exploitation, Child Criminal Exploitation and County Lines to the definitions of abuse in Appendix A • Referencing contextual safeguarding and mental health concerns on the definitions of abuse in Appendix A • Adding a reference to allegations of staff posing a risk to children in the section on Reporting. Reference to Charity Commission guidance on safeguarding added.

1.   Purpose of the policy

The purpose of this policy is to protect the health, safety, well-being and human rights of people coming into contact with Mulberry Schools Foundation ("the Foundation"), particularly children, at-risk adults and beneficiaries of the Foundation's assistance. The policy aims to protect people from any harm arising from:

- the conduct of staff or personnel associated with the Foundation;
- the design and implementation of the Foundation's programmes and activities.

The policy lays out the commitments made by the Foundation and informs staff and associated personnel of their responsibilities in relation to safeguarding.

By virtue of its close relationship with Mulberry Schools Trust, whereby much of the Foundation's work will be undertaken within Mulberry Schools Trust's schools, the staff and trustees of the Foundation come into contact from time to time with Mulberry Schools Trust students. The Foundation will therefore adhere to the full safeguarding policies of those schools. The Foundation does not employ its own staff and the staff engaged by the Foundation are in fact employees of Mulberry Schools Trust. References to "staff" in this policy is intended to include anyone working for or carrying out activities on behalf of the Foundation even where they are directly employed by Mulberry Schools Trust.

This policy reflects the Charity Commission guidance on safeguarding and protecting people.[1] Since the majority of the Foundation's work relates to advancing education for young people, this policy also aligns with the **DfE's 2020 Statutory Guidance "Keeping Children Safe in Education"[2]**.

The Foundation also follows **Mulberry Schools Trust's policy on Safer Recruitment[3]**. This policy can be found on the Trust's website. The Foundation will ensure that staff and Trustees undergo enhanced DBS checks and, in accordance with the Charity Commission's guidance on safeguarding, working with Mulberry Schools Trust as appropriate to obtain these checks and ensure safer recruitment.

2.   Principles

Ensuring the safety and protection of their beneficiaries is an essential aspect of all charities' work. Unless individuals are safe and treated well, with dignity and respect, it is impossible for them to realise their potential or fully benefit from their involvement with the Foundation.

Over recent years there has been increasing recognition of the way in which vulnerable people can be at risk of harm from organisations that are supposed to help them. As a consequence, there has been a significant increase in the efforts made by organisations to ensure that no harm comes to vulnerable people from contact with their staff or as a result of any of the organisation's activities.

This duty of care extends beyond statutory safeguarding requirements. The Foundation takes seriously its obligations to operate in such a way as to ensure so far as possible that its work causes no harm to anyone who comes into contact with its work. In this regard, it is noted that the Foundation and its staff and trustees are already required to comply with Mulberry Schools Trust's own safeguarding policy when working together.

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[1] https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees
[2] https://www.gov.uk/government/publications/keeping-children-safe-in-education--2
[3] http://www.mulberryschoolstrust.org/key-information/trust-policies

Given these values and in light of widely recognised risks, the Foundation has developed this Safeguarding Policy to promote protection for all those people it comes into contact with, as well as staff and Trustees, and Mulberry Schools Trust as a partner organisation.

Whenever the Foundation comes into contact with vulnerable groups, it takes responsibility to ensure it is doing all it can to protect such groups from all forms of harm, including abuse, neglect and exploitation and to ensure appropriate action is taken if such harm occurs.

The Foundation also recognises that good safeguarding policies and procedures are of benefit to everyone involved with the Foundation's work.

Accordingly, as part of this Safeguarding Policy, the Foundation will:

- promote and prioritise the safety and wellbeing of children and adults at risk;
- ensure everyone understands their roles and responsibilities in respect of safeguarding;
- where appropriate, report any concerns to relevant authorities including statutory agencies and the Charity Commission[4]; and
- ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored.

This Safeguarding Policy and procedures will be widely promoted and are mandatory for everyone involved in the Foundation's work.

3.   Definitions

In the UK, **safeguarding** means protecting people's physical and mental health, well-being and human rights, and enabling them to live free from harm, abuse and neglect.

A **child** means anyone under the age of 18.

An **adult at risk** means any adult who by reason of: disability, age or illness; the context they are in; or as a result of social and other inequalities; is or may be unable to take care of or to protect him/herself against significant harm or exploitation.

4.   Scope

This policy applies to:

- the Foundation's Trustees;
- all staff contracted by the Foundation, whether employed or seconded/loaned;
- associated personnel engaged with work, events or activities related to the Foundation, including but not limited to consultants; volunteers; contractors; visitors.

The Foundation expects all organisations receiving funding from the Foundation, or that otherwise work with the Foundation to deliver its charitable activities, to fully support the values and commitments set out in this Safeguarding Policy and to have appropriate safeguarding policies and procedures in place.

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[4] www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity

5. **Commitment**

The Foundation believes that everyone, regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation. The Foundation will not tolerate abuse and exploitation by staff or associated personnel.

The Foundation commits to addressing safeguarding throughout its work, through prevention, reporting and response.

The Foundation aims to contribute to building self-esteem and confidence in the people it works with and recognises the positive impact this can have, especially on those at risk of, or suffering from, abuse.

6. **Prevention**

The Foundation will:

- ensure all staff and associated personnel have access to, are familiar with, and know their responsibilities within, this policy;
- design and undertake its activities in a way that ensures participants feel safe and listened to and that protects them from any risk of harm that may arise from their coming into contact with the Foundation. This includes the way in which information about individuals on our programmes is gathered and communicated;
- implement stringent safeguarding procedures when recruiting, managing and deploying staff and associated personnel;
- ensure staff and associated personnel receive training on safeguarding at a level commensurate with their role;
- follow up on reports of safeguarding concerns promptly and with due process.

It is **all staff and associated personnel's responsibility** to contribute to creating and maintaining an environment that maintains the well-being and safety of all, prevents safeguarding violations and promotes the implementation of this policy.

7. **Reporting and responding to concerns**

The Foundation will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the people it works with. This includes any concerns of possible/actual harm, including abuse, exploitation, and neglect as defined in Appendix 1 and policy non-compliance, or risk of such, resulting from action or inaction by anyone covered by this Safeguarding Policy.

Internally to the Foundation, staff and associated personnel should report concerns or complaints directly to the Trustee with safeguarding responsibility (Mulberry Schools Trust CEO; headteacher@mulberryschoolstrust.org or via 0207-790-6327), in line with the Mulberry Schools Trust Whistle-blowing Policy if appropriate (available on the MST website). This includes any allegation that a member of staff or associated personnel would pose a risk of harm if they continue to work in regular or close contact with children or young people in a school or college.

When working with partner organisations, including Mulberry Schools Trust, on their premises, with partners' staff responsible for their participants, the reporting mechanism will be defined as part of the planning for the activity, drawing on the procedures of the host or partner school/organisation. If any person working within or for the Foundation sees something that causes an immediate safeguarding concern in any event wherever hosted, they should raise this immediately with the Lead Safeguarding

Contact for that particular joint activity or another member of staff and should not delay in passing this information on.

An allegation of abuse or inappropriate conduct made against a Trustee or staff member working within or for the Foundation must be reported immediately to the Trustee with safeguarding responsibility (MST CEO: CEO@mulberryschoolstrust.org or via 0207-790-6327). If the allegation is against the Trustee with safeguarding responsibility, or for any reason the Trustee with safeguarding responsibility is unavailable, then the concern should be reported to the Foundation's Chair of Trustees (via 0207-791-7205).

It is **all staff and associated personnel's responsibility** to report any concerns about a young person or vulnerable adult's well-being and safety or suspicions regarding safeguarding violations by Mulberry Schools Foundation staff using the agreed systems, or directly to the Trustee with safeguarding responsibility (MST CEO: CEO@mulberryschoolstrust.org or via 0207-790-6327).

It is essential that confidentiality is maintained when dealing with safeguarding concerns. Information should be shared on a need-to-know basis only and should be kept secure at all times.

The Foundation will follow up all safeguarding concerns and reports raised with the Foundation. It will apply appropriate disciplinary measures to staff found in breach of policy. The Foundation is committed to reporting any incidents as the appropriate regulatory bodies (including the Charity Commission[5]) as required. Where there is evidence that criminal activity may have taken place, we will report to the relevant police and/or safeguarding authorities as appropriate.

The Foundation will offer support to survivors of any harm caused by staff, regardless of whether a formal response is made.

8.   Policy monitoring, evaluation and review

Trustees will receive a safeguarding report at each Board meeting. This will include:

- comment on the safeguarding commitments of the applications being considered at the meeting, and any recommendation for improvements to the application documentation;
- comment on the ease of defining safeguarding reporting mechanisms with partner organisations in recent activities, and any recommended changes to approach;
- numerical information on any safeguarding concerns reported.

These reports, and any new or updated statutory guidance, will feed into an annual review of this policy conducted by the Trustee with safeguarding responsibility. The revised policy will be approved by the full Mulberry Schools Foundation Board.

9.   Policy availability

This policy is available to all staff and partners on the Foundation's website. It is highlighted to all staff at the beginning of each planned activity.

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[5] www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity

Appendix 1: Definitions of abuse

It can often be difficult to recognise abuse. It is nevertheless important to know what could indicate that abuse is taking place and to be alert to the need to consult further. Someone can abuse a child/vulnerable adult by actively inflicting harm or by failing to act to prevent harm. Abuse can take place within a family, in an institutional or community setting, by telephone or on the Internet. Outside the family, children/vulnerable adults can be at risk of multiple harms including, but not limited to, sexual exploitation, criminal exploitation, and serious youth violence. Abuse can be carried out by someone known to the person or by a stranger.   Abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

If you are worried about a child/vulnerable adult it is important that you pass on your concerns immediately, using the reporting mechanisms above.

In addition to the indicators below, it should also be recognised that mental health problems can, in some cases, be an indicator that a person has suffered or is at risk of suffering abuse, neglect or exploitation.

A.   CHILDREN

Physical abuse	Physical abuse is the deliberate infliction of pain, physical harm or injury and includes withholding or misuse of medication. Indicators include: • Any injuries not consistent with the explanation given for them • Injuries which occur to the body in places which are not normally exposed to falls, bumps, etc • Injuries which have not received medical attention • Reluctance to change for, or participate in, games or swimming • Finger marks or multiple bruising • Bruises, bites, cuts, scratches, burns, fractures, etc. which do not have an accidental explanation • Flinching or evidence of pain/discomfort during normal activity
Emotional abuse	Emotional abuse is the emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless, unloved or inadequate or causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. It may feature age or developmentally inappropriate expectations Some level of emotional abuse is involved in all types of ill treatment of a child, though it may occur alone. Indicators include: • Changes or regression in mood or behaviour, particularly where a child withdraws or becomes clinging • Nervousness, frozen watchfulness • Obsessions or phobias • Sudden under-achievement or lack of concentration • Inappropriate relationships with peers and/or adults • Attention seeking behaviour

	• Running away/stealing/lying
Sexual abuse	Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not they are aware what is happening. This may involve physical contact, including penetrative (e.g. rape, buggery) or non-penetrative acts or non-contact activities, such as involving children in looking at, or the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways. Indicators include: • Any allegations made by the child concerning sexual abuse • Child with excessive preoccupation with sexual matters and detailed knowledge of adult sexual behaviour, or who regularly engages in age-inappropriate sexual play • Sexual activity through words, play or drawing • Child who is sexually provocative or seductive with adults • Inappropriate bed sharing arrangements at home • Unexplained bruising around or bleeding from the genital area • Stained or bloody underclothing • Unexplained difficulties in walking
Neglect	Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. It may involve a parent or carer failing to provide adequate food, shelter or clothing, failure to protect a child from physical harm or danger, or failure to ensure access to appropriate medical care or treatment. Indicators include: • Persistent hunger • Weight loss • Poor hygiene • Dress inappropriate to weather or activities • Physical problems and medical needs that are not attended
Organised abuse	Organised or multiple abuse may be defined as abuse involving one or more abuser and a number of related or non-related abused children and young people. The abusers concerned may be acting in concert to abuse children, sometimes acting in isolation, or may be using an institutional framework or position of authority to recruit children for abuse. Indicators include: • Series of complaints from different parents about the same staff/situations/issues • Records regularly being mislaid/poor record keeping • Controlling relationships • Children/activities being visited regularly by "associates" of staff
Child Criminal Exploitation (CCE)	CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even

	if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. Indicators include: • Unexplained gifts or new possessions • Association with other young people involved in exploitation • Changes in emotional well-being • Misuse of drugs and alcohol • Going missing for periods of time or regularly coming home late • Regularly missing school or education or not taking part in education
Child Sexual Exploitation (CSE)	CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. CSE can affect any child or young person under 18, including 16- and 17-year-olds who can legally consent to have sex. The sexual activity may be exploitative even if it appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). The above CCE indicators can also be indicators of CSE, as can: • older boyfriends or girlfriends; and • sexually transmitted infections or becoming pregnant.
County lines	"County lines" describe gangs and organised criminal networks involved in transporting illegal drugs, using dedicated mobile phone lines or other form of "deal line". Exploitation is integral to the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders can use coercion, intimidation, violence (including sexual violence) and weapons to ensure victims' compliance. Children can be targeted and recruited into county lines in their educational settings. Children are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten victims (and their families) with serious violence and kidnap if they attempt to leave the county lines network. Indicators include: • missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs

B. ADULTS

Physical abuse	Physical abuse is the deliberate infliction of pain, physical harm or injury and includes withholding or misuse of medication. Indicators include:

	• Injuries not consistent with falls or offered explanations • Unexplained loss of hair in clumps • Cuts that are not likely to be explained by self-injury • Finger-marks • Flinching or evidence of pain/ discomfort during normal activity
Psychological abuse	Psychological abuse is any pattern of behaviour by another that results in harm and may include insults, humiliation, ridicule, bullying, threats, enforced isolation, interference in relationships and contact between consenting adults, coercion, lack of privacy or choice, denial of dignity. Indicators include: • Signs of strain within a relationship and/ or tension when a particular person is present • Indicators that an individual acts differently when a third person is present than at other times • Suggestions of refusal to allow a choice eg to eat or not eat more or less of particular foods, to dress according to preference • Signs of withdrawal or fear or other changes to emotional state • Signs of unexplained sleep or weight loss
Sexual abuse	Sexual Abuse is any sexual activity involving but carried out without the informed consent of an adult at risk. Sexual abuse may include sexual intercourse, inappropriate touching, offensive or suggestive language, upskirting, 'voyeuristic' behaviour and exposure to the suggestive or sexually explicit activities of others, including films, photographs, images. Indicators include: • Unexplained bruising around or bleeding from the genital area; • Stained or bloody underclothing • Unexplained difficulties in walking • Reluctance of the person to be alone with an individual known to them • Unusual and inappropriate sexualised language
Financial or material abuse	Financial abuse is the misappropriation of funds (savings or income) or property of an adult at risk. This may include exploitation, theft or fraudulent use of money, misuse of property or possessions and incurring financial liabilities on behalf of an adult at risk without their informed consent. Indicators include: • Unexplained shortage of money despite a seemingly adequate disposable income • Unexplained withdrawals from savings accounts • Unexplained disappearance of financial documents for example bank statements, receipts for non-routine expenditure • Loss of personal possessions
Neglect and acts of omission	Neglect may be deliberate or by default where the abuser is not able to provide the care and support needed or may not recognise the need for the care and support to be given. The abuser may also be neglecting themselves. Indicators include: • Persistent hunger and / or weight loss • Poor hygiene

	• Dress inappropriate to weather or activities • Denial of religious or cultural needs • Physical problems and medical needs that are not attended to • Physical problems and medical needs that are not attended
Discriminatory abuse	When the adult at risk is harassed or discriminated against because of their age, race, gender, sexuality, religion, disability, culture etc Indicators include: • Signs of strain within a relationship and/ or tension when a particular person is present • Signs of withdrawal or fear or other changes to emotional state • Unexplained outbursts • Out of character discriminatory language, behaviour
Organisational abuse	Where neglect and poor professional practice impact on care. It can occur when poor communication, systems, practice and norms mean the care received is below that what should be expected. Indicators include: • Medication errors • Poor record keeping • Complaints from service users and their family • Loss of personal possessions / clothing • Controlling relationships between staff and service users
Self Neglect	Where the adult at risk is neglecting to care for their own personal hygiene, health or surroundings Indicators include: • Hoarding • Poor personal hygiene • Unexplained weight loss • Wearing the same clothes for several days • Physical problems and medical needs that are not attended to
Modern Slavery	Includes forced labour, debt bondage, sexual exploitation, criminal exploitation and domestic servitude Indicators include: • Not being allowed to travel alone or make decisions • Lack of personal possessions • Reluctance to seek help • Poor levels of nourishment, dress and energy
Domestic violence	Includes controlling, coercive or threatening behaviour and / or violence between people who are or have been intimate partners or family members Indicators include: • 'Honour' based violence • Female genital mutilation (FGM) • Forced marriage • Signs of strain within a relationship and/ or tension when a particular person is present • Signs of withdrawal or fear or other changes to emotional state

This is not an exhaustive list of abuse and its indicators. There could be other forms of abuse we have not discussed in this policy. We ask all our partners to familiarise themselves with this policy and to train their staff who have contact with children and vulnerable adults in child protection and safeguarding, and on the signs of recognising abuse.