



Trust Level Safeguarding Policy

2025/26

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1. Introduction

Spencer Academies Trust (SAT) believes that a child or young person should never experience abuse of any kind. We have a responsibility to promote the welfare of all children and young people and keep them safe. We are committed to practise in a way that protects them.

The purpose of this document is to provide an umbrella summary of the aspects of safeguarding that are common across our Trust.

Each school within our Trust has the academy-specific *Safeguarding & Child Protection Policy and Guidance* which is published on their individual website. A list of academies and their websites are included in Appendix 1 of this document.

This policy should be read alongside the following documents:

- Whistleblowing Policy
- Employee Expectations & Code of Conduct
- Equality & Diversity Policy
- Keeping Children Safe in Education, (DFE, 2025)
- Working Together to Safeguard Children – (DFE, 2023)
- The Children Act 1989 and 2004
- The Children and Social Work Act 2017
- The Education Act 2002
- The Prevent Duty 2015

2. Key Contacts

Role	Name	Contact
Director of Inclusion & Engagement	Sarah McAneny-Vincent	smcaneny@spencertrust.org.uk
Head of Student Welfare Systems	Fiona Hallam	fhallam@spencertrust.org.uk
Board Member Safeguarding Link	Donna Kinderman	dkinderman@spencertrust.org.uk

3. Definitions

It is important to see safeguarding as the universal term for everything we do to support children and young people by keeping them safe and promoting their welfare. *Keeping Children Safe in Education (2025)* defines safeguarding and promoting the welfare of children as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the impairment of children’s mental and 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.

Child Protection, however, is defined in *Working Together to Safeguard Children (2023)* as:

- the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

As part of this, all staff will be responsive to emerging issues preventing the need for child protection procedures with good safeguarding and welfare practices.

4. The Law and National Framework

The requirements of our Trust and each Academy to safeguard and promote the welfare of all children and young people are embedded in legislation, government, and Local Authority guidance. Therefore, the policy of our Trust must be, and is, in line with this wider framework.

4.1 National Guidance

The government publications *Working Together to Safeguard Children (2023)* and *Keeping Children Safe in Education (2025)* (KCSiE), provide the statutory framework for safeguarding and give practical guidance on implementing legal requirements.

All academy staff are provided with KCSiE Part 1 at the beginning of the academic year or upon induction to the academy. All staff must complete an online training session and assessment to confirm understanding of this guidance annually.

Our Trust also provides an audiobook of Annexe B of KCSiE as an accessible alternative to this statutory guidance¹.

4.2 Local Safeguarding Partnerships

Local Safeguarding Partnerships (LSPs) are made up of senior managers from the three safeguarding partners. A safeguarding partner in relation to a local authority area in England is defined under the Children Act 2004 (as amended by the Children and Social Work Act, 2017) as:

- the local authority;
- a clinical commissioning group for an area, any part of which falls within the local authority area;
- the chief officer of police for an area, any part of which falls within the local authority area.

The three Safeguarding partners oversee, at a local level, the working together arrangements for safeguarding. Each partnership arrangement will have a unique offer that relates to the community they serve. Each academy shows due regard to their local partnership arrangements.

It is an expectation of our Trust that DSLs (or their deputies) will attend update events, as required, by their local partnership arrangements.

¹ Staff should be made aware of this during their induction or annual safeguarding training.

5. Roles and Responsibilities

All employees of SAT have a role to play in ensuring the wellbeing and safety of children, young people, their families, and each other. Below is a brief description of roles and responsibilities.

5.1 All Staff

All staff will:

- ensure they have undertaken identified annual safeguarding training;
- ensure they report any concerns to the DSL, no matter what their role;
- ensure they have a copy of Part One of KCSIe and that they have read and understood it;
- take action to reduce the risk of allegations being made against them;
- be aware of the needs of young people and be vigilant for any possible signs of abuse.

5.2 The Designated Safeguarding Lead at Academy Level

The Designated Safeguarding Lead (DSL) is a member of the academy Senior Leadership Team and is responsible for the strategic leadership of safeguarding. The DSL is the person to whom staff should pass their initial concerns and who will ensure a practical and efficient way of dealing with those concerns.

The DSL will:

- ensure an open and efficient route for staff to bring concerns to them of any sort and to have their concerns taken seriously;
- ensure they are appropriately trained to carry out the role;
- support staff in ensuring they receive appropriate training;
- promote the procedural pathway within the academy, so staff are aware of the way to report concerns;
- ensure the academy procedures are followed and adhered to with regard to referring;
- offer clear advice and support to staff bringing concerns or needing help;
- consider whether concerns referred to them need to be referred to Children's Services/Social Care;
- offer appropriate feedback as necessary as to the progress of the concern;
- maintain written records of concerns about a child even if there is no need to make an immediate referral and maintain a CPOMS record to ensure consistency;
- discuss with the Principal and, where appropriate, the wider safeguarding team any complex concerns;
- ensure that all such records are kept confidentially and securely and are separate from student records;
- ensure particular complex cases are referred without delay, and especially where it involves a child or young person subject to a child protection plan;
- take lead responsibility for ensuring online safety and understanding the filtering and monitoring systems and processes in place;
- follow the LSP's escalation policy where cases are not progressing in an acceptable manner;
- gather, collate and analyse as appropriate all relevant information for purposes of quality assurance and;
- attend the termly Trust DSL Network Meeting as part of the quality assurance and CPD process.

5.3 Designated Safeguarding Lead(s) for the Spencer Alliance for Leadership and Teaching

The Spencer Alliance for Leadership and Teaching includes:

- Spencer Teaching School Hub, including all CPD courses and AB Services
- George Spencer Academy SCITT
- Spencer Apprenticeships
- The Derby Research School at Wyndham Primary Academy
- Maths Hub East Midlands West

Drawing from the advice and guidance in the September 2025 KCSIE, the SALT Team have developed a role descriptor for their Designated Safeguarding Lead, linking to the statutory requirements for their responsibilities:

- ITE Ofsted Requirements and ITT Criteria and Supporting Advice
- FE Ofsted Requirements
- NPQ and ECF Ofsted Requirements
- Prevent Duty Requirements
- Ofsted Research and Analysis: Review of Sexual Abuse in Schools and Colleges

In addition to the role of the Academy DSL, the SALT DSL will:

- ensure the SCITT and Apprenticeship adhere to Safer Recruitment practices for the recruitment and onboarding of learners;
- ensure the SALT team maintain the event management protocols including visiting facilitator checks and participant checks, site safety and trust visitors policy;
- embed a wider curriculum entitlement for personal development reflecting each strand's statutory requirements.

5.4 Deputy Designated Safeguarding Lead(s)

Each academy within our Trust will appoint at least one Deputy Designated Safeguarding Lead who will formally provide cover and additional capacity for the DSL. Each Deputy DSL will be trained to the same level as the DSL.

In the event of the long-term absence of the DSL, the Principal will identify a Deputy DSL to undertake the duties of the DSL listed above.

5.5 The Principal / SALT Director

The Principal in each academy and the SALT Director is responsible for ensuring the DSL is effective in their role of providing and accessing high-quality services to safeguard and promote the welfare of children, young people and learners accessing provision, including:

- offer day to day support and guidance to the DSL as necessary;
- oversee the promotion of safeguarding throughout the academy/training provision, ensuring all staff are;
- appropriately trained and aware of their responsibilities;
- ensure cover is provided where necessary in the absence of the DSL;
- offer supervision to the DSL in relation to their role and decisions made;
- ensure that a senior member of staff is designated as the person in charge of Looked After and Previously looked after Children and receives appropriate training;

- encourage students and parents to inform the academy/training provision of any concerns;
- work with the representative of the governing body to put mechanisms in place to ensure that students and learners requiring safeguarding measures are monitored in relation to their situation and progress with their learning;
- ensure all recruitment procedures follow safeguarding best practice based on advice;
- contribute, as appropriate, to quality assurance processes; and
- ensure sufficient allocation of time given to DSLs to undertake the role.

5.6 The Academy and Training Provision Senior Leadership Team

The academy and training provision Senior Leadership Team will support the Principal/Director to discharge the duties to safeguard children, young people and learners.

The School and Training Provision's Senior Leadership Team will:

- promote the importance of safeguarding throughout the academy/provision;
- oversee the effectiveness of safeguarding systems, especially procedures, and review and report any changes that are required;
- support the work of the DSL to ensure an effective process for dealing with concerns and;
- ensure that the academy/training provision fulfils its statutory duty to co-operate with other agencies and that the chain of accountability is clear from the front line to senior level.

5.7 The SAT Executive Team

The Director of Inclusion and Engagement will provide strategic leadership within our Trust for all aspects of safeguarding children and young people.

The Director of Inclusion & Engagement will:

- ensure that all policies and procedures are reviewed and updated in line with national and local requirements and appropriate changes disseminated to all academies;
- co-ordinate a termly DSL Network meeting to share best practice, provide CPD and quality assure the work of DSLs across the Trust;
- ensure that there are systems in place to support the effective management of safeguarding, especially the role of DSLs, training for all staff and supervision as appropriate;
- ensure that there is someone who can offer appropriate advice to Principals and support with safeguarding concerns, especially when they are complex and/or relate to allegations against staff;
- ensure quality assurance processes are in place and oversee the information they produce to measure the progress and effectiveness of existing safeguarding frameworks;
- produce information to the Trust Board in relation to Safeguarding in order to ensure that the Board can demonstrate that it is discharging its safeguarding obligations appropriately.

5.8 The Chief Executive Officer

- Leads and holds to account the SAT Executive Team and is also a member of the Board of Directors

- Under our trust whistleblowing policy any safeguarding concerns about Members of our Trust Executive Team, Principals or Executive Principals of SAT Academies must be referred to the CEO.
- Holds responsibility for advising the Board on our Trust safeguarding strategy including policy, practice use and deployment of resources
- Ensure a safe, inclusive and positive culture across our Trust and its academies
- Ensure the organisation complies with all statutory and legal requirements including safeguarding and health and safety

5.9 The Board of Directors

Boards have a strategic leadership responsibility for safeguarding arrangements within the entire Trust and must ensure that they comply with their duties under legislation.

Under the SAT Scheme of Delegation, it is the responsibility of The Board to ensure that:

- policies on the safer recruitment of staff, on dealing with allegations against staff, supporting pupils with medical conditions and a staff code of conduct for working with children are in place;
- that these policies are communicated to all employees and that appropriate systems and procedures are in place to secure effective implementation of these policies;
- all Directors (Trustees) receive appropriate safeguarding and child protection training at induction in order to discharge their statutory responsibilities;
- safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.
- there are appropriate filtering and monitoring systems in place and regularly review their effectiveness.
- alongside the CEO, will provide appropriate challenge and support to the Director of Inclusion and Engagement.

6. Governance of Safeguarding

Although the responsibility for safeguarding rests with the Board, SAT appoint a Director of the Board to take leadership responsibility for our Trust's safeguarding arrangements and this individual has direct links with the Director of Inclusion and Engagement on a regular basis.

The day-to-day strategic leadership of safeguarding is delegated to the Director of Inclusion and Engagement, who, as a member of the Trust Executive Leadership Team, will work with Principals, SALT Director and DSLs to ensure that all statutory duties are fulfilled.

The Director of Inclusion and Engagement provides regular reports to the Board member with responsibility for safeguarding along with other members of the Trust Board, through the Quality and Standards Committee.

The role of the Board member with responsibility for safeguarding is to provide appropriate challenge and support to the CEO and Director of Inclusion and Engagement to ensure that they are satisfied that the Trust is fulfilling its safeguarding duties identified in the statutory guidance KCSiE.

The SALT Training Provision also has a requirement to report high-level safeguarding and Prevent data to each of their Strategic Board, particularly Spencer Apprenticeships and GSA SCITT.

7. Quality Assurance

Robust safeguarding practices and procedures are key to supporting and safeguarding the children, young people and learners that access services from SAT. Effective quality assurance measures are essential in ensuring the practices and procedures are fit for purpose.

The Safeguarding Improvement Evaluation Framework (IEF) has 8 strands in place to monitor safeguarding within our Trust;

- Leadership
- Policies & Procedures
- Training
- Record Keeping
- Case Management
- Vulnerable Children and Emerging Needs
- Induction
- Low Level Concerns

Academies self-evaluate their safeguarding work on a termly basis, rating each strand (Stabilise, Repair, Improve, Sustain and Lead) as well as completing a three-line action plan (TLAP) which will dictate improvement work being undertaken for the term. In addition to this, academies are also required to take part in a Safeguarding Quality Assurance Visit on at least an annual basis to showcase rationale for ratings while partaking in professional discussion and challenge.

Where schools are graded as Stabilise or Repair, they will be visited by the Inclusion team on at least a half termly basis.

It is important to note that the current rating of each academy is reviewed constantly and may be subject to change without prior notice.

Our Trust will provide effective and robust feedback to academies that will support their ongoing evaluation and improvement work at a strategic level.

8. Escalation

On rare occasions staff may wish to escalate their concern where they are dissatisfied with the outcome or action of leaders within the academy or SALT training provision. This may be indicated by:

- difficulty in getting hold of a DSL;
- staff not being satisfied with the decision of the DSL or Principal/SALT Director;
- staff aware that a colleague has not passed on a concern;
- external agencies not accepting a referral from an academy/training provision when it is felt one is needed;
- staff not aware of what has happened to their concern because of a lack of feedback.

Staff must not close a concern because they feel "stuck" or "they can't do anymore".

If staff become concerned about the progress or action taken in relation to a concern, they should escalate their concern to the Principal in the first instance or, if necessary, to the Chief Executive Officer

(CEO).

If there are concerns about the work of an external agency, the academy will follow the escalation steps outlined in the local authority agreed procedures documents.

Further information about raising concerns can be found in our Trust Whistleblowing Policy.

9. Managing Allegations against Adults Working within the Trust

The Trust takes allegations against members of staff very seriously and acknowledges that if concerns are not addressed as early as possible, they can create unsafe working environments and leave staff and children increasingly vulnerable.

This following procedure must be used in any case in which it is alleged that a member of staff, governor, contractor, visiting professional or volunteer has:

- Behaved in a way that has harmed a child/young person or may have harmed a child/young person;
- Possibly committed a criminal offence against or related to a child/young person; or
- Behaved in a way that indicates s/he may not be suitable to work with children/young people.
- Behaved towards a child or children in a way that indicated s/he may pose a risk of harm to children.

This applies to anyone working in the academy who has behaved, or may have behaved, in a way that indicates they may not be suitable to work with children. Inappropriate behaviour by staff/volunteers could take (but are not limited to) the following forms:

Physical

For example, the 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 that discriminate on the grounds of race, gender, disability or sexuality.

Sexual

For example, sexualised behaviour towards pupils, sexual harassment, inappropriate phone calls and texts, images via social media, sexual assault and rape.

Neglect

For example, failing to act to protect children/young people, failing to seek medical attention or failure to carry out an appropriate risk assessment.

Spiritual Abuse

For example, using undue influence or pressure to control individuals or ensure obedience, follow religious practices that are harmful such as beatings or starvation.

Although it is an uncomfortable thought, it needs to be acknowledged that there is the potential for staff in our academy to abuse students. In our academy we also recognise that concerns may be apparent before an allegation is made.

All staff working within our organisation must report any potential safeguarding concerns about an

individual's behaviour towards children and young people **immediately**.

If a child or learner makes an allegation about a member of staff, trustee, governor, visitor or volunteer the Principal/SALT Director must be informed immediately. The Principal/SALT Director must carry out an urgent initial consideration in order to establish whether there is substance to the allegation. The Principal/SALT Director will appoint an appropriate manager to conduct the investigation and will ensure that all investigations including for supply staff are completed appropriately. The Principal/SALT Director will liaise with the Local Authority Designated Officer (LADO) Team who will decide on any action required. The Principal/SALT Director must also liaise with the Trust HR team. The Principal/SALT Director should exercise and be accountable for their professional judgement on the action to be taken as follows

- If the actions of the member of staff, and the consequences of the actions, raise credible child protection concerns the Principal will notify the Local Authority Designated Officer (LADO) Team. The LADO Team will liaise with the Principal and advise about action to be taken and may initiate internal referrals within the local authority to address the needs of children likely to have been affected.
- If the actions of the member of staff, and the consequences of the actions, do not raise credible child protection concerns, but do raise other issues in relation to the conduct of the member of staff or the student, these should be addressed through the academy's own internal procedures.
- If the Principal decides that the allegation is without foundation and no further formal action is necessary, all those involved should be informed of this conclusion, and the reasons for the decision should be recorded on the child's safeguarding file. The allegation should be removed from personnel records.

If the concern relates to the Principal or a member of the Trust central team, it must be reported immediately to the Chief Executive Officer (CEO) Paul West, who will liaise with the LADO and they will decide on any action required.

If the safeguarding concern relates to CEO or a Trust Board Member then the concern must be made to the Chair of the Trust Board of Directors, Donna Kinderman, who will liaise directly with the LADO and HR Team who will decide on any action required.

Before contacting the LADO, the academy should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. Following this, allegations should be reported to the LADO without delay.

Under guidance on 'transferable risk,' a risk assessment will be carried out where there is reason to believe that an individual has behaved or may have behaved in a way that indicates they may not be suitable to work with children. This might include an incident outside the academy which did not involve children but could have an impact on an individual's suitability to work with children.

The Principal/SALT Director has to decide whether the concern is an allegation or low-level concern. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO).

9.1 Low level allegations or concerns about a member of staff

Concerns may be graded low-level if the concern does not meet the criteria for an allegation; and the person has acted in a way that is inconsistent with the staff code of conduct, including inappropriate

conduct outside of work.

Example behaviours include, but are not limited to:

- being over friendly 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,
- using inappropriate sexualised, intimidating or offensive language.

All staff working within our organisation must report any potential low-level concerns about an individual's behaviour towards children and young people immediately to the Principal. It is recognised that depending on the role of the DSL in the school/training provision, the Principal/SALT Director may wish to consult with the DSL and take a more collaborative decision-making approach.

If the concern has been raised via a third party, the Principal/SALT Director should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Staff should be encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Low-level concerns should be recorded in writing, including:

name* of individual sharing their concerns (* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible);

- details of the concern;
- context in which the concern arose;
- action taken.

Records must be kept confidential, held securely and comply with the Data Protection Act 2018. The HR platform Every should be used to store the records in individual staff files. The Academy/training provision will retain such information until the individual leaves their employment.

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter will be referred to the LADO (see paragraph 22 above).

The records' review might identify that there are wider cultural issues within the Academy that enabled the behaviour to occur. This might mean that policies or processes could be revised or extra training delivered to minimise the risk of it happening again.

Low-level allegations about supply staff/contractors should be referred to their employers so that any potential patterns of inappropriate behaviour can be identified. Where there is any doubt about concern meeting the harms threshold, the academy should consult the LADO.

10. Safer Recruitment

The Trust recognises that it is vital to create a culture that safeguards and promotes the welfare of children across our Trust. As part of this culture, we have in place robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities with the Trust.

Short-listing of candidates will be against the Job Description and Person Specification for the post.

Shortlisted candidates will be required to declare any relevant convictions, adult cautions or other matters which may affect their suitability to work with children. As a result of amendments to the Rehabilitation of Offenders Act 1974 (exceptions order 1975) in 2013 and 2020, some minor offences are now protected (filtered) and should not be disclosed to potential employers, and employers cannot take these offences into account.

Online searches of candidates will also be completed as part of due diligence and in line with recommendations within KCSiE 2025. Candidates will be notified of this during the recruitment process.

Where possible, references will be taken up prior to interview, any concerns raised will then be explored further with the referee and taken up with the candidate at interview.

Our Trust will always seek at least two references for each candidate.

Our Trust will use a range of selection techniques to identify the most suitable person for the post. At least one interview panel member will have completed the statutory Safer Recruitment Training.

All offers of appointment will be conditional until satisfactory completion of the mandatory pre-employment checks.

Pre-employment checks referred to in KCSiE 2025, will be carried out, and successful candidates will be subject to an enhanced DBS check (with barred list information as appropriate) and other relevant checks with statutory bodies.

Our Trust maintains a record of pre-appointment checks carried out in each academy within known as the 'Single Central Record'. This also includes members and directors of our Trust.

The designated safeguarding lead within the SALT Team is also expected to ensure safe recruitment where both the SCITT and Apprenticeship team:

- apply appropriate pre-selection checks;
- consider Disclosure and Barring Service (DBS) criminal records checks and children's barred list information;
- confirm in writing to schools that a non-salaried trainee's criminal record check, including a check of the children's barred list, has been completed and that the individual has been judged by the provider to be suitable to work with children;
- check that a trainee has not previously been removed from a programme because they have behaved in a way that indicates they may not be suitable to work with children, or if the previous provider would have removed the trainee had they not left.

Appendix 1 – List of Academies and SALT Provision

Primary	Website
Ashwood Spencer Academy	www.ashwoodspencer.org.uk
Brackensdale Spencer Academy	www.brackensdalespencer.org.uk
Bispham Spencer Academy	www.bisphamspencer.org.uk
Castleward Spencer Academy	www.castlewardspencer.org.uk
Chellaston Fields Spencer Academy	www.chellastonfieldsspencer.org.uk
Chetwynd Spencer Academy	www.chetwyndspencer.org.uk
Clover Leys Spencer Academy	www.cloverleysspencer.org.uk
Fairfield Spencer Academy	www.fairfieldspencer.org.uk
Glenbrook Spencer Academy	www.glenbrookspencer.org.uk
Highfields Spencer Academy	www.highfieldsspencer.org.uk
Hilton Spencer Academy	www.hiltonspencer.org.uk
Inkersall Spencer Academy	www.inkersallspencer.org.uk
Portland Spencer Academy	www.portlandspencer.org.uk
Rosecliffe Spencer Academy	www.rosecliffespencer.org.uk
St Giles Spencer Academy	www.stgilesspencer.org.uk
Sunnyside Spencer Academy	www.sunnysidespencer.org.uk
The Mease Spencer Academy	www.themeasespencer.org.uk
Wyndham Spencer Academy	www.wyndhamspencer.org.uk

Secondary	Website
Arnold Hill Spencer Academy	www.arnoldhillspencer.org.uk
Derby Moor Spencer Academy	www.derbymoorspencer.org.uk
Farnborough Spencer Academy	www.farnboroughspencer.org.uk
George Spencer Academy	www.georgespencer.org.uk
Heanor Gate Spencer Academy	www.heanorgatespencer.org.uk
John Port Spencer Academy	www.johnportspencer.org.uk
Long Field Spencer Academy	www.longfieldspencer.org.uk
Rushcliffe Spencer Academy	www.rushcliffespencer.org.uk

Spencer Alliance for Leadership and Teaching	Website
George Spencer SCITT	http://georgespencerscitt.co.uk/
Spencer Apprenticeships	http://spencertrust.org.uk/apprenticeships
Spencer Teaching School Hub	http://spencerteachingschoolhub.org.uk
Maths Hub East Midlands West	http://emwest.org.uk
Derby Research School	https://researchschool.org.uk/derby