

CUMBRIA RURAL ACADEMY

SAFEGUARDING POLICY

INTRODUCTION

Cumbria Rural Academy take Student Protection very seriously. Only about 5% of child protection concerns get reported and of these, only 5% result in a conviction, this is often due to contamination of evidence through poor handling of the initial disclosure. Other students that we work with may be, or have been, at risk of exploitation by their peers or adults.

Cumbria Rural Academy's aim is to keep all students safe and to report anything that we may observe that gives us cause for concern that a student may have suffered, or be suffering, from inappropriate treatment or care. We recognise that high self-esteem, peer support, a secure environment and clear lines of communication with trusted adults helps all young people particularly those at risk of or suffering abuse and the well-being of an individual is an intrinsic part of all aspects of our curriculum and ethos.

This Safeguarding Policy outlines what staff should be aware of, and what to do, in the event, that a student consciously or sub consciously discloses something, that may indicate abuse of some kind. Don't automatically assume that:

- Symptoms of abuse have been observed by others
- Because the student tells you something about their past that others will already be aware of it. You may be the only adult they have ever trusted enough to tell ▪ What they share is history.

In fact – DON'T ASSUME ANYTHING and never agree to keep secrets. However unbelievable or disgusting what a student may present in word or action, you must be prepared to accept the unacceptable and accurately record and pass on the details to the Company Safeguarding Officer (CSO) who is the Director of Cumbria Rural Academy. This must be done as soon as it is practical to do so, **but always within a maximum of 24 hours**. Never discuss what a student has disclosed with anyone outside the organisation

Safeguarding underpins all that we do and all other policies that we hold. The safety of students is paramount. following policies should be read and understood.

- **Equality & Diversity** Policy
- **Whistleblowing** Policy
- **Health and Safety** Policy

All staff will be required to read and understand the Safeguarding Policy as part of their induction and review this annually during their employment.

Students Act 1989 highlights the welfare of the student as paramount and it is the responsibility of all staff to ensure this is complied with.

OUR AIMS

To provide:

- A safe environment where students can learn, feel safe, secure, valued and respected.
- Robust staff recruitment and training, policies and procedures with teaching and pastoral support for students
- A place where students can feel confident to talk openly and be sure of being listened to
- An education that promotes self-esteem and give students the knowledge and skills to make positive choices
- Support for students and staff in difficult situations.
- Clear procedures to ensure that staff identify and respond appropriately and sensitively to Safeguarding concerns and that reporting requirements are met.

In addition, Cumbria Rural Academy prohibits staff engaging in or encouraging sexual activity with students under the age of 18.

RESPONSIBILITIES

The Director of Cumbria Rural Academy have responsibility for ensuring that policies and procedures are in place in respect to Safeguarding and Child Protection. There is a Senior Staff member with lead responsibility for Safeguarding and Child Protection assisted by designated staff. The Director of Cumbria Rural Academy has received training in Safeguarding and Child Protection issues and is required to keep up to date with developments and reflect this in this policy and procedure.

The Director of Cumbria Rural Academy will:

- Ensure policies and procedures are in place.
- Oversee the referral of cases of suspected abuse or allegations to the local Integrated Services Safeguarding Team. By exception in an emergency or after discussion with the Director of Cumbria Rural academy staff may be able to make a referral.
- Provide advice and support to staff and volunteers.
- Maintain an accurate record of any referral, complaint or concern in respect of abuse or safeguarding (even where it does not lead to a referral)
- Liaise with schools in relation to Safeguarding and Child Protection issues to ensure that appropriate arrangements are made for students attending Cumbria Rural Academy.

- Liaise with employers and training organisations in relation to Safeguarding and Child Protection issues to ensure that appropriate arrangements are in place.
- Ensure that all staff and volunteers receive basic training in Safeguarding and Child Protection.
- Follow the LEA's child protection procedures.

CODE OF PRACTICE

All staff should take precautions not to place themselves in a vulnerable position with students. It is always advisable when working 1:1 with individual students to be in full view of other adults where possible.

All staff (both teaching and non-teaching) are required to complete and submit a Disclosure Form for the Disclosure and Barring Service (DBS) prior to starting to work for the organisation. It is necessary that staff subscribe to the DBS Update Service to grant portability for an annual check on their DBS.

IDENTIFYING ABUSE AND, OR NEGLECT

Members of staff have a professional responsibility for sharing information if they are told about or suspect abuse. The student must be advised of this responsibility and that it cannot be kept secret. This should be handled sensitively and carefully.

Listed below are some of the signs and types of behaviour which may indicate a student is being, or has been abused or neglected. In themselves, these signs are not evidence of maltreatment but, may suggest abuse, particularly if a student exhibits several of them or, if a pattern emerges of exhibiting such signs or behaviour. There may be a pattern of minor injuries over time or, inadequate, muddled and inconsistent explanations, which alert you to the possibility of abuse. Be aware, that even for 'experts' abuse is not easy to diagnose. Sharing your concerns with the CSO is vital and the most important first step to take.

The signs and symptoms *may* include:

- Repeated minor physical injuries, for example bruising, cuts, etc
- Dirty, smelly, poorly clothed or appearing underfed
- Lingering illnesses which are not attended to
- Deterioration in school work or significant changes in behaviour without explanation
- Aggressive behaviour and or severe tantrums
- An air of 'detachment' or 'don't care' attitude
- Overly complaint behaviour, 'watchful' attitude
- Reluctant to go home for no apparent reason
- Does not join in social activities, has few friends
- Tummy pains with no medical reason that you know of
- Eating problems, including over-eating, loss of appetite
- Evidence or observation of self-inflicted wounds

- Reverting to younger behaviour, depression, withdrawal
- Relationships between the student and adults which are secretive and exclude others.

Many forms of abuse, such as emotional and sexual abuse, may not show physical signs at all. Staff should look for a series of signs and symptoms rather than isolated instances, although, some signs on their own can be significant.

RESPONDING TO A DISCLOSURE OR NOTABLE EVENT

Responding to the student

1. Make a full written record, using your notes, as soon as possible after talking to the student
2. Make a note of any witnesses who may have been present.
3. After reporting the disclosure, if you have further contact with the student it is important that you check the status of the case with the CSO initially.

RECORDING AND MONITORING CONCERNS

Recording has special importance in child protection work and is invaluable in helping agencies to assess a case. It ensures accurate transfer of information between professionals. It may also be needed if court action is necessary. It also serves as a record that staff have acted appropriately and followed guidelines. The following **must** be recorded.

Any concerns as they arise

- Marks on the student's body
- Inappropriate behaviour
- Poor attendance
- Dirty or inappropriate clothes
- Details of conversations with parent and students
- Referral to another agency

Information must be kept **confidential** and **secure**. This information is only accessible to the CSO.

What constraints govern recording?

Cumbria Rural Academy is registered under the Data Protection Act as an organisation; the Company comply with government requirements. These include the following stipulations (subject to the provisions of the Data Protection Act 2016):

- Files on students must be open to those with parental responsibility for the student, however, a formal request will need to be made to see the file. Third party information is not to be disclosed without consent of the third party.
- Access to files can be denied for certain prescribed reasons, such as in the case of actual, alleged or suspected student abuse
- Working notes are not subject to disclosure but must be eventually summarised on file and then destroyed.

If a member of staff suspects, has evidence of, or has witnessed a disclosure of abuse or neglect, the following steps should be taken:

1. The staff member must contact the Director of Cumbria Rural Academy to inform them of the concern immediately after the session. This should be followed up by completing a Child Protection Reporting Form with a full written record and the names of any witnesses. This should then be given to the CSO. The CSO may need to talk to the member of staff to seek clarification
2. If a referral to Social Services is deemed appropriate, the CSO will telephone the student's Local Authority Social Services. The following information will be reported:
 - Cause for concern
 - The facts of the case
 - Past concerns or any other notable events

The Duty Social Worker should decide on the most appropriate course of action and will direct what should happen next and who should be informed by whom. **Unless specifically directed to do so, no contact should be made with parents/carers except by the CSO as directed by Social Services.**

3. The CSO may provide additional information in writing to Social Services if requested
4. When a student has already an allocated social worker, all concerns **must** be shared directly with the social worker keeping always the commissioner well informed.

All information is confidential and securely kept in accordance with the Data Protection Act.

Responding to Parents/Carers

In striking a balance between respecting parents/carers feelings and ensuring students are protected, legislation stresses that the welfare of a child is paramount. Therefore, parents/carers may need to take 'second place' in order to protect a student who may be at risk of, or suffering abuse. Staff need to keep in mind:

1. The importance of not making assumptions
2. The error of believing that parents/carers "are not the sort of people who would do that"
3. The importance of gathering all related information
4. That the investigation is not a criminal enquiry, but an attempt to find out what has happened
5. That parents/carers should NEVER be contacted, nor concerns shared with them at any point. ALWAYS refer your concerns to the CSO.

SUPPORTING AN ABUSED STUDENT

You need to accept that students who are being or have been abused may express the effects of abuse through disturbed or difficult behaviour, so it may be hard to relate to them, and or, to even 'like' them very much. For example, they may be anxious, fearful, hostile, manipulative or destructive. Feeling sympathetic about what has happened to a student does not necessarily make it any easier to cope with their behaviour. Difficult behaviour also isolates students from others.

Some of the ways in which abuse may affect a student's behaviour are, for example, signs of being restless, preoccupied, or sexually precocious. They may bully other students and animals. They may find it hard to trust other people.

Other effects of abuse include:

- Confusion
- Lack of self-confidence/self-esteem
- A sense of being a victim
- Feelings of being wicked, deserving to be punished
- A desire to hurt others
- Regression to babyhood
- Pent-up anger
- A tendency to under-achieve
- Difficulties with concentration.

Although the long-term effects of abuse should not be underestimated, some abused students show considerable improvement with the appropriate help.

SUPPORT TO STAFF

Abuse can arouse strong emotions even within professionals, especially if they know the student well. Such feelings are natural and often affect staff personally. Staff may also have the burden of continuing daily contact with the student and in some cases, the parents. Support in the form of opportunities for staff to discuss their feelings and the effect of this work on their personal life can come from the:

- Company Safeguarding Officer (CSO)
- Pastoral Officer

The CSO is available for all staff and can give advice and support, as well as putting them in touch with outside agencies for professional support.

Staff should work towards an atmosphere which enables students to feel safe to talk. However, staff should **never** promise a student to keep certain information confidential. It must be explained that staff have certain duties to help keep students safe and may need the help of others to do this.

THE SAFEGUARDING REGISTER

The CSO will inform staff with responsibility for students whose name is on the Child Protection Register. These students should be monitored very carefully, and the smallest concern recorded.

TRAINING

All staff receive training in safeguarding upon induction. Training needs are identified at both an organisational and individual level through staff development interviews and organisational self-assessment.

ALLEGATIONS AGAINST STAFF

Should an allegation be made against a member of staff, an initial assessment based on the information received will be made and a decision made as to whether an investigation will take place. If the allegation is made against the CSO, then a Designated Senior Manager of the Company will make the initial assessment. If the assessment is that it requires further investigation then the CSO will refer the matter to the Local Authority Designated Officer within 1 day in accordance with procedures.

LADOs are responsible for (amongst others):

- Providing advice, information and guidance to employers and voluntary organisations around allegations and concerns regarding paid and unpaid workers
- Ensuring the child's voice is heard and that they are safeguarded
- Ensuring there is a consistent, fair and thorough process for all persons working with children against whom an allegation is made
- Monitoring the progress of cases to ensure they are dealt with as quickly as possible
- Recommending the progress of cases to ensure they are dealt with as quickly as possible
- Recommending a referral and chairing the strategy meeting in cases where the allegation requires investigation by police and/or social care.

The Company will maintain fairness to all parties during the investigation and this includes providing support to the person that the allegation has been made against, and to the person who has brought

Other potential outcomes if not referred to the LADO could be:

- The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the child. The matter should be addressed in accordance with the Employer's disciplinary procedures.
- The allegation can be shown to be false because the facts alleged could not possibly be true.

Enquiries and Investigations

Child protection enquiries by Social Services or the police are not to be confused with internal, disciplinary enquiries by Cumbria Rural Academy. Cumbria Rural Academy may be able to use the outcome of external agency enquiries as part of its own procedures. The child protection agencies, including the police, have no power to direct Cumbria Rural Academy to act in a particular way, however, Cumbria Rural Academy should assist the agencies with their enquiries.

Cumbria Rural Academy shall hold in abeyance its own internal enquiries while the formal police or social services investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries shall conform with the existing staff disciplinary procedures

If there is an investigation by an external agency, for example the police, the Senior Staff Member with Lead Responsibility (or Designated Senior Person) should normally be involved in, and contribute to, the inter-agency strategy discussions. The Senior Staff Member with Lead Responsibility (or Designated Senior Person) is responsible for ensuring that Cumbria Rural Academy gives every assistance with the agency's enquiries. He/she will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of

staff about whom the allegation is made. The Senior Staff Member with Lead Responsibility (or Designated Senior Person) shall advise the member of staff that he/she should consult with a representative; for example, a trade union.

The Senior Staff Member with Lead Responsibility (or Designated Senior Person) will consult with Social Services the police or the Children's Integrated Services Safeguarding Team, particularly in relation to timing and content of the information to be provided, and shall:

- Inform the student or parent/carer making the allegation that the investigation is taking place and what the likely process will involve.
- Ensure that the parents/carers of the student making the allegation have been informed that the allegation has been made and what the likely information given to him/her at the meeting and prepare a response, although that adjournment may be brief.

If the Senior Staff Member with Lead Responsibility (or Chair or Vice Chair of the Board of Trustees) considers that suspension is necessary, the member of staff shall be informed that he/she is suspended from duty. Written confirmation of the suspension, with reasons, shall be dispatched as soon as possible, and ideally within one working day.

- Where a member of staff is suspended, the Senior Staff Member with Lead Responsibility (or Chair or Vice Chair of the Board of Trustees) should address the following issues:
 - the Chair of the Board of Trustees should be informed of the suspension in writing.
 - the Board of Trustees should receive a report that a member of staff has been suspended pending investigation, the detail given to the governing body should be minimal
 - where the Senior Staff Member with Lead Responsibility has been suspended, the Chair or Vice Chair of the Board of Trustees will need to take action to address the management of the Academy
 - 5.9.4 the parents/carers of the student making the allegation should be informed of the suspension. They should be asked to treat the information as confidential. Consideration should be given to informing the student making the allegation of the suspension
 - senior staff who, need to know of the reason for the suspension should be informed
 - depending on the nature of the allegation, the Senior Staff Member with Lead Responsibility should consider with the Board of Trustees whether a statement to the students of the College and/or parents/carers should be made, taking due regard of the need to avoid unwelcome publicity
- The Senior Staff Member with Lead Responsibility shall consider carefully and review the decisions as to who is informed of the suspension and investigation. The LSCB and external investigating authorities should be consulted.

- The suspended member of staff should be given appropriate support during the period of suspension. He/she should also be provided with information on progress and developments in the case at regular intervals.
- The suspension should remain under review in accordance with the Employer's disciplinary procedures.

The Disciplinary Investigation

The disciplinary investigation should be conducted in accordance with the existing Employer's Disciplinary Procedures. The member of staff should be informed of the disciplinary charge against him/her.

If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she should be informed about the College's statutory duty to notify the Independent Safeguarding Authority in accordance with the Vetting and Barring Scheme.

Monitoring Effectiveness

Where an allegation has been made against a member of staff, the designated Governor, together with the Senior Staff Member with Lead Responsibility should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of the College's procedures and/or policies and/or which should be drawn to the attention of the Children's Integrated Services Safeguarding Team. Consideration should also be given to the training needs of staff.

E - Safer Recruitment Policy Statement

Cumbria Rural Academy aims to attract, reward and retain the best available people and to make the maximum possible use of the abilities of all its employees whilst ensuring it safeguards and promotes the welfare of young people and vulnerable adults receiving education and training at the College.

In accordance with legislation, guidance and the requirements of the Independent Safeguarding Authority Cumbria Rural Academy has a comprehensive Safer Recruitment Policy and procedures in respect the Independent Safeguarding Agency (ISA) and Criminal Records Bureau (CRB) disclosures. All trustees, staff and volunteers of Cumbria Rural Academy will only be permitted to have supervised access to young people and vulnerable adults until Enhanced CRB clearance has been received.

Appendix **CHILD PROTECTION REPORTING FORM**

Student's Name:	Date of the event:
Referrer's Name (your name and job title):	
Details of your concern <i>(What, where & when you noticed (if applicable); was the student accompanied and if so who by; nature of the injury or behaviour; what the student said; what you said; witnesses; other adults involved and what they said)</i>	
What actions were taken (to be completed by the CSO) <i>(What actions were taken and by whom; any recommendations for future action; other agencies involved)</i>	
Date received by CSO:	
Referrer's Signature:	CSO's Signature:

Appendix 2 – Types of Abuse

Categories of Child Abuse

There are many aspects to abuse and they are not easy to identify. Four main areas can be identified:

- **Neglect:** The persistent or severe neglect of a child, or the failure to protect a child from exposure to any kind of danger, including cold or starvation and, or extreme failure to carry out important aspects of care, resulting in the significant impairment of the child's health or development including psychological failure to thrive
- **Physical Abuse:** Actual or likely physical injury to a child or failure to prevent physical injury, or suffering to a child, including deliberate poisoning, suffocation and Munchausen's syndrome by proxy
- **Sexual Abuse:** Actual or likely sexual exploitation of a child or adolescent. The child may be dependent and, or developmentally immature
- **Emotional abuse:** Actual or likely severe adverse effect on the emotional and behavioural development of a child caused by persistent or severe emotional ill treatment or rejection. All abuse involves some emotional ill treatment. This category should be used where it is the main or sole form of abuse.

Complex forms of abuse can often be difficult to identify and may even fall into more than one category. Some examples are:

- **Fabricated / Induced Illness (FFI):** This form of abuse occurs when a child is presented for medical attention with signs or symptoms which have been fabricated or induced by the child's carer
- **Harmful practices related to culture and faith based beliefs:** Not all practices related to culture, faith and beliefs are harmful, but there are some that are unsafe and also illegal in the UK. These include, branding a child as a witch, breast ironing, child trafficking, cupping therapy, female genital mutilation, forced marriage, honour based violence, harsh forms of physical chastisements, scaring initiations and certain healing practices and initiations
- **Child Trafficking:** The recruitment and movement of children for the purpose of exploitation. This can be for sexual exploitation, forced labour, domestic servitude, criminal activity, for example, Benefits fraud, forced marriage or the removal of organs
- **Child Sexual Exploitation (CSE):** Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people receive 'something'; for example, food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money in return for them performing or have others perform sexual activities with them. Child sexual exploitation can happen through the use of technology without the child's immediate recognition; for example, being persuaded to post sexual images on the Internet and Sexting via mobile devices without immediate payment or gain. In all

cases, those exploiting the child or young person have power over them by virtue of their age, gender, intellect, physical strength and, or economic or other resources. Violence, coercion and intimidation are commonly involved in exploitative relationships, being characterised in the main by the child or young person's limited availability of choice, as a result of their social, economic and or emotional vulnerability (DCSF 2009). Please refer to Appendix 6 for additional guidance on Child Sexual Exploitation

- **Grooming:** Where someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse or exploitation. Children and young people may be groomed online or in the real world, by a stranger or by someone they know, for example, a family member, family friend or a member of the community, for example a teacher, religious leader or optician
- **Online abuse:** Any type of abuse that happens on the web, whether through social networks, playing online games or using mobile devices
- **Female Genital Mutilation (FGM):** Also known as female circumcision, is defined by World Health Organisation as a range of procedures that involves "the partial or total removal of the external genitalia or injury to the female genital organs whether for cultural or any other non-therapeutic reasons". According to 2007 Prevalence Study by FORWARD UK, it is estimated that 140 million girls worldwide have been affected and 24,000 girls in the UK are at risk annually. FGM is child abuse and illegal in the UK. The procedure is usually carried out on young girls at some time between infancy and the age of 15, however most likely between 6 - 8 years of age. Please see Appendix 2 for guidance on how to respond if you are concerned a child is at risk of, or has already undergone FGM
- **Radicalisation:** Where a person is encouraged to become an advocate of a radical political or religious movement which supports terrorism and or violent extremism. Children may be exposed to messages about terrorism and or extremism through a family member or friend, a religious school or group, or through social media and the internet. This creates risk of a child or young person being drawn into criminal activity and exposure to significant harm. Staff need to be vigilant for students exhibiting signs of extremism as there are dangers of exploitation and grooming of children by extremist groups. The Prevent Duty document issued by the Department for Education (DfE) in June 2015 offers advice to professionals in education. Training on how to detect and prevent radicalisation was made mandatory from September 2015. Please refer to the Prevent Duty and the Company training documents (Policy and Procedures) in Appendix 7 and follow the Safeguarding procedures if you have any concerns about a child
- **Forced Marriage:** Where someone is made to marry another person, to whom they do not wish to be married. Forced marriages can happen in secret and be planned by parents, other family members or religious leaders. It may involve physical, sexual and, or emotional abuse.