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SAFEGUARDING POLICY

1. Policy Statement

This document sets out the policy and procedures of PPA to ensure a safe creative learning environment for all young people and vulnerable adults. The policy applies to all students and staff at PPA. PPA believes that all individuals have a right to learn and develop within a safe environment and PPA is committed to protecting all young people and adults, especially those vulnerable to abuse or harm.

PPA also recognises its responsibilities to protect all staff, students and volunteers against unfounded allegations of abuse. This policy aims to ensure that young people and vulnerable adults, and all those who work with them, are safe and supported within the College and its organised activities. Staff will adhere to the guidance written in this policy, however where awarding bodies/collaborative partners have their own published procedures these may take precedent over the college policy.[1] If an issue cannot be resolved within the scope of the PPA policy, for students registered on a degree programme we will refer this onto De Montfort University: https://www.dmu.ac.uk/documents/dmu-staff/pod/safeguarding/dmu-safeguarding-policy.pdf

2. Scope

This policy is to be used by any member of staff or volunteer working directly with children and young people, and Adults at Risk. Children, young people, Adults at Risk and parents/carers are informed of the policy as appropriate, which is reviewed annually by PPA senior staff and made freely available on the website.

[1] De Montfort University is the collaborative partner that validates the degree provision at PPA, and our policies and procedures are informed by the regulations specified by the University. Most policies at DMU apply to students enrolled on the degree provision. Guidance on the general student policies and procedures can be retrieved here: https://www.dmu.ac.uk/current-students/student-support/exams-deferrals-regulations-policies/student-regulations-and-policies/index.aspx Many of our wider college policies for diploma students follow similar principles to ensure a consistent best practice approach is offered to everyone studying and working at PPA.

This policy must be known, understood and implemented by both staff and students. This includes support staff for SpLD Learners.

Course Leaders should, at the appropriate time, introduce new members of staff to this policy and ensure visiting/associate staff such as mentors or SpLD support workers are also appraised.

Course teams should use the induction period, or other appropriate time, to introduce and signpost learners to this policy.

3. Legislation

PPA is College that delivers HE courses but also works with under 18's as part of its wider academic provision. PPA understands that it has a duty to safeguard and protect young people in response to the relevant legislation which includes:

> The Education Act 2011, the Children Act 1989 and 2004, the Safeguarding Vulnerable Groups Act 2006, the Care Act 2014, Working Together to Safeguard Children 2018 and Keeping Children Safe in Education 2023, and the Prevent Duty under the Counterterrorism and Security Act 2021

At PPA for all our provision we adhere to the definition of safeguarding specified by DMU which is derived from current legislation. This states that '*Safeguarding relates to protecting children and adults who may be vulnerable from all forms of abuse or exploitation'*.

There is no exhaustive list of what may constitute abuse or exploitation, but it includes physical, emotional, sexual, financial, neglect, online abuse, domestic abuse, human trafficking, and discriminatory abuse. It also relates to broader preventative responsibilities that are wide-ranging concerning the welfare and well-being of children and enabling people to reach their full potential as well as to stay safe and healthy.

4. Responsibilities

PPA asks that all staff meet their responsibility to give full and active support for the policy by:

- Providing PPA with a valid Disclosure and Barring Service (DBS) certificate every 3 years
- Providing PPA with a valid Safeguarding Certificate every 3 years

Relevant staff will be required to undertake mandatory training in safeguarding essentials or attend workshops/training where the need is identified by the COO, Safeguarding Leads or HR.

PPA has a Designated Safeguarding Lead and a Safeguarding Team and ensures that their contact details are visible and accessible to all staff and students on site.

All staff are given annual guidance and support in team meetings prior to student induction to ensure everyone is aware of the latest policies and procedures. New staff should be directed to all relevant documents to ensure they can adhere to all safeguarding guidelines.

All staff at PPA must be committed to ensuring that a person who discloses abuse/harm is offered ongoing appropriate support after disclosure in conjunction with our wellbeing support practices.

Staff should ensure that any records of a disclosure are stored confidentially.

Course Leaders and Module Leaders should ensure students are aware of the mechanisms for reporting bullying and abuse (for example via Moodle and in class talks).

If a serious incident is disclosed relating to a young person or vulnerable adult, then the PPA Safeguarding Leads will refer the individual on to the relevant professional body if the person requests it or the situation requires it. This may include Children's Social Care, Adult Social Care or another appropriate agency e.g. the Police or NSPCC, East Surrey College/ Local Safeguarding Children's Board (LSCB), Multi Agency Safeguarding Hub (MASH) or DMU.

5. Actions to Implement and Develop Policy

The Designated Safeguarding Lead is responsible for investigating complaints and acting upon them. They are responsible for maintaining PPA's safeguarding policy, for making referrals to relevant agencies, if appropriate, and overseeing any required training in safeguarding to staff, volunteers and students. They must also maintain confidential records in relation to safeguarding and may be required to investigate incidents as required.

The Safeguarding Leads are responsible for liaising with relevant external agencies as appropriate in relation to policy and practice, on-going training, record keeping.

Human Resources is responsible for ensuring that appropriate Disclosure and Barring Service (DBS) checks are undertaken, and up to date records maintained, as well as that the appropriate checks and references are taken up for staff and volunteers offered employment/volunteering opportunities at PPA.

Designated Course Leaders and Module Leaders are responsible for ensuring that activity is conducted in accordance with the PPA Safeguarding Policy and

Procedures, including reporting any instances where the policy might have been breached, informing HR of the potential need for further DBS checks and ensuring that staff are sent on safeguarding training.

All staff have a responsibility to report any concerns to their course/module leader or to the Safeguarding Lead.

6. Managing a Disclosure

Staff will handle disclosures with sensitivity and as is appropriate, confidentiality. Disclosing abuse is difficult for variety of reasons. Some children and vulnerable adults do not disclose because they feel they will not be believed or be taken seriously. It is very important that staff actively listen and respond sensitively. Creating a safe space to talk is crucial in breaking down barriers to disclosure. The chart below shows some things to do and those not to do when speaking to someone.

Do	Don't
• Stay calm • Recognise your feelings, but keep them to yourself • Use language that the person can understand • Reassure the person: – telling you is doing the right thing – they are not to blame – you believe that they are telling the truth • Listen carefully, record what the person says and keep these notes • Explain what you will do next (i.e. tell the Safeguarding Lead) in a simple and clear way • Follow the standard procedure in telling the Safeguarding Lead and seeking advice and support for yourself.	• Panic or delay • Express strong feelings of upset or anger • Use jargon or express opinions • Probe deeply for information • Use leading questions • Make them repeat the story • Promise unconditional confidentiality • Approach the person against whom the allegation has been made or discuss the disclosure with anyone other than the Safeguarding Lead or Designated Safeguarding Lead.

STUDENTS SHOULD ALWAYS BE MADE AWARE THAT ANY DISCLOSURE WILL BE REPORTED TO THE DESIGNATED SAFEGUARDING LEAD AND THE SAFEGUARDING TEAM.

7. Reporting a Concern / Disclosure

The procedure below will be followed whenever a disclosure has been made, or there is a suspicion that a child or vulnerable adult is at risk of harm or has been abused. If in doubt about whether to make a written record (for example, you have a slight

concern), you can contact the Designated Safeguarding Lead before submitting a written record. The default position is that staff should write a note of their concerns.

- The member of staff will make a detailed written record of the matter, using, if possible, the Disclosure Form below, and report it within twenty-four hours to the Designated Safeguarding Lead **or** one of the Safeguarding Team. In the case of an urgent concern, the member of staff will communicate the matter as soon as possible, and complete the written report afterwards.

- The Safeguarding Team will investigate the issue and assess the level of risk of harm.

- The Safeguarding Team will seek advice from external agencies where required, to inform decision making about the appropriate course of action to be taken, sharing necessary information as appropriate to best protect the individual at risk, with their consent wherever possible.

Where risk of harm or abuse is identified, PPA will act to best protect the individual. The College will involve the individual in decision making and act with their consent where possible. The Safeguarding Team will act without consent where this is in the best interests of a child or vulnerable adult.

PPA will support a child or vulnerable adult in understanding the risk of harm and encourage and empower them to take any appropriate action to mitigate that risk themselves, with support.

Where it is agreed that no immediate action needs to be taken, a programme of follow-up support will be agreed.

In the case of an allegation of abuse being made against a member of staff or a student, the individual concerned may be informed of the allegation, on the advice of the Local Authority and/or Police and may be removed from contact with children and vulnerable adults in line with the appropriate disciplinary process (staff or student).

Any internal disciplinary action arising from an investigation will be handled in accordance with the relevant disciplinary process (staff or student). PPA assures all staff that it will fully support and protect anyone who, in good faith, reports his or her concerns that anyone is, or may be, abusing a child or vulnerable adult.

8. Allegations Against a Student

Where an allegation is brought against a student on one of PPA's courses, this will be handled in the same way as an allegation towards a member of staff and will also invoke the appropriate student disciplinary or misconduct policies, as necessary. In the case of students enrolled on a DMU degree programme their policies and procedures may supersede PPA college practices.

If the matter is the subject of a criminal investigation PPA is entitled to pursue its own or complementary confidential enquiries and disciplinary action. The Designated Safeguarding Lead will consult with the relevant agencies in such cases.

To maintain the integrity of the investigation, individuals who face an allegation may be advised to only discuss the substance of the allegation with his or her union or legal representative, immediate family or as directed by the investigating officer.

Following an investigation, disciplinary action may be taken as appropriate.

Information is shared and discussed between staff and relevant agencies on a need to-act basis only.

PPA's local authority is Guildford Borough Council. If it is necessary to involve the local authority, we will refer to Surrey Safeguarding Children Board (https://surreyscp.org.uk). Information is shared and discussed between staff and relevant agencies on a need-to-act basis only.

9. Recruitment, Vetting, Induction and Training of Staff

PPA recognises that anyone may have the potential to abuse children and vulnerable adults in some way and that all reasonable steps are taken to ensure unsuitable people are prevented from working with them.

PPA complies with its on-going duty to notify DBS with any relevant information regarding the conduct of any individual which PPA considers having caused harm or pose a risk of harm to vulnerable groups.

PPA will implement appropriate recruitment procedures for personnel working on activities with children and/or adults at risk, having substantial access to children and/or adults at risk, access to children's personal information or images, or who through the course of their work are liable to find themselves in a position of trust. These procedures will include:

- Identity and Disclosure and Barring Service checks carried out by HR on the offer of a post which is likely to have significant contact with children and/or vulnerable adults. Two reference checks will be needed to confirm their suitability to work with children.

- SpLD Mentors or support workers PPA are required to sign in and out of campus. They may also be asked to provide a DBS and/or identification to confirm their role before they can access the site. They will also be provided with, and expect to adhere to, a code of conduct on site.

10. Safeguarding all PPA Students

Under the Sexual Offences Act 2003, it is a criminal offence for a person to engage in a sexual relationship with a person under the age of 18 when they are in a position of trust in relation to that person. At PPA, all staff, volunteers and anyone formally representing the College are in a position of trust for this purpose. PPA considers it unethical for staff and visiting professionals to enter sexual or romantic relationships with students over the age of 18, and failure to disclose any such relationship may result in disciplinary action being brought.

PPA programmes may involve off-site visits, performances and trips away from the College. The College includes the safeguarding of under 18-year-olds and vulnerable adults in the pre-departure risk assessment procedure and makes appropriate arrangements based on this assessment. Beyond this, and the general requirements of this policy and procedure, no additional arrangements are made.

In normal circumstances the College deals directly with students (with whom it has a contractual relationship) and not with parents or other third parties, and this approach applies to students who are vulnerable adults or are under 18 years. PPA has duties under data protection legislation to preserve the right to privacy and confidentiality of students. The College therefore only discloses information regarding students (including vulnerable adults or under 18-year-olds) to third parties (including parents, guardians and next of kin) in accordance with its Data Protection Policy.

11. **Monitoring and Evaluation**

The Senior Management team ensure that the policy and related procedures are reviewed and monitored annually to stay fit for purpose.

Policy Updated: August 2024

Policy Update Due: September 2026

Appendix A: Glossary & Further Guidance

Abuse	This refers to a form of maltreatment of a child or adult. Abuse includes physical, sexual, emotional, psychological, financial, material, neglect, acts of omission, discriminatory and organisational abuse. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children. **There is no exhaustive list of what may indicate abuse and further information about the warning signs of abuse can be found in the DMU eLearning pack Safeguarding Essentials. For general guidance on abuse in children visit the NSPCC Site;** https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/ and for adults the NHS provides an introductory platform: https://www.nhs.uk/conditions/social-care-and-support-guide/help-from-social-services-and-charities/abuse-and-neglect-adults-at-risk/
DBS (Disclosure and Barring Service)	This is a government body established in 2012 through the Protection of Freedoms Act and the merger of two former organisations, the Criminal Records Bureau and the Independent Safeguarding Authority. The DBS is designed to help employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable adults. The DBS search police records and barring lists of prospective employees and issue DBS certificates. They also manage central barred lists of people who are known to have caused harm to adults with needs of care and support. The DBS recommends checks to be made every 3 years.
Local Safeguarding Adults Board (LSAB)	This is a statutory, multi-organisation partnership committee, coordinated by the local authority, which gives strategic leadership for adult safeguarding, across the local authority. A SAB has the remit of agreeing objectives, setting priorities and coordinating the strategic development of adult safeguarding across its area.
MASH (Multi-Agency Safeguarding Hub)	A joint service made up of Police, Adult Services, NHS and other organisations. Information from different agencies is collated and used to decide what action to take. This helps agencies to act quickly in a co-ordinated and consistent way, ensuring that the person at risk is kept safe.
PREVENT	The Government strategy launched in 2007 which seeks to stop people becoming terrorists or supporting terrorism. It is the preventative strand of the government's counter-terrorism strategy and aims to respond to the ideological challenge of terrorism and the threat from those who promote it; prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support and work with sectors and institutions where there are risks of radicalisation that need to be addressed. It is the preventative strand of the government's counterterrorism strategy, CONTEST.
Safeguarding	This refers to activity to protect a person's right to live in safety, free from abuse and neglect. It involves people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that their wellbeing and safety is promoted.
Local Contacts	Surrey Safeguarding Children Partnership Tel: 0300 470 9100 cspa@surreycc.gov.uk

DMU Contacts	Safeguarding Coordinators at DMU: Faculty of Art Design & Humanities: Paul McNicoll Tel: 0116 257 7547 Email: paul.mcnicoll@dmu.ac.uk Student and Academic Services Peter Broadhurst Tel: 0116 257 7879 Email: peter.broadhurst@dmu.ac.uk

Appendix B: Safeguarding General Overview

PPA Quick reference guide to handling concerns about safeguarding of children or vulnerable adults

Is the person in immediate danger?
Contact the Police Public Protection Unit 020 7601 2941 or 999 in an emergency.

If you cannot reach designated PPA staff and need immediate guidance, the NSPCC helpline is 0808 800 5000.

Our Designated Safeguarding Lead:

Sarah Thorne

The Safeguarding Team:

David Mitchell
Joel Gatehouse
Nick Charters
Lucy Stewart
Laura Tilling

You are approached by a child (under 18) or vulnerable adult with a disclosure that s/he is being harmed or abused.	**You have concerns that a child or vulnerable adult is or may be subject to abuse or harm.**	**You have concern about the behaviour of a member of staff or another volunteer within PPA.**
Stay calm and keep an open mind. Don't promise to keep information secret. Make it clear that you have a duty to pass it on. Record the information you are provided with and pass on to one of the Safeguarding Team (within 24 hours) who will decide what further action might be needed. This information is likely to be passed on to an external agency and should include a record of the time, date and persons present. Don't question the individual except to clarify what they are saying.	Make a written and dated note of any observations. Inform one of the Safeguarding Team as soon as possible and within 24 hours, who will investigate and make any necessary referrals.	If the behaviour of a member of staff or another person (including other students) is potentially threatening the well-being of a child or vulnerable adult, you must report your concerns to one of the Safeguarding Team. Any allegations concerning a member of staff will be passed to the Head of Faculty and Education who will decide on further action.

ALWAYS NOTIFY ONE OF THE SAFEGUARDING TEAM WITHIN 24 HOURS OF ANY INCIDENT OR CONCERNS.

Appendix C: Safeguarding Disclosure

Safeguarding Concern / Disclosure Form

PRIVATE & CONFIDENTIAL

Details of person at risk	
Name:	
Age:	**Gender:**
Phone Number:	
E-mail:	
Parent / Carer contact details (where relevant):	
Details of the incident / concern	
Date and time of incident / concern:	
Who was there?	
Who raised the concern (if not you)?	
Contact details of person who raised the concern:	
Details of the incident / concern: What was said or done, and by whom? (If possible use young person's/vulnerable adult's words as closely as possible.) **Continue overleaf if needed.**	
Action Taken	
Details of any immediate action taken	

Who you passed this information on to and when:	
Details	
Your name:	
Your role/ job title:	
Your phone number:	
Your email:	
Signed:	Date: