# **PPA Kids – Child Protection Policy**

# This policy applies to all staff and any volunteers who work at PPA Kids.

PPA Kids will safeguard and promote the welfare of children who are students at PPA Kids, having regard to the Government guidance: Working Together to Safeguard Children (July 2018); Keeping children safe during community activities, after-school clubs and tuition (October 2020); What to do if you're worried a child is being abused: advice for practitioners (2015); Information sharing: advice for practitioners providing safeguarding services (2018).

At PPA Kids, the following individuals have responsibility for Child Protection and Safeguarding matters.

| Name             | Role    | Telephone       | Email                  |
|------------------|---------|-----------------|------------------------|
| Louise<br>Pieri  | CEO     | 01483<br>459080 | louise@ppacademy.co.uk |
| Honor<br>O'Neill | Manager | 01483<br>459080 | kids@ppacademy.co.uk   |

# Local Authority Services - Surrey Safeguarding Children Partnership

Children's Single Point of Access (C-SPA) is a multi-agency team of professionals who work together to share information and make child protection decisions. Accusations against staff should be reported to the Local Authority Designated Officer (LADO)

| LADO | Telephone | 0300 123 1650        |
|------|-----------|----------------------|
|      | Email     | LADO@surreycc.gov.uk |

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Contact details for those responsible for child protection and safeguarding, as well as national helplines, are listed at the front of this policy document and also at Appendix 2.

#### I. INTRODUCTION

At PPA Kids, we want every student to feel safe and protected from neglect and abuse and to know there is someone they can turn to if they are being neglected or abused. All staff have an inescapable duty to protect our students from harm and this duty applies to **everyone** working at PPA Kids. Under no circumstances should any staff member or volunteer inflict physical or psychological harm on a child.

## I.I All members of staff have a responsibility to:

- Be alert to signs of abuse and neglect by knowing and recognising them.
- Question behaviours if something seems unusual and ask for help.
- Take action to protect a student who is suffering significant harm or is likely to do so.
- Recognise vulnerable children and take action to promote their welfare, even if they are not suffering harm or are at immediate risk of harm.
- Provide a safe environment in which students can learn.
- Always act in the interest of the child when concerned about their welfare.

## 1.2 The purpose of this policy is to:

- Identify the members of PPA Kids' Child Protection team and explain their roles.
- Set out PPA Kids' expectations in respect of training.
- Identify the different categories of abuse and neglect and provide guidance for recognising the indicators of possible abuse.
- Explain PPA Kids' role in identifying and preventing specific safeguarding issues, including radicalisation and extremism.
- Describe the procedures that should be followed if anyone at PPA Kids has a concern about the safety and welfare of a student.
- Identify the particular attention that should be paid to those children who fall into a category that might be deemed "vulnerable".
- Highlight the importance of "Early Help".
- Outline the safer recruitment procedures for staff and volunteers.
- Explain how allegations against staff will be handled.
- Detail the whistleblowing procedures in relation to safeguarding.
- Set out expectations regarding record keeping.
- Explain how children will be kept safe through the everyday life of PPA Kids.
- Outline how the implementation of this policy will be monitored and managed.
- Provide a list of key contact details.

This policy should be read in conjunction with the following policies: Serious Incident Policy & Procedure, Relationships Between Staff & Students Policy and Anti Bullying and Harassment Policy.

All staff are required to read this policy carefully and acknowledge that they have done so.

#### 2. PPA KIDS' CHILD PROTECTION TEAM

- 2.1 PPA Kids has appointed and trained a Designated Person (DP) who has responsibility for Child Protection and Safeguarding matters.
- 2.2 The Designated Safeguarding Lead (DSL) has ultimate lead responsibility for child protection matters and is the first point of contact for external agencies that are pursuing Child Protection (CP) investigations. The DSL also co-ordinates the CP representation at conferences and meetings.
- 2.3 When concerns/incidents are reported, the DSL will decide whether a referral to the Local Authority (LA) Children's Services, Early Help or other support is appropriate, in accordance with the referral thresholds set by the LSCB.
- 2.4 The applicable persons at PPA Kids are:
  - Designated Safeguarding Lead (DSL): Honor O'Neill
  - Other Designated Persons: Louise Pieri

Parents are welcome to approach any of the above if they have concerns about the welfare of any child at PPA Kids, whether these concerns relate to their own child or any other.

The DP's contact details are set out at the front of this policy and in Appendix 2.

2.5 When dealing with disclosures, concerns, suspicions and allegations, the DPs will follow the procedures set out by the Local Safeguarding Partnership – Surrey Safeguarding Children Partnership ("SCP").

## 3. TRAINING

- 3.1 As part of their induction process, all new staff are provided with the identity and function of the DSL and DPs, a copy of this Child Protection Policy and appropriate training. The appropriate response to children who are missing from classes and the acceptable use of IT is also explained to staff.
- 3.2 PPA Kids will provide guidance and support to assist staff to understand and discharge their role and responsibilities.
- 3.3 Formal training will be carried out in accordance with LSCB guidance and will be updated on a regular basis and to keep up with developments (through email, e-bulletins, briefings, staff training etc.).
- 3.4 Additionally, PPA Kids will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns, such as radicalisation, child sexual exploitation, female genital mutilation, cyberbullying and mental health and to ensure

that staff have the skills, knowledge and understanding to keep safe Looked After children (an especially vulnerable group).

- 3.5 The DSL and DPs will undertake training to provide them with the knowledge and skills required to carry out the roles. The DSL and DPs have undertaken Level I child protection training. They will attend refresher training at yearly intervals and, in addition, keep up-to-date with safeguarding developments relevant to their role at least annually.
- 3.6 The DSL will provide advice to other members of staff, giving them the knowledge and confidence to identify children at risk of being drawn into terrorism, to challenge extremist ideas and to know how to refer children for further help.
- 3.7 All members of staff are aware that corporal punishment is never used, nor is its use ever threatened.

#### 4. ABUSE AND NEGLECT

4.1 Abuse is a form of maltreatment of a child (anyone under 18 years of age). Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused by those known to them, in a family or in an institutional setting, or by a stranger, including via the internet. The abuse may take place wholly online. They may be abused by an adult or adults, by a member of staff or a group of staff, another child or children or by a student or students.

All staff should be aware that 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.

A member of staff who has consistent regular contact with a child has more opportunity to observe signs of abuse than anyone else with whom the child has contact and in many cases, may be the first to see the child after the abuse has occurred. Staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.

#### 4.2 Physical Abuse

Physical abuse is the causing of physical harm. It can lead directly to neurological damage, physical injury and disability. Some physical abuse is reactive; some may be premeditated with the intent to cause harm. Types of abuse include: hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating, but may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Signs that a child has been physically abused include: bruises, abrasions, burns, scalds, bite marks, fractures and scars.

Signs which may be indicators of concern include:

• Explanations provided for an injury which may not be consistent with the injury.

- Parents/carers undisturbed or uninterested by an accident or injury.
- Unexplained delay in seeking treatment for an injury.
- Repeated presentation for minor injuries, which may represent a cry for help.
- Reluctance to give information or mention previous injuries.
- Children who flinch at sudden movements.

#### 4.3 Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It has an important impact on a developing child's mental health, behaviour and self-esteem.

Types of emotional abuse include:

- Conveying to a child that they are worthless, unloved, inadequate or valued only insofar as they meet the needs of another person.
- Not allowing a child to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- Persistently criticising, teasing or humiliating a child.
- Imposing developmentally inappropriate expectations, such as interactions beyond a child's developmental capabilities, overprotection, limiting exploration or preventing normal social interaction.
- Causing a child to feel frightened or in danger.
- Exploitation or corruption of children.
- Allowing a child to see or hear the ill-treatment of another.
- Bullying or cyberbullying.

Signs of emotional abuse may be difficult to recognise as they are mainly behavioural. From the parent/child relationship perspective they include:

- Abnormal attachment between the child and their parent.
- Parents who frequently complain about their child, who never praise or give attention or who are emotionally distant from their child.

From the child's perspective, they include:

- Failure to thrive.
- Behavioural problems such as aggression or attention-seeking.
- Low self-esteem, lack of confidence and fearfulness, distress or anxiety.
- Poor relationships such as withdrawn or isolated behaviour.
- Delay in achieving developmental milestones.

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

#### 4.4 **Sexual Abuse**

Sexual abuse is forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (e.g. rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching through clothing.
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways.
- Grooming a child in preparation for abuse (including via the internet).

Sexual abuse is not solely perpetrated by adult males; women can commit acts of sexual abuse, as can other children.

Child sex abusers come from any professional, racial or religious background. Children under 16 years of age cannot provide lawful consent to any sexual intercourse.

Recognition of sexual abuse is difficult unless the child chooses to disclose and is believed, but signs are likely to be behavioural and emotional. There may be:

- Sexually explicit conversation or behaviour inappropriate to the child's age.
- Self-harm, including eating disorders and self-mutilation.
- Suicide attempts.
- Running away.
- Poor peer relationships, including unwillingness to be involved or communicate.
- Sudden changes in behaviours or extreme mood swings.
- Withdrawal and/or depression.
- Inappropriately sexualised conduct.

## 4.5 **Neglect**

Neglect is the persistent failure to meet basic physical, emotional and/or psychological needs and is likely to result in the serious impairment of the child's health or development and long term difficulties with social functioning, relationships and educational progress.

Types of neglect include failure to:

- Provide adequate food, clothing and shelter.
- Protect a child from physical and emotional harm or danger or ensure adequate supervision.
- Ensure access to appropriate medical care or treatment.
- Respond to a child's basic emotional needs.

Signs of general neglect include a child who:

- Is unkempt or inadequately clothed.
- Is listless, apathetic or unresponsive.
- Frequently and/or inexplicably comes to classes hungry.

- Has frequent accidents or injuries.
- Thrives away from the home environment, but not in it.

#### 5. SPECIFIC SAFEGUARDING ISSUES

Abusive behaviours can be displayed in a variety of ways and can consist of sexual abuse/activity; physical harm; emotional and/or verbal abuse. Additionally, behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger.

The following are all safeguarding issues:

- bullying including cyberbullying;
- children involved in the court system;
- children missing education;
- children missing from home or care;
- children with family members in prison;
- child criminal exploitation;
- child sexual exploitation;
- domestic abuse;
- drugs;
- fabricated or induced illness;
- faith abuse;
- female genital mutilation (FGM);
- forced marriage;
- gangs and youth violence;
- gender-based violence / violence against women and girls (VAWG);
- hate;
- homelessness;
- so called 'honour-based' violence;
- mental health;
- peer on peer abuse (including sexual harassment and sexual violence between children);
- private fostering;
- radicalisation;
- relationship abuse;
- sexting;
- trafficking;
- violence against women and girls.

Staff should be mindful that safeguarding incidents and/or behaviours can be associated with factors outside of PPA Kids. This is known as contextual safeguarding, which means that assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

Up-to-date guidance and practical support on specific safeguarding issues will be sought where necessary. The DSL and DPs will attend relevant training and ensure that staff understand the indicators and complexities of the issues noted below:

#### 5.1 Peer on Peer Abuse

All staff should be aware that safeguarding issues can manifest via peer on peer abuse. This is most likely to include, but is not limited to, bullying (including cyber bullying), but may also include physical abuse (e.g. hitting, kicking, shaking, biting, hair pulling), sexting, upskirting, gender specific abuse, initiation/hazing type violence and rituals (e.g. students being subject to initiation type activities), inappropriate behaviour by an older student towards a younger or more vulnerable student or sexual violence and sexual harassment (sexual comments, remarks, jokes and online sexual harassment). We do not tolerate any harmful behaviour at PPA Kids or pass it off as "having a laugh", "banter" or "part of growing up" and will take swift action to intervene where this occurs.

If staff become aware of a peer on peer incident or any child's behaviour that gives rise to a safeguarding concern, they must report it to a DSL or DP in accordance with the procedures set out in this policy. All victims will be reassured that they are being taken seriously and no victim will ever be made to feel ashamed for making a report.

All staff will be trained in how to make a report. This will include the importance of not promising confidentiality at the initial stage and the need to listen carefully to the child whilst not being judgmental. Ideally, two staff members will be present (although this will not always be possible) and clear notes will be taken (best practice is to wait until the end of the disclosure and then write up notes immediately). Where illegal images are involved, staff will avoid viewing them wherever possible and make sure they are not forwarded on.

We understand that any child who is engaging in abusive behaviour towards others may have been subject to abuse from other children or from adults. Where an allegation is made against a student, both the victim and the perpetrator will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. Appropriate support will be provided to all students involved, including support from external services as necessary. All allegations will be recorded.

Careful consideration will be given to the appropriate response to any report of child on child sexual violence and/or sexual harassment. This will involve a risk and needs assessment and take into account the nature of the alleged incident (including whether a crime may have been committed), the ages of the children involved, any power imbalance between the children, whether the incident is a one-off or sustained pattern, the on-going risks present and other related issues and the wider context. Special consideration will be given to the appropriateness of separating the perpetrator and victim from any classes they share.

PPA Kids has a strong commitment to its Anti Bullying and Harassment Policy and will consider all coercive acts and inappropriate child behaviour within a Child Protection context. PPA

Kids will take the appropriate action to ensure the safety and welfare of all students involved, including the student or students accused of abuse. This may include:

- Managing the incident internally;
- Early Help;
- Referrals to Children's Social Care;
- Reporting to the police

Victims may not disclose the whole picture immediately and children who have been victims of sexual violence may be traumatised and struggle in class. Perpetrators may also need support and disciplinary sanctions may need to be implemented. PPA Kids will be alert to the need for on-going safeguarding vigilance and support for both victim and perpetrator in all cases of child on child abuse.

## 5.2 Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of sexual abuse, where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

Further information can be found at <a href="https://www.gov.uk/government/publications/what-to-do-if-you-suspect-a-child-is-being-sexually-exploited">www.gov.uk/government/publications/what-to-do-if-you-suspect-a-child-is-being-sexually-exploited</a>

#### 5.3 Honour based violence

So-called 'honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. All forms of so-called HBV are abuse (regardless of the motivation) and should be handled and escalated as such.

As with all matters pertaining to the maintenance of a safeguarding culture within PPA Kids, staff are expected to be vigilant in identifying concerns and ensuring these are passed to the DSL without delay. The DSL will take further advice from the SCP and make a referral where this is deemed necessary.

## Female Genital Mutilation (FGM)

All staff should be alert to the possibility of a girl being at risk of, or already having suffered, FGM (sometimes referred to as female circumcision). Victims are likely to come from a community that is known to practise FGM. The age at which FGM is carried out varies enormously and may be carried out shortly after birth, during childhood or adolescence, just before marriage or during a woman's first pregnancy.

There is a range of potential indicators that a child may be at risk, the most pertinent for PPA Kids being a parent informing us that the child will not be attending classes for an extended period of time with an unconvincing explanation for the absence. FGM may already have happened if a girl has difficulty walking, sitting or standing or spending longer than usual away from a class with bladder problems.

Concerns should be reported immediately to the DSL, who will involve the SCP and police as appropriate.

Further information can be found at:

https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation

### Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. Some communities use religion and culture as a way to coerce a person into marriage.

#### 5.4 Preventing Radicalisation

PPA Kids' seeks to protect its students from being radicalised or drawn into terrorism.

Indicators of vulnerability to radicalisation include:

- Family tensions.
- Sense of isolation/low self-esteem/feeling of failure.
- Distance from cultural heritage/events affecting the student's country or region.
- A sense of grievance triggered by personal experience.

Early indicators of radicalisation or extremism may include:

- Becoming involved with a new group of friends.
- Searching for answers to questions about identity, faith and belonging.
- Expressions of support for terrorism, justifying the use of violence to solve real or perceived grievances.
- Possessing or accessing extremist materials.
- Changes in behaviour or language.

It is important to note that children experiencing these situations or displaying these behaviours are not necessarily showing signs of being radicalised. There could be many other reasons for the behaviour, including those already detailed in this policy.

Any concerns should be reported to the DSL. If the DSL considers that a referral is necessary to the Surrey Prevent team, the Prevent team's referral form should be completed and sent to the Surrey Prevent team using the contact details contained in Appendix 2.

This policy should be read alongside PPA Kids' Counter Extremism Strategy.

#### 5.5 Children left at home alone

This is a fairly common occurrence, but is potentially dangerous for children both physically and emotionally. If a member of staff is concerned about this, they should inform the DSL. The DSL may decide to contact the parents, on their return, to express serious concern about the incident, highlighting the risks to the child.

Reassurance will be sought from the parents that such a situation will not be repeated. If such reassurance is refused and the child continues to be left at home alone, the DSL should contact the SCP.

#### 5.6 Private Fostering

If PPA Kids becomes aware that one of its students is being cared for 28 days or more by someone who is not their parent or a close relative, PPA Kids will refer the arrangement to the LA Children's Services. Close relatives are defined as step parents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or by marriage).

# 6. RESPONDING TO CONCERNS ABOUT THE SAFETY AND WELFARE OF A CHILD

- 6.1 We acknowledge that children who are affected by abuse or neglect may demonstrate their needs and distress through their words, actions, behaviour, demeanour or other children.
- 6.2 Concerns about a child may arise from:
  - Observation of the child's behaviour or appearance.
  - Things the child has said.
  - A third party (another student, parent or guardian) who expresses concern.
  - Receipt of an anonymous allegation.

#### 6.3 A member of staff suspects abuse or a child tells of abuse

When there is suspicion of abuse, the member of staff must make a casual enquiry, without asking leading questions, about how an obvious injury was sustained or why the child appears upset. They should not, however, enter into a detailed investigation of the symptoms or causes of the child's distress or injury, as such an approach could prejudice later formal investigations.

Staff must not offer confidentiality to the child. This is not realistic. The member of staff should explain to the child that they need to pass on the information in accordance with this policy.

The member of staff must:

- **Observe** carefully the child's behaviour and demeanour.
- **Record** in detail what they have seen and heard and when they did so. Any comment by the child concerned or by an adult (who might be the abuser), should be recorded,

preferably quoting words actually used, as soon as possible after the comment has been made.

• **Report** suspicions, on the same day, in accordance with the procedures in this policy.

## 6.4 A third party expresses concern

The member of staff to whom a third party expresses concern must:

- **Observe** the behaviour and demeanour of the person expressing concern, if done in person.
- **Record** in detail what they have seen and heard and when they did so. Actual words used should be quoted where possible.
- **Report** suspicions, on the same day, in accordance with the procedures in this policy.

The third party may seek confidentiality and anonymity. Whilst being sensitive to this request, no guarantee should be given as, in the interests of the child and if legal proceedings should follow, the identity of the third party may have to be disclosed.

Where another student expresses concerns, it should be remembered that such an action may be traumatic for the informer and support should be given.

## 6.5 An anonymous allegation is received

The member of staff in receipt of anonymous allegations about child abuse must:

- **Record** in writing the words used, as far as possible, where the allegation is by telephone or retain the paper where it is in writing.
- **Report** suspicions, on the same day, in accordance with the procedures in this policy.

#### 6.6 Action by staff in all cases

- Written records are to be kept of all concerns. PPA Kids has a concerns form (Appendix I) that should, wherever possible, be used for this purpose. These records are to be kept securely and separate from the main student files.
- Dates, times and content of all interviews and actions in relation to the suspected abuse, should be recorded and signed by the observer and/or enforcer. Records must be accurate, factual, legible and contemporaneous; they may be used in court at a later date.
- 6.7 Members of staff with a concern or receiving a disclosure should report the matter in accordance with the procedures set out below.
- 6.8 The child's parent/carer will normally be contacted and kept informed of any action to be taken under these procedures. The decision as to when to contact parents will be made by the DSL. However, there may be circumstances when the DSL will need to consult the Local Authority Designated Officer, Children's Social Care and / or the police before discussing

details with parents. In all cases, the DSL will be guided by the Surrey SCP referral threshold document.

#### 7. EARLY HELP

- 7.1 Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help from a number of agencies, an early help inter-agency assessment should be arranged.
- 7.2 Effective early help relies upon local agencies working together to:
  - Identify children and families who would benefit from early help.
  - Undertake an assessment of the need for early help.
  - Provide targeted early help service to address the assessed needs of a child and their family, which focuses on activity to significantly improve the outcomes for the child.
- 7.3 All staff should be aware that providing early help is more effective in promoting the welfare of children than reacting later.
- 7.4 All staff should be aware of the early help process and understand their role which includes:
  - Identifying emerging problems.
  - Discussing early help requirements with the DSL.
  - Sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.
- 7.5 Staff should be aware that all children may benefit from early help but that they should be particularly alert to the potential need for early help of a child who:
  - Is disabled and has specific educational needs;
  - Has special educational needs;
  - Is a young carer;
  - Shows signs of being drawn into anti-social or criminal behaviour;
  - Frequently goes missing from care of home;
  - Is misusing drugs or alcohol;
  - Is at risk of modern slavery, trafficking or exploitation;
  - Is in a challenging family circumstance e.g. substance abuse, mental health issues;
  - Has returned home to their family from care;
  - Is showing early signs of abuse or neglect;
  - Is at risk of being radicalised or exploited;
  - Is a privately fostered child.
- 7.6 A member of staff or volunteer who considers that a student may benefit from early help should, in the first instance, discuss this with the DSL. The DSL will consider the appropriate action to take in accordance with the Surrey SCP referral threshold document.

7.7 If early help is appropriate, the DSL should support the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate. The DSL should keep the case under constant review and consider referring the case to the LA Children's Services if the child's situation does not improve.

#### 8. SAFEGUARDING PROCEDURES - REPORTING CONCERNS

#### 8. Concerns about a student's welfare

If a member of staff is concerned about a student's welfare they should act immediately. Staff should not assume another colleague or professional will take action. Staff should be aware that the GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purpose of keeping children and young people safe. Early information sharing is vital and so the matter should be reported to the DSL as soon as possible. If the DSL is unavailable, the report should be made to another DP. See below for the procedures for dealing with allegations against staff.

On being notified of a concern, the DSL will consider the appropriate course of action in accordance with the Surrey SCP referral threshold document. Such action may include early help or a referral to Children's Social Care.

If it is decided that a referral is not required, the DSL will keep the matter under review and consideration will be given to a referral to Children's Social Care if the child's situation does not appear to be improving.

Staff are reminded that normal referral processes must be used when there are concerns about children who may be at risk of being drawn into terrorism.

In accordance with these procedures, if a member of staff has a concern about a child, there should be a conversation with the DSL to agree a course of action where possible. However, any member of staff can make a referral to Children's Social Care or to the police. If a referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

## 8.2 If a child is in immediate danger or at risk of harm

If a student is in **immediate** danger or is at risk of harm, a referral should be made to Children's Social Care and / or the police immediately. Anybody can make a referral in these circumstances. See below for details on making a referral.

If a referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

## 8.3 Making a referral

The relevant contact information is set out at the front of this policy and in Appendix 2. If the referral is made by telephone, this should be followed up in writing.

Confirmation of the referral and details of the decision as to what course of action will be taken, should be received from the local authority within one working day. If this is not received, the DSL (or the person that made the referral) should contact Children's Social Care again. Information must be shared with the minimum of people and the child concerned given clear avenues of support and communication.

If, after a referral, the child's situation does not appear to be improving, the DSL (or the person who made the referral) should press for reconsideration to ensure their concerns are addressed and that the child's situation improves.

Where relevant, PPA Kids will co-operate with the Channel panel and the police in providing any relevant information, so that each can effectively carry out its functions to determine whether an individual is vulnerable to being drawn into terrorism. PPA Kids will respond to requests for information from the police promptly and, in any event, within five to ten working days.

#### 9. VULNERABLE CHILDREN

- 9.1 PPA Kids will always ascertain the views and feelings of all children. We acknowledge the additional needs for support and protection of children who are vulnerable by virtue of:
  - Special educational needs (SEN).
  - Disability.
  - The effects of substance abuse within the family.
  - Being a young carer.
  - Having been excluded from school.
  - Having English as an additional language, particularly if they are very young.
- 9.2 Staff must understand that additional barriers can exist when recognising abuse and neglect in these children:
  - Staff may assume that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability or situation. Further exploration is essential.
  - Peer group isolation can be more common than with other children.
  - The child can be disproportionally impacted by things like bullying, without outwardly showing any signs.
  - The child may have communication barriers and difficulties in overcoming these barriers.

#### 10. RECRUITMENT OF STAFF

PPA Kids is committed to creating a safe environment for children and, as part of that, follows 'Safer Recruitment' procedures that help deter, reject or identify people who might abuse children.

Before employing staff, PPA Kids will undertake checks to confirm a candidate's identity and to confirm that they are permitted to work in the UK. PPA Kids will also undertake the appropriate level of criminal records checks (Disclosure and Barring Service (DBS) checks), including a 'children's barred list' check where relevant for the role.

PPA Kids will consider whether the role the candidate is applying for requires any prohibition checks such as those that prohibit someone being a teacher (teacher prohibition) or engaging in management of a school (section 128 checks). Where relevant, these checks will be undertaken.

References will always be sought before a new member of staff is permitted to start their employment at PPA Kids. References will be scrutinised to resolve any concerns satisfactorily before confirming the appointment, including for any internal candidate. PPA Kids will always ask for written information about employment history, qualifications, or personal references, and check it is consistent and complete. References will always be sought from the candidate's current employer. If a potential employee does not have a career history, PPA Kids will seek personal references from school/university staff. If a candidate is not currently working, verification will be sought in relation to their most recent period of employment and reasons for leaving from the organisation where they were employed. References will always be requested directly from the referee and preferably from a senior person with appropriate authority, not just a colleague. Open references, for example, 'to whom it may concern' testimonials, will not be accepted. References will be compared for consistency with the information provided by the candidate on their application form.

The interview process will explore the applicant's ability to carry out the job description and meet the person specification. The interviewer will explore any anomalies or gaps in the candidate's employment history. Any information disclosed which relates to past disciplinary action or allegations, cautions or convictions will be discussed and considered in the circumstance of the individual case.

PPA Kids will also undertake any further checks which it decides are necessary as a result of the applicant having lived or worked outside of the UK which may include an overseas criminal records check, certificate of good conduct or professional references.

Details of the DBS certificate and the dates of all other required checks will be logged. Copies of all necessary document proofs will be held on the individual's personnel file.

Once appointed, PPA Kids will regularly monitor and review the individuals in post to ensure they continue to be well suited and have the necessary skills and training to carry out their role and responsibilities.

It is also important that staff keep PPA Kids informed on an on-going basis of any information that might have implications for the safeguarding of the children at PPA Kids e.g. where their relationships and associations both within and outside the workplace (including online) may have implications for the safeguarding of children at PPA Kids.

#### II. ALLEGATIONS OF ABUSE AGAINST STAFF

11.1 PPA Kids takes seriously all allegations made against members of staff (including the DSL, any volunteers, temporary and visiting staff) that call into question their suitability to work with

or be in a position of trust with children, whether made about events in their private or professional life.

- 11.2 PPA Kids has procedures to deal with any allegations that a member of staff has:
  - Behaved in a way that has harmed a child or may have harmed a child.
  - Possibly committed a criminal offence against or related to a child.
  - Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children.
  - Behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- 11.3 All allegations against a member of staff must be brought immediately to the attention of the DSL. The LA's Designated Officer (LADO) must be informed, within one working day and before any further action is taken, of all allegations that appear to meet the criteria set out in 11.2 above.
- II.4 If an allegation is made against the DSL, the member of staff must immediately inform a DP without the DSL being informed first. The DP must then inform the LADO of any such allegation that appears to meet the criteria set out in II.2 above, within one working day and before any further action is taken.
- 11.5 Many cases may not meet the criteria set out above or may do so without warranting either a police investigation or enquiries by the LA. In these cases, local arrangements will be followed to resolve cases without delay.
- 11.6 All discussions should be recorded in writing and any communication with both the individual concerned and the parents of the child/children agreed with the LADO and other agencies, as appropriate.
- 11.7 Some rare allegations will be so serious they will require immediate intervention by the LA and/or police. In such cases, referral to the LADO will lead to a strategy meeting or discussion being held in accordance with SCP procedures. This process will agree upon the appropriate course of action and the timescale for investigations.
- 11.8 When an allegation is made, PPA Kids will make every effort to maintain confidentiality as far as possible while it is being investigated or considered.
- 11.9 Allegations that are found to be malicious will be removed from personnel records; for all other allegations, full details will be recorded on the confidential personnel file of the person accused. Any that are false, unsubstantiated or malicious, will not be referred to in employer references.
- 11.10 PPA Kids will retain all safeguarding records and relevant personnel records for so long as may reasonably be required in the circumstances whilst also having regard to relevant guidance

from the Information Commissioner, and the Independent Inquiry into Child Sexual Abuse (IICSA).

- 11.11 Where students that are found to have made malicious allegations, disciplinary action may be taken. Whether or not the person making the allegation is a student or a parent (or other member of the public), PPA Kids reserves the right to contact the police to determine whether any action might be appropriate.
- 11.12 The resignation of a member of staff or volunteer mid-way through an investigation will not lead to the investigation being abandoned.

#### 12. WHISTLEBLOWING OF SAFEGUARDING CONCERNS

12.1 The NSPCC whistleblowing helpline is available for those who feel unable to raise any concerns about child protection failures internally. Staff and volunteers may contact the NSPCC Whistleblowing Helpline (0800 0280285) (8.00 am to 8.00 pm Monday to Friday) or email: help@nspcc.org.uk.

#### 13. NOTIFICATION TO THE DISCLOSURE AND BARRING SERVICE

- 13.1 If PPA Kids ceases to use the services of a member of staff because they are unsuitable to work with children, a settlement agreement (formerly known as a compromise agreement) will not be used and a referral to the Disclosure and Barring Service will be made promptly, if the criteria for a referral are met. Any such incidents will be followed by a review of the safeguarding procedures within PPA Kids.
- 13.2 If a member of staff tenders his or her resignation or ceases to provide his or her services to PPA Kids at a time when child protection concerns exist in relation to that person, those concerns will still be investigated in full by PPA Kids and a referral to the Disclosure and Barring Service will be made promptly, if the criteria for a referral are met.

#### 14. SUPPORT FOR STAFF

- 14.1 Members of staff who have been dealing with child protection issues may find the situation stressful or upsetting. We understand this and will ensure that they are supported.
- 14.2 Staff may also be concerned about being sued for defamation if their concerns are later found to be untrue. To assist in protecting against this, staff should ensure that concerns and statements are only made to the appropriate authorities.

#### 15. KEEPING CHILDREN SAFE THROUGH THE EVERYDAY LIFE OF PPA KIDS

#### 15.1 Child Missing from Class

Parents are responsible for making sure their children come to, and are delivered to, PPA Kids safely. If a child is going missing from a PPA Kids class, from school or from home, it may be an indicator of abuse or neglect. A register will be taken at the start of each class. If a child is not present in circumstances where the parents have not informed PPA Kids that their child

will not be attending that day, then a member of staff will attempt to contact the parents or guardians of the students to find out the reason for the absence and in order to alert them to the non-attendance (it is a condition of children attending PPA Kids that parents provide an emergency contact number in addition to their own contact details).

#### 15.2 First Aid and Medical Plans

Except in cases of emergency, first aid will only be administered by qualified First Aiders. If it is necessary for a child to remove clothing for first aid treatment, there will, wherever possible, be another adult present.

All first aid treatment will be recorded and shared with parents/carers at the earliest opportunity.

Students requiring regular medication or therapies for long-term medical conditions will be made the subject of a medical plan that has been agreed with the parents.

#### 15.3 Safety on the PPA Kids' premises

Entry to PPA Kids' premises is controlled.

- Authorised visitors to the premises will be logged into and out of the premises and will be asked to wear visible visitor badges.
- Unidentified visitors will be challenged by staff and escorted to the PPA Kids' Reception.
- Carelessness in closing any controlled entrance will be challenged.

The presence of intruders and suspicious strangers seen loitering near the PPA Kids' premises or approaching students, will be reported to the Police.

Internal doors to classrooms will not be locked whilst children are present in these areas.

#### 16. RECORD KEEPING

- 16.1 The content of Child Protection conferences or Review reports prepared by PPA Kids, will follow the headings recommended by the SCP and will, wherever possible, be shared with the parents/carer in advance of meetings.
- 16.2 Archived records will be kept in accordance with the Privacy Notice.

## 17. MANAGING, MONITORING AND REVIEW

17.1 If a member of staff has any concerns about how the DSL is managing any of their duties, or if they are concerned that the DSL is not investigating a concern that has been reported to the

DSL, these concerns should be escalated to Louise Pieri (CEO) who can be contacted at louise@ppacademy.co.uk.

#### 17.2 PPA Kids is committed to:

- Ensuring appropriate procedures are in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.
- Ensuring there is a named Designated Safeguarding Lead in place.
- Ensuring PPA Kids contributes to inter-agency working, including providing a coordinated offer of Early Help when additional needs of children are identified and support to children subject to child protection plans.
- 17.3 PPA Kids will conduct an annual review of the Child Protection Policy and of the efficiency with which the related duties have been discharged. The DSL will ensure that the procedures set out in this policy and the implementation of these procedures are updated and reviewed regularly. The DSL will update staff regularly on the operation of the safeguarding arrangements. Any deficiencies or weaknesses in regard to arrangements will be remedied without delay.

#### 17.4 PPA Kids will ensure that:

- The safeguarding arrangements take into account the procedures and practice of Surrey SCP, including understanding and reflecting local protocols for assessment and the referral threshold document.
- PPA Kids complies with their duties under legislation and that policies, procedures and training are effective and comply with the law at all times.

Date of policy review: 25/10/2022 Date of next review: 25/10/2023

Member of staff responsible for policy: Honor O'Neill

# **APPENDIX I: PPA KIDS - RECORD OF CONCERN ABOUT A CHILD**

| Child's Name                                  |    |
|---|----|
| Date of Birth                                 |    |
| Gender M/F                                    |    |
| Disability                                    |    |
| Date and Time of Concern                      |    |
| Your account of the concern:                  |    |
|   |    |
| (What was said, observed, reported and by who | m) |
| ,   | ,  |
|   |    |
| A Little III Co                               |    |
| Additional Information:                       |    |
| (What did you do/say following the concern)   |    |
| ,       |    |
|   |    |
| V.  |    |
| Your response:                                |    |
| (What did you do/say following the concern)   |    |
|   |    |
|   |    |
|   |    |
| Your Name                                     |    |
| Tour realite                                  |    |
| V C:  |    |
| Your Signature                                |    |
|   |    |
| Your position at PPA                          |    |
|   |    |
| Date and time of this recording               |    |
| Date and time of this recording               |    |
| 4 - 4   |    |
| Action and response of DSL                    |    |
|   |    |
| Name  |    |
|   |    |
| Data  |    |
| Date  |    |
|   |    |

All concerns must be reported the same day or within 24 hours.

#### **APPENDIX 2: CHILD PROTECTION AND SAFEGUARDING CONTACT DETAILS**

## **PPA KIDS - DESIGNATED PERSONS**

| Honor O'Neill: Designated Safeguarding Lead | 01483 459080 | kids@ppacademy.co.uk   |
|---|--------------|------------------------|
| Louise Pieri                                | 01483 459080 | louise@ppacademy.co.uk |

## LOCAL AUTHORITY SERVICES - SURREY SAFEGUARDING CHILDREN'S BOARD

All serious child protection concerns must be reported to Surrey C-SPA (Children's Single Point of Access) – a multi-agency team that works together to share information and make child protection decisions.

Allegations against staff must be reported to the LADO (Local Authority Designated Officer).

| Surrey C-SPA | 0300 470 9100 | Out of hours: 01483 517898 |
|--------------|---------------|----------------------------|
|              | Email         | cspa@surreycc.gov.uk       |
|              |               |                            |
| LADO         | 0300 123 1650 | LADO@surreycc.gov.uk       |

#### Other useful contact details

| Surrey Prevent<br>Referrals           | 01483 632982  | preventreferrals@surrey.pnn.police.uk                                  |
|---------------------------------------|---------------|--|
| Police Non-Emergency                  | 101           |  |
| Police Anti-Terrorist Hotline         | 0800 789 321  |  |
| Police Child Abuse Investigation Team | 020 8247 6331 |  |
| Forced Marriage Unit                  | 020 7008 0151 | fmu@fco.gov.uk   |
| DfE Helpline<br>(Extremism)           | 020 7340 7264 | counter.extremism@education.gov.uk                                     |
| Disclosure and Barring Service        | 01325 953 795 | www.gov.uk/government/organisations/disclosure-<br>and-barring-service |
| NSPCC Whistle-<br>Blowing Helpline    | 0800 028 0285 | help@nspcc.org.uk  |