

# SAFEGUARDING, CHILD PROTECTION AND PREVENT POLICY

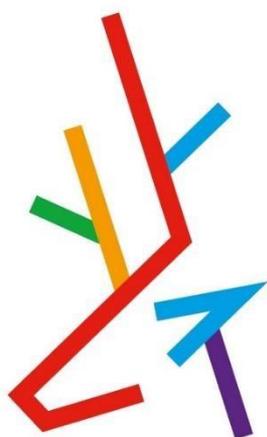
(Incorporating Safer Recruitment and Employee Security Policy)

February 2022

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**HART**  
LEARNING GROUP

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## 1. INTRODUCTION, DEFINITIONS AND RESPONSIBILITIES

- This policy is to inform staff, parents, volunteers, employers, partners, stakeholders and governors about the Hart Learning Group's (HLG) responsibilities for safeguarding. The purpose is to enable everyone to have a clear understanding of how these responsibilities should be carried out.
- This Safeguarding, Child Protection and Prevent Policy forms part of a suite of documents and policies, which relate to the safeguarding responsibilities of the Group. These are stored in the OurNHC Safeguarding and Prevent area on SharePoint.

North Hertfordshire College and Hart Learning & Development follow the procedures established by the Hertfordshire Safeguarding Children Partnership and by Hertfordshire Safeguarding Adults Board. The Group has appropriate procedures in place for responding to situations in which they believe that someone has been abused or are at risk of abuse or neglect. This also covers circumstances in which a member of staff, volunteer or other worker has behaved in a way that has, or may have, harmed a student/apprentice, or indicates that they would pose a risk of harm.

**Definition of Safeguarding** Safeguarding is defined as protecting children from maltreatment, preventing impairment of children's health or development, ensuring that children are growing up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes. (Working Together to Safeguard Children, DfE, 2018, pg.6)

**Definition of child or young person** An individual is considered to be a child or young person up to their 18<sup>th</sup> birthday (as defined by the UN Convention on the Rights of the Child).

**Definition of an adult at risk** An **adult at risk** is any person who is aged 18 years or over and at **risk of abuse** or neglect because of their needs for care and or support.

**Definition of abuse of a child or young person** A form of maltreatment of a child. Someone may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional setting by those known to them or, more rarely, by others (e.g., via the internet). They may be abused by an adult or adults or by another child or children.

**Definition of abuse of adults at risk** Harm that is caused by anyone that has power over another person; which may include family members, friends, unpaid carers, health or social care workers and organisations. This may include: physical, sexual, emotional, psychological, financial, material, neglect, acts of omission, discriminatory and organisational abuse.

**Trauma Informed** Hart Learning Group is a trauma-informed provider. Staff are trained to consider the impact of trauma in all our work with students and apprentices. This is particularly important in our handling of safeguarding concerns.

## **Responsibilities of HLG Staff, Temporary Staff & Volunteers**

Everyone working for HLG, either in a paid or voluntary capacity, have a responsibility to provide a safe environment in which individuals can learn.

Group staff and volunteers are particularly well placed to observe outward signs of abuse, changes in behaviour and failure to develop because they have daily contact with our students/apprentices.

Temporary staff (Agency or Contractors) and volunteers will be made aware of the safeguarding policies and procedures by Human Resources and the relevant line manager -including Safeguarding & Child Protection Policy and staff behaviour policy (Code of Conduct)

Staff should consider how students/apprentices may be taught about safeguarding, including online, through teaching and learning opportunities as part of providing a broad and balanced curriculum.

Apprenticeship tutors are also responsible for ensuring that Apprentices know about their employer's own policies and procedures along with those of the group.

Staff are advised to maintain an attitude of 'it could happen here' and 'it could be happening to this student/apprentice,' where safeguarding is concerned. When concerned about the welfare of a student/apprentice, staff members should always act in the best interests of that individual.

## **Related policies and statements**

- Health and Safety Policy
- Confidentiality Statement
- IT Policy for Users
- Student/Apprentice Code of conduct and Disciplinary Procedures
- Student/Apprentice Anti-Bullying Policy
- Complaints, Compliments and Suggestions Procedure
- Staff Code of Conduct
- Public Interest Disclosure Policy (Whistleblowing)
- Prevent Strategy and action plan
  - Police Enquiries and Attendance on Site
  - Data Protection and Management Policy
  - Video Conferencing Guidelines for Staff and Students

## **Implementation, Monitoring and Review of the Policy**

The policy will be reviewed at least annually by the governing body. It will be implemented through the Group staff development programme, and as part of day-to-day practice. Compliance with the policy will be monitored by the Strategic Lead for Safeguarding, the Designated Safeguarding Lead and through staff performance measures.

## 2. OBJECTIVES OF THE POLICY

- Establish and maintain an ethos and culture where young people and adults at risk feel secure, are encouraged to talk, and are responded to when they have a worry or concern.
- Ensure young people and adults at risk know that there are staff whom they can approach if they are concerned.
- Include opportunities in the Bridge tutorial programme and on OneFile for students/apprentices to develop the skills they need to recognise and stay safe from abuse
- Establish and maintain an ethos and culture where staff and volunteers feel safe, are encouraged to talk, and are responded to when they have concerns about the safety and wellbeing of a student/apprentice.
- Ensure that students/apprentices who have additional/unmet needs are supported appropriately. This could include referral to early help services or child protection contact referrals to specialist services if they are a child in need or have been / are at risk of being abused and neglected.
- Consider how students/apprentices may be taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum. KCSiE(DfE 2021), pg. 31-33

## 3. STATUTORY FRAMEWORK

In order to safeguard and promote the welfare of students/apprentices HLG will act in accordance with the following legislation and guidance:

- The Children Act 1989
- The Children Act 2004
- Children and Social Work Act 2017
- Education Act 2002 (section 175/157)
- Hertfordshire Safeguarding Children Partnership Procedures Manual (Electronic)
- Keeping Children Safe in Education (DfE, September 2021)
- Working Together to Safeguard Children (DfE 2018)
- The Education (Pupil Information) (England) Regulations 2005
- Hertfordshire Safeguarding Adults Board - Safeguarding adults at risk. The multiagency policy, procedure and practice for working with adults at risk of abuse or neglect in Hertfordshire, January 2019, Issue 12
- Care Act 2014
- Ofsted. Safeguarding policy (2015): updated 8<sup>th</sup> March 2018
- Sexual Offences Act (2003)
- Section 26. The Counter Terrorism and Security Act 2015 (PREVENT duty)

- Female Genital Mutilation Act 2003 (Section 74, Serious Crime Act 2015)
- Anti-social Behaviour, Crime and Policing Act 2014 (makes it a criminal offence to force someone to *marry*. Includes taking someone overseas to force them to *marry* (whether or not the *forced marriage* takes place).
- Serious Violence Strategy 2018
- Sexual violence and sexual harassment between children in schools and colleges (DfE 2021)

Keeping Children Safe in Education (DfE 2021) states that governing bodies and proprietors should ensure that the school or college contributes to multi-agency working in line with statutory guidance Working together to safeguard children.

Furthermore, it also states that governing bodies and proprietors of all schools and colleges should ensure that their safeguarding arrangements take into account the procedures and practice of the local authority as part of inter-agency safeguarding procedures set up by the local safeguarding partnerships.

#### 4. THE DESIGNATED SAFEGUARDING LEAD

Ensuring the Group provides a safe and secure ethos and culture is the responsibility of the Governing Body. The governing body also ensures an appropriate senior member of staff, from the leadership team, is appointed as safeguarding lead. The Senior Management Team member with specific strategic responsibility for safeguarding is Sarah Robins, Director of Curriculum. The Strategic Lead also acts as a Deputy DSL.

The Designated Safeguarding Lead for North Hertfordshire College and Hart Learning & Development is **Emma Masters** – Head of Wellbeing & Safeguarding. Mobile – 07940 526 032 Phone: 01462 424214 ext. 4214

Where the DSL is not available one of the Deputy DSLs (DDSL) act in their absence. The DDSLs for the Group are as follows:

Name	Role	Ext.	Mobile
Sarah Robins	Deputy DSL and Strategic Lead	3063	07943 880673
Nadia Hodges	Deputy DSL – Stevenage	3483	
Lara Mathie	Deputy DSL – Supported Studies	4353	07939 203066
Ann Webb	Deputy DSL – Supported Studies	3281	
Jennifer Watts	Deputy DSL – Springboard	4347	
Wendy Berezowy	Deputy DSL – Learning Support	2275	
Stuart Dunlop	Deputy DSL – Hitchin Centre	4354	
Julie King	Deputy DSL – ECC	4320	
Kelly Ireland	Deputy DSL – Hart Learning and Development	1489	07944 251649

Welfare concerns, which do not involve abuse, neglect or concerns around radicalisation, should be referred to one of the Support Coaches in the Student Services team

The broad areas of responsibility for the DSL are:

- Managing safeguarding, child protection contact referrals and cases
- Contacting the Child Protection Consultation Hub when advice is needed regarding child protection concerns which possibly meet the threshold for statutory intervention
- Completing child protection contact referrals for all cases of suspected abuse or neglect where there is a risk of significant harm to the child/young person, referrals to Adult safeguarding team, Police (when a crime may have been committed) and the Channel team where there is a radicalisation concern
- Liaise with senior staff as appropriate to inform them of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- Act as a source of support, advice and expertise to staff on matters of safeguarding and when deciding whether to make a referral or child protection contact referrals by liaising with relevant agencies
- Support staff who make child protection contact referrals and other service referrals
- Share information with appropriate staff in relation to a child's looked after (CLA) or Care Leaver (CL) legal status (whether they are looked after under voluntary arrangements with consent of parents or on an Interim Care Order or Care Order) and contact arrangements with birth parents or those with parental responsibility.
- Ensure they have details of the CLA/CL's social worker and the name of the virtual school Head Teacher in the authority that looks after the child.

## **TRAINING FOR DESIGNATED STAFF**

The Designated Safeguarding Lead and Deputy DSLs will undergo formal training every two years. The DSL will also undertake Prevent awareness training every 3 years. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care.

In addition to this training, their knowledge and skills should be refreshed (for example via e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments) at least annually to:

- Understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes

- Are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers.
- Understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners.  
(Full details in Chapter one of **Working Together to Safeguard Children**)
- Understand and support the Group with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting students/apprentices from the risk of radicalisation.
- Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college
- Can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online
- Be able to keep detailed, accurate, secure written records of concerns, child protection contact referrals alongside referrals to other agencies.
- Obtain access to resources and attend any relevant or refresher training courses and encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the Group may put in place to protect them.

## **RAISING AWARENESS**

The DSL, with the strategic lead, will ensure NHC/HLD and HLG policies are known and used appropriately. To raise awareness, they should:

- Ensure all staff including part time, contractors, volunteers and supply staff are aware of the Group's policies, that these are understood and used appropriately.
- work with the governing bodies or proprietors to ensure that the safeguarding & child protection policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly.
- Ensure the safeguarding and child protection policy is available publicly and that parents/carers are aware that advice regarding child protection concerns could be sought from the Child Protection Consultation Hub and that child protection contact referrals, or other specialist referrals about suspected abuse or neglect may be made. Ensure parents/carers are aware of our statutory role regarding safeguarding of children.
- Link with the local safeguarding partnership and boards to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- Where students/apprentices leave NHC/HLD ensure the file for safeguarding and any child protection information is sent to any new provider as soon as possible but transferred separately from the main pupil file. The file should not be sent until the individual is physically attending the new provider.

- We will obtain proof that the new school/education setting has received the safeguarding file for any child transferring and then destroy any information held on the child unless the case is currently open and in line with data protection guidelines (see Record Keeping Guidance on Hertfordshire Grid for Learning for further information.)
- consider if it would be appropriate to share any information with the new provider in advance of an individual leaving. For example, information that would allow the new provider to continue supporting victims of abuse and have that support in place for when the individual arrives.

## 5. THE MANAGEMENT OF SAFEGUARDING

Governing bodies and management committees must ensure that they comply with their duties under legislation. They must also have regard to this guidance to ensure that the policies, procedures and training in their schools or colleges are always effective and comply with the law.

Governing bodies and proprietors should have a senior board level (or equivalent) lead to take **leadership** responsibility for their schools or college's safeguarding arrangements

The Hart Learning Group nominated lead governor for safeguarding is **Toni Beck**

The responsibilities placed on governing bodies and proprietors include:

- ensure there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare e.g.
  - Safeguarding & Child Protection Policy in place
  - Staff behaviour policy (HLG Code of Conduct)
  - ensuring staff are provided with Part One of Keeping Children Safe in Education (DfE 2021) – and Annex B and are aware of specific safeguarding issues relevant to their role in other areas of the document.
- ensuring information regarding the role and identity of the designated safeguarding lead (and any deputies), is provided to all those working for the Group at induction
- appointing a designated safeguarding strategic lead and operational DSL who should undergo child protection training every two years (in line with KCSIE and HSCP procedures) and receive regular (annual) safeguarding refreshers (for example via e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments.
- Ensuring that an appropriate number of Deputy DSLs are appointed with representation across all areas of the group
- Prevent people who pose a risk of harm from working with children by adhering to statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required and ensuring volunteers are appropriately supervised.
- Ensure school have written recruitment and selection policies and procedures in place and at least one of the persons who conducts an interview has completed safer recruitment training

- Should ensure there are procedures in place (as described in part 4 of KCSiE) to manage concerns and allegations against staff including volunteers and supply staff
- There must be procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned. (refer to Type of DBS checks in KCSiE (DfE 2021) pg. 57
- All staff should be clear about their school's or college's policy and procedures with regard to peer-on-peer abuse.
- Where there is a safeguarding concern, ensure any child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place for children to express their views and give feedback. Ultimately, all systems and processes should operate with the best interests of the child at heart.
- Ensuring that all of the DSLs, including deputies, should undergo formal training every two years, in line with KCSiE and HSCP procedures, and receive regular, at least annual, safeguarding updates via e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments, for example.
- Prioritising the welfare of children, young people and adults at risk and creating a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- Ensure that students/apprentices are taught about safeguarding, including online safety as part of a broad and balanced curriculum.
- Ensuring appropriate filters and appropriate monitoring systems are in place to safeguard children from potentially harmful and inappropriate online material. Additional information to support governing bodies and proprietors is provided in Part 2 of KCSiE (DfE 2021).
- Having a senior board level lead to take leadership responsibility for the organisation's safeguarding arrangements

The Principal and SMT ensure that the above policies and procedures, adopted by the governing body, and particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff

- Undertaking appropriate Safeguarding & Child Protection and Prevent training which is refreshed every 3 years. A variety of updates will be provided at least annually and as required via email, bulletins, site visits and board meetings.
- New safeguarding partners and child death review partner arrangements are in place
- Should understand the local criteria for action and the local protocol for assessment and ensure they are reflected in their own policies and procedures. They should also be prepared to supply information as requested by the three safeguarding partners
- Schools and colleges should work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans. Ensuring arrangements are in place that set out clearly the principles for sharing information within the school or college and with the three safeguarding partners, other organisations, agencies, and practitioners as required.

- Ensure that all staff undergo safeguarding training (including online safety) at induction. The training should be regularly updated. Induction and training should be in line with advice from the local three safeguarding partners (HSCP) 3 years.
- All staff should receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings) as required, and at least annually
  - Opportunity should therefore be provided for staff to contribute to and shape safeguarding arrangements and policy.

### OTHER STAFF TRAINING

- All HLG staff will receive appropriate safeguarding training (which is updated regularly – Hertfordshire Safeguarding Children Partnership advises every 3 years), so that they are knowledgeable and aware of their role in the early recognition of the indicators of abuse or neglect and of the appropriate procedures to follow. In addition, all staff members receive safeguarding and child protection updates (for example, via email, e-bulletins, and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard students/apprentices effectively.
- All staff are required to undertake mandatory training relating to the Prevent agenda and recognising radicalisation, equality & diversity and British Values. This is refreshed every 3 years. NHC/HLD utilise the government eLearning package alongside a session delivered by the DSL to ensure internal policies and procedures are known and understood.
- The DSL and staff development team will liaise with existing staff to ensure staff are aware of their training requirements and are notified in a timely manner when it is due for renewal.
- Human Resources and line managers will notify new staff as part of induction and ensure the Introductory Safeguarding Training is completed and tracked.
- All staff involved in recruitment undertake eLearning on Safeguarding and Safer Recruitment. This will be refreshed every three years.
- Remote staff will be provided with appropriate eLearning to address their training needs in liaison with their line manager. This is for those staff who live and work a significant distance from the college campuses and for whom travel time to training locally would significantly outweigh the time of the actual training delivered. Other local training may also be sourced locally where appropriate and need is identified.
- Agency staff will be required to undertake appropriate e-training related to safeguarding and Prevent as directed and recorded by the relevant agencies. This is monitored by the HR team.
- Proof of training will be stored with each individual training record. This will be accompanied by direct guidance and information provided by Human Resources and their relevant line manager.

## 6. HART LEARNING GROUP PROCEDURES

### 6.1 IDENTIFYING AND REPORTING CONCERNS, ABUSE AND OTHER SAFEGUARDING ISSUES

Concern about safeguarding issues should include any area where the health or physical and emotional wellbeing of a student/apprentice is at risk. This could include alcohol dependency, bullying etc.

General welfare concerns, which do not involve abuse, neglect or radicalisation, should be referred to the Student Services team via the Support Coach embedded in each curriculum area.

However, all reports of abuse or neglect should be referred using the procedure detailed below. If in doubt, talk to the DSL or Deputy DSL first.

#### **WHEN TO BE CONCERNED**

Knowing what to look for is vital for the early identification of abuse and neglect. All staff should be aware of the indicators of abuse and neglect so that they are able to identify cases who may be in need of help or protection. Please refer to Annex A for a list of possible indicators.

If staff have any concerns about a student/apprentice's welfare, they should act on them immediately. If staff have a concern, they should follow this policy and speak to the Designated Safeguarding Lead (or deputy). The DSL (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns. Any staff member should be able to make a child protection contact referral or safeguarding referral to relevant services if necessary.

#### **Any staff member should be able to make a Child Protection Contact Referral to Children's Services if necessary.**

All staff should be aware of the process for making child protection contact referrals to Children's Services and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm - from abuse or neglect) that may follow a contact referral, along with the role they might be expected to play in such assessments.

Staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment, and allocation of appropriate service provision.

#### **Options will then include:**

- managing any support for the student/apprentice internally via the group's own pastoral support processes.
- completing a Families First Assessment or a Request for Support referral.
- a child protection contact referral or referral for statutory services, for example as the student/apprentice might be in need, is in need or suffering or likely to suffer significant harm from abuse or neglect.

## Extra Familial Harm (formerly contextual Safeguarding)

Safeguarding incidents and/or behaviours can be associated with factors outside the group and/or can occur between students outside of the study environment. All staff, but especially DSLs and their Deputies should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments should consider whether wider environmental factors are present in a student's life that are a threat to their safety and/or welfare. [Hertfordshire promote a child centred and coordinated approach to safeguarding:](#) Safeguarding and promoting the welfare of children is everyone's responsibility. In order to fulfil this responsibility effectively, each professional should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child.

Schools and colleges and their staff form part of the wider safeguarding system for children. This system is based on the principle of providing help for families to stay together where it is safe for the children to do so, and looking at alternatives where it is not, whilst acting in the best interests of the child at all times.

### Children who may require early help (known as Families First in Hertfordshire)

Families First is Hertfordshire's programme of early help services for families. A directory of early help services is available at [www.hertfordshire.gov.uk/familiesfirst](http://www.hertfordshire.gov.uk/familiesfirst) which will help practitioners and families find information and support to prevent escalation of needs and crisis.

All staff should be aware of the **early help process**, and understand their role in identifying emerging problems, sharing information with other professionals to support early identification and assessment of a child's needs. It is important for families to receive the right help at the right time to address risks and prevent issues escalating. This also includes staff monitoring the situation and feeding back to the Designated Safeguarding Lead any ongoing/escalating concerns so that consideration can be given to a child protection contact referral to Safeguarding and Specialist Services if the situation does not appear to be improving.

If early help is appropriate, the designated safeguarding lead (or deputy) will generally lead on liaising with other agencies and setting up a Families First Assessment as appropriate.

### **Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a student/apprentice who:**

- is disabled and has specific additional needs.
- has special educational needs (whether or not they have a statutory education, health, and care plan).
- is a young carer.
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- is frequently missing/goes missing from care or from home.
- is misusing drugs or alcohol themselves.
- is at risk of modern slavery, trafficking or exploitation.
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse.

- has returned home to their family from care.
- is showing early signs of abuse and/or neglect.
- is at risk of being radicalised or exploited.
- is a privately fostered child.

Within HLG it should staff should also be aware of mature students/apprentices who may be parents that require support from the Families First service.

All staff members. Contractors and volunteers should be aware of the main categories of maltreatment: **physical abuse, emotional abuse, sexual abuse and neglect** as well as being aware of the indicators of maltreatment and **specific safeguarding issues** so that they are able to identify cases of children who may be in need of help or protection

*See Appendix A of this policy for information on indicators of abuse and Appendix A of KCSiE for specific safeguarding issues.*

## INDIVIDUALS WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES

Additional barriers can exist when recognising abuse and neglect in this group. This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the individual's impairment without further exploration.
- Assumptions that those with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs.
- Communication barriers and difficulties.
- Reluctance to challenge carers, (professionals may over empathise with carers because of the perceived stress of caring for a disabled child)
- Disabled children often rely on a wide network of carers to meet their basic needs and therefore the potential risk of exposure to abusive behaviour can be increased.
- A disabled child's understanding of abuse.
- Lack of choice/participation.
- Isolation.

## DEALING WITH A DISCLOSURE

If a student/apprentice discloses to a member of staff that he or she has been abused in some way, the member of staff, volunteer or other person working at NHC or HLD should:

- Listen to what is being said without displaying shock or disbelief.
- Accept what is being said

- Allow the student/apprentice to talk freely
- Reassure the student/apprentice, but not make promises which it might not be possible to keep
- Never promise that they will not tell anyone – as this may ultimately not be in the best interests of the student/apprentice.
- Reassure him or her that what has happened is not his or her fault
- Stress that it was the right thing to tell
- Listen, only asking questions when necessary to clarify
- Not criticise the alleged perpetrator
- Explain what has to be done next and who has to be told
- Make a written record (see below)
- Pass information to the Designated Safeguarding Lead (or DSL) without delay

### Third Party Disclosures

It's everyone's responsibility to report concerns related to children and make referrals to Children Services and the Police if suspected that a child has been abused or is at risk of abuse.

Therefore, when safeguarding concerns are shared to the DSL in college by a parent or member of the public, it is important to note that there is equal responsibility by the complainant to report the matter also directly rather than assume the responsibility is that of the college. If unsure of how to do this speak to the DSL / Deputy DSL and they will advise accordingly.

If a disclosure is about potential harm caused by another staff member, they should see section 6.2 of this policy – Allegations against a staff member (p18)

## RECORD KEEPING

All practitioners should be confident of the processing conditions under the Data Protection Act 2018 and the GDPR (General Data Protection Regulations) which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'.

All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements staff should discuss with the designated safeguarding lead.

When a student/apprentice has made a disclosure, the member of staff/volunteer should:

- Record as soon as possible after the conversation. Use the full cause for concern sheet wherever possible. This is available in the Safeguarding portal on SharePoint under Reporting.
- Record the date, time, place and any noticeable non-verbal behaviour and the words used by the student/apprentice making the disclosure

- Use the body map in the safeguarding portal to indicate the position of any injuries (<https://nhcollege.sharepoint.com/Safeguarding&Prevent/Reporting/Forms/AllItems.aspx>)
- Record statements and observations rather than interpretations or assumptions
- Do not destroy the original records in case they are needed by a court
- All records need to be given to the Designated Safeguarding Lead promptly. No copies should be retained by the member of staff or volunteer.

The Designated Safeguarding Lead will ensure that all safeguarding records are managed in accordance with the Education (Pupil Information) (England) Regulations 2005.

Where students/apprentices leave the group, the Designated Safeguarding Lead will ensure any child protection file is transferred to the new provider as soon as possible, ensuring secure transit, and confirmation of receipt should be obtained. On receiving files, they will ensure the ALS (Additional Learning Support) team or Deputy DSL are aware as required. If the student has an allocated social worker, they will also inform them of the change of provider.

In addition to the child protection file, the Designated Safeguarding Lead should also consider if it would be appropriate to share any information with the new provider in advance of a student/apprentice leaving. For example, information that would allow the new provider to continue supporting victims of abuse and have that support in place for when the student/apprentice arrives.

## SUPPORT

Dealing with a safeguarding disclosure can be a stressful experience. The member of staff/volunteer should therefore consider seeking support for him/herself and discuss this with the Designated Safeguarding Lead or the Head of HR.

## REPORTING PROCEDURES

- If any member of staff is concerned that a student/apprentice is the subject of abuse, neglect, or potential radicalisation they must inform the Designated Safeguarding Lead. The DSL will decide whether the concerns should be referred to specialist services. If deemed to have met the threshold, a child protection contact referral will be completed.  
If a child protection contact referral to Children's Services is made the DSL will discuss the referral with the parents, unless to do so would place the child at further risk of harm.
- While it is the DSLs role to make referrals, any staff member can make a child protection contact referral to Children's Services or referral to Adult Care Services if a child is in immediate danger or is at risk of harm (e.g., concern that a family might have plans to carry out FGM, Forced Marriage etc).  
In these circumstances a child protection contact referral should be made to Children's Services and/or the Police immediately (or Adult Care Services where the individual is 18 or other). Where child protection contact referrals/referrals are not made by the DSL, the DSL should be informed as soon as possible.
- If a **tutor/lecturer** (persons employed or engaged to carry out teaching work at schools and other institutions in England) in the course of their work in the profession, discovers that an act of Female Genital Mutilation (FGM) appears to have been carried out on a girl under the

age of 18 the **tutor** must report this to the police on 101. **This is a mandatory reporting duty.** KCSiE (DfE 2021) pg. 131-132:

- If the allegations raised by the staff member are against other children, the Group should follow section 5.1.7 of the Hertfordshire Safeguarding Children Partnership Procedures Manual - Children Who Abuse Others.
- The member of staff must record information regarding the concerns on the same day. The recording must be a clear, precise, factual account of any verbal disclosures and observations. Standard pro-forma for recording concerns is available on SharePoint in the Safeguarding and Prevent area. A short form is also available online which will send an immediate alert to the DSL and primary Deputy DSLs. This area of the portal is restricted access to maintain security and confidentiality. This should not be used when a student/apprentice is at immediate risk of harm. The DSL or Deputy should be contacted by telephone in these instances.
- Particular attention will be paid to the attendance and development of any student/apprentice about whom the Group has concerns, or who has been identified as being the subject of a child protection plan and a written record will be kept.
- The Designated Safeguarding Lead is responsible for making the senior leadership team aware of trends in behaviour that may affect student/apprentice welfare. If necessary, training will be arranged.

As a person who works with children, staff have a duty to refer child protection safeguarding concerns to the designated senior person. However, if:

- concerns are not taken seriously by an organisation or,
- action to safeguard the child is not taken by professionals and the child is considered to be at continuing risk of harm,

then staff should speak to the strategic lead, Sarah Robins, or contact Hertfordshire Children's Services (including out of hours) on 0300 123 4043.

- In emergency situations (e.g. where there is the risk or occurrence of severe physical injury), where immediate action is needed to safeguard the health or safety of the individual or anyone else who may be at risk, the emergency services should be involved. Where a crime is taking place, has just occurred, or is suspected, the police must be contacted immediately, and the Strategic Lead be informed.
- Where an allegation is made regarding a 14 – 16-year-old pupil who attends the Group as part of the school links, members of staff should follow the same procedures as outlined above. The Designated Safeguarding Lead for NHC/ HLD will liaise with the DSL from the relevant school, ensuring that the pupil is informed of this process.

A safeguarding referral flowchart is attached at Appendix B.

[Page 23 of KCSIE 2021](#)

[The National Police Chiefs' Council- When to call the police guidance](#)

This advice covers incidents on school and college premises where students have potentially committed a crime. It provides guidance on what schools and colleges should bear in mind when considering contacting the police. This advice covers the following situations:

- concerns are not taken seriously by an organisation or,
- Assault
- Criminal damage
- Cyber crime
- Drugs
- Harassment
- Sexual offences
- Theft
- Weapons

This advice aims to support schools and college to make defensible decisions when considering whether to involve the police. Further guidance can be found at;

<https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf>

If a **teacher** (persons employed or engaged to carry out teaching work at schools and other institutions in England), in the course of their work in the profession, discovers that an act of Female Genital Mutilation (FGM) appears to have been carried out on a girl under the age of 18 the **teacher** must report this to the police via 101. **This is a mandatory reporting duty.** KCSiE (DfE 2021) pg. 131-132:

## 6.2 ALLEGATIONS AGAINST A MEMBER OF STAFF

An allegation is any information which indicates that a member of staff/volunteer may have:

- Behaved in a way that has, or may have harmed a child/young person/adult at risk
- Possibly committed a criminal offence against/related to a child/young person/ adult at risk
- Behaved towards a child or children in a way which indicates he or she would pose a risk of harm to children; or
- Behaved or may have behaved in a way that indicated they may not be suitable to work with children/adults at risk

This relates to members of staff, supply staff and volunteers who are currently working in any school or college regardless of whether the school or college is where the alleged abuse took place. Allegations against a member of teaching staff who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the group's safeguarding arrangements.

Appropriate whistleblowing procedures are in place for such concerns to be raised with the senior leadership team.

If staff members have concerns about another staff member, then this should be referred to the Head of Human Resources (Vicki Ellis) or to the DSL or a Deputy DSL if the Head of Human Resources is not available. The DSL or Deputy will immediately inform the Head of HR or, in his/her absence, the SMT lead for Human Resources – Executive Director of Corporate Services, (Lizzie Jones)

- If the concerns are about the Principal, then the Chair of Governors should be contacted. The Chair of Governors for North Hertfordshire College is: **Andrew Simmons**
- In the absence of the Chair of Governors, the Vice Chair should be contacted. The Vice Chair is: **Philip Moore**

In each case, they can be contacted via the Clerk to the Corporation, Robert Dale on extension 3066. Please give just your name and ask for the Chair or Vice Chair to contact you on a confidential matter. No further detail should be given at this time.

In the event of allegations of abuse being made against the Principal, where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, allegations should be reported directly to the Local Authority Designated Officer (LADO). Staff may consider discussing any concerns with the Designated Safeguarding Lead and, if appropriate, make any referral via them. (See Keeping Children Safe in Education: Part Four, DfE 2021, for further information).

The person to whom an allegation is first reported should take the matter seriously and keep an open mind. S/he should not investigate or ask leading questions if seeking clarification; it is important not to make assumptions. Confidentiality should not be promised, and the person should be advised that the concern will be shared on a 'need to know' basis only.

Actions to be taken include making an immediate written record of the allegation using the informant's words – including time, date, and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record should be signed, dated, and immediately passed on to the Head of Human Resources.

The recipient of an allegation must **not** unilaterally determine its validity, and failure to report it in accordance with procedures is a potential disciplinary matter.

The Head of HR/Chair of Governors will not investigate the allegation itself, or take written or detailed statements, but will assess whether it is necessary to refer the concern to the Local Authority Designated Officer

LADO Threshold Guidance may be used to inform this decision – found at:

[https://hertsscb.proceduresonline.com/chapters/p\\_manage\\_alleg.html](https://hertsscb.proceduresonline.com/chapters/p_manage_alleg.html)

- Children's Services (Including out of hours)– 0300 1234 043
- If the allegation meets any of the three criteria set out at the start of this section, contact should always be made with the LADO without delay on the number above.
- Adult Care Services – 0300 123 4042

If it is decided that the allegation requires a child protection strategy meeting or joint evaluation meeting, this will take place in accordance with section 4.1 of the Hertfordshire Safeguarding Children Partnership Inter-agency Child Protection and Safeguarding Children Procedures.

If it is decided it does not require a child protection strategy meeting or joint evaluation meeting, the LADO will provide the employer with advice and support on how the allegations should be managed. This may entail implementing staff disciplinary procedures.

The Head of Human Resources should, as soon as possible, following briefing from the Local Authority Designated Officer inform the subject of the allegation.

For further information, see:

Hertfordshire Safeguarding Children Partnership Procedures Manual Section 5.1.5 Managing Allegations Against Adults who work with Children and Young People

Where a staff member feels unable to raise an issue with their employer/through the whistleblowing procedure or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

Children's Services 0300 123 4043

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## SAFER WORKING PRACTICE

To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the staff handbook/school code of conduct/staff behaviour policy and Safer Recruitment Consortium document ***Guidance for safer working practice for those working with children and young people in education settings (May 2019) and also Addendum April 2020*** available at

<https://www.saferrecruitmentconsortium.org/>

The document seeks to ensure that the responsibilities of school leaders towards children and staff are discharged by raising awareness of illegal, unsafe, unprofessional and unwise behaviour. This includes guidelines for staff on positive behaviour management in line with the ban on corporal punishment (School Standards and Framework Act 1998). Please see the school/college's behaviour management policy for more information.

**HSCP escalation and complaints procedure link**

[https://hertsscb.proceduresonline.com/chapters/p\\_resolution\\_disagree.html](https://hertsscb.proceduresonline.com/chapters/p_resolution_disagree.html)

## 6.3 WORK PLACEMENT AND WORK EXPERIENCE

Employers are asked to make a commitment to safeguarding students'/apprentice's welfare through the health and safety site appraisal conducted by the Group. Our online Grofar system used to record work experience also requires employers to return a health and safety declaration which includes safeguarding considerations. This ensures the provider has policies and procedures in place to protect students/apprentices from harm and the right checks and supervision is provided.

With regards student/apprentice DBS checks, in accordance with Keeping Children Safe in Education (DfES 2021 P77): If the activity undertaken by the child on work experience takes place in a 'specified place', such as a school or college, and gives the opportunity for contact with

children, this may itself be considered to be regulated activity. In these cases, and where the child is 16 years of age or over, the work experience provider should consider whether a DBS enhanced check should be requested for the child/young person in question. DBS checks cannot be requested for children/young people under the age of 16.

Whilst on placement, students/apprentices are monitored regularly remotely and through on-site visits and are encouraged to share any concerns they may have.

#### 6.4 APPRENTICES AND WORK-BASED LEARNING

- Apprentices are employed from the start of their programme. This policy is provided to apprentices as part of their induction programme. The review process, carried out approximately every 10-12 weeks with the employer and apprentice, includes safeguarding. This is to increase their awareness, give them a greater understanding of safeguarding issues and policies, and provide opportunities to uncover and address concerns.
- HLG ensures that, where an Apprentice is placed with an employer, the employer understands their responsibilities for safeguarding. We will undertake a health and safety risk assessment and ensure that all employers have equality and diversity and health and safety policies in place. Where an apprentice is working 1-1 with a member of the employer's staff on a regular basis the Group will create a risk assessment with the employer. Appropriate measures will be put in place as fitting to the setting and individual requirements of that particular case.

#### 6.5 THIRD PARTY TRAINING PROVIDERS

- Where a subcontracted training provider is used to deliver any aspect of training, the Group checks that they have robust safeguarding procedures in place. This is comprised of a single point of contact for safeguarding, all staff DBS checked all staff (including the single point of contact for the organisation) are trained in safeguarding and employer premises are risk assessed with appropriately qualified staff undertaking risk assessments.

Subcontractors are subject to a rigorous due diligence assessment as part of their application to deliver for HLG. This includes thorough review of safeguarding, Prevent, training and DBS certification. The Apprenticeship team hold quarterly reviews with the subcontractors to check progress and quality measures. Initial safeguarding measures include:

- Mid-year review of policies to ensure timely renewal
- Reporting on safeguarding issues at quarterly reviews in line with information shared at Safeguarding Forum
- "Onboarding activity to take place at commencement of new contracts including meeting of safeguarding leads.
- Additional support promotion to students to remind them that they can access support directly from HLG.
- Automatic updates to HLG as the Prime provider for any serious safeguarding issues involving referral to social care, Prevent or police teams, regardless of whether the relevant DSL requires any advice and guidance on this.

#### 6.6 ADULT AND COMMUNITY LEARNING

- ACL courses adopt our policies and procedures ensuring materials reflect the local situation when external venues are used. In particular, the ACL work will include appropriate risk assessment, safeguarding compliance, health and safety checks and training for all staff.

## 7. CONFIDENTIALITY

Safeguarding raises issues of confidentiality that must be clearly understood by all staff/volunteers in education, as follows:

- All staff have a responsibility to share relevant information about the protection of young people and adults at risk with other professionals, particularly the investigative agencies (Children's Services, Specialist Services, the Police, Prevent team and Adult Care Services).
- If a student/apprentice confides in a member of staff/volunteer working for the Group and requests that the information be kept secret, it is important that this person tell them in a manner appropriate to the individual's age/personal learning needs that they cannot promise complete confidentiality. They must explain that they may need to pass information to other professionals to help keep the student/apprentice, other students/apprentices, or other individuals safe. This will ultimately be in the best interests of the student/apprentice.
- Anyone who receive information about students/apprentices and their families in the course of their work should share that information only within appropriate professional contexts.

## 8. COMMUNICATION WITH PARENTS

We will ensure the policy is available publicly via the website.

Parents/carers should be informed prior to child protection contact referral/referral, unless it is considered to do so might place the student/apprentice at increased risk of significant harm by:

- The behavioural response it prompts e.g., a child being subjected to abuse, maltreatment or threats / forced to remain silent if alleged abuser informed.
- Leading to an unreasonable delay.
- Leading to the risk of loss of evidential material.

(North Hertfordshire College/Hart Learning & Development may also consider not informing parent(s) where this would place a member of staff at risk).

NHC/HLD will endeavour to ensure that parents/carers have an understanding of the responsibilities placed on the company and staff for safeguarding.

Where reasonably possible schools and colleges should hold more than one emergency contact number for each pupil and student. KCSiE (DfE 2021) pg. 26.

Further guidance around information sharing can be located within; **Information sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers** (DfE, 2018).

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

## 9. HART LEARNING GROUP PUBLICATIONS

The Group will include information about Safeguarding in key college documents and materials. This will include but is not limited to:

- Website
- Recruitment literature for staff vacancies
- Staff induction materials
- Referring to safeguarding duties in all job descriptions

## APPENDIX A - INDICATORS OF POSSIBLE SIGNIFICANT HARM

(These lists are not exhaustive. More information about different types of harm can be found under “resources and additional information” in the “safeguarding and prevent” area of SharePoint.)

It should be noted that within the Group, it may be that our student/apprentice is the parent rather than the child.

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology maybe used to facilitate offline abuse. Children maybe abused by an adult or adults or by another child or children.

<b>Physical abuse</b>	
A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.	
<b>Indicators in a child/ young person</b>	
Bruises – shape, grouping, site, repeat or multiple	Withdrawal from physical contact
Bite-marks – site and size Burns and Scalds – shape, definition, size, depth, scars	Aggression towards others, emotional and behaviour problems
Improbable, conflicting explanations for injuries or unexplained injuries	Frequently absent from school
Untreated injuries	Admission of punishment which appears excessive
Injuries on parts of body where accidental injury is unlikely	Fractures
Repeated or multiple injuries	Fabricated or induced illness

## **Emotional abuse**

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

### **Indicators in a child/ young person**

Self-harm	Over-reaction to mistakes / Inappropriate emotional responses
Chronic running away	Abnormal or indiscriminate attachment
Drug/solvent abuse	Low self-esteem
Compulsive stealing	Extremes of passivity or aggression
Makes a disclosure	Social isolation – withdrawn, a 'loner' Frozen watchfulness particularly pre school
Developmental delay	Depression
Neurotic behaviour (e.g., rocking, hair twisting, thumb sucking)	Desperate attention-seeking behaviour

## Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### Indicators in a child/ young person

Failure to thrive - underweight, small stature	Low self-esteem
Dirty and unkempt condition	Inadequate social skills and poor socialisation
Inadequately clothed	Frequent lateness or non-attendance at school
Dry sparse hair	Abnormal voracious appetite at school or nursery
Untreated medical problems	Self-harming behaviour
Red/purple mottled skin, particularly on the hands and feet, seen in the winter due to cold	Constant tiredness
Swollen limbs with sores that are slow to heal, usually associated with cold injury	Disturbed peer relationships

### **Sexual abuse**

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include 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, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as peer-on-peer abuse) in education and all staff should be aware of it and of their school or colleges policy and procedures for dealing with it.

### **Indicators in a child/ young person**

Self-harm - eating disorders, self-mutilation and suicide attempts	Poor self-image, self-harm, self-hatred
Running away from home	Inappropriate sexualised conduct
Reluctant to undress for PE	Withdrawal, isolation or excessive worrying
Pregnancy	Sexual knowledge or behaviour inappropriate to age/stage of development, or that is unusually explicit
Inexplicable changes in behaviour, such as becoming aggressive or withdrawn	Poor attention / concentration (world of their own)
Pain, bleeding, bruising or itching in genital and /or anal area	Sudden changes in schoolwork habits, become truant
Sexually exploited or indiscriminate choice of sexual partners	

## **PREVENT: SAFEGUARDING CHILDREN AND YOUNG PEOPLE FROM RADICALISATION**

Children and adults can be vulnerable to extreme ideologies and radicalisation. Similar to protecting children from other forms of harm and abuse, protecting children from radicalisation must be part of all school and college safeguarding approaches.

All schools and colleges are subject to the Prevent Duty under Section 26 of the Counter Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions to have “due regard to the need to prevent people from being drawn into terrorism.” Pg 133 KCSiE (DfE 2021).

There are signs and vulnerability factors that may indicate a child is susceptible to radicalisation or is in the process of being radicalised. It is possible to protect vulnerable people from extremist thinking and intervene to safeguard those at risk of radicalisation. Staff must be alert to changes in children’s behaviour, which could indicate that they may be in need of Prevent support. They must act proportionately to the concern using the Prevent ‘notice, check, share’ approach, which may lead to the DSL making a Prevent referral.

Local Hertfordshire County Council guidance on Prevent is featured at 5.3.9 of the Hertfordshire Safeguarding Children’s Partnership CP procedures [https://hertsscb.proceduresonline.com/chapters/p\\_prevent\\_guide.html](https://hertsscb.proceduresonline.com/chapters/p_prevent_guide.html) which outlines the specific duties in Hertfordshire. This guidance also features advice on making a Prevent referral.

Greater detail relating to these is made available to staff through mandatory training and through the NHC/HLD Prevent strategy

### **PEER ON PEER ABUSE (child on child)**

Education settings are an important part of the inter-agency framework not only in terms of identifying, evaluating and referring concerns to Children’s Services and the Police, but also in the assessment and management of risk that the child or young person may pose to themselves and others in the education setting. If one child or young person causes harm to another, this should not necessarily be dealt with as abuse.

When considering whether behaviour is abusive, it is important to consider:

- whether there is a large difference in power (for example age, size, ability, development) between the young people concerned; or
- whether the perpetrator has repeatedly tried to harm one or more other children; or
- whether there are concerns about the intention of the alleged perpetrator.

All staff should be aware that safeguarding issues can manifest themselves via peer-on-peer abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying).
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- sexual violence, such as rape, assault by penetration and sexual assault.

- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- sexting (also known as youth produced sexual imagery); and
- initiation/hazing type violence and rituals.

All staff should be aware that abuse is abuse and peer on peer abuse will never be tolerated or passed off as “banter,” “just having a laugh” or “part of growing up.” Furthermore, they should recognise the gendered nature of peer-on-peer abuse (i.e., that it is more likely that girls will be victims and boys perpetrators), but that all peer-on-peer abuse is unacceptable and will be taken seriously.

Hertfordshire County Council recommends that education settings use The Sexual Behaviours Traffic Light Tool by the Brook Advisory Service to help professionals; assess and respond appropriately to sexualised behaviour. The traffic light tool can be found at [www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool](http://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool).

Guidance on responding to and managing sexting incidents can be found at [http://www.thegrid.org.uk/info/welfare/child\\_protection/reference/index.shtml#sex](http://www.thegrid.org.uk/info/welfare/child_protection/reference/index.shtml#sex)

In order to minimise the risk of peer-on-peer abuse HLG:

- Provides a developmentally appropriate PSHE curriculum which develops students//apprentices understanding of acceptable behaviour and keeping themselves safe. This is delivered through the Bridge Programme and includes topics such as anti-bullying, knife crime and mental health awareness.
- Has systems in place for any student/apprentice to raise concerns with staff, knowing that they will be listened to, believed and valued. This includes 1:1s, Student Services and a dedicated [Support@nhc.ac.uk](mailto:Support@nhc.ac.uk) email.
- Develops robust risk assessments where appropriate
- Has relevant policies in place (such as the Code of Conduct).

**Where there is an allegation or concern that a child has abused others, please refer to Section 5.1.7 of the Hertfordshire Safeguarding Children Partnership Inter Agency Child Protection Procedures manual, ‘Children Who Abuse Others’:**

[http://hertsscb.proceduresonline.com/chapters/p\\_chil\\_abuse.html](http://hertsscb.proceduresonline.com/chapters/p_chil_abuse.html)

Staff should also refer to Part five of KCSiE (DfE 2021) – **‘Child on child sexual violence and sexual harassment’:**

<https://www.gov.uk/government/publications/keeping-children-safe-in-education->

## **SERIOUS VIOLENCE**

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime.

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts/new possessions

Also refer to Schools Toolkit the characteristics of young peoples' vulnerability to CSE and CCE on the HGFL;

<https://thegrid.org.uk/safeguarding-and-child-protection/child-protection/specific-safeguarding-issues/child-sexual-and-criminal-exploitation>

## **CHILD SEXUAL EXPLOITATION (CSE) AND CHILD CRIMINAL EXPLOITATION (CCE)**

- Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.

- Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

- In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

- The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

- Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

More information include definitions and indicators are included in Annex B KCSiE DfE 2021

## **MENTAL HEALTH**

All staff should be aware that mental health problems can, in some cases, be an indicator that someone has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriate trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe individuals day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

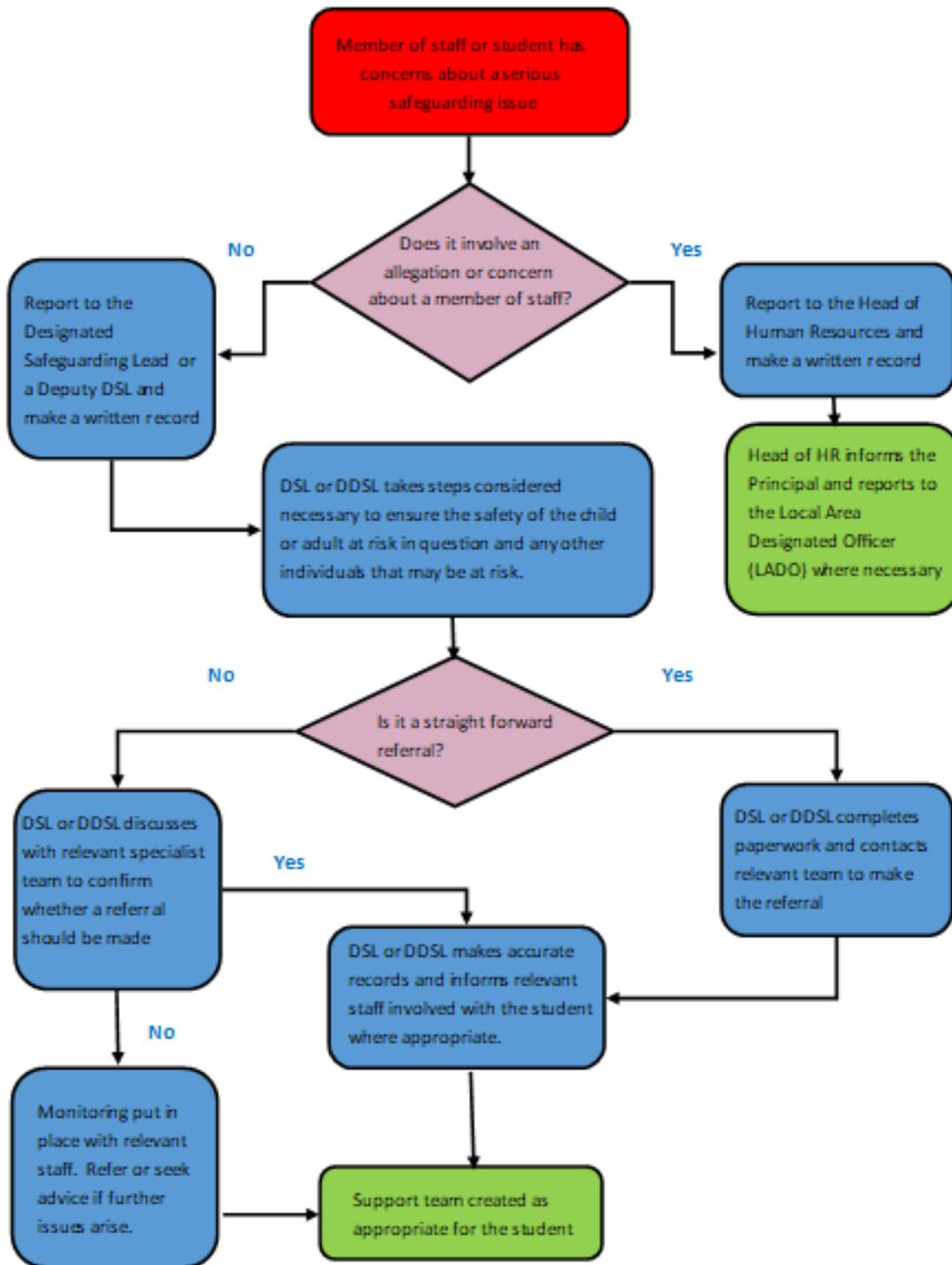
If staff have a mental health concern about someone that is also a safeguarding concern, immediate action should be taken by following the procedures in this policy and speaking to the DSL.

## **DOMESTIC ABUSE**

Domestic abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to psychological; physical; sexual; financial; and emotional.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.

# APPENDIX B - SAFEGUARDING REFERRAL FLOWCHART



All more serious and complex issues are shared as part of a weekly anonymised report to SMT

## APPENDIX C

### SAFER RECRUITMENT AND EMPLOYEE SECURITY (DBS) PROCEDURE

#### POLICY STATEMENT

- Hart Learning Group has a duty to provide a secure and safe environment in which apprentices and staff can obtain the best possible benefit from studying or working at the college. This procedure complies with safeguarding guidance and legislation.
- Part of the Group's duty is to ensure that it does not employ or make use of the services of a person who has a criminal conviction or record of behaviour that could pose a threat to the safety and well-being of apprentices and staff. This procedure will ensure that appropriate checks are made on college governors, employees, agency workers and those carrying out services for the college and volunteers, as required.
- Should a new member of staff commence their employment prior to the completion of his/her DBS clearance, his/her line manager will be required to undertake a safeguarding risk assessment and return a copy of this form to Human Resources

### SAFER RECRUITMENT AND INDEPENDENT SAFEGUARDING AUTHORITY REGULATIONS

#### DUTY TO REFER

The Group complies with the duty to refer any employee or volunteer who poses a risk to children or adults at risk. If the college removes someone who is employed or a volunteer, or if they leave under investigation for allegedly causing harm or posing a risk of harm, the Head of Human Resources will be responsible for referring this information to the Independent Safeguarding Authority.

#### REGULATED AND CONTROLLED ACTIVITY

- The Group is not a designated RAP (Regulated Activity Provider). Staff work in both in regulated and controlled activity.
- The Group has defined regulated activity in its situation as follows:
- Those workers involved in contact with children or adults at risk of a specified nature for teaching, training, care, supervision, advice, treatment or transport and is frequently intensively and/or overnight. Frequently means once a month or more, 3 or more occasions in a single 30-day period or overnight (2am to 6am).
- All teachers, trainers, assessors and those involved in learning support are in regulated jobs at HLG. Some staff in Student Services are also in regulated jobs.
- The Group has defined controlled activity in its situation as follows:
- Workers involved in frequent or intensive support work on site, such as caretakers, cleaners, catering staff, car park attendants and receptionists. Also, those workers with access to sensitive records about apprentices.
- Frequent or intensive has the same definition as above.

## COMPLIANCE WITH SAFER RECRUITMENT

- Currently, all staff, whatever their job role, have an enhanced DBS as all staff have the potential to come into contact with children and adults at risk.
- The Group will pay for all staff to have an enhanced DBS disclosure. Agency workers' pay for this check themselves.
- If a DBS does bring back further information a risk assessment is completed to determine if the person is suitable for the role
- The Group has a single central record which records details of staff identity, DBS disclosures, qualifications, overseas DBS checks, List 99 and right to work in the UK details. The Head of Human Resources is responsible for the maintenance of this record. The record also includes details of contractors, consultants, volunteers. References are taken for all workers to check identity and ask specific questions relating to safeguarding.
- The Group currently checks List 99 details before offering employment to new candidates.

## CONTRACTORS AND CONSULTANTS

- Where a sub contracted training provider is used to deliver any aspect of training, HLG checks that they have robust safeguarding procedures in place. This is comprised of a single point of contact for safeguarding, all staff DBS checked, all staff (including the single point of contact for the organisation) are trained in safeguarding and employer premises are risk assessed with appropriately qualified staff undertaking risk assessments. This information will be held by the department working with the partner/contractor and Human Resources.
- Other contractors whose staff are engaged in regulated activity or who work on a regular basis in HLG premises or with HLG students/apprentices will be provided with training and are required to provide the Group with evidence of identity checking, qualification checking and DBS disclosure details for these staff.

## VOLUNTEERS

- Often individuals approach HLG to indicate they wish to gain experience in an area: this may be teaching experience or assisting in a specific specialism such as IT. Volunteer helpers are not employees of the Group and do not receive any form of payment for the services they provide. HLG reserves the right to stop any volunteer's placement at any time for any reason.
- The Volunteer Registration form must be completed and authorised by the line manager prior to the commencement of the volunteering activities. This form must be completed and sent to Human Resources even if the period of volunteering is only for a few hours.
- Volunteers cannot to be used as substitute staff and should not have sole responsibility for a student/apprentice or group of students/apprentices at any time. Volunteer helpers must be registered with Human Resources prior to undertaking any work, and Human Resources must be notified when a volunteer ceases undertaking work at or for the Group.

- Volunteers will not commence work or other activities for HLG without first meeting with Human Resources, who will check their identity and qualifications and ensure List 99 and DBS checks are undertaken. The Safer Recruitment and Employee Security (DBS) Procedure will apply in the same way as for permanent employees of HLG.

#### AGENCY WORKERS

- Agency workers may be provided through specialist agencies, who supply the Group with a list containing all the required information relating to identification, qualifications and DBS disclosures. Where an agency does not provide this service, the agency contact and arrangements for meeting the new worker should, in the first instance, be engaged through Human Resources to ensure compliance with the DBS processes.
- As part of initial meeting training will also be checked. Where training is not in date, agency staff will be booked onto internal training.

#### DISCLOSURE AND BARRING SERVICE (DBS)

- Disclosure and Barring Service (DBS) disclosure is a facility whereby an employer can request that a check is carried out on a person to confirm his/her suitability for certain types of work, involving contact with children (under 18) or adults at risk.
- Where a DBS check is required, the individual will be asked to complete a DBS Disclosure Application (on-line) and to produce evidence of identity to one of the Group's counter-signatories or a nominated member of the Human Resources team.
- The DBS check may take several weeks to complete. When completed the DBS sends the disclosure certificate to the individual who has applied. The disclosure will give details of criminal record or other related matter which has been recorded. HLG may require the individual to present the DBS disclosure certificate on request.

#### RECRUITMENT OF NEW EMPLOYEES

- It will be a condition of all offers of employment made by HLG that a satisfactory enhanced DBS disclosure is obtained. All applicants for posts with HLG will be informed of the necessity of a check through the DBS disclosure system. At interview, all applicants will be told that a refusal to agree to such a check being carried out, or the outcome of the check being unsatisfactory, will lead to any offer being withdrawn. This will be reiterated when a conditional offer is made.
- HLG will require a DBS enhanced disclosure for all new academic staff and business support staff, due to the nature of the Group's business.
- All new casual staff and new agency workers will be required to have a satisfactory DBS disclosure. Voluntary workers will also be required to have obtained a satisfactory DBS disclosure.

#### PROCEDURE FOR DBS CHECKS: NEW APPOINTMENTS

All new appointees will be required to complete the DBS disclosure application online and to provide evidence of identity in accordance with DBS requirements. The completed online DBS

disclosure application and evidence will be checked by a counter-signatory or nominated member of the Human Resources Team, who will then process the DBS check in accordance with DBS procedures.

When completed the DBS sends the disclosure certificate to the individual who has applied. Human Resources will be notified by the DBS when the check has been completed. The Head of Human Resources or a member of the Human Resources Team will consult with line management and consider if the disclosure is satisfactory to enable the prospective employee to commence their employment with HLG. If there are issues raised in the disclosure the Head of Human Resources will invite the individual to meet to discuss the disclosure and its content.

In determining if the employment should commence/continue the following factors will be taken into account:

- whether the conviction or other matter revealed is relevant to the post offered
- the seriousness of any offence or other matter revealed
- the length of time since the offence or other matter occurred
- whether the individual has a pattern of offending behaviour or record that relates to another relevant matter
- whether the individual's circumstances have changed since the offending behaviour
- the circumstances surrounding the offence or other matter and the explanation offered by the individual

If it is determined that the employment should not commence, or should not continue, the individual will be given written reasons for this. If the individual has not commenced employment the Head of Human Resources will write to him/her withdrawing the offer and explaining the reasons. Where the individual has commenced employment pending the DBS check, the Head of Human Resources will write to the Principal if dismissal is recommended. There will be an opportunity for the individual to write to the Principal setting out his/her reasons why he/she believes he/she should not be dismissed.

Agency lecturers and support workers will not be employed unless they have registered with an agency used by Hart Learning Group which ensures that all its lecturers and support workers have a satisfactory DBS check.

#### PROCEDURE FOR DBS CHECKS: EXISTING EMPLOYEES

- HLG requires all existing employees to hold an enhanced DBS disclosure. Each year the Group will ask employees if they have received a conviction, reprimand or warning. If an employee does make a declaration, then HR will contact the individual and take reasonable steps.
- Existing employees may be required to undertake a re-check at any time during their employment. If this is required, then the online DBS disclosure application and guidelines will be sent to all existing employees. The employee will be required to complete the online application and provide evidence of identity in accordance with DBS requirements.

The evidence will be checked by a counter signatory or nominated member of the Human Resources Team, who will then process the DBS check in accordance with DBS procedures. Refusal to agree to the disclosure process may result in the employee being unable to continue in his/her employment.

- Once the disclosure has been obtained from the DBS the Head of Human Resources in consultation with line management will consider if the disclosure is satisfactory, taking the following factors into account:
  - whether the conviction or other matter revealed is relevant to the post
  - the seriousness of any offence or other matter revealed
  - the length of time since the offence or other matter occurred
  - whether the individual has a pattern of offending behaviour or record that relates to another relevant matter
  - whether the individual's circumstances have changed since the offending behaviour
  - the circumstances surrounding the offence or other matter and the explanation offered by the individual
- If it is not considered satisfactory the employee will be invited to a meeting with the Head of Human Resources and his/her line manager. The employee may be accompanied by a trade union representative or a work colleague.
- If, following the meeting held in accordance with guidance, the Head of Human Resources and line manager believe that the current employment should not continue the Head of Human Resources will write to the Principal setting out the reasons for this. The individual will have the opportunity to present his/her case to the Principal and may be accompanied by a trade union representative or a work colleague at the meeting. The Head of Human Resources and the line manager will also be present at this meeting. The Principal may decide on any of the following courses of action:
  - that the employee may continue in his/her current post
  - that the duties of the employee's post may be amended to enable continuation in his/her current post
  - that the employee should be transferred to another college post which does not involve working with children or adults at risk
  - that the employee shall be dismissed

The Principal will notify the employee in writing of his/her decision within two working days of the meeting taking place. If the Principal's decision is that the employee shall be dismissed there will be the right of appeal to a panel of governors. Any appeal must be in writing and received by the Clerk to the Corporation within 10 working days of receiving the Principal's decision to dismiss.

HLG reserves the right to request a new DBS check from existing employees where there may be concerns about an employee's behaviour or the Group receives notification that criminal proceedings are taking place.

In addition to the above, the Disabled Student Allowance Quality Assurance Group requires DBS checks to be carried out every three years for all Access Centre staff.

- DBS checks will be requested for new staff to the Access Centre.
- When disclosures are more than three years old, DBS checks will be sought for all Access Centre permanent staff, and for all casual consultants, via Hart Learning Group Human Resources Department.

When employing new consultant DSA assessors, DBS enhanced checks will be carried out. While waiting for this process, consultants will be employed, and a risk assessment will be carried out.

#### PROCEDURE FOR DBS CHECKS: GOVERNORS

- All Group governors are required to have a satisfactory enhanced DBS disclosure.
- The online DBS disclosure application and guidelines will be sent to all governors, who will be required to complete the application and provide evidence of identity in accordance with DBS requirements. The completed disclosure application and evidence will be checked by a counter-signatory or nominated member of the Human Resources Team, who will then process the DBS check in accordance with DBS procedures.
- When completed the DBS sends the disclosure certificate to the individual who has applied. Human Resources will be notified by the DBS when the check has been completed. If there are issues raised in the disclosure the Head of Human Resources will inform the Principal and Clerk to the Corporation, who will invite the individual to meet to discuss the disclosure form and its content.
- The Principal or Clerk to the Corporation will ensure that the following factors will be taken into account in determining if the individual is appropriate to act, or to continue to act as a college governor:
  - whether the conviction or other matter revealed is relevant to the post offered
  - the seriousness of any offence or other matter revealed
  - the length of time since the offence or other matter occurred
  - whether the individual has a pattern of offending behaviour or record that relates to another relevant matter
  - whether the individual's circumstances have changed since the offending behaviour
  - the circumstances surrounding the offence or other matter and the explanation offered by the individual
- All new Governors will also be required to provide two references.

# APPENDIX D

## VISITORS

All visitors will be required to adhere to the following procedures at all times:

- On arrival at one of our sites, use the main entrance and report to the Reception desk.
- Visitors must sign in on arrival and sign out again when they leave the premises
- Wear the visitors badge which is issued by reception staff throughout their visit
- Take note of any Health and Safety and safeguarding guidance given as part of their visit
- Wait in the seated area in reception, until they are collected by the relevant member of staff
- Check out at reception on leaving the building, returning the visitor badge
- On arrival, ensure they are aware of the nearest fire exit to the meeting rooms they will be using during the visit. These are clearly displayed around the building. Should there be a fire evacuation whilst they are visiting they are required to follow the directions given by staff.

## VISITORS MEETING WITH STAFF

If you have arranged for a visitor to meet with yourself or another member of staff, please ensure that:

- You enter all details of the visit onto the Visitor Management System <http://our.nhc.ac.uk/Pages/Default.aspx> prior to the visit. Please note that 48 hours' notice is required to reserve a parking space.
- You have corresponded with your visitor prior to the visit, drawing attention to the following:
- On arrival at one of our sites, to use the main college entrance and report to the reception desk to sign in, collect their visitor badge and safeguarding booklet
- To wait in reception until they are collected by yourself
- Show your visitor the nearest fire exit to the meeting room
- At the end of the visit you accompany the visitor to the reception desk to check out and return their visitor badge

# APPENDIX E

## **KEEPING CHILDREN SAFE IN EDUCATION (DFE 2021)**

### **Part One: Information for all school and college staff**

All staff have access to this online document and have read Part 1, Annex B, and any other parts relevant to their role. It is advised to provide the hyperlink only to KCSiE rather than the document in its entirety, due to the potential for updates to the content.

We took the decision not to use the “Annex A for staff who do not have direct work with children” as all staff have the potential to come across students in the course of the day-to-day work on site.

For others, they may be working with adult apprentices who have their own children. Consequently, safeguarding of child concerns may be raised via observations/disclosures from them as parents.

Staff have opportunity to seek clarity from designated staff for any content.

This is to assist staff to understand their role and discharge their responsibilities as set out in this guidance.

Staff sign to say they have read and understood the updates, and this is recorded on their staff development records.

The document has also been shared with Governors along with current guidance including the requirement to read part 2 in relation to their role.

### **Link to KCSiE (DfE, 2021):**

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/999348/Keeping\\_children\\_safe\\_in\\_education\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999348/Keeping_children_safe_in_education_2021.pdf)

## APPENDIX F

### OTHER SUPPORTING GUIDANCE

#### SEXUAL VIOLENCE AND SEXUAL HARASSMENT BETWEEN CHILDREN IN SCHOOLS AND COLLEGES GUIDANCE (2021)

- This is advice provided by the Department for Education (the department). Its focus is child on child sexual violence and sexual harassment at schools and colleges. The advice covers children of all ages, from primary through to secondary stage and into colleges and online. For the purposes of this advice, a child is anyone under the age of 18. Whilst the focus of the advice is on protecting and supporting children, schools and colleges should of course protect any adult students and engage with adult social care, support services and the police as required.
- The advice sets out what sexual violence and sexual harassment is, how to minimise the risk of it occurring and what to do when it does occur or is alleged to have occurred.
- The advice highlights best practice and cross-references other advice, statutory guidance and the legal framework.
- It is for individual schools and colleges to develop their own policies and procedures. It is important that policies and procedures are developed in line with their legal obligations, including the Human Rights Act 1998 and the Equality Act 2010, especially the Public Sector Equality Duty, and their local multi-agency safeguarding arrangements. It is important that schools and colleges consider how to reflect sexual violence and sexual harassment in their whole school or college approach to safeguarding and in their child protection policy.
- On publication of this County Child Protection Policy, September 2021, the Child Protection Schools Liaison Officers (CPSLO) Service has recommended providing the hyperlink to the document rather than the document in its entirety, due to the potential for updates to the content.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/999239/SVSH\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999239/SVSH_2021.pdf)

#### ONLINE SAFETY GUIDANCE

- The CPSLO Service has recommend signposting to the document rather than provide the document in its entirety, due to the potential for updates to the content.
  - Annex D: KCSiE (DfE,2021) for national guidance
  - Hertfordshire Guidance

<https://thegrid.org.uk/safeguarding-and-child-protection/online-safety/online-safety-national-guidance>

#### COVID GUIDANCE INTO NEW ACADEMIC YEAR 2021-2022

- The CPSLO Service has recommend signposting to the document rather than provide the document in its entirety, due to the potential for updates to the content.

<https://www.gov.uk/government/collections/guidance-for-schools-coronavirus-covid-19>