

**Safeguarding policy for children and adults
at risk of harm**

Designated Safeguarding Officers

Margaret Holborn
margaret.holborn@theguardianfoundation.org
07425 624010

Esmat Jeraj
esmat.jeraj@theguardianfoundation.org
07809 608 786

Lead Trustee for Safeguarding:
Mélody Patry

Summary

This policy sets out The Guardian Foundation's (hereafter referred to as "GF") commitment to safeguarding the children and adults at risk with whom it works. We will take preventative measures through our recruitment of staff and volunteers, and by making it clear on our public platforms that safeguarding is of paramount importance to the organisation.

We will ensure that all staff and volunteers are trained in best safeguarding practice, and we will deal promptly, sensitively and fairly with both disclosures and concerns. This policy also sets out our use of the Disclosure and Barring Service (DBS).

Below are the procedures that GF staff and volunteers will follow whenever they are working with children or adults at risk in any capacity, including at events in the Guardian Media Group HQ building, events at schools and other venues, and virtual events. It also covers the protection of images and video footage of children and adults at risk, as well as their work. Finally, the policy sets out a code of conduct that all staff and volunteers are required to sign and follow at all times.

These procedures will be reviewed on an annual basis. Any queries about this policy, procedures or code of conduct should be referred in the first instance to the Designated Safeguarding Officers as named on the front page of this document.

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1. Safeguarding policy for children and adults at risk of harm

1.1 Terms of reference

The GF believes that safeguarding is everyone's responsibility and that the safety and welfare of those with whom we work is paramount in all circumstances. In order to provide the right help at the right time, everyone has a role to play in identifying concerns, sharing information and taking prompt action.

Definitions

A child is a person aged under 18 years; young people aged 16 or 17 who are living independently are still defined as 'children'.¹ In line with the law, this policy defines a child as anyone under the age of 18 years, but in the case of Special Educational Needs (SEN) and disabilities, it is up to 25 years of age.

Adult at risk of harm: is a person aged 18 or over, whose exposure to harm through abuse, exploitation or neglect may be increased by their: a) Personal characteristics which may include, but are not limited to, age, disability, special educational needs, illness, mental or physical frailty or impairment of, or disturbance in, the functioning of the mind or brain, and/or b) Life circumstances which may include, but are not limited to, isolation, socio-economic factors and environmental living conditions.²

Some groups of people are particularly vulnerable to harm and exploitation, and it is important that their needs are carefully considered:

- those with disabilities
- those living away from home
- refugees and asylum seekers
- children and young people in hospital
- children in contact with the youth justice system
- victims of domestic abuse
- those who may be singled out due to their religion or ethnicity
- those who may be exposed to violent extremism.

Harm is defined as "ill treatment or the impairment of the health or development of the child" (Section 31, Children Act 1989; Article 2, Children (Northern Ireland) Order 1995; Scottish Government, 2014). For the purposes of this policy, this definition also applies to adults at risk of harm. Harm could include:

- Ill-treatment (sexual abuse, neglect, emotional abuse and psychological abuse). The impairment of physical or mental health (including that suffered from seeing or hearing another person suffer ill-treatment)
- The impairment of physical, intellectual, emotional, social or behavioural development (including that suffered from seeing or hearing another person suffer ill-treatment).

We recognise that:

- the welfare of those we work with is paramount

¹ In Scotland, a child legally becomes an adult when they turn 16, but statutory guidance which supports the Children and Young People (Scotland) Act 2014, includes all children and young people up to the age of 18.

² nspcc.org.uk

- everyone, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation, gender reassignment, marriage or civil partnership, health, pregnancy or maternity, political beliefs, or on any other grounds or identity, has the right to equal protection from all types of harm or abuse.

The purpose of the policy is:

- to protect children and adults at risk who take part in our programmes, events or other activities
- to provide staff and volunteers with guidance
- to provide staff and volunteers with guidance on procedures they should adopt if they suspect a child or young person may be experiencing, or be at risk of, harm.

This policy applies to all staff, including senior managers and the board of trustees, paid staff, volunteers, freelance contractors, agency staff, students or anyone working on our behalf. We have a fundamental duty to ensure that all who work or volunteer for us have confidence that they are fully supported in their contact with our beneficiaries.

We define safeguarding as the action we take to promote the welfare of children and adults at risk and protect them from harm, including protecting them from abuse or maltreatment, preventing harm to health or development, ensuring safe and effective care and taking action to enable all children and young people to have the best outcomes. It includes child protection for those identified as suffering or likely to suffer significant harm. Child abuse includes any action by another person – adult or child – that causes significant harm to a child, whether physical, emotional or through neglect.

We are committed to ensuring our safeguarding policies and procedures reflect best practice in the sector. Staff are required to follow [Charity Commission safeguarding guidance](#).

We will seek to safeguard children, young people and adults at risk by:

- valuing, listening to and respecting them
- writing and regularly reviewing risk assessments for each programme or activity
- ensuring all staff and volunteers follow agreed safeguarding and conduct procedures
- recruiting staff and volunteers safely, ensuring all necessary checks are made
- sharing information about good practice with staff and volunteers
- ensuring all suspicions and allegations of abuse are taken seriously and responded to swiftly and appropriately
- providing effective management for staff and volunteers through supervision, support and training
- appointing two nominated Designated Safeguarding Officers (DSO) and a trustee who will take responsibility for safeguarding at the highest level in the organisation
- building a safeguarding culture where staff, volunteers, programme participants and stakeholders know how they are expected to behave and feel comfortable about sharing concerns.

The DSOs will review our procedures regularly.

1.2 Responding to a disclosure

If someone tells you that they, or someone they know, is being abused:

- if you feel the individual is in immediate danger, call 999 and, where possible, take them straight to the responsible staff member
- believe what the person is saying and take it seriously
- reassure them that they have done the right thing
- give them time to talk and do not probe or ask leading questions; investigating is not your responsibility
- do not promise to keep secrets; all allegations of harm or potential harm must be acted upon
- explain that you will share this information with a senior member of staff who will ensure the appropriate procedures will be followed
- record what you have been told straight away while it is fresh in your mind, using the actual words spoken as much as possible, rather than your own reinterpretation
- ensure that the disclosure is reported to the staff member responsible for safeguarding at that setting, where relevant (details should be publicly available in a school reception or on their website)
- notify one of the GF DSOs as soon as possible (see contact details on p.1), including all details, including whether you have notified the Safeguarding lead at the venue/setting.

Please see appendix 3 for a flowchart for more detail on the procedure to be followed and appendix 4 for a template for recording and safely sharing incidents.

1.3 Acting on concerns

We follow the guidelines in part 4 of [Keeping Children Safe in Education](#) for managing allegations against adults. Any concerns about an adult's behaviour towards children, young people or adults at risk should be reported immediately to the Designated Safeguarding Officer:

If you have any concerns about an adult's behaviour towards children, young people or adults at risk you should follow the steps outlined in the safeguarding procedure flowchart in [appendix 3](#). This includes:

- make notes, detailing what you have seen and heard, including dates, times and locations
- report your concerns to the relevant DSO immediately
- not confront the adult until advice has been sought
- allegations against the DSOs should be reported to the Trustee Lead for Safeguarding or through the Guardian Whistleblowing policy.

All concerns will be investigated in confidence. We will ensure that the member of staff or volunteer is treated fairly and honestly, and is helped to understand the concerns expressed, the process being followed and any outcomes of the process. However, consideration will be given to the graveness of the allegation before informing the person concerned. In the event of serious allegations, the police will be involved.

In all circumstances, we will act quickly and effectively if an allegation is made, or if there is suspicion or concern about a professional or volunteer's relationship with a child, young person or adult at risk, or group thereof, particularly if they have:

- behaved in a way that has harmed, or may have harmed, an individual
- possibly committed a criminal offence
- behaved in a way that indicates she/he is unsuitable to work with children, young people or adults at risk.

Staff should also refer to our [whistleblowing policy](#), which is available on our staff intranet site and is available to all staff working on GF projects. This policy sets out how they can raise any serious concerns they may have, including those that relate to safeguarding issues.

Please see appendix 3 for a flowchart for more detail on the procedure to be followed and appendix 4 for a template for recording and safely sharing incidents.

Organisations have a legal requirement to report individuals to the Disclosure and Barring Service (DBS) if they are dismissed or removed from regulated activity (or would have been had they not already left) because they harmed or posed a risk to a child or adult. This duty to refer overrides any obligation to withhold information on the grounds of confidentiality.

1.4 Ongoing training and support

Staff and volunteers will be provided with a thorough induction and appropriate training suited to their role. Induction sessions are designed to make staff and volunteers aware of their roles and understand what they are and aren't expected to do. Training will also address boundaries and what to do in any unexpected or difficult situations. Staff and volunteers will be required to read and sign the Code of conduct and Personal disclosure forms prior to engagement, virtually or in person, with young people.

We will endeavour to ensure good practice on a day-to-day basis. The DSOs are available to answer safeguarding questions or provide advice to staff and volunteers about safeguarding practices. Channels for members of staff or volunteers to raise concerns will be made clear, transparent and easy to access. Training will be regularly updated and we run refresher training sessions for existing staff and volunteers on an annual basis.

We aim to create a culture in which everyone involved with the organisation knows that the protection of children, adults at risk, staff and volunteers are taken seriously.

1.5 Review of policy and procedures

This policy and accompanying procedures were produced by the Designated Safeguarding Officers in collaboration with GF staff and volunteers, teachers, and with information from expert organisations including the NSPCC, BBC Children In Need Digital Checklist, CEOP, National Literacy Trust and PSHE Association, and in alignment with legislation and statutory guidance for educational institutions and charities.

Safeguarding policy and procedures are reviewed annually by the DSOs and Trustees.

2. GF Safeguarding Procedures

All GF staff and volunteers have been trained in and are expected to adhere to the following safeguarding procedures. In addition, many of our programmes supporting children and adults at risk are delivered in partnership with other organisations including, but not limited to, schools, universities, libraries and community groups.

We expect that all project delivery partners and volunteers will observe statutory requirements and good practice on safeguarding. All partner organisations will be required to provide a copy of their safeguarding policy, provide information on how it is actively enforced before the commencement of the partnership, and notify The GF when policies are updated. Where relevant, individuals will also be expected to have a valid DBS certificate.

All sub-contractors and volunteers will be required to adhere to this safeguarding policy when working on our behalf. This will be made clear in the contract documents they sign before undertaking any work on our behalf.

2.1 Safer recruitment processes

All job descriptions, for paid staff and volunteers, will refer to the postholder adhering to this safeguarding policy and procedure:

“The GF is committed to safeguarding the children and adults at risk with whom it works. The successful candidate will be expected to adhere to our policy and code of conduct.”

2.1.1 Staff recruitment

Where posts have been identified as being subject to a DBS check, this will also be stated. The DBS check process will be initiated immediately as the person takes up the post. Having a criminal record will not be an automatic barrier to working or volunteering with us, as only relevant convictions will be taken into account. If a new employee or volunteer does not disclose a relevant conviction before being checked, we reserve the right to withdraw the offer of employment/volunteering. In general, offences that are considered relevant, and would therefore be a barring offence, are those that indicate there may be a risk of harm to children and adults at risk. These include cautions, reprimands and final warnings.

For all GF employees and casual workers, trustees and contractors (where applicable), DBS checks will be carried out by the Human Resources team at Guardian News & Media, who provide us with HR support. For programme volunteers, DBS checks will only be carried out in specific circumstances (see 2.8). However, all volunteers interacting with children or vulnerable adults will be required to read and sign our Code of conduct and a Personal disclosure Form. In all circumstances, personal data will be handled sensitively, held securely and not be shared with any other parties.

Safer recruitment does not start and end with DBS checks. Therefore, we will not rely solely on this process, but will also follow good practice procedures to create a safe environment for all.

We will ensure a thorough recruitment procedure is in place for everyone who applies to work with us. We will conduct face-to-face interviews, where reasonably possible, and take up references. Staff posts will be subject to a 12-week probationary period unless a shorter, fixed-term contract requires a shorter probation period.

2.1.2 Volunteer recruitment

- Journalists are primarily recruited from our sister organisation, Guardian News and Media ('GNM'), part of the Guardian Media Group, and other journalism organisations to, voluntarily support journalist training programmes; produce skills 'explainer' videos; conduct pre-recorded or video conference Q&A sessions with children; speak to school groups or groups of young people about their work. Journalists will be recruited via internal communications, social networking sites and other networks such as industry bodies
- Prospective volunteers will register interest either via email or via a secure form and then be contacted by a staff member for vetting before training takes place.
- Student journalists may also be recruited as volunteers from university journalism courses. The relevant programme team will work with course leaders, journalism departments and outreach teams to promote the opportunity and recruit students. Most interactions will be virtual; in-person interactions will be very limited. Prospective student journalist volunteers complete a form registering their interest. A GF staff member then meets all applicants to vet their suitability for the programme. Student journalist volunteers' student status is verified via their course leaders and they must submit evidence of published work
- Safeguarding training for all volunteers, where relevant, is delivered pre-programme. All volunteers who will be working with children (those aged under 18) or adults at risk will be asked to read the safeguarding policy and sign the GF Code of conduct and Personal disclosure form before volunteering, whether their volunteering activity will be remote or in person.
- All volunteers are over 18.

2.2 Programmes

Each GF programme or event will have individual risk registers addressing safeguarding where relevant. All event risk assessments should be stored securely on the GF server.

2.3 Events

The GF runs programmes in a number of UK and International venues, and procedures exist to cover these scenarios as follows:

2.3.1 GNM-based events

The GF regularly runs one-off events for young people within GNM's Headquarters, where The GF's offices are also based. This includes access and inclusion projects, and the Education Centre managed by the GF's Behind the Headlines programme, a fully equipped classroom within the building, which school groups visit frequently. However, there are many hundreds of staff based at the Guardian News & Media HQ and therefore there are certain issues in regard to children, their safety and security as well as the maintenance of the building, which all staff are made aware of and adhere to:

- Event staff and volunteers will follow the GF Code of conduct at all times
- All GNM staff are made aware via GNM internal communications that visits by school groups or groups of young people will be taking place and are reminded of the code of conduct
- Young people aged 16 and 17 may participate in a GNM-based activity without an adult in loco parentis, but must provide parental consent in writing to do so
- Schools visiting the Education Centre are made aware of the GF safeguarding policy and procedures and the Behind the Headlines risk assessment via email in advance on booking and again in preparation for the visit - this information is also on the [Foundation's website](#).

- Information on additional educational and accessibility needs is requested before the visit, and preparations are made in advance of the visit. This information is stored securely according to GDPR and processed in accordance with our privacy policy.
- Teachers remain in loco parentis of school visiting groups and are responsible for the safety of all of their students while at school and off-site, on an educational visit. They, therefore, have a legal obligation to take action where students are lost, at-risk or unwell
- If a non-hosting staff member needs to communicate with a school group for any reason, this should always be done through the teacher.
- All visitors will pass through security, and be collected and escorted by a GF staff member
- All staff should be tolerant of noise levels within reason and should treat children and teachers respectfully
- Toilets will be allocated for children's use, and these will be inaccessible to staff throughout the children's visit
- Staff should never be alone with children without a teacher present
- If a child or teacher requires medical help, contact one of the designated first aiders. If there is a medical emergency, you should also ring Security on 34105/6 to request an ambulance. Security can also help to locate a first aider who should be available for any serious emergency first aid where a child has lost consciousness or is seriously ill. A member of the school's teaching staff is required to stay with the child needing medical help
- First aiders should take appropriate action, but should be careful not to exceed the limits of their expertise, and should bear in mind that the teacher is ultimately responsible for the welfare of the child
- Injuries sustained, as the result of accidents on Guardian premises should always be recorded. An accident report must be completed in the event of an accident. The accident book is kept by Security on Level 1. An accident/dangerous occurrence form must also be completed, a copy of the form can also be found on Spike, GNM's intranet. The accident/dangerous occurrence form must be forwarded to the DSO and to GNM's Head of Workplace Management at the earliest opportunity
- Teachers will be briefed on evacuation procedures on arrival. GF staff will lead an evacuation if necessary and will liaise with Fire Wardens
- An ongoing PEEP (Personal Emergency Evacuation Plan) where applicable for visitors with accessibility issues and is activated by GF staff where necessary
- If a child is lost, staff will follow the 'lost child/found child protocol'
- Children aged under 16 or in school groups will not be permitted to leave the building unaccompanied by a teacher.

2.3.2 School-based events

Where events are taking place within a school setting, we will follow the following procedure:

- Notify the school contact which visiting staff hold a DBS check
- Request information on additional educational needs, and prepare appropriate adaptations to workshop content. Store this information securely according to GDPR
- Familiarise yourself with the programme risk assessment and school safeguarding policy (usually available on the website) and identify the DSO at the school. It may be helpful to take a copy of appendix 3, the safeguarding procedure flow chart with you.
- Bring DBS certificate and ID to all school visits
- Sign in and clarify outstanding safeguarding questions with the school reception staff/safeguarding lead
- Staff and volunteers will follow the GF Code of conduct at all times.

2.3.3 Other events

Where events take place outside of the school setting, a full risk assessment will be carried out by the GF event lead and approved in writing by the programme lead prior to the event taking place.

- Where possible a site visit should take place, which helps inform the GF risk assessment. The venue should have its own risk assessment
- Where relevant, the DSO for the venue shall be identified in advance with contact details provided to the GF event safeguarding lead.
- At least 2 GF staff should have a copy of and have read the risk assessment, with other staff receiving a verbal briefing on key elements. A copy will be made available to participating schools and organisations on request
- For all non-school-based events, a named staff member shall be assigned Health & Safety lead and will act as the liaison for all safeguarding, health and safety concerns throughout the event
- Where parents/guardians are in attendance they remain responsible for their children at all times. Parents are made aware of this verbally and/or via a booking form. This shall be repeated during the briefing at the start of the event
- Where teachers are in attendance, accompanying students, they remain responsible for the children in their care at all times. Schools are made aware of this verbally and/or via the booking form and confirmation email. This shall be repeated during the briefing at the start of the event.

2.3.4 Virtual events

Staff and/or volunteers may be required to run or participate in virtual events, as we continue to adopt a hybrid approach to delivery. Safeguarding procedures remain the same for all virtual events, and participating staff or volunteers are expected to follow The GF's safeguarding policy and Code of conduct. In addition:

- Staff for each programme will complete a digital checklist, reflecting different learning and technical scenarios in different schools, and flagging any outstanding issues to DSOs.
- Staff /volunteers will ensure that there are at least two responsible adults on the call at all times (one adult may be a teacher)
- Staff and volunteers will not record virtual sessions unless, in rare circumstances, with prior written approval of the programme lead and written parental and school consent.
- Staff and volunteers should only connect with a school virtually via a school or teacher account, and should never directly contact children through a child or family member's video conferencing, school or social media account without prior written consent of the DSO.
- Staff and volunteers should only access a school or teacher account on a private, password-protected computer or device, and should ensure that security settings are up to date. Staff and volunteers should not use public computers or devices (which are used by other people e.g. libraries, cafes) for virtual events.
- Staff and volunteers should only access a school or teacher account where they, and the participants in their session including children, can be assured of privacy, and not in a public area.
- Staff and volunteers should at no time share account information with children, and should take steps to ensure their account information is not available to children whilst connecting virtually with a school.
- Platform policy should be followed at all times, children and young people should not access virtual technology or social media if their age is below that authorised by the platform.
- Staff and volunteers should ensure that the background of their virtual session is neutral and age-appropriate for children.

- Volunteers and staff are notified that DSOs and programme leads retain the right to ‘drop in’ on virtual sessions with the consent of the hosting teacher.
- Young people aged 16 and 17 may participate in a virtual event without an adult in loco parentis but must provide parental consent in writing to do so.

2.4 News and young people

The GF runs news and media literacy education programmes for young people, often drawing upon examples of real news reports. It is therefore important that we consider the age and vulnerability of our programme participants and take the following measures:

- Any real news reports used in our educational programmes are vetted and edited for age-appropriateness prior to sharing with children or young people
- Teachers are often consulted on the appropriateness of news reports based on their knowledge of their class
- Staff and volunteers are mindful of the age of participants when sharing experiences and/or examples of news reporting
- The GF signposts resources with further support on our website and in individual programme lessons.
- We take guidance from experts including the PSHE Association on how to ‘distance’ learning from children, young people and adults at risk when referring to the potentially difficult subject matter.

2.5 Use of images and/or child-authored content

We will protect the safety and privacy of the children we work with by following good practice in the use of their authored work and images, both still and video:

- We only use imagery featuring identifiable children when written permission has been granted – either directly to us or to the school or organisation that has supplied the image
- Consent must cover the specific intended use, and consent givers retain the right to withdraw consent at any time. Children retain the right to have their work withdrawn at any time via a teacher or parent.
- Publicity photos for which we have specific parental consent will not name the individual children shown.
- We will not record virtual workshops without prior written consent. We never record school-based workshops.
- Where any image of a child is used, we will remain mindful of jigsaw identification. Only basic information will be given alongside images of children, young people or adults at risk.
- Where an image or video is used for general publicity, we will not name the child.
- Where an image is used to celebrate the work of a specific child, we will use first name and age only.
- It is good practice that parental permission is obtained for use of work and/or images of young people aged 16 or 17 even though they can self-consent. Images of children under 16 will not be shared on social media without explicit written parental consent.
- Images of children will be stored securely and will not be made available for public use at any time.
- For those under 16, we will only share child-authored content (written or video news reports) with explicit parental and school consent to do so. We will make it clear where content will be shared (website/social media) and consenters retain the right to withdraw consent at any point.
- Parental and/or teacher consent documents will be retained by the GF team and stored securely in accordance with the Data Protection Act 2018.

2.6 Work experience

Work experience programmes at The GF are open to those aged 18+. Occasionally, the GF will offer work experience opportunities to adults at risk of harm through an intermediary organisation such as Mencap. All staff will follow the guidance set out below:

- Adults at risk will be provided with the main point of contact for any issues or concerns: for young people aged under 18, this would be the GF DSO, for adults at risk this would be their assigned contact at their intermediary organisation
- Adults at risk will be accompanied on the first day of their placement by a representative of their intermediary organisation and will discuss any concerns with the staff host and/or DSO.
- GNM volunteers working with children or adults at risk, are required to complete a Personal disclosure and sign a Code of conduct
- GF staff members and volunteers will not be permitted to work alone with the applicant 1 on 1 in any “enclosed” space
- GF staff will follow the Management of Health and Safety at Work Regulations 1999 to ensure that applicants are not put at risk.

2.7 Journalists

The GF runs furthering capacity programmes for journalists. Occasionally these journalists can be in exile, experience a range of challenges, or have other indicators of vulnerability. Although not defined as “adults at risk” in the formal sense, the GF recognises its responsibilities with respect to these journalists who in many cases require additional safeguarding support, including:

- Recognising that these journalists may have experienced trauma and/or abuse and offering links to appropriate support services
- Recognising that journalists may write under a pen name and therefore ensuring names of journalists are not shared with other participants, volunteers or the wider organisation, as well as following GDPR requirements
- Offering specific training on security & safety
- Recognising that their legal status may be in flux, and adapting programmes to facilitate their participation.

2.8 Use of Disclosure and Barring Service (DBS) checks

A DBS check provides information about a person’s criminal history, to help organisations determine whether a person is a suitable candidate for a particular position. It forms one part of the wider safeguarding process.

If a position, paid or voluntary, will put an individual in regular contact with children and/or adults at risk, we will follow the steps below to determine if a Disclosure and Barring Service (DBS) check should be undertaken. Careful consideration will be given to whether it is necessary to conduct a check or whether other safeguarding measures provide adequate protection. Only certain posts and activities are eligible for checks, and DBS checks will not be used as a “just in case” box-ticking exercise.

For clarity, at The GF, all child-facing roles (core team members working with children and freelancers working with children) require a current DBS certificate, issued within the last 2 years.

If a check is required, the individual will be informed and the reasons why it is needed will be explained. If a prospective, new or existing employee makes a disclosure prior to being checked, the relevance of that disclosure will be assessed against the profile of their likely contact with children and adults at risk.

We will conduct a DBS check on anyone who is to take part in unsupervised regulated activity, in line with the information in 2.1.1. The following activities are classed as regulated activities if done regularly (by the same person at least once a week, or more than three days in a 30-day period): teaching, training, instructing, caring for or supervising children, providing advice/guidance on wellbeing, and driving a vehicle only for children.

A summary of what constitutes a *supervised* activity, and therefore does not require a DBS check, is at <https://www.gov.uk/government/publications/supervision-of-activity-with-children>

Appendices to the policy:

1. [GF staff and volunteer code of conduct](#)
2. [Personal disclosure form for volunteers](#)
3. [Safeguarding disclosure procedure](#)
4. [Safeguarding Reporting Template](#)
5. Safeguarding Procedure in response to a Pandemic (Available on request)