

SAFEGUARDING AND CHILD PROTECTION POLICY

- 1. Policy Statement
- 1.1 Safeguarding and Child Protection Policy

Hesheli Education Consulting Ltd (Hesheli-Edu) is committed to safeguarding and promoting the welfare of children and believes that all students, regardless of age, special needs or disability, racial/cultural heritage, religious belief or sexual orientation have the right to be protected from all types of harm and abuse. This Safeguarding and Child Protection Policy ("this policy") forms a fundamental part of our approach to providing excellent guardianship service and pastoral care to all young overseas Chinese students who are studying in the UK, including young people who may be over the age of 18 years.

Key documents with which this Policy is in accordance:

- ♦ The Education Acts
- Education (Independent Schools Standards) (England) Regulations 2010 (as amended from time to time)
- ♦ Safeguarding Vulnerable Groups Act 2006
- ♦ The Children Act 2004
- ♦ What to do if you are worried a Child is being Abused 2006
- ♦ Working Together to Safeguard Children March 2013 (A guide to inter-agency working to safeguard and promote the welfare of children)
- ☆ Safeguarding Children and Safer Recruitment in Education 2007 (with regard as appropriate to the March 2013 consultation on its replacement Keeping Children Safe in Education)
- ♦ Information Sharing: Guidance for Practitioners and Managers 2008
- ♦ DBS Referral Guidance (as may be amended from time to time)
- ♦ Independent Schools Inspectorate Handbook September 2013 the regulatory requirements (and as amended)
- ♦ Dealing with Allegations of Abuse against Teachers and Other Staff 2012

Hesheli-Edu recognises and acts upon the legal duties set out in the above statutes regulations and guidance, to protect its students (and staff) from harm, and to cooperate with other agencies in carrying out those duties and responding to safeguarding concerns.

This Policy is used in accordance with locally agreed inter-agency procedures, and specifically in accordance with London Borough of Sutton Local Safeguarding Children Board (LSCB) guidance.

This Policy is addressed to all members of staff (including interim course tutors, living skill tutors and interns) and volunteers at Hesheli-Edu. Adherence to this Policy is mandatory for all staff and volunteers and its use is not subject to discretion. This Policy applies whenever staff or volunteers are working with students, including where this is away from Hesheli-Edu, for example at another institution, school visits and trips, as well as sporting and cultural activities



This Policy is available to all parents, students, staff and volunteers on Hesheli-Edu's website. A paper copy of this Policy is also available to parents upon request to Hesheli-Edu office.

Students are made aware of this Policy throughout the guardianship service and other means of sharing information appropriate to their age and understanding.

1.2 Creating a Culture of Safeguarding

Hesheli-Edu recognises that safeguarding covers much more than child protection and so this Policy will operate in conjunction with other related policies and procedures, covering areas such as Health and Safety, Anti-Bullying, Behaviour Management, Information Sharing, the safe use of ICT and venue security. The Managing Director has overall responsibility for all aspects of safeguarding.

'Safeguarding' is broader than 'child protection'. As well as protecting children from harm, 'safeguarding' widens the responsibility to preventing harm and promoting the well being of children. It is recognised that safeguarding and promoting the welfare of children includes:

- ♦ protecting children from maltreatment
- ♦ preventing the impairment of children's health or development
- ♦ ensuring that children are growing up in circumstances consistent with the provision of safe and effective guardianship and care

Hesheli-Edu takes its responsibilities very seriously. As well as ensuring Hesheli-Edu's policies and procedures support its safeguarding responsibilities, Hesheli-Edu will work with students, their families, Social Services Departments and other relevant agencies to ensure the risk of harm to children is minimised.

Hesheli-Edu is committed to working in partnership with parents, Social Services Departments and diverse communities, to continuously develop and improve the safeguarding culture within Hesheli-Edu.

Having these safeguards in place not only protects and promotes the welfare of children but also it enhances the confidence of our staff, volunteers, parents/carers, host families and the general public.

Hesheli-Edu has systems to:

- ♦ prevent unsuitable people working with students
- identify students who are at risk of and/or are likely to suffer significant harm and take appropriate action with the aim of making sure they are safe
- promote safe practice and challenge poor practice and unsafe practice deal with issues of confidentiality, information sharing and consent ensure that staff do not, through their actions, place students at risk of harm, or themselves at risk from an allegation of harm (by providing guidance on areas such as 1-1 tuition, sports coaching, conveying by car, inappropriate electronic communication).

Hesheli-Edu encourages the students in its guardianship to raise any concerns that they might have and ensure that these are taken seriously. Hesheli-Edu also encourages students to contribute their own ideas, according to their age and understanding, about how their safety and welfare could be further improved.

Hesheli-Edu management team must notify the Governing Board of any safeguarding issues in the following circumstances:

- ♦ The issue involves an allegation against a member of staff, a volunteer or the Managing Director;
- ♦ The issue relates to concerns about the service provided to the student



- ♦ The issue involves referral to external agencies
- ♦ The issue could result in a claim against or affect Hesheli-Edu's reputation

Hesheli-Edu management team is encouraged to contact the Governing Board in any other case where guidance or advice is felt to be needed.

1.3 Implementation Procedures

Hesheli-Edu has implementation procedures to assist staff and volunteers when handling safeguarding concerns. Information on these procedures is available to all staff and volunteers at Hesheli-Edu and the procedures must be followed at all times.

2. Aims

Our aims are to:

- ♦ create an environment in Hesheli-Edu which is safe and secure for all students
- ♦ encourage students to establish satisfying relationships within their families, with peers and with other adults
- ♦ encourage children to develop a sense of autonomy and independence
- ♦ work with parents to build their understanding of and commitment to the welfare of all students

In order to fulfill these aims the Managing Director will take the necessary steps to ensure that:

- ♦ all staff and volunteers receive training in Safeguarding Children as part of their induction
- ♦ all staff (including the Managing Director, living skill tutors and interim course tutors) and volunteers receive updated safeguarding training every three years
- Hesheli-Edu operates safe recruitment procedures. This includes ensuring that at least one member of any recruitment panel involved in all stages of the recruitment process has undertaken the appropriate training in Safer Recruitment and carrying out all required checks on the suitability of all staff and volunteers to work with children and young people in accordance with the guidance and regulations as presented above and in accordance with Hesheli-Edu recruitment and selection procedures.
- Hesheli-Edu obtains assurance that appropriate child protection checks are carried out and procedures apply to any staff or volunteer of another organisation who work with Hesheli-Edu's students on another site (for example, in a separate institution).
- Hesheli-Edu ensures that corporative partners (i.e. independent schools and host families) are holding good records being with children which are evidenced against the DBS checks before using their services so as to protect students' wellbeing from harm.
- Where Hesheli-Edu ceases to use the services of any person (staff, tutors, host families, volunteer or any other person) because it is considered that the person may be unsuitable to work with children, a referral will be made to the Disclosure and Barring Service (DBS) in accordance with our legal duty. A referral will also be made to the Teaching Agency if the tutor is a teacher.
- ♦ all staff are alert to the signs of abuse and neglect (appropriate to their role) and all staff known to whom they should report concerns or suspicions of abuse or neglect.
- ♦ all staff keep themselves updated on safeguarding issues and child protection policies by accessing advice, guidance and training as appropriate to their role.
- This policy is compatible with and meets all applicable requirements of the London Borough of Sutton LSCB. Hesheli-Edu ensures that it has possible communication with LSCB to ensure compliance with any



changes in local protocol and access to relevant support. The LSCB can be contacted through the Local Social Services Department (Children's Services) "Social Services". Their contact details are set out below.

3. Identifying Abuse

Staff who have day-to-day contact with students are particularly well placed to observe outward signs of abuse such as changes in behaviour or developmental concerns. A child protection concern may come to the attention of Hesheli-Edu staff or volunteers in a variety of ways, such as student disclosure, third party disclosure or staff suspicion.

Any suspicion, allegation or incident of abuse must be reported to the Designated Officer within Hesheli-Edu immediately. It is not the responsibility of Hesheli-Edu to investigate suspected or alleged abuse; this is the role of the Police and Social Services.

What is Child Abuse?

The definitions in this document are drawn from paragraphs 1.33-1.36 of the original version of Working Together to Safeguard Children (2010). Someone may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm in the following four categories:

Physical abuse - may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Female genital mutilation (FGM) or the risk of FGM should also be treated as a child protection issue. Physical harm may also be caused when a parent or carer fabricates the symptoms, or deliberately induces illness in a child.

Emotional abuse - persistent emotional ill-treatment of a child such as to cause severe and persistent adverse effects on a child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or unvalued. It may feature age or developmentally inappropriate expectations being imposed on a child, or causing children to feel frightened or in danger.

Sexual abuse - involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is fully aware of what is happening and whether or not such an act was consensual. It may involve physical contact and/or non-contact activities such as involving children in looking at or the production of pornographic material, watching sexual activity or encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.

Neglect - the persistent failure to meet a child's basic physical, emotional and/or psychological needs likely to result in the serious impairment of the child's health or development. It may involve a parent or guardian failing to provide adequate food, shelter and clothing, failing to protect a child from physical and emotional harm or danger, failure to ensure adequate supervision, or failing to ensure access to appropriate medical care of treatment. It can also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Who are the abusers? - abusers can be parents or guardians, siblings or members of the extended family, neighbours, teachers, host families, strangers or other students; in short, an abuser could be anyone.

Signs of abuse

The following may help staff be aware of possible signs of abuse but *these do not necessarily mean that the child has been abused:*

Physical Abuse

♦ Unexplained injuries/ burns



- ♦ Untreated injuries
- ♦ Bruises/ abrasion around the face
- ♦ Bi-lateral injuries e.g. two bruised eyes
- ♦ Bite marks
- ♦ Bruising abrasions to lips, cheeks, outer ear

Emotional Abuse

- ♦ Excessive overreaction to mistakes
- ♦ Continual self-deprecation
- ♦ Excessive rocking, thumb sucking, hair twisting
- ♦ Extreme compliance/aggression
- ♦ Drug, alcohol and substance misuse
- ♦ Significant peer relationship difficulties

Sexual Abuse

- ♦ Sexual awareness inappropriate to child's age, including provocative sexual behaviour
- ♦ Self-harm
- ♦ Pregnancy
- ♦ Sexually transmitted diseases
- ♦ Sudden changes in behaviour or school performance
- ♦ Fear of undressing for gym
- ♦ Depression/withdrawal
- ♦ Drug, alcohol, substance abuse

Neglect

- ♦ Constant hunger, tiredness and/or poor personal hygiene
- ♦ Untreated medical problems
- ♦ Destructive tendencies
- ♦ Social isolation
- ♦ Poor self esteem and/or relationship with peers
- ♦ Excessive rocking, hair twisting, thumb sucking

4. Designated Officer

Hesheli-Edu has appointed a Designated Officer and a person to contact in his absence. The Designated Officers are members of Hesheli-Edu's Management Team with the necessary status and authority to take responsibility for child protection matters. The Designated Officer at Hesheli-Edu is Mr. He Qiang, the Managing Director. His contact details are set out in section 13.

The Designated Officer will:

- ♦ be responsible for ensuring that all cases of suspected or actual child protection concerns are dealt with in accordance with the guidance and regulations set out in section 1.
- ☆ refer cases of suspected abuse or allegations to the local Social Services Department in accordance with LSCB procedures
- ensure that he/she/they is/are aware of the latest national and local guidance and requirements and will keep staff and volunteers informed as appropriate
- receive appropriate training in child protection matters and interagency working, to include both national and local bodies, at least every two years



- ensure that staff and volunteers have access to and understand their role as appropriate in the child protection procedures, including but not limited to part-time staff, supply staff, peripatetic staff, newly appointed staff, newly qualified staff, interim course tutors, interns and volunteers.
- ☆ act as a source of advice and support within Hesheli-Edu and co-ordinate action regarding referrals in relation to both children and allegations against staff.

5. Responding to Disclosures of Abuse

5.1 Children are more likely to be abused by someone they know and trust than by a stranger.

5.2 Staff and volunteers should make themselves available to listen and demonstrate to the student that what they are saying is being taken seriously and without criticism and should respond in a supportive, calm manner and avoid asking detailed questions. The role of the staff or volunteer is to listen, record and report; not to investigate. Staff and volunteers should take care to ensure that their behaviour and actions do not place students or themselves at risk of harm.

5.3 If a student reports abuse from another student or students, staff should follow the procedures in this section. The Designated Officer will liaise with local agencies in relation to handling any such cases which arise. Further guidance can be found in the Safeguarding Procedures (Section 5).

5.4 Immediate Response

If a disclosure is made, the member of staff or volunteer should:

5.4.1 allow the pace of the conversation to be dictated by the student

5.4.2 ask open questions which encourage the student to talk such as "can you tell me what happened?"

5.4.3 accept what the student says and do not ask for further detail

5.4.4 acknowledge how hard it was for them to tell you and show by voice tone and/or facial expression that you are taking their concerns seriously

5.4.5 note carefully any clearly visible external signs of possible injury or neglect (but note paragraph 5.5.4 below)

5.4.6 reassure the student that they have done the right thing, that it is not their fault, and explain whom you will have to tell (the Designated Officer) and why.

5.5 The member of staff or volunteer **should not**:

5.5.1 burden the student with guilt by asking questions such as "why didn't you tell me before?"

5.5.2 interrogate or pressure the student to provide information

5.5.3 ask any potentially leading questions such as those that start with the words, how, what, when, where and why

5.5.4 undress the child or examine clothed parts of the child's body in an attempt to determine the nature of any such injuries/neglect

5.5.5 criticise the alleged perpetrator, this may be someone they love

5.5.6 promise confidentiality (see paragraph 5.6 and 5.7)

5.5.7 make promises that they cannot keep such as "I'll stay with you all the time" or "it will be alright now"



5.5.8 put words in the child's mouth (i.e. finish their sentences)

5.5.9 jump to conclusions or speculate about what happened or might have happened, or make accusations

5.5.10 show an overly emotional reaction, such as expressing disgust, shock or disbelief

5.5.11 attempt to investigate the allegations

5.6 If a student confides in a member of staff or volunteer and requests that the information is kept secret, staff/volunteers *must not* make promises about confidentiality. Staff must tell the student sensitively that they have a responsibility to tell the named Designated Officer (see paragraph 4) so that the child can be helped to stay safe and feel better.

5.7 In every case, the staff/volunteer should consider whether the student is able to provide consent for the information to be shared and if so, seek to obtain that consent in accordance with the Hesheli-Edu's Safeguarding Procedures relating to information sharing and consent. If the student does not consent, the staff/volunteer should explain that they need to share the information with the Designated Officer and reassure them that the information will *only be disclosed* to other people who *need to know*. The member of staff/volunteer should refer to the Hesheli-Edu's Safeguarding Procedures for further information and guidance.

5.8 Hesheli-Edu recognises that a child who is abused may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth. We recognise that Hesheli-Edu may provide the only stability in the lives of children who have been abused or who are at risk of harm.

5.9 Hesheli-Edu will provide continuing support to a student who has disclosed abuse through promoting a caring and safe environment within Hesheli-Edu and encouraging self-esteem and self-assertiveness through the curriculum and through relationships. In doing so, Hesheli-Edu will act in accordance with guidance from the relevant authorities to ensure that, for example, legal proceedings are not compromised.

5.10 Recording Information

Staff/volunteers should:

5.10.1 make brief notes at the time or immediately afterwards, which record the date, time, place and context of the disclosure or concern, and what has actually been said (wherever possible using the child's exact words, even if they seem childish, rude or inappropriate), not assumption or interpretation. Notes must be signed and dated

5.10.2 clearly distinguish between fact, observation, allegation and opinion

5.10.3 record any observed injuries and bruises

5.10.4 note the non-verbal behaviour and the key words in the language used by the student (do not translate into "proper terms")

5.10.5 complete a Safeguarding Concern Form, attach any original notes and pass them to the Designated Officer

5.10.6 appreciate that their records may be used in criminal proceedings or disciplinary investigations.

5.11 Reporting to the Designated Officer



5.11.1 Any concerns about students must be discussed with the Designated Officer (or in his absence the Deputy Designated Officer) as soon as possible and at latest by the end of Hesheli-Edu's business day.

5.11.2 Where the disclosure identifies a safeguarding issue, the Designated Officer will report the disclosure to the local Social Services Department within 24 hours. In the most serious cases the police may be contacted.

6. Allegations against staff

The policy aims to strike a balance between protecting students from abuse and protecting staff and volunteers from false allegations. What follows is a summary of those procedures.

Where a safeguarding related allegation or cause for concern is made against any member of staff or volunteer, the matter should be reported immediately to the Designated Officer (now it is the Managing Director). If the Designated Officer is absent, the senior officer authorized by the Managing Director should be notified immediately.

Where a safeguarding related allegation or cause for concern is made against the Designated Officer (now it is the Managing Director), the matter should be reported immediately to the local Social Services Department. In the most serious cases the police may be contacted. Never should the Managing Director be reported.

A decision whether or not to suspend a member of staff or volunteer will be taken by the Managing Director following consultation with the senior management team. If the allegation is against the Managing Director, the Governing Board will consult with the relevant authorities before a decision of suspending the Managing Director. Suspension is not an automatic response and the decision will be taken according to the circumstances of each particular case.

In considering the available options, including redeployment of the member of staff or volunteer, the Hesheli-Edu and the Managing Director will ensure that their primary concerns are the safety and wellbeing of the students, together with the need for a full and fair investigation.

Where we cease to use the services of any person (staff member, peripatetic tutors, volunteer or any other person) because it is considered that the person may be unsuitable to work with children, a referral will be made to the DBS promptly and in any event within 28 days in accordance with our legal duty. Hesheli-Edu will also consider making a referral to the National College for Teaching and Leadership (NCTL) where a peripatetic tutor is a teacher.

Where required to do so, we will provide information requested by the DBS or NCTL in respect of a member of staff or volunteer in accordance with our legal duty.

Communications with Hesheli-Edu community about safeguarding related allegations shall only be made following consultation with any investigating authorities. Hesheli-Edu will disseminate information internally about safeguarding related allegations.

7. Roles and Responsibilities

Every member of staff, members of Hesheli-Edu Governing Board, and every volunteer who assists Hesheli-Edu should:

- ♦ protect students from abuse
- ♦ be aware of the Hesheli-Edu's safeguarding policy
- ♦ know how to access and implement the policy



- ♦ follow the policy at all times
- know the identity of Hesheli-Edu's Designated Officer and to whom one should speak in the absence of the Designated Officer.
- ♦ report all safeguarding concerns to the Designated Officer (subject to section 4 of this Policy)
- ♦ keep a record of any safeguarding concern, conversation or incident
- ♦ undertake appropriate training including refresher training every three years
- \diamond check the safety of services provided by the third party

8. Reporting Students to Social Services

The decision to make a referral which could activate a child protection investigation, and the issue of gaining parental consent, are serious matters and require careful judgment. These decisions must only be taken by the Managing Director (who is the Designated Officer) who will liaise with the Hesheli-Edu Governing Board as appropriate, following consultation with the Local Social Services Department (Children's Services) "Social Services".

The consent of parents should be obtained before making a formal referral, unless to do so could place the child at risk of significant harm.

In accordance with section 5 of this policy, where the disclosure relates to actual abuse or the suspicion of abuse, the Designated Officer will report the disclosure to Social Services within 24 hours.

In the event of Hesheli-Edu making a referral to Social Services, they should agree with the recipient of the referral what exactly the child and parents will be told, by whom and when. The Designated Officer should ask to be kept informed of the timing of the strategy discussion between Social Services and the police, which will decide whether and how to investigate. The Designated Officer should be prepared to contribute to the strategy discussion.

Social Services are required to acknowledge written referrals within one working day, although schools should expect a prompter response in cases which appear to be urgent. If Hesheli-Edu has not heard from Social Services after two working days Hesheli-Edu should contact Social Services again. A record of each contact with Social Services, including the name of the officer with whom Hesheli-Edu has spoken should be kept.

9. Whistle-blowing

Hesheli-Edu recognises that children cannot be expected to raise concerns in an environment where staff fail to do so.

Where staff or volunteers reasonably believe that safeguarding concerns exist, or where they have concerns regarding the management of safeguarding issues, it is their duty to raise concerns.

The member of staff or volunteer should bring their concerns to the attention of the Designated Officer, or in a case where the concerns relate to the actions or inaction of the Managing Director, it becomes necessary to consult outside Hesheli-Edu, for instance seeking advice and help from Social Services or Police.

10. Monitoring and Review

The working of this Policy will be monitored by the Managing Director in Hesheli-Edu and will report as required to the governing board.



Hesheli-Edu will undertake an annual review of safeguarding policies and procedures together with a review of the safeguarding incidents that have arisen and how they were managed. This Policy will also be reviewed as necessary to reflect changes in legislation, guidance and practice. This process is carried out to ensure that the Hesheli-Edu is continuing to provide the very highest standard of safeguarding possible.

The annual review will be reported back to the Governing Board, which will monitor compliance and promoting the welfare of overseas Chinese students who are under Hesheli-Edu's guardianship.

Any deficiencies or weaknesses identified in this Policy or in any of Hesheli-Edu's child protection arrangements will be remedied without delay.

11. Equal Opportunities

In meeting its safeguarding obligations Hesheli-Edu will be mindful of the obligations under the Equality Act 2010, which covers discrimination against a student or prospective student on grounds of sex, race, caste, disability, religion or belief, sexual orientation, gender reassignment, pregnancy or maternity.

All staff, volunteers and members of Governing Board with responsibilities under this Policy must take into account the Equal Opportunities Policy when discharging their duties.

12. The Third Party Services

If Hesheli-Edu uses services provided by the third party (i.e. independent schools, peripatetic tutors, host families, community partners, summer camp partner, taxi companies), Hesheli-Edu is responsible for checking if the third party has the similar policy regarding safeguarding and child protection. If the third party, as a self-employed individual, will work with a student who is under our guardianship, Hesheli-Edu must verify that the individual is holding a valid DBS check report. The third party is required to be aware of this Policy before the service commencement. Where it is not sure whether or not the third party is holding a valid DBS check report, a Hesheli-Edu's staff should be present when the third party is working alone with a student under our guardianship.

13. Key Contacts

Designated Officer: Qiang He / Managing Director Mobile: +44(0)791 090 8888 Email: <u>heqiang@hesheli-edu.com</u>

This Policy is reviewed by Qiang He/Managing Director on 11 March 2025. Next review will be due in March 2030.

Read appendix on next page



Appendix Safe Practice Principles when working with children

Staff members are advised to not behave in a manner that could lead a reasonable person to question their conduct, intentions or suitability to care for other people's children including:

- ♦ touching children in a manner which is or may be considered sexual, threatening, gratuitous or intimidating
- ♦ discriminating either favourably or unfavourably towards any child
- making arrangements to contact, communicate or meet children outside of work unless it is agreed with the Designated Officer for Child Protection
- ☆ refer to the ICT code of conduct before using electronic communication; staff should not give out their personal contact details
- develop personal or sexual relationships with children, including students aged 16 or over push, hit, kick, punch, slap, throw missiles at or smack a child or threaten to do so unless your own personal safety is threatened make inappropriate jokes of a personal, sexual, racial, discriminatory, intimidating or otherwise offensive nature
- intentionally embarrass or humiliate children, for example, by using sarcasm or humour in an inappropriate way allow, encourage or condone children to act in an illegal, improper or unsafe manner e.g. smoking or drinking alcohol

One to one tuition including sports coaching

- ♦ Staff should ensure that they are not alone on site with a student.
- ♦ They should avoid remote parts of the site, ensure that the exit is clear and the area is well-lit.
- ♦ Where possible use rooms with a viewing panel, or position a piece of furniture themselves and the student.

Guidance on conveying by car

Any staff member who conveys a student by car must do so with the knowledge of their line manager and must provide:

- 1. their driving licence
- 2. the most recent MOT certificate for the vehicle in use
- 3. certificate of insurance for the vehicle in use
- 4. a risk assessment for the activity

In addition, all drivers must adhere to the following safety rules:

1. not using mobile phones (including hands-free sets) whilst driving

2. ensuring they are fit to drive, wearing glasses or contact lenses as recommended by eye tests and reporting any illness which may affect their ability to drive

3. not driving under the influence of alcohol, drugs or medicines that may affect their ability to drive safely

4. Planning the journey to avoid excessive hours, the risk of fatigue and to include opportunities for food and drink intake

- 5. complying with road safety legislation and the Highway Code
- 6. letting a student to sit in the back seat if travelling alone with a member of staff.
- 7. ensuring that students have fastened their seat belts before starting the drive