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Safeguarding Policy	
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Purpose and context

As part of providing high quality opportunities and support, the Students' Union give the highest priority to the health, safety and wellbeing of its employees, students and others who may be affected by its activities and utilise its facilities.

The Students' Union recognises the need to discharge an enhanced duty of care towards children and adults at risk of harm.

Scope

This policy applies to all activities and facilities considered to be wholly or partly under the Union's control. It covers all employees, students and others involved with those activities and accessing those facilities.

Safeguarding Policy

Safeguarding statements of intent

Huddersfield Students' Union has a statutory duty to protect the safety and welfare of children and adults at risk of harm. As such the Students' Union recognises that: -

- (a) It must protect staff, students, volunteers and clients from all forms of abuse including physical, emotional and sexual harm.
- (b) The safety and welfare of children and adults at risk of harm is of paramount importance.
- (c) Everyone who works with children and adults at risk of harm has a responsibility to safeguard their welfare and report any concerns.
- (d) Staff, students and volunteers must be protected from unsubstantiated allegations of abuse.
- (e) Allegations of abuse or poor practice should be responded to quickly and appropriately.
- (f) Confidentiality should be maintained in accordance with relevant legislation.
- (g) Anyone who is unsuitable to work with children and/or vulnerable adults should be identified by whatever legal means is available to the Students' Union and prevented from doing so.
- (h) It is necessary to work with other agencies providing services for vulnerable groups to combat and prevent abuse occurring.

1. Personnel responsible for the implementation of this policy

1.1. Board of Trustees

1.1.1. The Board of Trustees have ultimate responsibility for ensuring the Union has appropriate policies and procedures in place and has identified and mitigated against safeguarding risks.

1.1.2. The Board of Trustees is advised on matters of safeguarding by the senior leadership team.

1.2. Chief Executive Officer

1.2.1. The Chief Executive Officer is delegated overall responsibility by The Board of Trustees for safeguarding and the operation of this policy.

1.3. Principal Safeguarding Officer

1.4. The Principal Safeguarding Officer shall have day to day responsibility for safeguarding matters including: -

1.4.1. Providing clear information, policies and procedures on safeguarding.

1.4.2. Ensure sufficient mechanisms are in place for the reporting of safeguarding issues.

1.4.3. Ensure the Union has sufficient personnel to provide the necessary competent assistance and advice on matters relating to safeguarding.

1.4.4. Ensuring the development, implementation and continuing effectiveness of the Union's Safeguarding Policy.

1.4.5. Investigating and reporting issues of safeguarding concern.

1.4.6. Where appropriate liaising with the University of Huddersfield Designated Safeguarding Officers.

1.4.7. Produce an anonymised annual report for the Board of Trustees

1.5. Senior Managers

1.5.1. Senior Managers have responsibility for safeguarding within areas of their control including: -

1.5.1.1. Ensuring that the Union's Safeguarding Policy document is implemented.

1.5.1.2. Undertaking risk assessments of activities and areas, and ensuring measures identified to manage the risks are implemented, adhered to and monitored.

1.5.1.3. Providing adequate information, instruction, training and supervision.

1.5.1.4. Effective consultation with staff and others.

1.5.1.5. Identifying safeguarding issues and liaising with the Principal Safeguarding Officer.

1.6. Departmental Managers

1.6.1. Departmental Managers will have overall responsibility for safeguarding at departmental level including

1.6.1.1. Ensuring suitable arrangements are in place to protect children and vulnerable adults.

1.6.1.2. Reporting any safeguarding concerns to the Principal Safeguarding Officer or Senior Manager.

1.7. All employees

1.7.1. All employees shall do everything that is reasonably practicable to safeguard those that might have suffered, or be vulnerable to suffering, harm or abuse including:

1.7.1.1. Following this policy, training or instructions provided by management.

1.7.1.2. Cooperating with the Union on matters of safeguarding to assist the Union in fulfilling its statutory and common law duties of care.

1.7.1.3. Never intentionally misuse or recklessly interfere with anything provided in the interests of safeguarding.

1.7.1.4. Ensuring they report, through the appropriate mechanisms, any situation they are aware of and know is likely to present significant risk to children and vulnerable adults.

1.8. Students

1.8.1. All students shall take reasonable care for their own actions whilst accessing services of the Students' Union including:

1.8.1.1. Cooperating with the Union on matters of safeguarding to assist the Union in fulfilling its statutory and common law duties of care.

1.8.1.2. Never intentionally misuse or recklessly interfere with anything provided in the interests of safeguarding.

1.8.1.3. Ensuring they report, through the appropriate mechanisms, any situation they are aware of and know is likely to present significant risk to children or vulnerable adults.

2. Confidentiality

- 2.1. The Union expects all staff, volunteers and trustees to maintain confidentiality at all times in line with GDPR/Data Protection law.
- 2.2. All reports of safeguarding concerns will be treated confidentially and shared only with those who need to know for the purpose of investigation and resolution, this may include University of Huddersfield Designated Safeguarding Officers.
- 2.3. It should however be noted that information will be shared with authorities if an adult is deemed to be at risk of immediate harm. Sharing the right information, at the right time, with the right people can make all the difference to preventing harm.

3. Risk assessment and management

- 3.1. The Students' Union Safeguarding Code of Conduct (Appendix A) shall be made available to support and guide staff, volunteers, students and others on safeguarding best practice.
- 3.2. Suitable and sufficient risk assessments will be in place for activities giving rise to significant risks to the safeguarding of staff, volunteers, students and others who could be affected.
- 3.3. The resultant measures identified by these assessments to manage, including mitigation of, these risks will be implemented.
- 3.4. Staff supporting students leading activities associated with the Union shall ensure suitable and sufficient assessments are in place.
- 3.5. Monitoring mechanisms will ensure the risk management measures are in place and remain valid.
- 3.6. The key findings will be communicated to employees, students and others when relevant, including their roles and responsibilities in successfully delivering the risk management measures.
- 3.7. Risk assessments will be subject to necessary reviews to confirm, and where appropriate revised to ensure, continuing validity.
- 3.8. All risk assessments shall be stored centrally.

4. Union Directed Activity

4.1. When a staff member or the leader of a student led activity becomes aware that a child or adult at risk of harm wishes to participate in Union activities, they must immediately discuss the situation with the Principal Safeguarding Officer who should consider: -

- 4.1.1. If any permission or consent needs to be sought from parents or guardians.
- 4.1.2. If the type of activity, frequency of the activity and period to which it will take place falls under the definitions of 'regulated' using the DBS flow charts outlined in Appendix E.
- 4.1.3. When a member of staff or a volunteer involved in Union directed activity is deemed to be "regulated activity", the Students' Union will seek an enhanced check from the DBS.
- 4.1.4. Judgement on the suitability of persons will be made with the information received and unsuitable persons will be prevented from attaining such a position. If there is any doubt, the decision will be made by the Principal Safeguarding Officer.
- 4.1.5. Suitable and sufficient measures and assessments must be undertaken and approved by the Principal Safeguarding Officer to enable children or adults at risk of harm to attend overnight trips, events or activities.

5. With Specific Regard to Under 18's

- 5.1.1. The Students' Union does not assume the responsibilities and authority that parents¹ have in relation to a child, and it will not act in *loco parentis* in relation to under 18 year olds at any of our events or activities.
- 5.1.2. Whilst the Students' Union recognises its enhanced duty of care towards students under 18, it expects such students to act responsibly and appropriately and in an adult manner.
- 5.1.3. The Students' Union will do its best to inform appropriate officers and staff of students under 18 but the student, as an individual, also has a responsibility to disclose that they are under 18, especially in the context of social and non-academic activities.
- 5.1.4. Students under 18 must not take responsibility for running an activity/event, and cannot take positions of responsibility i.e. posts in activity group committees or sabbatical positions.

5.1.5. Students under 18 and their parents may be required to complete a consent form before they can participate in a high risk activity (as determined by the Students' Union's Principal Health and Safety Officer).

6. Incident reporting and investigations

6.1. All Students' Union staff, students and volunteers will be aware of: -

6.1.1. The importance of reporting incidents, irrespective of circumstances or outcomes; and

6.1.2. How to report safeguarding incidents (Appendix B)

6.2. The Principal Safeguarding Officer shall be responsible for: -

6.2.1. Receiving reports submitted.

6.2.2. Coordinating follow up investigations, including via the University of Huddersfield if appropriate.

6.2.3. Monitoring actions arising from incident investigations, as appropriate, to ensure implementation and continued effectiveness.

6.2.4. Analysing and reporting relevant information to committees or third parties as obligated by law such as the Charity Commission, Local Authority, DBS and the Police.

¹ Throughout this document 'parent(s)' should be taken to mean 'parent(s)/carer(s)/guardian(s)'

Appendix A: Safeguarding Code of Conduct

Do treat everyone with dignity and respect.

Do set an example for others to follow.

Do plan activities that involve more than one other person being present, or at least within sight and hearing of others.

Do respect people's right to personal privacy.

Do avoid unacceptable situations within a relationship of trust, eg a sexual relationship with a young person who is over the age of consent.

Do allow people to talk about any concerns they may have.

Do encourage others to challenge attitudes or behaviours they do not like.

Do avoid being drawn into inappropriate attention-seeking behaviour, eg tantrums and crushes

Do make everyone (young people, parents and carers, vulnerable adults and other helpers) aware of our safeguarding arrangements.

Do remember this code at sensitive moments, eg when helping someone who has been bullied, bereaved or abused.

Do tell others where you are and what you are doing

Do remember someone else might misinterpret your actions, even if you mean well.

Do take any allegations or concerns of abuse seriously and refer them to the Principal Safeguarding Officer.

Do not trivialise abuse.

Do not form relationships with a young person and vulnerable adult, that is abuse of trust.

Do not drink alcohol when you are directly responsible for young people and never allow young people to drink alcohol.

Do not allow abusive activities, eg initiation ceremonies or bullying.

Do not take part in inappropriate behaviour or contact, whether physical, verbal or sexual.

Do not take part in physical contact games with young people and vulnerable adults

Do not make suggestive remarks or threats to a young person and vulnerable adults, even in fun.

Do not use inappropriate language when writing, phoning, emailing or using the internet.

Do not let allegations, suspicions, or concerns about abuse go unreported.

Do not rely just on your good name to protect you.

Appendix B: Reporting a Safeguarding Incident

1. Reporting

- 1.1 If the process begins by a vulnerable person making a disclosure of abuse, ideally details should be taken in an open space, in the presence of another person, but having regard to the sensitive nature of the allegation.
- 1.2 Disclosure may not always occur in the circumstances or surroundings described above. In such cases the wishes and feelings of the vulnerable person should be ascertained as far as is reasonable and given due consideration before attempting to change surroundings or personnel. Give consideration to whether anyone else should be present (for instance where the gender of the person receiving the complaint is different to that of the vulnerable person).
- 1.3 Reassure the vulnerable person as necessary and explain as soon as possible that the information may need to be shared. Promises of confidentiality must not be given due to the fact that it may not be possible to honour them.
- 1.4 Let the vulnerable person proceed at their own pace. Do not interview the vulnerable person or other witnesses and do not ask leading questions. Any questions asked should be limited to who? what? when? where? to establish the matters which form the basis of the allegation.

2. Records

- 2.1 The person to whom a disclosure of abuse is made by a vulnerable person or who suspects that abuse is taking (or has taken) place should record details on 'Safeguarding Report Form' found in Appendix C.
- 2.2 It is important that the matter is well documented (verbatim notes if possible) to avoid later confusion.
- 2.3 On completing the form, the individual should tell the vulnerable person what will happen next and with whom the information will be shared.
- 2.4 The individual must then send the form immediately (within 24 hours of the disclosure of abuse or the next working day) to the Principal Safeguarding Officer. Do not discuss the matter with anyone who does not strictly need to know unless instructed to do so by a Designated Safeguarding Officer.
- 2.5 If the concern arises out of regular working hours, you should contact Kirklees Council Social Services Emergency Duty Team (01484 414933)
- 2.6 You should also notify the member of staff in charge of the event or activity and the Principal Safeguarding Officer as soon as possible.

2.7 Where there is an immediate risk of harm or need for medical treatment, call the police and ambulance and advise the attending officers/paramedics of your concerns. Then contact the Principal Safeguarding Officer.

3. Role of the Principal Safeguarding Officer

3.1 The Principal Safeguarding Officer is responsible for making reports of relevant information.

3.2 Within 1 hour of receiving details of a disclosure of abuse (either through receipt of the relevant form, or verbal report in the case of emergencies), the Principal Safeguarding Officer will make a report to the duty Social Worker at the appropriate local branch of Social Services (or as required by the Local Safeguarding Children Board Procedures).

3.3 The Principal Safeguarding Officer will make a written record of the telephone call and then send the 'Safeguarding Referral Form' (Appendix C) to Social Services within 48 hours (by email as well as post), keeping a copy for Students' Union records.

3.4 It is not the responsibility of the Students' Union or any of its staff, students or volunteers to contact the parents or carers of the child or vulnerable adult concerned. Enquiries from parents and carers should be directed to the Principal Safeguarding Officer who will, unless otherwise instructed by the relevant authorities (police/social services/ NSPCC etc), refer these on to Social Services for a response.

3.5 The Principal Safeguarding may share reports with the University of Huddersfield Designated Safeguarding Officers if appropriate.

4. DBS Referrals

4.1 The Principal Safeguarding Officer must refer relevant information to the DBS as soon as it becomes available.

4.2 The Safeguarding Vulnerable Groups Act 2006 requires a report to be made in the following circumstances: -

(a) Employers and service providers of regulated and controlled activity have a legal obligation to refer relevant information- where there is concern relating to harm or the risk of harm to children or vulnerable adults, to the DBS.

(b) Employers and service providers must refer information to the DBS when they have dismissed an individual, or an individual resigns, because they harmed, or may harm, a child or vulnerable adult.

(c) If the employee would or could have been sacked on grounds that could lead to barring, the employer must refer the employee to the DBS - even if the employee has stopped working for them.

9.1 It is a serious offence to make a malicious referral with an intention to mislead. A person found guilty of this may be subject to defamation and damages claims. Criminal sanctions, which include offences relating to wasting police time, perverting or attempting to pervert the course of justice, conspiracy and perjury, could also apply.

Appendix C: Reporting Form

Use this [online form](#) to report safeguarding concerns. If you are unable to use the form please email your referral including above details to the Principal Safeguarding Officer.

You will be asked to provide the following information:

Your Details

1. Name
2. Email Address
3. Job Title

Full details of the alleged abuse or neglect

4. Name of the individual at risk
5. Has the individual making the disclosure given consent for this information to be shared?
6. Have they been advised that this information has been shared with the Principal Safeguarding Officer despite consent not being given
7. How did you become aware of the alleged abuse or risk?
8. What exactly has happened? Please include the time and date(s) of incident including persons involved an witnesses, what was said and done, and where it happened.
9. Is the abuse / incident still ongoing?
10. Do the alleged perpetrators continue to have access to or contact with the vulnerable person?

Alleged Abuser

1. Name
2. Contact Details
3. Their relationship (if any) to the adult at risk)
4. Is the alleged abuser a member of staff / volunteer / trustee of the Students' Union?

Appendix D Definitions

1. Abuse in relation to children: The following definitions are reproduced from the government publication "Working Together to Safeguard Children" (2015)
 - 1.1. Abuse is 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 (e.g. via the internet). They may be abused by an adult or adults, or another child or children.
 - 1.2. Physical abuse is 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.
 - 1.3. Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children 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 participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), 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, though it may occur alone.
 - 1.4. Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (e.g. rape, or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual online images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely

perpetrated by adult males. Women also commit acts of sexual abuse, as can other children.

1.5. Neglect is 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 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.

2. Abuse – in relation to adults with care and support needs: The following descriptions of abuse are reproduced from guidance issued by the Social Care Institute for Excellence (2015), which also sets out guidance on the types of indicators of abuse and types of behaviour that might mean that somebody is being abused.

2.1. Physical abuse includes assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing, rough handling, scalding and burning, physical punishments, inappropriate or unlawful use of restraint, making someone purposefully uncomfortable (e.g. opening a window and removing blankets), involuntary isolation or confinement, misuse of medication (e.g. over-sedation), forcible feeding or withholding food, unauthorised restraint, restricting movement (e.g. tying someone to a chair).

2.2. Domestic violence or abuse can be psychological, physical, sexual, financial and/or emotional and includes any incident or pattern of incidents of controlling, coercive or 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. It also includes so called 'honour'-based violence, female genital mutilation and forced marriage. Coercive or controlling behaviour is a core part of domestic violence. Coercive behaviour can include acts of assault, threats, humiliation and intimidation, harming, punishing, or frightening the person, isolating the person from sources of support, exploitation of resources or money, preventing the person from escaping abuse, and regulating everyday behaviour.

2.3. Sexual abuse includes rape, attempted rape or sexual assault, inappropriate touch anywhere, non-consensual masturbation of either or both persons, non-consensual sexual penetration or attempted penetration of the vagina, anus or mouth, any

sexual activity that the person lacks the capacity to consent to, inappropriate looking, sexual teasing or innuendo or sexual harassment, sexual photography or forced use of pornography or witnessing of sexual acts, indecent exposure.

- 2.4. Psychological or emotional abuse includes enforced social isolation – preventing someone accessing services, educational and social opportunities and seeing friends, removing mobility or communication aids or intentionally leaving someone unattended when they need assistance, preventing someone from meeting their religious and cultural needs, preventing the expression of choice and opinion, failure to respect privacy, preventing stimulation, meaningful occupation or activities, intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse, addressing a person in a patronising or infantilising way, threats of harm or abandonment, cyberbullying.
- 2.5. Financial or material abuse includes theft of money or possessions, fraud or scamming, preventing a person from accessing their own money, benefits or assets, undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions, arranging less care than is needed to save money, denying assistance to manage/monitor financial affairs or to access benefits, misuse of benefits, false representation or exploitation of assets, misuse of legal authority, rogue trading.
- 2.6. Modern slavery includes human trafficking, forced labour, domestic servitude, sexual exploitation, such as escort work, prostitution and pornography, debt bondage – being forced to work to pay off debts that realistically they never will be able to.
- 2.7. Discriminatory abuse includes unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation and other forms of harassment, slurs or similar treatment, denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic.
- 2.8. Organisational or institutional abuse includes neglect and poor care practice within an institution or care setting, such as a hospital or care home. This may range from isolated incidents to continuing ill-treatment.
- 2.9. Neglect and acts of omission includes failure to provide or allow access to food, shelter, clothing, heating, stimulation and activity, personal or medical care, providing care in a way that the person dislikes, failure to administer medication as prescribed, refusal of access to visitors, not taking account of individuals' cultural,

religious or ethnic needs, not taking account of educational, social and recreational needs, ignoring or isolating the person, preventing the person from making their own decisions, preventing access to glasses, hearing aids, dentures, etc., failure to ensure privacy and dignity.

3. Regulated activity for children, regulated activity refers to an activity of a specified nature that involves regular or close contact with children. [The Disclosure and Barring Service has published guidance about regulated activity with children.](#)
4. Regulated activity for adults, regulated activity is defined as work providing health care, personal care or providing assistance with money for adults or work which involves making welfare decisions on behalf of adults. [The Disclosure and Barring Service has published guidance about regulated activity with adults.](#)

Appendix E: DBS Referral Flowchart

Question 1 Are you a Regulated Activity provider, a personnel supplier, a local authority, an education and library board (NI), a health and social care (HSC) trust, a keeper of register or a supervisory authority?

If **yes**, go to Question 2.

If **no**, you are not one of the groups listed in legislation. You do not have a legal duty to refer, however, you can still send the information to DBS. If you have concerns, contact the person's employer, the police or social services.

Question 2 Was/is the person working in Regulated Activity?

If **yes**, go to Question 3.

If **no**, there is no need to refer to DBS.

Question 3 Have you carried out an investigation to establish facts and gather evidence?

If **yes**, go to Question 4.

If **no**, you must follow your safeguarding and disciplinary procedures to establish facts and gather evidence. Reconsider whether the person should be referred after this process.

Question 4 Does the evidence point to the concerns or allegations being true?

If **yes**, go to Question 5.

If **no**, there is no need to refer to DBS.

Question 5 Has the person been removed from Regulated Activity (either through instruction or of their own choosing) because they pose a risk of harm or caused harm to a child or adult?

If **yes**: If you are a Regulated Activity provider or a personnel supplier, you have a legal duty to make a referral to DBS. If you are a local authority, an education and library board (NI), a health and social care (HSC) trust, a keeper of register or a supervisory authority you can make a referral to DBS with information to support your concerns.

If **no**, go to Question 5a.

Question 5a Do you still have safeguarding concerns about the person?

If **yes**, you can make a referral to DBS with information to support your concerns.

If **no**, no further action is needed.

Safeguarding Policy

Appendix F

Role	Training requirements	Training available	Timescales
All staff	The majority of Students' Union Staff do not have regular contact with children or adults at risk of harm. They require a general safeguarding literacy, and an awareness of the policy and know how to report concerns.	SharePoint Information Site: Staff Hub Safeguarding page All Staff Briefings	Rolled out to existing staff commencing October 2023 Included in new starter induction from October 2023 Staff Training to be refreshed and updated at every two years
Senior Leadership Team Advice Centre Manager Advisers Participation Manager	Level 1 safeguarding training. They need to be aware of and know about: <ul style="list-style-type: none"> ➤ Relevant Legislation & Guidance ➤ Recognising Abuse ➤ Institutional Abuse ➤ Responding to Abuse ➤ Disclosure ➤ Whistle Blowing ➤ Prevent 	Mandatory online training module: Safeguarding in Higher Education	Rolled out to existing staff commencing October 2023
Principal Safeguarding Officer	Level 1 and Level 2 adult and child safeguarding training to manage referrals to statutory services.	Kirklees Safeguarding Board Face to Face and Online learning	By December 2023