



Policy Book  
(Updated September 2022)

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## **Administration of Medicines Policy**

### **Introduction**

Most pupils will, at some time, have a medical condition that may affect their participation in activities at The Positive Impact Academy and for many, this will be short-term. Other pupils have medical conditions that, if not properly managed, could limit their access to education. Most children with medical needs can attend school regularly and, with some support from The Positive Impact Academy, can take part in most normal school activities. The Positive Impact Academy is committed to ensuring that children with medical needs have the same right of access as other children.

There is no legal duty that requires schools and staff to administer medication, this is a voluntary role. The 'duty of care' extends to administering medication in exceptional circumstances and, therefore, it is for schools to decide their local policy for the administration of medication.

### **The Role of Parents/Carers**

Parents/carers should, wherever possible, administer or supervise the self-administration of medication to their children. This may be by spacing the doses so that they are not required within school hours, or by the parent/carer coming to The Positive Impact Academy at lunch time to administer the medication. However, this might not be practical and in such a case parents/carer may make a request for medication to be administered to the child whilst at The Positive Impact Academy.

If medicine needs to be administered during school time, then a parent or carer must bring it to The Positive Impact Academy office and fill in the Administration of Medication Permission and Record form (Appendix 1). Medication must not be brought to The Positive Impact Academy by the child themselves. If medication is for a short-term condition, any remaining medication must be collected from The Positive Impact Academy by a parent or carer at the end of the day.

### **Prescription Medication**

Prescription medicines should be administered at home wherever possible, for example medicines that need to be taken 3 times a day can usually be taken before school, after school and at bedtime. Parents are encouraged to ask the GP to whether this is possible. Prescription medicines will only be administered by The Positive Impact Academy where it would be detrimental to a child's health if it were not done.

Medicines should always be provided in the original container as dispensed by a pharmacist and include the prescriber's instructions for administration. The exception to this is insulin which must still be in date. Schools should never accept medicines that have been taken out of the container nor make changes to dosages on parental instruction.

In all cases it is necessary to check:

- Name of child
- Name of medicine
- Dosage
- Written instructions provided by prescriber
- Expiry date

An Administration of Medicine Permission & Record form (Appendix 1) must be completed and signed by the parent or carer. No medication will be given without the parent's written consent. Prescribed medication, other than emergency medication, will be kept in the office, either in the cupboard or the refrigerator as appropriate. All emergency medicines (asthma inhalers, EpiPen etc.) should be kept with the young person's tutor and be readily available. A second EpiPen for each child who requires one will be kept in the office, in a box clearly labelled with the child's name and photograph.

### **Long Term Medical Needs**

It is important for The Positive Impact Academy to have sufficient information regarding the medical condition of any pupil with long term medical needs. The Local Authority will draw up a health care plan for such pupils, involving the parents and the relevant health professionals.

Appropriate training will be arranged for the administration of any specialist medication (e.g., adrenaline via an EpiPen, Buccal midazolam, insulin etc.) Staff should not administer such medicines until they have been trained to do so.

### **Controlled Drugs**

Controlled drugs, such as Ritalin, are controlled by the Misuse of Drugs Act. Therefore, it is imperative that controlled drugs are strictly managed between The Positive Impact Academy and parents. Ideally controlled drugs are only brought in daily by parents, but certainly no more than a week's supply and the amount of medication handed over to The Positive Impact Academy should always be recorded. Controlled drugs should be stored in a locked non portable container, such as a safe, and only specific named staff allowed access to it. Each time the drug is administered it must be recorded, including if the child refused to take it. If pupils refuse to take medication, The Positive Impact Academy staff should not force them to do so. The Positive Impact Academy should inform the child's parents as a matter of urgency. If necessary, The Positive Impact Academy should call the emergency services. The person administering the controlled drug should monitor that the drug has been taken.

### **Passing a controlled drug to another child is an offence under the Misuse of Drugs Act.**

As with all medicines any unused medication should be recorded as being returned to the parent when no longer required. If this is not possible it should be returned to the dispensing pharmacist. It should not be thrown away.

### **Non-Prescription Medication**

Where possible, The Positive Impact Academy will avoid administering non-prescription medicine. However, we may do so, if requested by the parent, if it will facilitate the child attending school and continuing their learning. This will usually be for a short period only, perhaps to finish a course of antibiotics, to apply a lotion or the administration of paracetamol for toothache or other pain. However, such medicines will only be administered in school where it would be detrimental to a child's health if it were not administered during the day.

### **A child under 16 should never be given aspirin-containing medicine, unless prescribed by a doctor.**

If non-prescription medication is to be administered, then the parent/carer must complete an Administration of Medicine Consent form (Appendix 1), and the same procedure will be

followed as for prescription medication. The medicine must be provided in its original container, with dosage information on it. The parent's instructions will be checked against the dosage information, and this will not be exceeded.

### **Administering Medicines**

Medicines will only be administered by members of staff who have been trained in the safe administration of medicines. This will usually be the SENDCO, but in their absence another appropriately trained member of staff may carry it out. Appropriate training will be arranged for the administration of any specialist medication (e.g., adrenaline via an EpiPen, Buccal midazolam, insulin etc.) Staff should not administer such medicines until they have been trained to do so. A list of all staff trained in administration of medicines will be maintained by the SENDCO. The SENDCO will maintain a record of staff trained in specialist medication for children and young people with Health Care Plans.

When a member of staff administers medicine, they will check the child's Administration of Medication Permission and Record form against the medication, to ensure that the dose and timing are correct. They will then administer the medicine as required, and record this on the form. For long-term medication, an Administration of Medication Continuation Sheet (Appendix 2) will be used as necessary.

### **Emergency Inhalers**

In line with "Guidance on the use of emergency salbutamol inhalers in schools" March 2015, The Positive Impact Academy will keep emergency reliever (blue) inhalers for the emergency use of children whose own inhaler is not available for any reason. They will be stored in the office, along with appropriate spacers. Parents must sign a "Consent Form: Use of Emergency Salbutamol Inhaler" (Appendix 4) to consent to their child being allowed to use the emergency inhaler.

### **Self-Management**

It is important that as children get older, they should be encouraged to take responsibility and manage their own medication. This encouragement of independence should be clearly set out in the child's health care plan in agreement with the parents, bearing in mind the safety of other pupils.

Staff should be aware of the need for asthmatics to carry medication with them (or for staff to take appropriate action). Children should know where their medicines are stored.

### **Refusing Medication**

If a child refuses to take medication, staff should not force them to do so, but note this in the records and inform parents of the refusal. If the refusal leads to a medical emergency, The Positive Impact Academy will call the emergency services and inform the parents.

### **Off Site Visits**

It is good practice for schools to encourage pupils with medical needs to participate in off site visits. All staff supervising visits should be aware of any medical needs and relevant emergency procedures. Where necessary, individual risk assessments will be completed. A member of staff who is trained to administer any specific medication will accompany the pupil and ensure that the appropriate medication is taken on the visit. Inhalers must be taken for all children who suffer from asthma.

Travel Sickness - Tablets can be given with written consent from a parent but the child's name, dosage, time of dose and any possible side effects (the child must have had the travel sickness preventative at home before the trip in case of side effects) should be clearly marked on the container, which must be the original packaging. Parents will need to complete an Administration of Medication Permission and Record form.

Residential visits – All medicines which a child needs to take should be handed to the tutor in charge of the visit. The only exception are asthma inhalers, which should be kept by the child themselves. The parents will sign a consent form for any medicines which they need to take during the visit, plus consent of emergency treatment to be administered – see example form in Appendix 3.

### **Disposal of Medicines**

The SENDCO will check all medicines kept at The Positive Impact Academy each term to ensure that they have not exceeded their expiry date. Parents/carers will be notified of any that need to be replaced. Parents/carers are responsible for ensuring that date-expired medicines are returned to a pharmacy for safe disposal. If parents do not collect all medicines, they should be taken to a local pharmacy for safe disposal.

Sharps boxes should always be used for the disposal of needles. There is a sharps box in the office. If any child requires regular injections (e.g., Insulin), they will have their own sharps box which can be taken off site with them on trips etc. The parents will be notified when the box is almost full so that they can bring in a new box and take the full box for disposal.

Policy Document Administration of Medicines Policy  
Updated: J Armson/D Strong  
Date: Sep 2022 - to be reviewed Sep 2023.

Signed by Director

A handwritten signature in black ink, appearing to read "James Armson", written over a horizontal line.

James Armson

## Appendix 1

### Administration of Medication Permission and Record

Name of child: \_\_\_\_\_

Class: \_\_\_\_\_ Date: \_\_\_\_\_

Details of illness:

\_\_\_\_\_

—

\_\_\_\_\_

—

Medicine:

\_\_\_\_\_

—

\_\_\_\_\_

—

Times and dosage of medicine:

\_\_\_\_\_

—

Relevant side effects to be observed if any:

\_\_\_\_\_

—

Medicine to be administered from: \_\_\_\_\_ to: \_\_\_\_\_

#### Parent/Carer:

I hereby give permission that the above medication, ordered by the doctor/dentist for my child \_\_\_\_\_ be administered by The Positive Impact Academy personnel.

I understand that I must supply The Positive Impact Academy with the prescribed medicine in the original container dispensed and properly labelled by pharmacist and will provide no more than a 5-day supply of said medication.

I understand that this medication will be destroyed if it is not picked up on the day this order terminates.

Signature: \_\_\_\_\_ Relationship to child: \_\_\_\_\_



**Appendix 3**  
**Example Consent Form for Residential Visit**

Parental consent for trip to .....

Date of visit: .....

I agree to \_\_\_\_\_ taking part in the visit and am happy for them to participate on the activities described. I acknowledge the need for my child to behave.

**Medical**

Has your child got any condition requiring medical treatment? YES/NO

Please list below:

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—

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—

Is your child allergic to any medication? YES/NO

Please list below:

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—

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—

I agree to my son/daughter receiving medication as instructed and any emergency, dental, medical, or surgical treatment considered necessary by the medical authorities present. I understand the extent and limitations of the insurance cover provided.

**Contact Numbers:**

Work: \_\_\_\_\_ Home: \_\_\_\_\_

---

Home address:

---

—

Name of family doctor: \_\_\_\_\_ Telephone no: \_\_\_\_\_

---

Address:

---

—

Alternative emergency contact:

Name: \_\_\_\_\_ Telephone no:  
\_\_\_\_\_

Address:  
\_\_\_\_\_  
\_\_\_\_\_

Signed (Parent/Carer): \_\_\_\_\_ Date:  
\_\_\_\_\_

**Prescribes Medicines:**

Name of Medicine	Time to be Taken	Dosage	Route

Signed (Parent/Carer): \_\_\_\_\_ Date:  
\_\_\_\_\_

**Appendix 4**

**Consent Form:  
Use of Emergency Salbutamol Inhaler**

Child showing symptoms of asthma/having asthma attack

1. I can confirm that my child has been diagnosed with asthma/has been prescribed an inhaler [delete as appropriate].
2. My child has a working, in-date inhaler, clearly labelled with their name, which they keep at The Positive Impact Academy.

3. In the event of my child displaying symptoms of asthma, and if their inhaler is not available or is unusable, I consent for my child to receive salbutamol from emergency inhaler held by The Positive Impact Academy for such emergencies.

Signed (Parent/Carer): \_\_\_\_\_ Date: \_\_\_\_\_

Name (print): \_\_\_\_\_

Child's name: \_\_\_\_\_ Class: \_\_\_\_\_

Work: \_\_\_\_\_ Home: \_\_\_\_\_

Home address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

## **Alcohol Policy**

The Positive Impact Academy are responsible employers, and we take our obligations to our employees and service users very seriously. Therefore, we have set out this policy to help us ensure the health, safety and welfare of our employees and service users, and to help us comply with our legal duties. Employees or service users who develop alcohol related problems cause harm to themselves, to others and impair their performance.

The Health and Safety at Work Act 1974 places a duty on employers to provide a safe and healthy working environment, and to ensure the health, safety, and welfare at work of their employees as well as any visitors or contractors on the premises.

### **Aims of the Policy**

This policy aims to:

- Promote awareness of alcohol related problems and addiction
- Encourage a sensible approach to drinking alcohol
- Ensure that the Company complies with its legal obligations
- Indicate restrictions on drinking alcohol at work
- Protect Employees and service users from the dangers of alcohol abuse
- Support Employees and service users with an alcohol related problem

### **Health and Safety**

In a social environment the consumption of alcohol in moderation is an accepted part of life. In the workplace however it can impair performance, result in inappropriate behaviour, and can place both the individual and those around them in danger, as well as affect health.

In the workplace alcohol abuse can take two different forms:

- Occasional inappropriate drinking; and
- Consistently inappropriate drinking.

Problems arising from the first category are more likely to be cases of misconduct whilst the second will be more likely to involve long term health and performance issues. In either case the health of the individual employee will be affected and quite possibly the health and safety of those around them.

While it will be clear if an individual is drunk at work, the symptoms of larger scale systematic alcohol abuse may be less obvious. Symptoms of alcohol abuse may include:

- Frequent absences on Mondays and Fridays
- Unusually high rates of absenteeism
- Unkempt appearance/Lack of hygiene
- Spasmodic work patterns and lower productivity
- Poor relations with others

These guidelines also apply to service users as well. While some service users are of a legal age to drink, moderation will be promoted, as well as the risks to health from consumption of alcohol will be explained through appropriate curriculum. Under no circumstances will any service user be permitted to consume alcohol on Company property, or within company of a The Positive Impact Academy employee. Appropriate education will be put in place to cater to all ages and needs, this will cover the potential detrimental effects alcohol has on themselves and others.

If a service user is on Company property and is in possession of alcohol or any other prohibited substances, The Positive Impact Academy staff hold the right to remove the substance to safeguard the service user and others on site.

### **Restrictions on Drinking Alcohol at Work**

- Alcohol must not be consumed in any situation whereas a consequence the safety of the individual, colleagues or visitors is put at risk.
- Alcohol must not be consumed in excess [or in sufficient quantities to impinge on the exercise of any individual's duties] when on Company business outside normal working hours, for example when involved in functions or in providing hospitality.
- Employees are not obliged to work with anyone they consider to be incapable through the consumption of alcohol and should immediately report the matter to James Armson/David Strong.
- Employees who are incapable of working through the consumption of alcohol should be immediately removed from duty and the matter reported to James Armson/David Strong.
- Employees will be held to be contributory negligence in the event that, whilst on Company business, they cause an accident or damage to anyone or anything, and that the incident occurred due to the Employee's consumption of alcohol.

### **Disciplinary Action**

Employees who are unfit or otherwise incapable for work through the consumption of alcohol will be liable for disciplinary action, may be found guilty of gross misconduct, and may face summary dismissal.

### **Procedure**

- All information relating to an employee's health including, but not limited to, matters involving alcohol, will be collected, held, and processed in accordance with the Company's [Employee] Data Protection Policy.
- In the event that an employee is diagnosed with an alcohol related problem, the Company will treat it as a health matter. However, this does not excuse the employee from any of the disciplinary matters that may fall within the scope of the Company disciplinary policy.
- All alcohol related issues will be dealt with in a constructive and sympathetic manner. The individual responsible for all such issues is James Armson who will also provide any interested employees in confidence with details of where to seek more information or help.
- All requests for help or advice will be treated in the strictest confidence and all information gathered as a result will be held in accordance with the Company's [Employee] Data Protection Policy.
- After receiving any appropriate medical reports, the Company will provide support to any affected employees. Where an employee agrees to follow a suitable course of action or treatment any disciplinary action may be suspended.
- The Company reserves the right to give affected employees lighter duties at the same rate of pay or require them to take paid leave if it is deemed appropriate.
- Following effective treatment and in the absence of any disciplinary action the Company will endeavour to return an affected employee to the same role previously fulfilled by the employee [and where this is not possible to a suitable alternative].
- In the event that an employee following successful treatment for an alcohol related problem suffers a relapse, the Company [will not make] [is under no obligation to

make] provision for any further treatment and the employee in question [will] [may] face summary dismissal.

- If it is considered that the working environment or culture is the cause or a contributor to an alcohol related problem, the Company will take all reasonably practical steps to ensure a reduction of such problems.

Policy Document Alcohol Policy  
Updated: J Armson/D Strong  
Date: Sep 2022 - to be reviewed Sep 2023.

Signed by Director

A handwritten signature in black ink, appearing to be "James Armson", written over a horizontal line.

James Armson

## Attendance Policy

At The Positive Impact Academy, all staff work collaboratively to encourage every pupil to strive for excellence. Every child will be supported, challenged, and valued. One way in which we strive to do this is by encouraging staff, parents, and children to maximise the learning experience, for all children to reach their maximum potential. We are determined in encouraging the development of high self-esteem and for our children to take pride and ownership of their learning. In conjunction with this, we will continuously provide a clear framework for parents and staff, as well as clear procedures for the involvement and effective communication with parents and/or external agencies where appropriate.

Our policy applies to all children registered at The Positive Impact Academy and this policy is made available to all parents/carers of pupils that are registered at The Positive Impact Academy on the official website.

The Positive Impact Academy encourages all parents/carers to work in partnership with the Academy to improve attendance and punctuality and, recognises that *“parents have the primary responsibility to ensure that pupils of compulsory school age attend school regularly”* (DfE, 1999).

### Aims & Objectives

This attendance policy ensures that all staff and governors in our setting are fully aware of and clear about the actions necessary to promote good attendance.

Through this policy we aim to:

- Improve pupils’ achievement by ensure high levels of attendance and punctuality
- Achieve a minimum of 95% for all pupils, apart from those with chronic health issues
- Create an ethos in which good attendance and punctuality are recognised as the norm and seen to be valued by The Positive Impact Academy
- Raise awareness of parents, carers, and pupils of the importance of uninterrupted attendance and punctuality at every stage of a child’s education
- Work in partnership with pupils, parents, staff, and external agencies so that all pupils realise their potential, unhindered by unnecessary absence
- Promote a positive and welcoming atmosphere in which pupils feel safe, secure, and valued, and encourage in pupils a sense of their own responsibility
- Establish a pattern of monitoring attendance and ensure consistency in recognising achievement and dealing with difficulties
- Recognise the key role of all staff in promoting good attendance

### Register Procedure

It is the responsibility of the Head of Academy (David Strong) to log the attendance of each student on the The Positive Impact Academy Portal. All pre-16 students that fall within Warwickshire County Council will have their attendance logged on CLM. Students from other Local Authorities all have their attendance monitored by The Positive Impact Academy’s online register. Attendance figures are shared with professionals working with the child.

The Positive Impact Academy keep and store registers for all their students in line with GDPR standards.

## **Responsibility of Parents/Carers**

Children who are persistently late or absent soon fall behind with their learning. Children who are absent from The Positive Impact Academy frequently develop large gaps in their learning which will impact on their progress and their ability to meet age related learning expectations. A child whose attendance drops to 90% each year will, over their time at school, have missed two whole terms of learning.

### **Punctuality**

It is the parent/carers responsibility:

- To ensure that their children are ready for their pickup time

### **Absences**

It is the parent/carer's responsibility:

- To notify The Positive Impact Academy on the first day of absence as soon as possible. Parents can report an absence by telephoning their child's Education Mentor
- To provide medical evidence where possible, on the child's return.
- To ensure that as far as possible, medical appointments are arranged for outside The Positive Impact Academy hours. Where this is not possible, parents are expected to provide evidence of the appointment in advance, and the child should attend The Positive Impact Academy before/after the appointment.
- To liaise with The Positive Impact Academy as soon as possible regarding any specific issues that might cause absence or lateness, e.g., a sick parent/carer.

Parents/carers of children for whom we do not know the reason for absence will be contacted after 9:30am.

### **Illness/Medical absences:**

In addition to the points above, if a child is repeatedly absent due to illness, The Positive Impact Academy may request medical evidence for further absences. This can take the form of a GP appointment card, a consultant letter, a copy of a prescription etc.

### **Absence for Holidays**

Parents/carers are expected to take their children on holiday during the school holidays to minimise the impact of missing education.

If there are exceptional circumstances, parents/carers must complete a leave of absence request form in advance of the trip (ideally at least 4 weeks prior). These requests will be considered on a case-by-case basis by the Director and Head of Academy, and they will use their discretion whilst applying government recommendations.

It is the parent/carer's responsibility:

- To obtain a leave of absence form from The Positive Impact Academy
- To complete and submit the form in advance of the period of absence (ideally 4 weeks prior)

If parents/carers decide to take a holiday without the Directors authorisation, the child's absences will be marked as unauthorised. Fixed Penalty Notices will be issued by the Education Welfare Service for unauthorised holiday absence during term time. This fine is payable at £60 per child, per parent.

### **Absence for Other Reasons:**

Absences for reasons such as religious observance (up to 2 days per year) or close family bereavement *may* be authorised by the Co-Heads. These requests must be discussed with The Positive Impact Academy. Absences for close family members' weddings or funerals will be limited to one day's authorised absence, if granted.

It is the parent/carer's responsibility:

- To inform the office, in writing, of the need for leave in circumstances which are known in advance.

### **Unexplained Absence**

When a child is repeatedly absent and no satisfactory reason is given, the parent/carers will be investigated and may be liable for prosecution and/or a fine from the Local Authority. Regular monitoring is carried out by the Education Welfare Officer. Children who have repeated unauthorised absences, holidays or otherwise, will be contacted by the Education Welfare Officer and may be invited into an attendance meeting to discuss absences and any appropriate support.

Role of the Education Welfare Officer:

- To investigate absence which exceeds more than 10%, and to hold meetings with these parents as required
- To investigate lateness which exceeds more than 5%
- To investigate any unexplained absence which exceeds more than 5 consecutive days
- To ensure parents are aware of their legal duty under the Education Act to ensure their children attend The Positive Impact Academy.
- To refer cases to the Local Authority for prosecution where persistent absenteeism has not improved despite thorough intervention and support from The Positive Impact Academy and Education Welfare Officer
- To report accurate whole and individual attendance data when required

### **Children Missing in Education**

If a child is absent (unexplained) for at least 5 consecutive days, the Education Welfare Officer will be notified. A home visit may be carried out. If the absence continues for a total of 10 days, the family will be referred as a CME case for the Local Authority.

Policy Document Attendance Policy

Updated: J Armson/D Strong

Date: Sep 2022 - to be reviewed Sep 2023

Signed by Director

A handwritten signature in black ink, appearing to read 'James Armson', written over a horizontal line.

James Armson

## Behaviour Policy

Whilst we aim to foster an atmosphere in which students may reach their academic potential and develop fully as individuals, we recognise that there will be occasions when behaviour falls below the high level we are trying to achieve. Therefore, clear guidelines for what may happen if behaviour is unacceptable are essential.

The Positive Impact Academy will not be successful if it works in isolation. We must maintain strong links with the parents of our students. The support of parents for any sanction which may be implemented for unacceptable behaviour is crucial. The Education mentor and Head of Academy alongside the Director, working with other staff, have a responsibility on a day-to-day basis for the overall wellbeing of each student. Each student should be able to develop secure and trusting relationships with members of staff and with each other. Changes in pastoral staff responsible for any student will be kept, where possible, to a minimum.

### Role and Responsibilities of The Head of Academy and Staff

The head of Academy has the responsibility of setting down general guidelines on standards of discipline and behaviour, and of reviewing their effectiveness. The Head of Academy support the other staff in adhering to these guidelines. The Head of Academy has the day-to-day authority to implement The Positive Impact Academy's policy on behaviour and discipline, but the Director may seek advice from other staff about disciplinary issues.

All staff must model the types of behaviour outlined by The Positive Impact Academy policy and must ensure that the policy is followed consistently and fairly.

### Behaviour Policy

Students are expected to be responsible for their own behaviour. They should have respect for themselves, respect for others and for the environment in which they work. This will be shown by high standards of behaviour, effort, punctuality, classwork, organisation, attendance, and uniform. Where a student's behaviour does meet with expectations, this should receive a positive comment.

Our approach is a positive one which emphasises the benefits for the whole organisation offered by an appropriate standard of behaviour. This approach also gives students a greater responsibility in creating and maintaining such an environment for the benefit of their own learning.

### The Positive Impact Academy Expectations

#### a. Respect for oneself

This is shown by a positive and active involvement in classwork and school life. Inside the classroom all those present should promote the learning process.

*If this does not happen:*

Lapses may be referred to the Head of Academy and parents/guardians may be informed.

#### b. Respect for others and their culture

All members of the Positive Impact Academy community should be treated with respect. This is shown by the way that we speak to each other and by being courteous, well-mannered and by showing regard for the feelings of others.

*If this does not happen:*

- Incidents will be treated seriously and investigated, with all directly involved being asked to provide a written statement.
- Attempts will be made to settle disputes in a reasonable way.
- Both sides in a dispute may be brought together under supervision to see whether working relationships can be restored through reconciliation.

### **c. Respect for the environment**

Not dropping litter and refraining from writing graffiti on walls and furniture or any damage caused by discarded chewing gum will help maintain a pleasant working environment.

The Positive Impact Academy's, another person's and one's own property should be used responsibly. Any theft or damage should be reported to the nearest member of staff.

Display work around The Positive Impact Academy should be respected.

Bags should not be left lying around where others may trip over them. Bags and coats should be carried in a sensible way so that they do not damage paintwork or present a danger to other people.

*If this does not happen:*

Everyone has a less pleasant environment in which to study and work. Incidents of deliberate damage will be investigated thoroughly. Any student found wilfully damaging the environment would be expected to put right the damage which has occurred and be subject to a significant sanction.

### **Incidences off-site**

If a behaviour incident occurs off-site but has a direct impact on the welfare or activities of students at The Positive Impact Academy, The Positive Impact Academy may investigate and issue sanctions if appropriate. The Positive Impact Academy reserves the right to use its professional discretion when deciding whether an off-site incident is investigated or not.

### **Conduct**

*We expect students to behave at all times, with courtesy and consideration to others for example:*

- A. Show respect to others - no name calling, swearing, or bullying.
- B. Enter and leave the classroom appropriately.
- C. Come to lessons equipped and prepared to work.
- D. Be ready for pick up.
- E. Follow instructions from staff quickly and politely.
- F. Be in correct uniform and smart throughout the day.
- G. Treat the environment with respect, disposing of litter appropriately.
- H. Food and drink is only to be consumed in designated areas.
- I. Do not tamper with, or damage to, school or other pupils' property.

## **Attitude to Learning**

### **Effort**

Students should make every effort to complete work to the best of their ability.

*If a student does not work to the best of their ability:*

- Examination grades may suffer.
- Tutors will do their best to encourage students to do better.
- Students will be asked to re-do work that is of a poor standard.
- Students may have any rewards revoked.

If students continue to have difficulties with managing their behaviour, the matter will be referred to the Head of Academy and the Director. Parents/guardians will be informed and possibly invited in to discuss the students' progress.

### **Attendance and Punctuality**

The Positive Impact Academy is required by law to keep a record of student attendance. In an emergency, such as a fire, it is essential that we have an accurate record of who is in. Good attendance and punctuality are essential for good learning. They are also essential skills for later life. Refer to The Positive Impact Academy attendance policy for a detailed explanation of processes and procedures pertaining to attendance.

We strongly discourage parents from taking their children out of school for holidays or family outings during the school term. In most cases, unless there are extenuating circumstances, these will count as an unauthorized absence.

### **Rewards and Sanctions**

#### **Rewards**

Praise and appreciation should be expressed to give encouragement and positive reinforcement. Our present rewards system includes:

- Verbal praise, either personal or public.
- Letters home for good progress shown in interim reports.
- Positive comments in weekly and termly reviews.

Rewards are agreed upon by the students, The Positive Impact Academy staff, and parents/carers at the start of the programme.

#### **Physical Force**

The Positive Impact Academy reserves the power to use reasonable force in exceptional circumstances whereby a student is a physical threat to themselves or others, this is in accordance with 'Use of Reasonable Force' - advice for head teachers, staff, and governing bodies (DfE July 2013).

Updated: J Armson/D Strong  
Date: Sep 2022 - to be reviewed Sep 2023.

Signed by Director

A handwritten signature in black ink, appearing to be "James Armson", written in a cursive style.

James Armson

## Bullying Policy

A summary of how The Positive Impact Academy responds to complaints about bullying:

1. Our aspiration is to establish and maintain a community of mutual tolerance and understanding within which bullying does not occur. However, we recognise that as with any human society, there is a danger that bullying will take place. Whenever bullying takes place our aim is to correct the offending behaviour in a swift and lasting manner.
2. We recognise that bullying may be verbal (for example, name calling), physical (for example, one student hitting another), social (for example, being deliberately ignored to isolate an individual) and cyber bullying (for example, using technology as a vehicle for undermining individuals – refer to the e-safety policy). We also recognise that there can sometimes be a complex relationship between the four types of bullying.
3. Incidents will normally be investigated by Education Mentors and Head of Academy in the first instance. If for any reason a parent or student is unhappy about the way in which a bullying complaint has been responded to, they should contact the Director, who will investigate.
4. All involved will be asked to provide a written statement.
5. Both sides will be listened to. Hasty judgements not based on clear evidence will be avoided. We will seek to consider both the actual incident and the context in which it has occurred.
6. We will seek to identify whether bullying has taken place, using the definitions in point two and the professional judgement and common sense of all involved.
7. More serious incidents will be referred through The Positive Impact Academy's Behaviour Policy.
8. All relevant parents will be informed about the incident. At a later stage they will be informed about the way in which The Positive Impact Academy has dealt with the incident. DFES guidance recommends that complaints of bullying should be responded to within two weeks. Where possible we will seek to respond more quickly, but speed of response must not be allowed to compromise the integrity of the investigation.
9. Sanctions will be imposed as appropriate. These may deduction of rewards or fixed term exclusions. More serious sanctions can only be imposed by the Director. Disciplinary sanctions will be discussed with the parents of the student concerned. However, we will not break the rules of confidentiality by discussing the case of other students.
10. If appropriate, external agencies will be involved to support the person being bullied or to offer corrective counselling to the person who is carrying out the bullying.
11. Tutors should review student behaviour following the incident. It may be appropriate to speak to the whole team about lessons that have been learnt.
12. It may be appropriate for the Director to speak to the entire team about a particular incident.

13. The Positive Impact Academy keep a log of bullying incidents to detect patterns of behaviour. Any member of staff who deals with an incident of bullying will be required to record the incident in the logbook held by the Senior DSL.

14. The Positive Impact Academy Education Mentors speak to all students and parents about the expectations regarding bullying when they join The Positive Impact Academy. If appropriate, a point of contact for students who wish to report an incident of bullying to someone who is not their mentor will be provided.

15. Bullying is reviewed on an ongoing basis by the Director.

Policy Document Bullying Policy

Updated: J Armson/D Strong

Date: Sep 2022 - to be reviewed Sep 2023.

Signed by Director

A handwritten signature in black ink, appearing to be "James Armson", written over a horizontal line.

James Armson

## Child Protection and Safeguarding Policy

### 1. Policy statement and principles

This policy is one of a series in The Positive Impact Academy's integrated safeguarding portfolio. The Positive Impact Academy's safeguarding arrangements are inspected by OFSTED under the judgements on the quality of leadership and management and the impact of this on the personal development, behaviour, and welfare of our learners.

This policy is available on The Positive Impact Academy website and all staff and volunteers are required to read it and confirm they have done so in writing before commencing work in The Positive Impact Academy.

#### Child protection statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection, and justice.

The procedures contained in this policy apply to all staff, volunteers and partners and are consistent with those of Safeguarding Warwickshire ([www.safeguardingwarwickshire.co.uk](http://www.safeguardingwarwickshire.co.uk)).

#### Policy principles:

- The Positive Impact Academy's responsibility to safeguard and promote the welfare of children is of paramount importance.
- All children, regardless of age, gender, ability, culture, race, language, religion, or sexual identity, have equal rights to protection.
- Children who are safe and feel safe are better equipped to learn.
- This organisation is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. Representatives of the whole organisations community of pupils, parents, staff and volunteers will therefore be involved in reviewing, shaping and developing The Positive Impact Academy's safeguarding arrangements and child protection policy.
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm at home, in the community or at The Positive Impact Academy.
- All staff members will maintain an attitude of 'It could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child.
- If, at any point, there is a risk of immediate serious harm to a child a referral will be made to Children's Social Care immediately. *Anybody can make a referral.* If the child's situation does not appear to be improving, any staff member with concerns should press for reconsideration.
- If a member of staff remains concerned about a child, they can discuss their concerns with the Director, another DSL or contact their Line Manager.
- Pupils and staff involved in child protection issues will receive appropriate support.
- This policy will be reviewed at least annually unless an incident, new legislation or guidance suggests the need for an interim review.

#### Policy aims:

- To provide all staff with the necessary information to enable them to meet their safeguarding and child protection responsibilities.

- To ensure consistent good practice.
- To demonstrate The Positive Impact Academy's commitment regarding safeguarding and child protection to pupils, parents, and other partners.
- To contribute to The Positive Impact Academy's safeguarding portfolio.

## Terminology

**Safeguarding** and promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.

**Child protection** refers to the processes undertaken to protect children who have been identified as suffering or being at risk of suffering significant harm.

**Staff** refers to all those working for or on behalf of The Positive Impact Academy, full-time, or part-time, temporary, or permanent, in either a paid or voluntary capacity.

**A child** includes everyone under the age of 18.

**Parent** refers to birth parents and other adults who are in a parenting role, for example stepparents, foster carers and adoptive parents.

## 2. Safeguarding Legislation and Guidance

**Alternative Providers of Education** - Section 157 of the Education Act 2011 and the Education (Independent Schools Standards) (England) Regulations 2014 require proprietors of independent schools (including academies and city technology colleges) to have arrangements to safeguard and promote the welfare of children who are pupils at The Positive Impact Academy.

- The **Teachers' Standards 2021** state that teachers, including Head Teachers, must have regard for the need to safeguard pupils' well-being, in accordance with statutory provisions; and maintain public trust in the teaching profession as part of their professional duties.
- The statutory guidance, **Working Together to Safeguard Children** (DFE, 2018), covers the legislative requirements and expectations on individual services (including The Positive Impact Academy) to safeguard and promote the welfare of children. It also provides the framework for Local Safeguarding Children Boards (LSCBs) to monitor the effectiveness of local services, including safeguarding arrangements in The Positive Impact Academy.
- The statutory guidance, **Keeping Children Safe in Education** (DFE 2022), is issued under Section 175 of the Education Act 2002, the Education (Independent Schools Standards) Regulations 2014. The Positive Impact Academy must regard to this guidance when carrying out their duties to safeguard and promote the welfare of children.

All staff must read Part One of **Keeping Children Safe in Education 2022**. Staff can find a copy on Google Drive and in the Positive Impact Academy office.

- **What to do if you're worried a child is being abused 2015 - Advice for practitioners** is non-statutory advice which helps practitioners (everyone who works with children) to identify abuse and neglect and take appropriate action.

In the UK, more than 50,000 children are annually subject to a child protection plan. Research suggests that one child a week dies from abuse, around 20 percent of children will suffer some form of abuse, one child in six is exposed to violence in the home and disabled children are three times more likely to be abused and neglected. The prevalence of neglect continues to be a major concern and online abuse is increasing. The sexual exploitation of children is a growing problem.

Due to their day-to-day contact with pupils, staff at The Positive Impact Academy are uniquely placed to observe changes in children's behaviour and the outward signs of abuse, neglect, exploitation, and radicalisation. Children may also turn to a trusted adult at The Positive Impact Academy when they are in distress or at risk. It is vital that all staff are alert to the signs of abuse, are approachable and trusted by pupils/students, listen actively to children, and understand the procedures for reporting their concerns. The Positive Impact Academy will act on identified concerns and provide early help to prevent concerns from escalating.

### 3. Roles and responsibilities

#### Key personnel

**The Designated Safeguarding Lead (DSL) 1** is David Strong (Head of Academy)  
Contact details: [David.strong@positive-impactuk.com](mailto:David.strong@positive-impactuk.com)

**The Designated Safeguarding Lead (DSL) 2** is Gemma Lish (LAC Education Welfare Officer)  
Contact details: [gemma.lish@positive-impactuk.com](mailto:gemma.lish@positive-impactuk.com)

**The Designated Safeguarding Lead (DSL) 3** is Kate Warren (Senior Education Mentor)  
Contact details: [kate.warren@positive-impactuk.com](mailto:kate.warren@positive-impactuk.com)

#### **The Designated Safeguarding Lead (DSL):**

- Is a senior member of staff from The Positive Impact Academy's leadership team and, therefore, has the status and authority within The Positive Impact Academy to carry out the duties of the post, including committing resources and supporting and directing other staff.
- Takes lead responsibility for safeguarding and child protection in The Positive Impact Academy, which will not be delegated although the activities of the DSL may be delegated to appropriately trained deputies.
- Is appropriately trained, receives refresher training at two-yearly intervals and regularly (at least annually) updates their knowledge and skills to keep up with any developments relevant to their role.
- Acts as a source of support and expertise to The Positive Impact Academy community.
- Encourages a culture of listening to children and taking account of their wishes and feelings.
- Is alert to the specific needs of children in need, those with special educational needs, looked after children and young carers.
- Has a working knowledge of Safeguarding Warwickshire (WSCB) procedures.
- Understands the CAF process to ensure effective assessment and understanding of children's additional needs to inform appropriate provision of early help and intervention.
- Keeps detailed written records of all concerns, ensuring that such records are stored securely and flagged, but kept separate from, the pupil's general file.
- Refers cases of suspected abuse to Social Care or the Police as appropriate.

- Notifies Children's Social Care if a child with a child protection plan is absent for more than two days without explanation.
- Ensures that when a pupil leaves The Positive Impact Academy, all child protection records are passed to the new educational setting (separately from the main pupil file and ensuring secure transit) and confirmation of receipt is obtained. If the child is the subject of an open case to Children's Social Care, the pupil's social worker is also informed.
- Attends and/or contributes to child protection conferences, strategy meetings and multi-agency sexual exploitation (MASE) meetings.
- Coordinates The Positive Impact Academy's contribution to child protection plans as part of core groups, attending and actively participating in core group meetings.
- Develops effective links with relevant statutory and voluntary agencies including the WSCB.
- Ensures that all staff sign to indicate that they have read and understood the child protection and safeguarding policy and staff behaviour policy (Code of Conduct).
- Has a working knowledge of relevant national guidance in respect of all specific safeguarding issues, ensuring that all staff receive necessary training, information, and guidance.
- Ensures that the child protection and safeguarding policy and procedures are regularly reviewed and updated annually, working with the whole The Positive Impact Academy community of pupils, parents, staff, volunteers, and governors and/or proprietors regarding this.
- Keeps a record of staff attendance at child protection training.
- Makes the child protection and safeguarding policy available publicly, i.e., on The Positive Impact Academy's website or by other means.
- Ensures parents are aware of The Positive Impact Academy's role in safeguarding and that referrals about suspected abuse and neglect may be made.
- Ensures that the Director is aware of the responsibility to refer all allegations that a child has been harmed by or that children may be at risk of harm from a member of staff or volunteer to the Designated Officer (DO) in the Local Authority within one working day prior to any internal investigation; and to the Disclosure and Barring Service (DBS) as appropriate.

**The Designated Safeguarding Lead(s)** are appropriately trained to the same level and, in the absence of the DSL 1, DSL 2 and DSL 3, carry out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of the long-term absence of DSL 1, then DSL 2 or 3 will assume all the functions above.

#### **The Head of Academy:**

- Ensures that the child protection policy and procedures are understood and implemented by all staff.
- Allocates sufficient time, training, support, and resources, including cover arrangements, when necessary, to enable the DSL and deputy/s to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings.
- Supports the LAC Education Welfare Officer to promote the educational achievement of any pupils who are looked after by the Local Authority and to ensure that all staff have the skills, knowledge and understanding necessary to keeping looked after children safe.
- Ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle blowing procedures.
- Ensures that pupils are provided with opportunities throughout the curriculum to learn about safeguarding and how to always keep themselves safe, including when online, as part of a broad and balanced curriculum.

- Refers all allegations that a child has been harmed by or that children may be at risk of harm from a member of staff or volunteer to the Designated Officer (DO) in the Local Authority within one working day prior to any internal investigation.
- Ensures that anyone who has harmed or may pose a risk of harm to a child is referred to the Disclosure and Barring Service, as advised by the Designated Officer.
- Appoints a case officer who will be a member of the senior leadership team to investigate allegations concerning members of staff and volunteers and/or act as a point of contact for the member of staff/volunteer against whom the allegation is made.

#### **4. Good Practice Guidelines and Staff Code of Conduct**

To meet and maintain our responsibilities towards pupils we identify standards of good practice and set out our expectations of staff in the Staff Behaviour Policy, which all members of staff and volunteers are required to read and sign before starting work at The Positive Impact Academy. In summary, our expectations include:

- Treating all pupils with respect.
- Setting a good example by conducting ourselves appropriately.
- Involving pupils in decisions that affect them.
- Encouraging positive, respectful, and safe behaviour among pupils.
- Being a good listener.
- Being alert to changes in pupils' behaviour and to signs of abuse and neglect and exploitation.
- Recognising that challenging behaviour may be an indicator of abuse.
- Reading and understanding The Positive Impact Academy's child protection policy, staff behaviour policy (Code of Conduct and guidance documents on wider safeguarding issues, for example bullying, behaviour, physical contact, sexual exploitation, extremism, e-safety, and information-sharing.)
- Asking the pupil's permission before initiating physical contact, such as assisting with dressing, physical support during PE or administering first aid.
- Maintaining appropriate standards of conversation and interaction with and between pupils and avoiding the use of sexualised or derogatory language.
- Being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse.
- Applying the use of reasonable force and physical intervention only as a last resort and in compliance with The Positive Impact Academy's procedures and WSCB guidance.
- Referring all concerns about a pupil's safety and welfare to the DSL or, if necessary, directly to the Police or Children's Social Care.
- Following The Positive Impact Academy's rules regarding communication and relationships with pupils, including via social media.
- Referring all allegations against members of staff, volunteers or other adults that work with children and any concerns about breaches of the Staff Behaviour Policy directly to the Director.

**Please also refer to The Positive Impact Academy's Code of Conduct for all staff and volunteers. This can be accessed via Google Drive and in The Positive Impact Academy office.**

## **5. Abuse of trust**

All The Positive Impact Academy staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach.

In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of The Positive Impact Academy staff and a pupil under 18 may be a criminal offence, even if that pupil is over the age of consent.

The Positive Impact Academy's Staff Behaviour (Code of Conduct) sets out our expectations of staff and is signed by all staff members.

## **6. Children who may be particularly vulnerable**

Some children are more vulnerable to abuse and neglect than others. Several factors may contribute to that increased vulnerability including prejudice and discrimination; isolation; social exclusion; communication issues; a reluctance on the part of some adults to accept that abuse can occur; as well as an individual child's personality, behaviour, disability mental and physical health needs, and family circumstances.

To ensure that all pupils receive equal protection, we will give special consideration to children who are:

- Vulnerable due to having Special Education Needs or Disabilities (SEND).
- Young carers.
- Affected by parental substance misuse, domestic abuse and violence or parental mental health needs.
- Asylum seekers.
- Looked after by the Local Authority or otherwise living away from home.
- Vulnerable to being bullied or engaging in bullying behaviours.
- Living in temporary accommodation.
- Living transient lifestyles.
- Living in chaotic and unsupportive home situations.
- Vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability, or sexuality.
- At risk of child sexual exploitation (CSE).
- Do not have English as a first language.
- At risk of female genital mutilation (FGM).
- At risk of forced marriage.
- At risk of being drawn into extremism.

This list provides examples of additionally vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for children with communication needs.

## **7. Early Help and use of the Common Assessment Framework (CAF) process**

The Positive Impact Academy recognises that providing early help is more effective in promoting the welfare of children than reacting later. Early help means providing support as soon as a problem emerges, at any point in a child's life. All The Positive Impact Academy staff are trained to notice any concerns about children which may help to identify that they would benefit from early help.

Early help might be simple and something The Positive Impact Academy is able to address with parents/carers so that the child's needs are met quickly and easily. The Positive Impact Academy will keep a record of any such help using the 'Pre-Early Help Assessment Action Plan' to record clear targets and progress.

Children and families may need support from a wide range of local agencies beyond The Positive Impact Academy. Where a child and family would benefit from co-ordinated support from more than one agency (e.g., Education, Health, Social Care, Police), and her/his parents' consent, The Positive Impact Academy will use the Early Help Assessment process to identify what help the child and family require to prevent their needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989.

The Positive Impact Academy is committed to working in partnership with children, parents, and other agencies to:

- Identify situations in which children and/or their families would benefit from early help.
- Undertake an assessment of the need for early help, using the Early Help Assessment process; and
- Provide targeted early help services to address the assessed needs of a child and their family, developing an action plan that will focus on activity to improve the child's outcomes.

The Positive Impact Academy will be particularly alert to the potential need for early help for any child who:

- Has special educational needs or disabilities (SEND)
- Is a young carer
- Is showing signs of engaging in anti-social or criminal behaviour
- Is in a family whose circumstances present challenges for the child, such as substance abuse, adult mental ill health, domestic abuse
- Is showing early signs of abuse and/or neglect
- Is particularly vulnerable in any of the ways identified in paragraph 6 above.

The Early Help process can only be effective if it is undertaken with the agreement of the child's parents/carers. Young people at The Positive Impact Academy may consent to Early Help, possibly including an Early Help Assessment, subject to Information Sharing Guidance. The Positive Impact Academy should seek advice from an Early Help Officer or the DSL 1 in those circumstances. The Early Help process should involve the child and family as well as all the professionals who are working with them.

The Positive Impact Academy will keep the needs and circumstances of children receiving early help under constant review. If the child's situation does not improve and/or the child's parents and/or the child do not consent to early help, The Positive Impact Academy will make a judgement about whether, without help, the needs of the child will escalate. If so, The Positive Impact Academy will seek the parents' consent to a referral to a multi-agency Locality Panel to address the child's needs. Alternatively, a referral to Children's Social Care may be necessary.

## **8. Attendance**

We recognise that full attendance at The Positive Impact Academy is important to the well-being of all our pupils and enables them to access the opportunities made available to them at The Positive Impact Academy. Attendance is monitored closely, and we work in partnership with the Warwickshire

County Council Attendance, Compliance and Enforcement (ACE) Service when patterns of absence give rise to concern. Our attendance policy is set out in a separate document.

## 9. Children Missing from Education

The Positive Impact Academy operates in accordance with statutory guidance *Children Missing Education (DfE 2016)*. All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude, and any SEND they may have.

Children missing education are at significant risk of underachieving, being victims of harm, exploitation, or radicalisation, and becoming NEET (not in education, employment, or training) later in life.

Effective information sharing between parents, The Positive Impact Academy and local authorities is critical to ensuring that all children of compulsory school age are safe and receiving suitable education.

Attendance, absence, and exclusions are closely monitored. The DSL will monitor unauthorised absence and take appropriate action, particularly where children go missing on repeated occasions and/or are missing for periods during the school day.

Where a pupil has 2 consecutive school days of unexplained absence and all reasonable steps\* have been taken by The Positive Impact Academy to establish their whereabouts without success, The Positive Impact Academy will make an immediate referral to Warwickshire County Council's Education and Learning Business Unit at 01926 742036 or via email to [cme@warwickshire.gcsx.gov.uk](mailto:cme@warwickshire.gcsx.gov.uk).

\*Reasonable steps include:

- Telephone calls to all known contacts.
- Letters home (including recorded delivery).
- Contact with other establishments where siblings may be registered.
- Possible home visits where safe to do so.
- Enquiries to friends, neighbours etc. through The Positive Impact Academy contacts.
- Enquiries with any other Service known to be involved with the pupil/family.
- All contacts and outcomes to be recorded on the pupil's file.

The Positive Impact Academy is required by law to have an admission register.

The Positive Impact Academy is required to inform the Local Authority when they are about to remove a pupil's name from The Positive Impact Academy admission register at non-standard transition points irrespective of the reason. The Local Authority may also require The Positive Impact Academy to provide

information about pupils who are going to be removed from the register at standard transition points.

The Positive Impact Academy will also notify the local authority within five days of adding a pupil's name to the admission register at a non-standard transition point. The Local Authority may also require The Positive Impact Academy to provide information about pupils added to the register at a standard transition point.

It is essential for The Positive Impact Academy to comply with this duty so that the Local Authority can, as part of its duty to identify children of compulsory school age who are missing education, follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

Upon receipt of a referral from The Positive Impact Academy, the Local Authority will continue to attempt to track the child, for at least a further 10 school days, using access to additional contacts/services, e.g., Social Care, Health services, Housing services. If this also fails to establish the pupil's whereabouts, The Positive Impact Academy will be informed by email and may then, but not before, remove the pupil from roll and place the child's name on the Children Missing from Education list.

Deletions from roll agreed with the Local Authority will normally be backdated to the first day of absence.

If the Local Authority can contact the pupil and her/his parents, arrangements will be made with The Positive Impact Academy and family for a return to education, including a reintegration programme where necessary. If the pupil has registered at another school, The Positive Impact Academy will delete the child's name from our roll and transfer the child's educational records to the new school in the normal way. Any child protection records will be transferred separately and securely for the attention of the DSL in the new school and a receipt secured.

## **10. Children who run away or go missing from home or care**

The Positive Impact Academy recognises that children who run away or go missing - and are thus absent from their normal residence - are potentially vulnerable to abuse, exploitation, offending and placing themselves in situations where they may suffer physical harm.

*Keeping Children Safe in Education 2019* highlights that 'Statutory Guidance on Children who Run Away or go Missing from Home or Care' (DfE 2014) requires that every child or young person who runs away or goes missing must be offered a Return Home Interview (RHI) within a period of 72 hours of their return.

RHI's are undertaken by professionals who are independent to facilitate a discussion with the young person that is as open as possible. As soon as the Local Authority receive notification that a young person has gone missing from home or care, a letter will be sent to the parents/carer seeking their consent to a RHI with their son/daughter. Direct contact will then be made with parents/carers and the young person to make arrangements for the interview.

To fulfil the timescale of within 72 hours, it is essential that all opportunities to interview young people including times during the school day are utilised.

When necessary and in conjunction with the Local Authority, The Positive Impact Academy will facilitate Return Home Interviews, both in terms of releasing the young person from their normal timetable to participate in an interview and in providing an appropriate and safe space on site for the interview to take place.

The Positive Impact Academy will check with the Local Authority whether parents/carers have given their consent to the interview. However, young people aged 16 and 17 years old are generally considered to be able to consent and withhold consent to their own information being shared and therefore to participate in an RHI or not. With reference to the Fraser Guidelines, younger children may also be deemed able to consent.

If the Local Authority has not received consent from parents/carers and the young person is not assessed as being capable of giving or withholding informed consent.

The Positive Impact Academy will contact the parent/carer and seek to secure their consent. Parents may also choose to accompany their son/daughter in interviews and The Positive Impact Academy will facilitate that as appropriate.

## **11. Helping children to keep themselves safe**

*Keeping Children Safe in Education 2019* requires governing bodies and proprietors to ensure that children are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a 'broad and balanced curriculum.'

Children are taught to understand and manage risk through our Personal, Social, Health and Economic (PSHE) education and sex and relationships lessons, Citizenship and through all aspects of school life. Our approach is designed to help children to think about risks they may encounter and with the support of staff work out how those risks might be reduced or managed. Discussions about risk are empowering and enabling for all children and promote sensible behaviour rather than fear or anxiety. Children are taught how to conduct themselves and how to behave in a responsible manner. Children are also reminded regularly about e-safety, the risks of sharing content and images online and tackling bullying, including cyber bullying procedures. The Positive Impact Academy continually promotes an ethos of respect for children and pupils who are encouraged to speak to a member of staff of their choosing about any worries they may have.

Discussions about risk will include talking to children about the risks and issues associated with young people sending, receiving and/or disseminating indecent images of themselves and other young people, which is widely referred to as 'sexting'.

It is recognised that a young person may choose to share indecent images with another young person in the context of a romantic or sexual relationship and that she or he may do so without any intention to cause harm or distress to anybody. Although technically an offence, sexting of that nature is referred to as 'experimental sexting' and it is usually not necessary or appropriate to criminalise young people in those circumstances.

However, there are clear risks associated with such behaviour. Staff are trained to be vigilant and to notice and record any concerns about young people sending and receiving indecent images, which includes listening to what young people say to each other and to staff, as they do with any other safeguarding concern.

When concerns are identified, staff will always speak to children and will inform parents about their concerns unless there is good reason to believe that doing so would place the child at increased risk of significant harm. The DSL will also need to consider the Fraser guidelines in making a judgement about whether to respect a young person's request not to inform his/her parents/carers.

N.B. Children under the age of 13 are unable to consent to sexual activity. Any imagery containing sexual activity by under 13-year-olds will therefore be referred to the Police.

## **12. Support for pupils, families and staff involved in a child protection issue**

Child abuse is devastating for the child and can also result in distress and anxiety for staff who become involved.

We will support pupils, their families, and staff by:

- Taking all suspicions and disclosures seriously.
- Nominating a link person who will keep all parties informed and be the central point of contact.
- Where a member of staff is the subject of an allegation made by a pupil, separate link people will be nominated to avoid any conflict of interest.
- Storing records securely.
- Maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies.
- Responding sympathetically to any request from pupils or staff for time out to deal with distress or anxiety.
- Offering details of helplines, counselling, or other avenues of external support.
- Following the procedures laid down in our child protection, whistleblowing, complaints, and disciplinary procedures.
- Co-operating fully with relevant statutory agencies.

### 13. Complaints procedure

Our complaints procedure will be followed where a pupil or parent raises a concern about poor practice towards a pupil that initially does not reach the threshold for child protection action. Poor practice examples include unfairly singling out a pupil or attempting to humiliate them, bullying, or belittling a pupil or discriminating against them in some way. Complaints are managed by the Director and other members of the senior leadership team. An explanation of the complaint's procedure is on the website for parents and pupils.

Complaints from staff are dealt with under The Positive Impact Academy's complaints and disciplinary and grievance procedures.

Complaints which escalate into a child protection concern will automatically be managed under The Positive Impact Academy's child protection procedure.

### 14. Whistle blowing if staff have concerns about a colleague

Staff who are concerned about the conduct of a colleague - including visiting professionals and volunteers - towards a pupil are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood a situation and they will wonder whether a report could jeopardise a colleague's career. All staff must remember that the welfare of the child is paramount.

The Positive Impact Academy's **whistleblowing** policy enables staff to raise concerns or allegations, initially in confidence and for a sensitive enquiry to take place.

Staff are expected to report all concerns about poor practice or possible child abuse by colleagues - including what may seem minor contraventions of The Positive Impact Academy's Staff Behaviour Policy (Code of Conduct) – to the Director; to facilitate proactive and early intervention to maintain appropriate boundaries and a safe culture that protect children and reduce the risk of serious abuse at The Positive Impact Academy.

The recommended format for all staff at The Positive Impact Academy to record any such poor practice or possible child abuse by colleagues or other adults who work with children is the pro forma 'Logging A Concern about the behaviour of an adults who works with children', also known as the 'Yellow form'. All such forms should be passed directly to the Director. Alternatively, staff are free to approach the Director directly to discuss their concerns.

Concerns or complaints about the Director should be reported to Warwickshire County Council. The 'Yellow Form' should also be used for that purpose as above.

Staff may also report concerns about suspected abuse or neglect directly to Children's Social Care or the Police if they believe direct reporting is necessary to secure action. Staff can also contact the Designated Officer in the Local Authority, who is responsible for the co-ordination of responses to allegations against people who work with children.

The NSPCC whistleblowing helpline is also available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 between 8.00a.m. and 8.00p.m. Monday to Friday or e mail [help@nspcc.org.uk](mailto:help@nspcc.org.uk). The NSPCC whistleblowing helpline and contact numbers for Children's Social Care, the Police and the Designated Officer are all made available to staff members.

### **15. Managing allegations against staff**

When an allegation is made against a member of staff, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some professionals do pose a serious risk to pupils, and we must act on every allegation. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress.

Suspension is not the default option and alternatives to suspension will always be considered. However, in some cases staff may be suspended where this is deemed to be the best way to ensure that allegations are investigated fairly, quickly, and consistently and that all parties are protected. In the event of suspension, The Positive Impact Academy will provide support and a named contact for the member of staff.

**As stated above, all allegations against staff should be reported to the Director. Allegations against the Director should be reported to Warwickshire County Council.**

**Staff may also report their concerns directly to the Police or Children's Social Care if they believe direct reporting is necessary to secure action.**

The full procedures for dealing with allegations against staff can be found in Part 4 of *Keeping Children Safe in Education 2019* and WSCB's inter-agency safeguarding procedures, section 6 - *Managing Allegations Against People Who Work with Children*.

Staff, parents, and partners are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites.

Allegations concerning staff who no longer work at The Positive Impact Academy or historical allegations will be reported to the Police.

In accordance with *Keeping Children Safe in Education 2019*, The Positive Impact Academy will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

## 16. Staff training

It is important that all staff have training to enable them to recognise the possible signs of abuse and neglect and exploitation and to know what to do if they have a concern.

New staff, governors who will have direct contact with children and volunteers will receive an explanation during their induction which will include:

- The Positive Impact Academy's child protection and safeguarding policy.
- Signs and symptoms of abuse and neglect.
- Responding to disclosure of abuse or neglect by a child.
- Reporting and recording arrangements.
- The Staff Behaviour Policy (Code of Conduct).
- Details of the DSL.

NB all the above will be explained **before** a new member of staff, governor or volunteer has direct contact with children in The Positive Impact Academy. The Positive Impact Academy's child protection policy and Staff Behaviour Policy (Code of Conduct) will be sent with the letter confirming an appointment with a written requirement that the individual read the two policies in advance of starting work at The Positive Impact Academy. The individual will be given an opportunity to clarify any issues on their first day at work and then asked to sign to confirm that they have read and understood both policies and undertake to comply with them.

All staff, including the Director (unless the Director is the DSL), volunteers and partners will receive appropriate and regularly updated safeguarding and child protection training and

thematic updates as required (at least annually) during inset days and regular discussions at staff meetings, to provide them with the requisite skills and knowledge to safeguard children effectively in line with statutory guidance and any requirements of WSCB.

The DSL will attend training for newly appointed DSLs and refresher training every two years delivered by Warwickshire County Council's Education Safeguarding Service. That training will include up to date information about WSCB inter-agency procedures. In addition, the DSL will update their knowledge and skills at least annually to keep up with any developments relevant to their role and will be supported to access WSCB inter-agency training as part of their continuing professional development.

All staff will be made aware of the increased risk of abuse to certain groups, including children with special educational needs and disabilities, looked after children, young carers and risks associated with specific safeguarding issues including child sexual exploitation, extremism, female genital mutilation and forced marriage.

In addition, the Director and at least one partner will attend safer recruitment training and The Positive Impact Academy will ensure that there are at least two The Positive Impact Academy leaders and/or partners that have attended safer recruitment training within the past three years.

## 17. Safer recruitment

The Positive Impact Academy endeavours to ensure that we do our utmost to employ 'safe' staff and allow 'safe' volunteers to work with children by following the guidance in *Keeping Children Safe in Education 2019* together with WSCB and The Positive Impact Academy's *Safer Recruitment* policies.

Safer recruitment means that all applicants will:

- Complete an application form which includes their employment history and explains any gaps in that history.
- Provide two referees, including at least one who can comment on the applicant's suitability to work with children.
- Provide evidence of identity and qualifications.
- If offered employment, be checked in accordance with the Disclosure and Barring Service (DBS) regulations as appropriate to their role. This will include an enhanced DBS check and a barred list check for those engaged in Regulated Activity.
- If offered employment, provide evidence of their right to work in the UK.
- Be interviewed by a panel of at least two The Positive Impact Academy leaders/governors, if shortlisted.

The Positive Impact Academy will also:

- Ensure that every job description and person specification for roles in The Positive Impact Academy includes a description of the role holder's responsibility for safeguarding.
- Ask at least one question at interview for every role in The Positive Impact Academy about the candidate's attitude to safeguarding and motivation for working with children.
- Verify the preferred candidate's mental and physical fitness to carry out their work responsibilities.
- Obtain references for all shortlisted candidates, including internal candidates.
- Carry out additional or alternative checks for applicants who have lived or worked outside the UK.
- Ensure that applicants for teaching posts are not subject to a prohibition order issued by the Secretary of State.
- Check that an applicant for a management position is not the subject of a section 128 direction made by the secretary of state prohibiting or restricting her/him from taking part in the management of an independent school, academy, or free school.

At least one member of each recruitment panel will have attended safer recruitment training.

All new members of staff and volunteers will undergo an induction that includes familiarisation with The Positive Impact Academy's child protection and safeguarding policy, Staff Behaviour Policy (Code of Conduct), other issues as in section 16 of this policy and identification of their child protection training needs.

All staff are required to sign to confirm they have received a copy of the child protection and safeguarding policy and Staff Behaviour Policy (Code of Conduct).

The Positive Impact Academy maintains a single central record of recruitment checks undertaken and ensures that the record is maintained in accordance with section 3 of *Keeping Children Safe in Education* and guidance issued by Warwickshire County Council.

### **Regulated Activity**

Schools are 'specified places' which means that most staff and volunteers will be engaged in regulated activity. A fuller explanation of regulated activity can be found in *Keeping Children Safe in Education* (2019) part three.

### **Volunteers**

Volunteers including partners will undergo checks commensurate with their work in The Positive Impact Academy and contact with pupils. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised or be allowed to engage in regulated activity.

### **Supervised volunteers**

Volunteers who work only in a supervised capacity and are not in regulated activity will undergo the safer recruitment checks appropriate to their role, in accordance with The Positive Impact Academy's risk assessment process and statutory guidance.

### **Contractors**

The Positive Impact Academy checks the identity of all contractors working on site and requests DBS checks where appropriate. Contractors who have not undergone checks will not be allowed to work unsupervised or in regulated activity.

## **18. Site security**

Visitors to The Positive Impact Academy, including contractors, are asked to sign in and are given an identity badge, which confirms they have permission to be on site. Parents who are simply delivering or collecting their children do not need to sign in. All visitors are expected to observe The Positive Impact Academy's safeguarding and health and safety regulations to ensure children at The Positive Impact Academy are kept safe. The Director will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

## **19. Behaviour Management**

*Our behaviour policy is set out in a separate document and is reviewed regularly by the Director. This policy is transparent to staff, parents, and pupils.*

## **20. Record Keeping**

The Positive Impact Academy will maintain safeguarding (including early help) and child protection records in accordance with the guidance document provided by WCC Education Safeguarding Service *Child Protection Record Keeping Guidance*.

In accordance with that guidance, The Positive Impact Academy will:

- Keep clear detailed written records of concerns about children (noting the date, event and action taken), even where there is no need to refer the matter to Children's Social Care immediately.
- Keep records in a folder in a meticulous chronological order.
- Ensure all records are kept secure and in locked locations.
- Ensure all relevant child protection records are sent to the receiving school, college, or other education establishment when a pupil moves.

Safeguarding and child protection records will be maintained independently from the pupil's Positive Impact Academy file. Such records will only be accessible to the Designated Safeguarding Lead and The Positive Impact Academy SLT who need to be aware.

The recommended format for all staff in The Positive Impact Academy, to record any safeguarding or child protection concerns about a child, is the online system named IRIS. If for any reason this is not accessible at the time of concern, the staff may use the WSCB pro forma *Logging A Concern About a Child's Safety and Welfare* (Form C) also known as the 'Green form'.

Such records will include, in addition to the name, address and age of the child, timed and dated observations describing the child's behaviour, appearance, statements/remarks made to staff or other children and observations of interactions between the child, other children, members of staff and/or parents/carers that give rise to concern. Where possible and without interpretation, the exact words spoken by the child or parent/carer will be recorded. Records will be signed, dated, and timed by the member of staff making the record.

Records of safeguarding/child protection observations or concerns can be completed electronically or as a paper version, but it is most important that **all staff use one consistent system for the recording of concerns and that all records are passed to the Designated Safeguarding Lead**, who should complete the form to confirm what action has been taken.

Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the Director or DSL, who will advise them to submit a Freedom of Information request for consideration.

The Data Protection Act does not prevent The Positive Impact Academy staff from sharing information with relevant agencies, where that information may help to protect a child.

## **21. Confidentiality and Information Sharing**

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the pupil, family and staff involved but also to ensure that information being released into the public domain does not compromise evidence.

Staff will ensure confidentiality protocols are adhered to and information is shared appropriately. If in any doubt about confidentiality, staff will seek advice from the DSL, another SLT member or outside agency as required (e.g., Education Safeguarding Manager).

It is reasonable for staff to discuss day-to-day concerns about pupils with colleagues to ensure that children's general needs are met at The Positive Impact Academy. However, staff should only refer child protection concerns to the DSL or Director or, in the case of concerns about the Director, to the chair of governors. The person receiving the referral will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

However, following several cases where senior leaders in Schools failed to act upon concerns raised by staff, *Keeping Children Safe in Education (2019)* emphasises that **any member of staff can contact and/or make a referral to Children's Social Care if they are concerned about a child.**

All staff must be aware that they have a professional responsibility to share information with other agencies to safeguard children. All staff must be aware that they cannot promise a child/parent to keep secrets.

Child protection information will be stored and handled in line with Data Protection Act 1998 principles. Information is:

- Processed for limited purposes.

- Adequate, relevant, and not excessive.
- Accurate.
- Kept no longer than necessary.
- Processed in accordance with the data subject's rights.
- Secure.

Record of concern forms (Form C – Green forms) and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals.

Every effort will be made to prevent unauthorised access to sensitive information. Any sensitive information that needs to be stored on portable devices such as laptop computers or tablets or on portable media such as a CD or flash drive will be password protected or encrypted and kept in locked storage.

The Positive Impact Academy's policy on confidentiality and information-sharing is available to parents and pupils on request and is also included in the Staff Induction and on Google Drive.

## **22. Extended school and off-site arrangements**

All extended and off-site activities are subject to a risk assessment, to satisfy health and safety and safeguarding requirements. When our pupils attend off-site activities, including day and residential visits and work-related activities, we will check that effective child protection arrangements are in place, including risk assessments for all activities off site.

Where extended activities are provided by and managed by The Positive Impact Academy, our child protection policy and procedures apply. If other organisations provide services or activities on The Positive Impact Academy site, The Positive Impact Academy will check that those organisations have appropriate procedures in place, including safer recruitment procedures.

## **23. Photography and images**

Most people who take or view photographs or videos of children do so for entirely innocent, understandable, and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place.

To protect pupils, we will:

- Seek their consent on enrolment for photographs to be taken.
- Seek parental consent.
- Ensure pupils are appropriately dressed; and
- Encourage pupils to tell us if they are worried about any photographs that are taken of them.

Visiting professionals who work directly with children are subject to the same restrictions as The Positive Impact Academy staff and volunteers in respect of recording and storing images of children.

However, some visiting professionals are permitted to record images of the premises only specifically for professional purposes and to support The Positive Impact Academy, e.g., professionals providing advice or preparing quotations for work such as maintenance, health and safety and building.

## 24. Online Safety

Children and young people commonly use electronic equipment including mobile phones, tablets, and computers daily to access the internet and share content and images via social networking sites such as Facebook, Twitter, MSN, Tumblr, Snapchat, and Instagram.

Those technologies and the internet are a source of fun, entertainment, communication, and education. Unfortunately, however, some adults and young people will use those technologies to harm children. That harm might range from sending hurtful or abusive texts and emails to grooming and enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings. Pupils may also be distressed or harmed by accessing inappropriate websites that promote unhealthy lifestyles, extremist behaviour, and criminal activity.

Chatrooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour and pupils are not allowed to access those sites at The Positive Impact Academy. Many pupils own or have access to handheld devices and parents are encouraged to consider measures to keep their children safe when using the internet and social media at home and in the community. (E-safety policy can be found on The Positive Impact Academy's website). No access is given within The Positive Impact Academy to inappropriate sites – either on our network or through own devices (as they are not permitted to be used on site and cannot access our internet).

The Positive Impact Academy's **online safety policy** can be accessed from Google Drive and The Positive Impact Academy website, and it explains how we try to keep pupils safe at The Positive Impact Academy and protect and educate pupils in the safe use of technology. The Positive Impact Academy has appropriate filters and monitoring systems in place to protect children from potentially harmful online material.

Cyberbullying and sexting by pupils will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures (see 'Sexting' below). Serious incidents may be managed in line with our child protection procedures.

All staff receive online safety training, and The Positive Impact Academy's e-safety coordinator is Leah Grant. Staff also receive advice regarding the use of social networking and electronic communication with pupils.

### **Online communication between staff and pupils**

Staff also receive advice regarding personal online activity, use of social networking and electronic communication with pupils, about which there are strict rules according to WCC guidance. Staff found to be in breach of these rules may be the subject of a referral to the Designated Officer in the Local Authority and may be subject to disciplinary action.

## 25. Child protection procedures

### **Recognising abuse**

To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone, or leaving knives or matches within reach of an unattended toddler.

Abuse may be committed by adult men or women and by other children and young people.

**There are four categories of abuse: physical abuse, emotional abuse, sexual abuse, and neglect.**

### **Physical abuse**

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 (this used to be called Munchausen Syndrome by Proxy but is now more usually referred to as fabricated or induced illness).

### **Emotional abuse**

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 a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child 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, although it may occur alone.

### **Sexual abuse**

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 the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

### **Neglect**

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 because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing, and shelter (including exclusion from home or abandonment).
- Protect a child from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate caregivers); or
- Ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### **Indicators of abuse**

Physical signs define some types of abuse, for example bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For those reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the Designated Safeguarding Lead.

### **It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.**

- A child who is being abused or neglected may.
- Have bruises, bleeding, burns, fractures, or other injuries.
- Show signs of pain or discomfort.
- Keep arms and legs covered, even in warm weather.
- Be concerned about changing for PE or swimming.
- Look unkempt and uncared for.
- Change their eating habits.
- Have difficulty in making or sustaining friendships.
- Appear fearful.
- Be reckless regarding their own or other's safety.
- Self-harm.
- Frequently miss school or arrive late.
- Show signs of not wanting to go home.
- Display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn.
- Challenge authority.
- Become disinterested in their work.
- Be constantly tired or preoccupied.
- Be wary of physical contact.
- Be involved in, or particularly knowledgeable about drugs or alcohol; and/or
- Display sexual knowledge or behaviour beyond that normally expected for their age and/or stage of development.
- Acquire gifts such as money or a mobile phone from new 'friends' or adults recently acquainted with the child's family.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw and each small piece of information will help the DSL to decide how to proceed.

### **It is very important that staff report all their concerns, however minor or insignificant they may think they are – they do not need 'absolute proof' that the child is at risk of abuse.**

The impact of child abuse, neglect, and exploitation should not be underestimated. Many children do recover well and go on to lead healthy, happy, and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach and the rest of their childhood, and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

## Taking action

Any child in any family in any The Positive Impact Academy could become a victim of abuse. Staff should always maintain an attitude of “It could happen here”.

Key points for staff to remember when taking action are:

- In an emergency take the action necessary to help the child, for example, call 999.
- Report your concern to the DSL as quickly as possible – immediately when there is evidence of physical or sexual abuse and certainly by the end of the day.
- Do not start your own investigation.
- Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family.
- Complete a record of concern, using a IRIS or Form C (Green form); and
- Seek support for yourself if you are distressed or need to debrief.

### **If a member of staff or volunteer is concerned about a pupil’s welfare**

There will be occasions when staff may suspect that a pupil may be at risk but have no ‘real’ evidence. The pupil’s behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical but inconclusive signs may have been noticed. In these circumstances, staff will try to give the pupil the opportunity to talk. The signs they have noticed may be due to a variety of factors, for example a parent has moved out, a pet has died, a grandparent is very ill, or an accident has occurred. It is fine for staff to ask the pupil if they are OK or if they can help in any way.

Staff should use the same record of concern IRIS or Form C (Green form) to record these early concerns. If the pupil does begin to reveal that they are being harmed, staff should follow the

advice below. Following an initial conversation with the pupil, if the member of staff remains concerned, they should discuss their concerns with the DSL.

Concerns which do not meet the threshold for child protection intervention will be managed through the Early Help/CAF process as in section 7 of this policy.

### **If a pupil discloses to a member of staff or volunteer**

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual. Their abuser may have threatened what will happen if they tell. They may have lost all trust in adults. Or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

If a pupil talks to a member of staff about any risks to their safety or wellbeing, **the staff member will need to let the pupil know that they must pass the information on** – staff are not allowed to keep secrets. The point at which they tell the pupil this is a matter for professional judgement. If they jump in immediately the pupil may think that they do not want to listen but if left until the very end of the conversation, the pupil may feel that they have been misled into revealing more than they would have otherwise.

If pupils have been completing the Taking Care curriculum they will have been taught about confidentiality and will generally understand the concept of safe and unsafe secrets. They should have a good knowledge and understanding of why staff cannot keep some information confidential but also know that information is passed on the specific people on a ‘need to know’ basis only.

During their conversations with pupils' staff will:

- Allow them to speak freely.
- Remain calm and not overreact – the pupil may stop talking if they feel they are upsetting their listener.
- Give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'.
- Not be afraid of silences – staff must remember how hard this must be for the pupil.
- **Under no circumstances** ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the pupil's mother think about all this; (**however**, it is reasonable to ask questions to clarify understanding and to support a meaningful referral if that is required, e.g., when did this happen, where did this happen?).
- At an appropriate time tell the pupil that to help them, the member of staff must pass the information on.
- Not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused.
- Avoid admonishing the child for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be the staff member's way of being supportive but may be interpreted by the child to mean that they have done something wrong.
- Tell the pupil what will happen next.
- Let them know that someone (either you or another named person, e.g., the DSL) will come to see them before the end of the day.
- Report verbally to the DSL.
- Write up their conversation as soon as possible on the **record of concern** and hand it to the DSL; and
- Seek support if they feel distressed or need to debrief.

### **Notifying parents**

The Positive Impact Academy will normally seek to discuss any concerns about a pupil with their parents. This must be handled sensitively, and the DSL will contact the parent in the event of a concern, suspicion or disclosure. However, if The Positive Impact Academy believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will be sought first from Children's Social Care.

### **Making a referral to Children's Social Care**

The DSL will make a referral to Children's Social Care if it is believed that a pupil is suffering or is at risk of suffering significant harm (see Section 33 '**Submitting child protection referrals.**)

**However, *Keeping Children Safe in Education (2019)* emphasises that any member of staff may make a direct referral to Children's Social Care if they genuinely believe independent action is necessary to protect a child.**

The pupil (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child or create undue delay.

## **26. Bullying**

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's well-being and in very rare cases has been a feature in the suicide of some young people.

All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our anti-bullying procedures. All pupils and parents

receive a copy of the procedures on joining The Positive Impact Academy and the subject of bullying is addressed at regular intervals in PSHE education.

If the bullying is particularly serious, or the anti-bullying procedures are deemed to be ineffective, the Head of Academy and the DSL will consider implementing early help (CAF) or child protection procedures.

Please also refer to issues in relation to children who are sexually harmful or abusive towards other children below.

## **27. Peer on peer abuse and children with sexually harmful or inappropriate behaviour**

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use The Positive Impact Academy's **anti-bullying procedures** as above where necessary. However, there will be occasions when a pupil's behaviour warrants a response under child protection rather than anti-bullying procedures. Research suggests that up to 30 percent of child sexual abuse is committed by someone under the age of 18.

Abusive behaviour by one child towards another will not be tolerated, minimised, or dismissed as 'banter' or 'part of growing up'.

When dealing with abuse of pupils by other pupils, staff will be mindful of the potential for prejudice-based bullying; racist, disability, homophobic and transphobic abuse; gender-based violence and teenage relationship abuse. Whilst mindful of the vulnerability of women and girls to violence, it is also recognised that boys as well as girls can be abused by members of the opposite as well as the same gender group.

Members of staff who become concerned about a pupil's sexualised behaviour, including any known online sexualised behaviour, should record their concerns and report them to the DSL as soon as possible, as with any other safeguarding concern.

The management of children and young people with sexually harmful behaviour is complex and The Positive Impact Academy will work with other relevant agencies to maintain the safety of the whole The Positive Impact Academy community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator.

Any instances of sexual harm caused by one pupil to another and any situation where there are concerns about power imbalance, coercion or force will be discussed with Children's Social Care.

The Positive Impact Academy will also be informed by the Police or Children's Social Care about referrals made directly to those agencies from other sources (e.g., family members, family friends, parents of other children) in relation to alleged sexualised inappropriate or sexually abusive behaviour displayed by pupils inside and/or outside of The Positive Impact Academy.

In all such circumstances, The Positive Impact Academy may be required to attend a strategy meeting under WSCB inter agency child protection procedures to facilitate risk management and planning with other agencies.

In responding to cases involving children or young people who have committed sexually abusive behaviours, Children's Social Care will consult with the Sexualised Inappropriate Behaviours Service (SIBS), for advice, consultation, or provision of a direct service. A wide range of practice guidance, knowledge and therapeutic materials has been developed by SIBS to inform the interventions relating to children and young people with sexual behaviour difficulties.

In circumstances where a child displays sexualised inappropriate behaviour but evidence of sexual harm towards other children is not clear-cut, The Positive Impact Academy may seek consultation and advice from SIBS and/or the Education Safeguarding Manager.

In deciding the most appropriate response, relevant considerations will include:

- The nature and extent of the inappropriate/abusive behaviours. In respect of sexual abuse, it is necessary to distinguish between normal childhood sexual development and experimentation, and sexually inappropriate or aggressive behaviour.
- The context of the abusive behaviours.
- The child/young person's development, family, and social circumstances.
- The need for services, specifically focusing on the child/young person's harmful behaviour as well as other significant needs; and/or
- The risks to self and others, including other children in The Positive Impact Academy, household, extended family, peer group and wider social network.

The Positive Impact Academy is committed to participating in plans both to provide pupils who are at risk from other children and those pupils who may present a risk to other children with appropriate services to address any concerns and, wherever possible, to facilitating ongoing access to education in The Positive Impact Academy for all children concerned, subject to appropriate risk assessments and risk management plans.

### **Youth produced sexual imagery ('sexting')**

The Positive Impact Academy will act in accordance with advice endorsed by DfE '*Sexting in Schools and colleges: responding to incidents and safeguarding young people*' (UK Council for Child Internet Safety 2016).

All incidents of youth produced sexual imagery (YPSI) will be dealt with as safeguarding concerns. The primary concern always will be the welfare and protection of the young people involved.

Young people who share sexual imagery of themselves or their peers are breaking the law. However, as highlighted in national guidance, it is important to avoid criminalising young people unnecessarily. The Positive Impact Academy will therefore work in partnership with external agencies with a view to responding proportionately to the circumstances of any incident.

All incidents of YPSI should be reported to the DSL as with all other safeguarding issues and concerns. Staff will not make their own judgements about whether an issue relating to YPSI is serious enough to warrant a report to the DSL. What may seem like less serious concerns to individual members of staff may be more significant when considered in the light of other information known to the DSL, which the member of staff may not be aware of.

If staff become concerned about a YPSI issue in relation to a device in the possession of a student (e.g., mobile phone, tablet, digital camera), the member of staff will secure the device (i.e., it should be confiscated). This is consistent with DfE advice **Searching**,

**Screening and Confiscation - Advice for Directors, School staff and governing bodies (DfE February 2014), page 11 'After the search'.**

Staff will not look at or print any indecent images. The confiscated device will be passed immediately to the DSL (see 'Viewing the imagery' below).

The DSL will discuss the concerns with appropriate staff and speak to young people involved as appropriate. Parents/carers will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.

If, at any point in the process, there is concern that a young person has been harmed or is at risk of harm a referral will be made to Children's Social Care and/or the Police immediately.

The Police will always be informed when there is reason to believe that indecent images involve sexual acts and any child in the imagery is under 13 years of age.

The DSL will make a judgement about whether a reported YPSI incident is experimental as in section 11 above or aggravated.

Aggravated incidents involve criminal or abusive elements beyond the creation, sending or possession of sexual images created by young people. These include possible adult involvement or criminal or abusive behaviour by young people such as sexual abuse, extortion, threats, malicious conduct arising from personal conflicts, or creation or sending or showing of images without the knowledge or against the will of a young person who is pictured.

Aggravated incidents of sexting will usually be referred to Warwickshire's Children and Families Front Door (a new integrated front door replacing the Multi Agency Safeguarding Hub MASH as the first point of contact for safeguarding concerns for children and young people) for advice about whether a response by the Police and/or Children's Social Care is required. This will facilitate consideration of whether:

- There are any offences that warrant a Police investigation.
- Child protection procedures need to be invoked.
- Parents/carers require support to safeguard their children.
- A multi-agency sexual exploitation (MASE) meeting is required.
- Any of the perpetrators and/or victims require additional support. This may require the initiation of a CAF and the offer of early help services.

Examples of aggravated incidents include:

- Evidence of adult involvement in acquiring, creating, or disseminating indecent images of young people (possibly by an adult pretending to be a young person known to the victim).
- Evidence of coercing, intimidating, bullying, threatening and/or extortion of students by one or more other students to create and share indecent images of themselves.
- Pressure applied to several students (e.g., all female students in a class or year group) to create and share indecent images of themselves.
- Pressurising a student who does not have the capacity to consent (e.g., due to their age, level of understanding or special educational needs) or with additional vulnerability to create and share indecent images of themselves.
- Dissemination of indecent images of young people to a significant number of others with an intention to cause harm or distress (possibly as an act of so-called 'revenge porn', bullying or exploitation).
- What is known about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage or are violent.

- Sharing of indecent images places a young person is at immediate risk of harm, for example the young person is presenting as suicidal or self-harming.

The DSL will make a judgement about whether or not a situation in which indecent images have been shared with a small number of others in a known friendship group with no previous concerns constitutes an aggravated incident; or whether The Positive Impact Academy is able to contain the situation in partnership with all parents of the students involved, arrange for the parents to ensure that all indecent images are deleted and that the young people involved learn from the incident in order to keep themselves safe in future.

In the latter instance, the DSL will usually consult with the Police and/or Children's Social Care through the Children and Families Front Door to check that no other relevant information is held by those agencies and to ensure an agreed response is documented before proceeding.

**Viewing the imagery** - adults should **not** view youth produced sexual imagery unless there is good and clear reason to do so. Wherever possible, the DSL's responses to incidents will be based on what they have been told about the content of the imagery.

Any decision to view imagery will be based on the DSL's professional judgement. Imagery will never be viewed if the act of viewing will cause significant distress or harm to a pupil.

If a decision is made to view imagery, the DSL will be satisfied that viewing:

- Is the only way to decide about whether to involve other agencies (i.e., it is not possible to establish the facts from the young people involved).
- Is necessary to report the image to a website, app, or suitable reporting agency to have it taken down, or to support the young person or parent in making a report - is unavoidable.
- Because a young person has presented an image directly to a staff member or the imagery has been found on a The Positive Impact Academy device or network.

If it is necessary to view the imagery, then the DSL will:

- Never copy, print, or share the imagery; this is illegal.
- Discuss the decision with the Director, Children's Social Care, or the Education Safeguarding Manager.
- Ensure viewing is undertaken by the DSL or Deputy DSL with delegated authority from the Director.
- Ensure viewing takes place with another member of staff present in the room, ideally the Director, another DSL, or a member of the senior leadership team. The other staff member does not need to view the images.
- Wherever possible ensure viewing takes place on The Positive Impact Academy premises, ideally in the Director or DSL's office.
- Ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery.
- Record the viewing of the imagery in the pupil's safeguarding record, including who was present, why the image was viewed and any subsequent actions; and ensure this is signed and dated and meets the wider standards set out by Ofsted for recording safeguarding incidents.

**Deletion of images** - if The Positive Impact Academy has decided that other agencies do not need to be involved, then consideration will be given to deleting imagery from devices and online services to limit any further sharing of the imagery.

## 28. Sexual exploitation of children

Sexual exploitation involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of children or young people. Victims can be boys or girls. Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs, and alcohol and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to the trafficking of children.

The Positive Impact Academy teaches children about consent and the risks of sexual exploitation in the PSHE and SRE curriculum. A common feature of sexual exploitation is that the child often does not recognise the coercive nature of the relationship and does not see her/himself as a victim. The child may initially resent what she/he perceives as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

All staff are made aware of the indicators of sexual exploitation of children and all concerns are reported immediately to the DSL. The DSL will consider the need to make a referral to Children's Social Care via Front Door (see section 33 below) as with any other child protection concern and with reference to WSCB Child Sexual Exploitation procedures. Parents will be consulted and notified as above.

Following a referral to Children's Social Care, a Multi-Agency Sexual Exploitation (MASE) meeting may be convened under WSCB inter-agency safeguarding procedures. The Positive Impact Academy will attend and share information at MASE meetings as required. Parents and young people will be invited to attend MASE meetings by Children's Social Care as appropriate.

## 29. So-called 'honour based' violence

So-called 'honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of a family and/or community. Such crimes include Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. Staff will be alert to the possibility of a child being at risk of HBV or already having suffered HBV.

All forms of so-called HBV are abuse (regardless of the motivation) and staff will record and report any concerns about a child who might be at risk of HBV to the Designated Safeguarding Lead as with any other safeguarding concern. The DSL will consider the need to make a referral to the Police and/or Children's Social Care as with any other child protection concern.

### Female Genital Mutilation

Female genital mutilation (FGM) is a form of child abuse. It is the collective name given to a range of procedures involving the partial or total removal of the external female genitalia for non-medical reasons or other injury to the female genital organs. It has no health benefits and harms girls and women in many ways. The practice, which is most carried out without anaesthetic, can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so The Positive Impact Academy staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by female pupil about going on a long holiday during the summer vacation period.

In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003. Any person found guilty of an offence under the Female Genital Mutilation Act 2003 is liable to a maximum penalty of 14 years imprisonment or a fine, or both.

If staff have a concern that a girl may be at risk of FGM, they will record their concern and inform the DSL as they would any other safeguarding concern.

Teachers are subject to a statutory duty defined by Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) to report to the Police personally where they discover (e.g., by means of a disclosure) that an act of FGM appears to have been carried out on a girl who is aged under 18. This is known as mandatory reporting.

Teachers in that situation will record their concerns and inform the DSL, who will support the teacher in making a direct report to the Police.

### **Forced Marriage**

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual, and emotional pressure. It may also involve physical or sexual violence and abuse.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether to accept the arrangement remains with the prospective spouses.

Children may be married at a very young age, and well below the age of consent in England. The Positive Impact Academy staff receive training and should be particularly alert to suspicions or concerns raised by a pupil about being taken abroad and not be allowed to return to England.

Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014. (See <https://www.gov.uk/forced-marriage> for further information).

## **30. Radicalisation and Extremism**

Protecting children from the risk of radicalisation is part of The Positive Impact Academy's wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. As such, the DSLs responsible for The Positive Impact Academy's strategy for protecting children from those risks.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. The government defines extremism as vocal or active opposition to fundamental British values.

Even very young children have been exposed, in rare circumstances, to extremism at home and elsewhere including online.

As children get older, they look for adventure and excitement and they may start to ask questions about their identity and belonging. During that stage of their development, they are vulnerable to extremist groups that may claim to offer answers, identity and a social network

apparently providing a sense of belonging. Many of those extremist groups make sophisticated use of the internet and social media to target young people and spread their ideology, making young people more vulnerable to being influenced by extremist ideas. Young people who feel isolated or disaffected in some ways are particularly vulnerable to radicalisation as they are other forms of abuse and exploitation.

The Positive Impact Academy has defined responsibilities to ensure that children are safe from terrorist and extremist material when accessing the internet in The Positive Impact Academy.

During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised. The Positive Impact Academy is committed to preventing pupils from being radicalised and drawn into any form of extremism or terrorism. The Positive Impact Academy promotes the values of democracy, the rule of law, individual liberty, mutual respect, and tolerance of those with different faiths and beliefs by providing pupils with opportunities through the curriculum to discuss issues of religion, ethnicity and culture and learn how to discuss and debate points of view; and by ensuring that all pupils are valued and listened to within The Positive Impact Academy.

The Positive Impact Academy staff receive training that provides them with both the information they need to understand the risks affecting children and young people in this area; and a specific understanding of how to identify individual children who may be at risk of radicalisation and how to support them. Staff are trained to report all concerns about possible radicalisation and extremism to the DSL immediately as they would any other safeguarding concern identifying early indicators of possible radicalisation including changes in behaviour and attitudes to learning, and expressions of interest in extremist ideas along with a tolerance towards potential violence to certain members of society.

The Positive Impact Academy recognises the importance of providing a safe space for children to discuss controversial issues; and building their resilience and the critical thinking skills they need to challenge extremist perspectives. However, The Positive Impact Academy will make appropriate referrals to the Police PREVENT team and Channel programme in respect of any pupil whose behaviour or comments suggest that they are vulnerable to being radicalised and drawn into extremism and terrorism to ensure that children receive appropriate support.

The Positive Impact Academy will discuss any concerns about possible radicalisation identified in The Positive Impact Academy with a child's parents/carers as with any other safeguarding or child protection issue unless there is reason to believe that doing so would place the child at risk; and will also support parents/carers who raise concerns about their children being vulnerable to radicalisation. Subject to consultation with the Police PREVENT team and in the interest of making proportionate responses, The Positive Impact Academy may offer support to children and their families through the provision of early help as appropriate.

The Positive Impact Academy expects all staff, volunteers, governors, visiting professionals, contractors and individuals or agencies that hire The Positive Impact Academy premises to behave in accordance with The Positive Impact Academy's Staff Behaviour Policy (code of conduct), will challenge the expression and/or promotion of extremist views and ideas by any adult on The Positive Impact Academy premises or at The Positive Impact Academy events and, when necessary, will make appropriate referrals in respect of any such adult.

Parents and staff may find the website [www.educateagainsthate.com](http://www.educateagainsthate.com) informative and useful. The website is designed to equip The Positive Impact Academy and college leaders, teachers and parents with the information, tools, and resources they need to recognise and

address extremism and radicalisation in young people and how best to support them. The website provides information on training resources for teachers and staff at The Positive Impact Academy.

### **31. Private fostering arrangements**

A private fostering arrangement occurs when someone other than a parent or a close relative care for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or aged under 18 if the child is disabled. Children looked after by the local authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered. Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

Most privately fostered children remain safe and well, but safeguarding concerns have been raised in some cases, so it is important that The Positive Impact Academy staff are alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.

By law, a parent, private foster carer, or other persons involved in making a private fostering arrangement must notify Children's Social Care as soon as possible. When The Positive Impact Academy becomes aware of a private fostering arrangement for a pupil that has not been notified to Children's Social Care, The Positive Impact Academy will encourage parents and private foster carers to notify Children's Social Care and will share information with Children's Social Care as appropriate.

### **32. Staff reporting directly to child protection agencies**

Staff should ordinarily follow the reporting procedures outlined in this policy. However, as emphasised in *Keeping Children Safe in Education 2019*, any staff member can refer their concerns directly to Children's Social Care and/or the Police if:

- The situation is an emergency and the DSLs, the Head of Academy and/or the chair of governors are all unavailable.
- They are convinced that a direct report is the only way to ensure the pupil's safety; or
- For any other reason they make a judgement that a direct referral is in the best interests of the child.

In any of those circumstances, staff may make direct child protection referrals and share information without being subject of censure or disciplinary action. However, staff should inform the DSL and/or Head of Academy at the earliest opportunity that they have done so unless in their judgement doing so would increase the risk of harm to the child.

### **33. Submitting child protection referrals**

All child protection referrals should be made to the Warwickshire's Children and Families Front Door (a new integrated front door replacing the Multi Agency Safeguarding Hub MASH as the first point of contact for safeguarding concerns for children and young people) The form can also be completed online.

All urgent child protection referrals, i.e., where there is an immediate concern about a child's safety, should be made in the first instance by telephoning Children and Family Front Door on 01926 414144.

Outside of office hours, immediate concerns about a child should be referred to the Emergency Duty Team on telephone number 01926 886922.

If staff are ever concerned that a child is in immediate danger, they will contact the Police by dialling 999. Stagg may seek support directly from the Education Safeguarding Manager should they consider that necessary.

#### **34. Related safeguarding portfolio policies**

- Staff Behaviour Policy (Code of Conduct)
- Physical intervention and the use of reasonable force
- Behaviour
- Complaints procedure
- Bullying
- Whistleblowing
- SEN
- Safer recruitment
- Staff Grievance
- Disciplinary and managing allegations

#### **35. Special Circumstances**

##### **Children who are looked after**

The most common reason for children becoming looked after is as a result of abuse or neglect. The Positive Impact Academy ensures that staff have the necessary skills and understanding to keep looked after children safe and ensures that appropriate staff have information about a child's looked after status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The designated teacher for looked after children and the DSL hold details of the child's social worker and the name and contact details of the Local Authority's virtual head for children who are looked after.

##### **Work Experience**

The Positive Impact Academy has detailed procedures to safeguard pupils undertaking work experience, including arrangements for checking people who provide placements and supervising pupils on work experience which are in accordance with the guidance in *Keeping Children Safe in Education (2019)*.

Policy Document Child Protection and Safeguarding policy

Updated: J Armson/D Strong

Date: Sep 2022 - to be reviewed Sep 2023.

Signed by Director

A handwritten signature in black ink, appearing to read 'James Armson', written over a horizontal line.

James Armson

## Complaints Policy

All policies will be shared with learners prior to their learning or course with The Positive Impact Academy. This will include the contact details of relevant people.

### Policy for Hearing and Dealing with Concerns and Complaints

This organisation is committed to working in close partnership with all members of the Positive Impact Academy community. The Positive Impact Academy places great value on the role which parents and carers can play in supporting children's learning. Staff and the Director actively encourage a positive relationship between The Positive Impact Academy and the families of children who attend The Positive Impact Academy.

We seek to speedily resolve all concerns and would emphasise that most are resolved through informal discussion with a member of the Senior Leadership Team, who should be contacted in the first instance if parents have any general concerns. Please note that all complaints are confidential and therefore if your complaint relates to a disciplinary issue, we will not reveal any sanctions imposed on other pupils.

However, if there is a continuing concern, this can be directed through the formal stages as outlined in The Positive Impact Academy's complaints procedure, detailed below.

Nothing in this policy applies to complaints which are made from persons other than parents of registered pupils at The Positive Impact Academy.

It is in everyone's interest that concerns are resolved at the earliest possible stage. The experience of the first contact between the parent and the Positive Impact Academy can be crucial in determining whether the concern will escalate to a complaint. To this end all staff and the Director are aware of the procedure to be followed if a concern is raised. Also, whilst not wishing to encourage complaints, parents should note that they have a duty to raise a matter as soon as conveniently possible. It can then be investigated more effectively whilst information is fresh in the minds of all parties.

Where a concern has not been resolved during the initial contact, a parent may request that the complaint is dealt with under The Positive Impact Academy's complaint process. The Positive Impact Academy operates a two-stage process. Stage 1 involves the investigation on behalf of the SLT and stage 2 investigation by the Director. A parent must begin the complaint at the informal stage and any attempt to bypass the procedures will result in the complaint being referred back to the appropriate stage for action.

### Procedure for dealing with complaints

#### **Stage 1: Initial Complaint**

Where a concern has not been resolved directly, the parent may raise an informal complaint with The Positive Impact Academy by contacting the Director. The complaint will be referred to the Director, who will refer it to an appropriate member of the middle leadership team to investigate. Where the complaint concerns the Director, Warwickshire County Council will undertake the role of the Director in arranging an appropriate investigation. The parent will receive a verbal or written response to the concern or complaint raised from the member of staff involved within 15 school days. Where it is not possible to respond fully within that time, the parent will be informed of the reasons why and a new deadline set for providing a full response.

### **Stage 2: Investigation by The Director or Head of Academy**

Where a complaint has not been resolved at stage 1, the parent may write to The Positive Impact Academy requesting a further formal investigation. The parent must put their complaint in writing using Appendix A and send it to the Director marked “strictly private and confidential”. The Director may refer it to another member of senior leadership team to investigate. Where the complaint concerns the Director, Warwickshire County Council will undertake the role of the Director in arranging an appropriate investigation. The parent will receive a verbal or written response to the concern or complaint raised from the member of staff involved within 15 school days. Where it is not possible to respond fully within that time, the parent will be informed of the reasons why and a new deadline set for providing a full response.

### **Vexatious Complaints**

Very rarely, The Positive Impact Academy may take a decision to close a complaint where the parent is still dissatisfied despite the significant level of scrutiny provided by these procedures. We will do all we can to assist in the resolution of a complaint but sometimes it is simply not possible to meet all of the parent’s wishes and it may be a case of “agreeing to disagree”. If a parent persists in making representations to The Positive Impact Academy which are wholly or substantially similar to a complaint which has exhausted the internal procedures or where complaints or representations are made which are false or where the intention is to disrupt the smooth running The Positive Impact Academy (in the reasonable opinion of The Positive Impact Academy, then The Positive Impact Academy reserves the right to take no further action in respect of that complaint.

### **General and Monitoring**

All complaints and correspondence/hearings under the complaints policy are treated as confidential and will only be disclosed when required to do so by law. The Director will keep a record of complaints and review on an annual basis the operation of the complaints policy.

In the event of a complainant believing that The Positive Impact Academy has failed to comply with its own complaints’ procedure or that The Positive Impact Academy’s complaints procedure does not comply with statutory requirements, the complainant may complain to Warwickshire County Council.

Policy Document Complaints Policy  
Updated: J Armson/D Strong  
Date: Sep 2022 - to be reviewed Sep 2023.

Signed by Director

A handwritten signature in black ink, appearing to read "James Armson", written over a horizontal line.

James Armson

**APPENDIX A – Stage 2 Complaints Form for complaint to the Director at The Positive Impact Academy.**

Please note: this form should not be submitted to the Director until Stage 1 of the process has been completed.

Complainants Name	
Pupils Name	
Complainants Relationship to Pupil	
Address of Complainant	
Daytime Telephone Number	
Mobile Number	
Email Address	
Details of your Original Complaint	
Who did you speak to or correspond with during stage 1, when and what was the response?	
Why are you dissatisfied with this response?	
What actions do you feel might resolve the complaint at this stage?	
Are you attaching any paperwork, if so please give details.	
Signed	
Date	

## Curriculum Policy

This policy is a statement of aims and principles relating to the Positive Impact Academy's curriculum and education.

### School Mission Statement

The Positive Impact Academy is here to help people find their limit, give them the knowledge to recognise it and the ability to exceed it.

### The Aims of the Positive Impact Academy

The Positive Impact Academy provides an enriched learning environment that has helped countless students learn, develop, and grow. Our unparalleled curriculum and teaching methods help students take the next step in their education and approach the future with confidence.

With a diverse range of committed and passionate staff, we can build relationships with all students and engage them in all areas of the curriculum. The Positive Impact Academy will help them to set and achieve goals to encourage them down a brighter and a more prosperous path.

The Positive Impact Academy is not built as a short-term provision with a view to reinstate students back into mainstream education. Most of our students will be enrolled with us as their home school and regardless of their academic background, we will help them gain ground and take them further than they thought possible. As part of the provision, The Positive Impact Academy will help develop every student academically, socially, morally, and emotionally to give them the best possible start to training or employment.

- Excellence: Striving always for success.
- Integrity: Consistently acting with honesty, compassion, and respect.
- Empathy: Embracing and supporting the uniqueness of every individual.
- Creativity: Inspiring and challenging through invention.
- Equality: Ensuring fair opportunity for all.
- Safety: Providing a safe and nurturing environment.

### The Curriculum

The Positive Impact Academy's curriculum is the way in which we are going to develop a broad band of knowledge that exposes young people to different ways of looking at the world. We aim to tailor education to individual needs, interest, and aptitude to fulfil every student's potential. Every young person will have access to a rich, broad, balanced and differentiated curriculum. We will use diverse teaching strategies to develop the talents of each student and education mentors will use the flexibilities that already exist to ally high standards in the basics with opportunities for enrichment and creativity.

### Common Values and Purpose

The curriculum, whilst paying due regard to achieving high standards in English and Mathematics, is broad, exciting, and challenging.

The curriculum embraces the five outcomes set out in Every Child Matters – Stay Safe, Be Healthy, Enjoy and Achieve, Achieve Economic Well-Being and Make a Positive Contribution.

The curriculum is used to increase children's knowledge for example, key concepts in Mathematics and English. Also, the ability to use the acquired knowledge, understanding as they grow and develop and become more aware of the world around them and fostering positive attitudes both in and out of the Positive Impact Academy.

The curriculum will be carefully planned and structured to ensure that learning is continuous, and that the students make good progress with the development of their learning, we ensure that the knowledge and skills gained are used across the whole curriculum and not simply in isolation and that meaningful links are made between subjects in our termly themes.

The curriculum will engage the young person's interest, encourage, and motivate them to want to learn. It will be exciting and offer young people first-hand experience to reinforce their learning and to underpin their growing knowledge, skills, understanding and attitudes. It will open their eyes to the wider world and educate them in acceptable behaviours and community cohesion.

### **Equal Opportunities**

All young people, regardless of gender, race or disability are given full access to our curriculum. We have a policy of equal opportunities.

### **Broad Guidelines**

The Positive Impact Academy delivers NCFE Functional Skill qualifications in English, Mathematics, and ICT, as well as a broad range of BTECs.

Our curriculum covers Entry Level 1, Entry Level 2, Entry Level 3, Level 1, and Level 2. There are mid-term plans and schemes of work highlighting the topics to be covered at each level.

Core subjects delivered at every level are:

- English
- Mathematics
- PSHE
- ICT
- Science
- Humanities
- SMSC

### **Reporting on Attainment**

All work carried out by the students is monitored and evaluated. A written report is made available to parents annually in the summer term. Parents will be invited to Education Consultation meetings in the autumn and spring terms to also discuss termly reviews. The governors and parents/carers receive regular reports on the children's attainment.

### **Target Setting**

All the Positive Impact Academy's students are set next step learning targets through education mentors marking, reviews and feedback and our use of assessment for learning. Curricular and personal targets are also set termly and agreed upon with students, education mentors and parents/carers.

## **Roles and Responsibilities**

The Head of Academy takes overall responsibility for the curriculum. Curriculum Leaders monitor their subject to ensure that it is implemented consistently and effectively in line with the agreed policies. Consultation relating to the curriculum is facilitated from parents and carers through questionnaires, from children through pupil voice and from staff and governors at their regular meetings.

## **Inclusion - provision for all children**

Education mentors plan to meet the needs of all children by ensuring learning is focused on the individual's needs and abilities. Outcomes from assessment for learning enable education mentors to set targets which reflect individual students' skills, abilities, and potential. Education Mentors are also supported by our SENDCo, who produces individual SEND profiles for learners based upon their EHCPs. The SENDCo meets regularly with each Education Mentor to discuss learner assessments and build a plan of action according to agreed specific outcomes. These meetings occur termly to ensure targets and provision is being reviewed according to the learners' needs. These targets are across academic and personal areas such as personal hygiene, communication, and interaction, preparing for adulthood and mental health/wellbeing.

## **Relationship Education**

Relationships Education forms part of the science and PSHE curriculum and is taught using the Association for PSHE guidelines.

## **Spiritual, Moral, Social and Cultural Opportunities**

The Positive Impact Academy has a set curriculum to deliver SMSC. The curriculum is structured to enable the development of social skills and independence whilst looking at the wider world and how each young person can contribute to society. Part of the curriculum will focus on British Values and PREVENT.

## **Self Esteem and Self Worth**

Talents and achievements of individual young people are celebrated within The Positive Impact Academy and communicated via social media, in reviews and feedback. The PSHE curriculum aims to build each young person's self-esteem and confidence with intensive work.

The Positive Impact Academy's SENDCo also supports Education Mentors with incorporating specific behaviour interventions around SEMH needs – this enables all young people to seek advice, guidance, and support on The Positive Impact Academy site.

Students' work and achievement within the curriculum will be celebrated and displayed to enable it to make a significant impact on the visual appearance of the Positive Impact Academy and to contribute to the values and ethos.

## **Extra-curricular activities**

The Positive Impact Academy offers a wide range of extra-curricular activities which are used as both educational and as a reward for outstanding effort and behaviour.

- Cooking – Health Eating Programme
- BTECs

- Baking
- Road Safety
- Work Experience
- Health and Exercise Programme
- Sports Leaders
- Sports – Physical Education
- Laser Quest
- Bowling
- Mini Golf

Policy Document Curriculum Policy  
Updated: J Armson/D Strong  
Date: Sep 2022 - to be reviewed Sep 2023.

Signed by Director

A handwritten signature in black ink, appearing to be "James Armson", written over a horizontal line.

James Armson

## **E-Safety Policy**

The e-Safety Policy relates to other policies including those for Data Protection, Bullying and for Child Protection.

- The Positive Impact Academy has an e-Safety coordinator, David Strong, who is also our Head of Academy and Senior Designated Safeguarding Lead – [David.strong@positive-impactuk.com](mailto:David.strong@positive-impactuk.com)
- Our e-Safety Policy has been written by The Positive Impact Academy, building on LA e-Safety Policy and government guidance. It has been agreed by senior management and approved by partners.
- The e-Safety Policy and its implementation will be reviewed annually.

### **Teaching and learning**

#### **Why Internet use is important**

- The Internet is an essential element in 21st century life for education, business, and social interaction. The Positive Impact Academy has a duty to provide students with quality Internet access as part of their learning experience.
- Internet use is a part of the statutory curriculum and a necessary tool for staff and pupils.

#### **Internet use will enhance learning**

- The Positive Impact Academy Internet access will be designed expressly for pupil use and will include filtering appropriate to the age of pupils.
- Pupils will be taught what Internet use is acceptable and what is not and given clear objectives for Internet use.
- Pupils will be educated in the effective use of the Internet in research, including the skills of knowledge location, retrieval, and evaluation.

#### **Pupils will be taught how to evaluate Internet content**

- The Positive Impact Academy will endeavour to ensure that the use of Internet derived materials by staff and by pupils complies with copyright law.
- Pupils will be taught to be critically aware of the materials they read and shown how to validate information before accepting its accuracy.

### **Managing Internet Access**

#### **Information system security**

- The Positive Impact Academy ICT systems capacity and security will be reviewed regularly.
- Virus protection will be installed and updated regularly.
- Security strategies will be discussed with the Local Authority.

#### **E-mail**

- Pupils may only use approved e-mail accounts on The Positive Impact Academy system.
- Pupils must immediately tell a tutor if they receive an offensive e-mail.

- Pupils must not reveal personal details of themselves or others in e-mail communication or arrange to meet anyone without specific permission.
- E-mail sent to an external organisation should be written carefully and authorised before sending, in the same way as a letter written on The Positive Impact Academy headed paper.

### **Published content and The Positive Impact Academy website**

- The contact details on the Website should be The Positive Impact Academy address, e-mail, and telephone number. Staff or pupils' personal information will not be published.
- The work contact details of all staff members will be detailed on The Positive Impact Academy website, including work e-mail and work mobile number.
- The Director's nominee takes an overall editorial responsibility and ensures that content is accurate and appropriate.

### **Publishing pupil's images and work**

- Pupils' full names will not be used anywhere on the Website or Blog, particularly in association with photographs.
- Written permission from parents or carers will be obtained before photographs of pupils are published on The Positive Impact Academy Website.
- Work can only be published with the permission of the pupil and parents.

### **Social networking and personal publishing**

- The Positive Impact Academy will block/filter access to social networking sites.
- Newsgroups will be blocked unless a specific use is approved.
- Pupils will be advised never to give out personal details of any kind which may identify them or their location.
- Pupils must not place personal photos on any social network space using The Positive Impact Academy's IT facilities.
- Pupils should be advised on security and encouraged to set passwords, deny access to unknown individuals and how to block unwanted communications. Pupils should be encouraged to invite known friends only and deny access to others.

### **Managing filtering**

- The Positive Impact Academy will work in partnership with the LA, DFE and the Internet Service Provider to ensure systems to protect pupils are reviewed and improved.
- If staff or pupils discover an unsuitable site, it must be reported to the e-Safety Coordinator or the Director.
- Senior staff will ensure that regular checks are made to ensure that the filtering methods selected are appropriate, effective, and reasonable.

### **Managing video conferencing**

- IP video conferencing should use the educational broadband network to ensure quality of service and security rather than the Internet.
- Pupils should ask permission from the supervising tutor before making or answering a video conference call.
- Video conferencing will be appropriately supervised for the pupils' age.

### **Managing emerging technologies**

- Emerging technologies will be examined for educational benefit and a risk assessment will be carried out before use at The Positive Impact Academy is allowed.
- Mobile phones will not be used during lessons. The sending of abusive or inappropriate text messages is forbidden.

### **Protecting personal data**

- Personal data will be recorded, processed, transferred, and made available according to the Data Protection Act 1998.

### **Policy Decisions**

#### **Authorising Internet access**

- All staff and students must read and sign the appropriate “Acceptable Use Policy” before using any The Positive Impact Academy ICT resource including internet access.
- The Positive Impact Academy will maintain a current record of all staff and pupils who are granted access to The Positive Impact Academy ICT systems.
- Parents will be asked to sign and return a consent form.

#### **Assessing risks**

- The Positive Impact Academy will take all reasonable precautions to prevent access to inappropriate material. However, due to the international scale and linked Internet content, it is not possible to guarantee that unsuitable material will never appear on a The Positive Impact Academy computer. Neither The Positive Impact Academy nor Warwickshire County Council can accept liability for the material accessed, or any consequences of Internet access.
- The Positive Impact Academy will audit ICT use to establish if the e-safety policy is adequate and that the implementation of the e-safety policy is appropriate.

#### **Handling e-safety complaints**

- Complaints of Internet misuse will be dealt with by a senior member of staff.
- Any complaint about staff misuse must be referred to the Director.
- Complaints of a child protection nature will be dealt with in accordance with The Positive Impact Academy child protection procedures.

#### **Community use of the Internet**

- The Positive Impact Academy will liaise with local organisations where it is appropriate to establish a common approach to e-safety.

### **Communications Policy**

#### **Introducing the e-safety policy to pupils**

- E-safety rules will be posted in all networked rooms.

- Pupils will be informed that network and Internet use will be monitored.

### **Staff and the e-Safety policy**

- All staff will be given The Positive Impact Academy e-Safety Policy and its importance explained.
- Staff should be aware that Internet traffic can be monitored and traced to the individual user. Discretion and professional conduct is essential.
- Staff that manage filtering systems or monitor ICT use will be supervised by senior management and have clear procedures for reporting issues.

### **Enlisting parents' support**

- Parents' attention will, from time to time, be drawn to The Positive Impact Academy e-Safety Policy in newsletters, The Positive Impact Academy brochure, meetings and on The Positive Impact Academy Website.

Policy Document e-Safety Policy  
Updated: J Armson/D Strong  
Date: Sep 2022 - to be reviewed Sep 2023.

Signed by Director

A handwritten signature in black ink, appearing to read "James Armson", written over a horizontal line.

James Armson

## Equality & Diversity Policy

All policies will be shared with learners prior to the beginning of their learning or course with The Positive Impact Academy. This will include the contact details of relevant people.

### EQUALITY STATEMENT

#### Legal Duties

At the Positive Impact Academy, we welcome our duties under the Equality Act 2010. The general duties are to:

- eliminate discrimination.
- advance equality of opportunity.
- foster good relations.

We understand the principle of the Act and the work needed to ensure that those with protected characteristics are not discriminated against and are given equality of opportunity. A protected characteristic under the act covers the groups listed below:

- age (for employees not for service provision).
- disability.
- ethnicity.
- gender.
- gender reassignment.
- maternity and pregnancy.
- religion and belief, and
- sexual identity.
- Marriage and Civil Partnership (for employees).

#### Recruitment

We follow the above principles when recruiting staff at the organisation. We do not discriminate to the above groups. We offer a fair and inclusive interview process. Our interview process includes a scoring system to ensure that all candidates are graded on the exact same scale and to the same criteria.

To meet our general duties, listed above, the law requires us to do some specific duties to demonstrate how we meet the general duties. These are to:

- Publish equality information – to demonstrate compliance with the general duty across its functions – this will be updated each academic year (We will not publish any information that can specifically identify any individual child or adult).
- Prepare and publish equality objectives – updated at least every 4 years.

To do this we will collect data related to the protected characteristics above and analyse this data to determine our focus for our equality objectives. The data will be assessed across our core provisions as a school. This will include the following functions:

- Admissions
- Attendance
- Attainment
- Exclusions/behaviour management
- Prejudice related incidents

Our objectives will detail how we will ensure equality is applied to the at The Positive Impact Academy however where we find evidence that other functions have a significant impact on any particular group, we will include work in this area.

We also welcome our duty under the Education and Inspections Act 2006 to promote community cohesion.

We recognise that these duties reflect international human rights standards as expressed in the UN Convention on the Rights of the Child, the UN Convention on the Rights of People with Disabilities, and the Human Rights Act 1998.

### Core Statements:

In fulfilling our legal obligations, we will be guided by seven core statements:

- Statement 1: All learners are of equal value.
- Statement 2: We recognise, welcome and respect diversity.
- Statement 3: We foster positive attitudes and relationships, and a shared sense of belonging.
- Statement 4: We observe good equalities practice, including staff recruitment, retention and development.
- Statement 5: We aim to reduce and remove existing inequalities and barriers.
- Statement 6: We consult and involve widely.
- Statement 7: We strive to ensure that society will benefit.

### Addressing Prejudice Related Incidents

The Positive Impact Academy is opposed to all forms of prejudice, and we recognise that children and young people who experience any form of prejudice related discrimination may fare less well in the education system. We provide both our pupils and staff with an awareness of the impact of prejudice to prevent any incidents. If incidents still occur, we will address them immediately. We will continue with our existing practice that all incidents of prejudice related discrimination will be reported to the Head of Academy.

### Responsibility

We believe that promoting Equality is the responsibility of everyone in the school community:

Role	Responsibility
Director	Promoting key messages to staff, parents, and pupils about equality and what is expected of them and what is expected of The Positive Impact Academy in carrying out its day-to-day duties. Ensuring all The Positive Impact Academy community receives adequate training to meet the need of delivering equality, including pupil awareness. Ensure that all staff are aware of their responsibility to record and report prejudice related incidents.
Senior Leadership Team (Head of Academy, SENDCo, Education Welfare Officers and Senior Education Mentor)	To support the Director as above. Ensure fair treatment and access to services and opportunities. Ensure that all staff are aware of their responsibility to record and report prejudice related incidents.
Education Mentors	Help in delivering the right outcomes for pupils. Uphold the commitment to pupils, parents/carers on how they can be expected to be treated. To design and deliver an inclusive curriculum to all students at The Positive Impact Academy. Ensure that you aware of their responsibility to record and report prejudice related incidents.

Parents	Take an active role in identifying barriers to education at The Positive Impact Academy and to inform the Director in order to eradicate these. Take an active role in supporting and challenging The Positive Impact Academy to achieve the commitment given by The Positive Impact Academy in tackling inequality and achieving equality for all.
Pupils	Support The Positive Impact Academy to achieve the commitment given by The Positive Impact Academy in tackling inequality and achieving equality for all. Uphold the commitment made by the Director on how pupils and parents/carers, staff and the wider community can be expected to be treated.
Local Community	Take an active role in identifying barriers to education at The Positive Impact Academy and to inform the Director in order to eradicate these. Take an active role in supporting and challenging The Positive Impact Academy to achieve the commitment given by The Positive Impact Academy in tackling inequality and achieving equality for all.

Policy Document Equality & Diversity Policy  
 Updated: J Armson/D Strong  
 Date: Sep 2022 - to be reviewed Sep 2023.

Signed by Director



James Armson

## Examinations Policy

The purpose of this exam policy is:

- To ensure the planning and management of exams is conducted efficiently and in the best interest of candidates.
- To ensure the operation of an efficient exam system with clear guidelines for all relevant staff.

It is the responsibility of everyone involved in the centre's exam processes to read, understand, and implement this policy.

### 1. Exam responsibilities

#### 1.1 Head of Academy

Overall responsibility for The Positive Impact Academy as an exam centre:

- Advises on appeals and re-marks.
- The Head of Academy is responsible for reporting all suspicions or actual incidents of malpractice.

Manages the administration of public and some internal exams and the analysis of exam results:

- Advises all staff on annual exam timetables and application procedures as set by the various Awarding Bodies.
- Oversees the production of an annual calendar for all exams in which candidates will be involved and communicates regularly with staff concerning imminent deadlines and events.
- Ensures that candidates and their parents are informed of and understand those aspects of the exam timetable that will affect them.
- Consults with staff to ensure that necessary coursework and controlled assessment is completed on time.
- Provides and confirms detailed data on estimated entries.
- Receives, checks and stores securely all exam papers and completed scripts.
- Administers access arrangements and makes applications for special consideration in conjunction with the SENDCo.
- Identifies and manages exam timetable clashes.
- Accounts for income and expenditures relating to all exam costs/charges.
- Organises the recruitment, training, and monitoring of a team of exams invigilators responsible for the conduct of exams.
- Prepares and presents reports to the SLT showing results achieved in relation to expected grades and comparable data for previous years, indicating where future procedural improvements might be made.
- Arranges for dissemination of exam results and certificates to candidates and forwards, in consultation with the SLT, any appeals/re-mark requests.
- Maintains systems and processes to support the timely entry of candidates for their exams.
- Organises the dispatch of exam scripts, coursework, and controlled assessment.

#### 1.2 All Staff

The subject leaders are responsible for:

- Early notification to the Head of Academy of any intended changes of Awarding Body or curriculum.

- Advising the Head of Academy of the correct entry codes for the subjects to be taken.
- Management of any coursework or controlled assessment.
- Guidance and pastoral oversight of candidates who are unsure about exam entries or amendments to entries.
- Accurate completion of entry and all other mark sheets and adherence to deadlines as set by the Head of Academy
- Accurate completion of coursework and controlled assessment mark sheets and declaration sheets.
- Liaison with Head of Academy for practical exams, orals, controlled assessments, coursework under timed conditions, external assessment visits and any other tests, as required.
- Subject advice in post-results procedures.
- Oversight of any coursework or controlled assessment.
- Submission of candidate names, estimated grades, coursework and controlled assessment marks and other exam information to Head of Academy.
- Assistance in identifying appropriate access arrangements.

### **1.3 SENDCo**

- Identification and testing of candidates' requirements for access arrangements, and liaison with Head of Academy to achieve this.
- Provision of additional support to Education Mentors and advise upon learners' provision, to help candidates achieve their course aims.

### **1.4 Lead invigilator/invigilators**

- Collecting of exam papers and other material from the office before the start of the exam, including signing to confirm that papers were unopened on receipt.
- Setting up the Exam room for the session with candidate cards in accordance with the seating plan.
- Efficient and appropriate control of the exam room and candidates during the exam.
- Collection of all exam papers in the correct order at the end of the exam and their return to the office.

### **1.5 Candidates**

- Reading the Exams Booklet and signing a declaration to that effect.
- Checking any Individual Exam timetable given to them and advising the Head of Academy, as soon as practically possible, of any errors, clashes or other concerns.
- Understanding coursework and controlled assessment regulations and reading and signing a declaration that authenticates the coursework/controlled assessment as their own.

## **2. The statutory tests and qualifications offered**

The statutory tests and qualifications offered at this centre are decided by the senior leadership team. The statutory tests and qualifications offered are:

- NCFE\_Functional Skills Qualification in English at Entry Level 1
- NCFE\_Functional Skills Qualification in English at Entry Level 2
- NCFE\_Functional Skills Qualification in English at Entry Level 3
- NCFE\_Functional Skills Qualification in English at Level 1
- NCFE\_Functional Skills Qualification in English at Level 2
- NCFE\_Functional Skills Qualification in Information and Communication Technology (ICT) at Entry Level 1
- NCFE\_Functional Skills Qualification in Information and Communication Technology (ICT) at Entry Level 2

- NCFE\_Functional Skills Qualification in Information and Communication Technology (ICT) at Entry Level 3
- NCFE\_Functional Skills Qualification in Information and Communication Technology (ICT) at Level 1
- NCFE\_Functional Skills Qualification in Information and Communication Technology (ICT) at Level 2
- NCFE\_Functional Skills Qualification in Mathematics at Entry Level 1
- NCFE\_Functional Skills Qualification in Mathematics at Entry Level 2
- NCFE\_Functional Skills Qualification in Mathematics at Entry Level 3
- NCFE\_Functional Skills Qualification in Mathematics at Level 1
- NCFE\_Functional Skills Qualification in Mathematics at Level 2
- Sports Leaders UK – Young Leader Award
- Various ASDAN Qualifications
- Various NCFE BTECs

The subjects offered for these qualifications in any academic year may be found on The Positive Impact Academy website.

### **3. Exam seasons and timetables**

The Head of Academy will circulate the exam timetables for both external and internal exams once these are confirmed. These will also be made available on The Positive Impact Academy website.

### **4. Entries, entry details, late entries and re-sits**

#### **4.1 Entries**

Candidates are selected for their exam entries by their tutor. A candidate or parent/carer can request a subject entry, change of level or withdrawal but this will be at the discretion of the Director. The centre may accept entries from external candidates.

#### **4.2 Re-sits**

Candidates are allowed to re-sit. In general, candidates who are at The Positive Impact Academy will be allowed to re-sit in any exam, subject to availability. Resit decisions will be made in consultation with the Head of Academy.

### **5. Exam fees**

Initial exam fees are paid by the centre. Candidates or departments will not be charged for changes of tier, withdrawals made by the proper procedures or alterations arising from administrative processes, provided these are made within the time allowed by the awarding bodies. Re-sit fees for first and any subsequent re-sits are paid by the centre. The re-sit fee will be set to cover the Awarding Body's charges and the extra invigilation and administration costs incurred. Students re-taking an entire course will have their exam fees paid by The Positive Impact Academy. Candidates must pay the fee for an enquiry about a result, should the centre not instigate the enquiry and the candidate insist on pursuing the enquiry.

### **6. The Equality Act (2010) special needs and access arrangements**

#### **6.1 Equality Act (2010)**

The Equality Act (2010) extends the application of the DDA to general qualifications. All exam centre staff must ensure that the access arrangements and special consideration regulations and guidance are consistent with the law.

## **6.2 Special Educational Needs**

A candidate's special educational needs requirements are determined by the SENDCO in consultation with relevant professionals. The SENDCO will inform staff of candidates with special educational needs who are embarking on a course leading to an exam. The SENDCO can then inform individual staff of any special arrangements that individual candidates may be granted during the course and in the exam.

## **6.3 Access arrangements**

Making special arrangements for candidates to take exams is the responsibility of the Head of Academy, in consultation with the SENDCO. Submitting completed access arrangement applications to the awarding bodies is the responsibility of the Head of Academy. Rooming for access arrangement candidates will be arranged by the Head of Academy in consultation with the SENDCO. Invigilation and support for access arrangement candidates will be organised by the Head of Academy in consultation with the SENDCO.

## **7. Estimated grades**

All staff will submit estimated grades to the Head of Academy when requested.

## **8. Managing invigilators and exam days**

### **8.1 Managing invigilators**

Invigilators will be used for exam supervision of external exams. The recruitment of invigilators is the responsibility of the Head of Academy. Securing the necessary Disclosure and Barring Service (DBS) clearance for new invigilators is the responsibility of the Director with the assistance of the Head of academy. DBS fees for securing such clearance are paid by the centre.

Invigilators are timetabled and briefed by the Head of Academy. Invigilators' rates of pay are set by the Director.

### **8.2 Exam days**

The Head of Academy will book all exam rooms after liaison with other users and make the question papers, other exam stationery and materials available for the invigilator(s). The lead invigilator will start all exams. Staff may be present at the start of the exam only if authorised by the Director and must not advise on which questions are to be attempted. In practical exams, staff may be on hand in case of any technical difficulties. Exam papers must not be read by staff or removed from the exam room before the end of a session. Papers will be distributed to Head of Academy after the last candidate at the centre has completed his/her exam.

## **9. Candidates, clash candidates and special consideration**

### **9.1 Candidates**

The centre's published rules on acceptable dress, behaviour and candidates' use of mobile phones and all electronic devices always apply. Candidates' personal belongings remain their own responsibility and the centre accepts no liability for their loss or damage. Candidates may leave the exam room for a genuine purpose requiring an immediate return to the exam room, in which case a member of staff must accompany them. The Head of Academy will attempt to contact any candidate who is not present at the start of an exam.

### **9.2 Clash candidates**

The Head of Academy will be responsible as necessary for identifying escorts, identifying a secure venue.

### **9.3 Special consideration**

Should a candidate be too ill to sit an exam, suffer bereavement or other trauma or be taken ill during the exam itself, it is the candidate's responsibility to alert the centre, or the Head of Academy, to that effect. Any special consideration claim must be supported by appropriate evidence within five days of the exam, for example a letter from the candidate's doctor. The Head of Academy will then submit a completed special consideration application to the relevant awarding body within seven days of the exam.

## **10. Coursework, controlled assessment and appeals against internal assessments**

### **10.1 Coursework and controlled assessment**

Candidates who must prepare portfolios should do so by the end of the course or centre-defined date. Heads of department will ensure all coursework and controlled assessment is ready for despatch at the correct time and the exams officer will keep a record of what has been sent when and to whom. Marks for all internally assessed work are provided to the exam's office by the heads of subject.

### **10.2 Appeals against internal assessments**

The centre is obliged to review all appeals against assessment decisions, parents and/or students are required to complete an appeals form, appendix A. This will need to be submitted to the *examination's office* within 14 days of the assessment decision.

## **11. Results, enquiries about results (EARs) and access to scripts (ATS)**

### **11.1 Results**

Candidates will receive individual results slips in person at the centre/by post to their home addresses.

### **11.2 Enquiries About Results (EARs)**

EARs may be requested by centre staff or candidates if there are reasonable grounds for believing there has been an error in marking. When the centre does not uphold an EAR, a candidate may apply to have an enquiry carried out.

### **11.3 Access to Scripts**

After the release of results, candidates may ask the Head of Academy to request the return of exam papers as soon as possible after receiving the results.

If a result is queried, the Head of Academy or other staff will investigate the feasibility of asking for a re-mark. Centre staff may also request scripts for investigation or for teaching purposes. For the latter, the consent of candidates must be obtained.

## **12. Certificates**

Certificates are collected and signed for. They may be collected on behalf of a candidate by a third party, provided they have been authorised to do so. The centre retains unclaimed certificates indefinitely.

Policy Document Examinations Policy  
Updated: J Armson/D Strong  
Date: Sep 2022 - to be reviewed Sep 2023.

Signed by Director

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James Armson

## APPENDIX A – Assessment appeals form.

### 1. STUDENT DETAILS

SURNAME	
FIRST NAME	
SCHOOL OF STUDY	
QUALIFICATION	
TEL NO.	
EMAIL	

### 2. GROUNDS OF APPEAL

a) There is existed circumstances affecting the student's performance of which the examiners were not aware when their decision was taken; <u>and which could not reasonably have been presented to the examiners:</u>	
b) There was a procedural irregularity or other inadequacy in the conduct of the examinations, or processing of marks or grades, or the categorisation of an award <u>of such a nature as to cause doubt as to whether the result might have been different had there not been such an irregularity:</u>	
c) There exists <u>evidence</u> of prejudice or of a bias on the part of an examiner	

### 3. BRIEF SUMMARY OF BASIS FOR APPEAL

Please provide a brief summary of your intended basis for appeal (maximum 200 words).

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## First Aid Policy

### Policy Statement

This Policy has been produced in accordance with The Positive Impact Academy's Health and Safety Policy to ensure that all health and safety issues relating to the provision of First Aid at work are adequately managed.

The Positive Impact Academy is committed to protecting the health, safety, welfare and wellbeing of its employees and others who may be affected. It is essential therefore that everyone who works for or undertakes work on behalf of The Positive Impact Academy adheres to the requirements of this Policy.

The information, guidance and instruction within this Policy provides the basis for the identification and implementation of first aid provision within The Positive Impact Academy. Although the Health and Safety (First Aid) Regulations do not require employers to provide first aid for anyone other than employees, it is The Positive Impact Academy's Policy to consider non-employees on our premises, in the assessment of first aid needs and make provision for them.

The application of this Policy will ensure that, so far as is reasonably practicable, The Positive Impact Academy meets all relevant statutory requirements regarding the general provision of first aid and duty of care.

### 1 Definitions

The following specifies the key terms used within this Policy.

**First aid at work** – is the application of treatment for the purpose of preserving life and minimising the consequences of injury and illness, until medical help/treatment is obtained, where necessary.

People at work can suffer injuries or be taken ill. It doesn't matter whether the injury or illness is caused by the work they do or not, it is important to give them immediate attention and call an ambulance in serious cases. First aid at work covers the arrangements we need to make to ensure this happens. It can save lives and prevent minor injuries becoming major ones.

It is important to remember that accidents and illness can happen at any time. First-aid provision needs to be always available people are at work.

It does not include giving tablets or medicines to treat illness as stated in The Positive Impact Academy's Medical Policy.

**First Aid Needs Assessment** – is an assessment undertaken by managers to identify what first aid provision is required. It must be identified by an assessment because the provision is dependent on the circumstances within that workplace/ premise and the activities undertaken.

**Emergency First Aider** – A person holding a valid certificate in 'Emergency First Aid at Work' (EFAW) issued by an organisation whose training and qualifications are approved by the Health and Safety Executive (HSE). A certificate will be issued with details of level of competence and be valid for 3 years. Subject to risk assessment, in low level risk environments or where service delivery needs may be better supported, this will involve

attendance on a 1-day (6 hours) Emergency First Aid at Work training course, which includes ongoing assessment throughout the day, but no practical assessment.

**First Aider** - A person holding a valid certificate in 'First Aid at Work' (FAW) issued by an organisation whose training and qualifications are approved by the Health and Safety Executive (HSE). This will involve attendance on a 3-day (18 hours) training course which includes a practical assessment. A certificate will be issued with details of level of competence and be valid for 3 years. A 2-day (12 hour) requalification course, including a practical assessment, must be taken before the certificate expiry date to demonstrate continuing competence.

The FAW training includes EFAW and also equips the first aider to apply first aid to a range of specific injuries and illness.

## **2 Roles and Responsibilities**

The following specific roles and responsibilities apply to this Policy and are in addition to the general roles and responsibilities placed on all managers and employees within The Positive Impact Academy's Health and Safety Policy.

### **2.1 Managers, Directors and Line Managers must ensure that:**

A first aid needs assessment is undertaken to ensure that first aid arrangements are adequate and appropriate in the circumstances. This means that enough suitably trained staff are available to:

- Give immediate help to casualties with injuries or illness that may occur at work; and call an ambulance or for other professional help.
- Sufficient suitable persons are available to provide first aid cover in accordance with the requirements of this policy and specific risk assessments made within individual departments.
- First aiders and Emergency First Aiders receive appropriate training to carry out their duties.
- First Aiders re-qualify before the expiry date of their Certificate, when still required to carry out this function.
- Inform employees about the first aid arrangements for their place of work on day one as part of their induction (this will include the location of equipment and personnel).
- Display at least one first aid notice, in a prominent place, to inform employees and visitors of the first aid arrangements.
- As part of the annual health and safety workplace inspection, ensure that the first aid box is being checked regularly by first aiders and it contains the required content.
- First-aid rooms are only provided when the first aid needs assessment determines one necessary. For The Positive Impact Academy, there must be a suitable room that can be used for medical treatment when required.

#### **2.1.1 The Head of Academy must:**

In addition to section 4.1, consider the first aid needs assessment as a building requirement rather than on an individual team basis for large, shared office buildings. This is to ensure adequate and proportionate cover for first aid across that building.

Ensure there are adequate First Aid Notices indicating the names and location of First Aiders and/or Emergency First Aiders and First Aid boxes, around the premises, in a prominent place.

Agree common first aid arrangements where a workplace is shared with other organisations.

Ensure that contractors and others working temporarily on the premises are familiar with the first aid arrangements as part of the signing procedure.

## **2.2 First Aider must:**

Attend 3-day HSE approved First Aid at Work training (FAW) and 2-day requalification training prior to the 3-year expiry date. In accordance with the training, treat any minor injuries, preserve life in an emergency and prevent an injury from becoming worse. Call the emergency services to summon an ambulance or other professional help when necessary.

Be responsible for the restock of first aid boxes. Ensure that a record of first-aid treatment is recorded of treatment given for injuries and ill health that are because of a workplace accident/incident.

Only provide first aid in accordance with the training received.

## **2.3 Emergency First Aiders must:**

Attend the 1-day HSE Emergency First Aid at Work (EFAW) training that is delivered by a HSE approved training provider. Undertake an annual refresher where an assessment deems this necessary. Take charge of the first-aid arrangements. Ensure that those responsible restocking first aid boxes are informed when supplies are required. Call the emergency services to summon an ambulance or other professional help when necessary. Provide emergency first aid in accordance with the training received. Only provide emergency first aid in accordance with the training received.

## **2.4 Employees will:**

Make themselves aware of the first aid provision within The Positive Impact Academy (First Aider/Emergency First Aider, and how to contact them). Seek first aid in accordance with their local arrangements if first aid is required and not provide first aid treatment at work unless trained to do so.

## **2.5 Health and Safety Staff will:**

Advise the Senior Leadership Team on their first aid needs assessment in conjunction with this Policy.

# **3 Organisation and Arrangements**

## **3.1 First Aid Needs Assessment**

The first aid needs assessment depends on the circumstances of each workplace, premise or work activity. The designated member of the Senior Leadership Team and Managers must assess first aid needs on an annual basis. This assessment need will be reviewed by the Warwickshire County Council through a Health and Safety inspection on a three yearly basis.

### **3.1.1 First aid needs assessment record sheet**

The First aid needs assessment record sheet must be used in conjunction with individual departments risk assessments to ascertain the basic first aid provision requirement across The Positive Impact Academy, and then identify other considerations which may require that basic provision to be increased or provided in an alternative way.

### **3.2 Training and competency**

The training required by the trained personnel is an integral part of The Positive Impact Academy's CPD programme, with all courses being certified in accordance with HSE guidance.

#### **3.2.1 Refresher training**

Nationally annual refresher training is not mandatory for FAW/EFAW certified first aiders. An opportunity is provided for those holding the certificates to retake the course as and when appropriate.

### **3.3 First aid equipment**

#### **3.3.1 First aid box**

The minimum level of first aid equipment is a suitably stocked in a properly identified first aid box. Each work site should provide at least one first-aid box supplied with enough first aid materials suitable for the circumstances. All first-aid boxes must be checked regularly and restocked as soon as possible after use. This is the responsibility of the First Aider or Emergency First Aider. Depending on the findings of the first aid needs assessment, more than one box may be required on large sites, and the size of the box may differ. The boxes should be easily accessible and preferably placed near to hand washing facilities. The boxes should be identified by a white cross on a green background.

The first aid stock is determined by the findings of the first aid needs assessment in conjunction with subject risk assessments. However, as a minimum (for low hazard work activities) the following stock should be included in a standard first aid box:

- 20 individually wrapped sterile plasters (assorted sizes), appropriate to the type of work (for example, food handlers will need ones that can be easily seen; and hypoallergenic plasters can be provided, if necessary).
- 2 sterile eye pads.
- 4 individually wrapped triangular bandages, preferably sterile.
- 6 safety pins.
- Mouth guard.
- 2 large sterile individually wrapped unmedicated wound dressings.
- 6 medium-sized individually wrapped unmedicated wound dressings; and a pair of disposable (non-latex) gloves.

A travelling first aid box will include:

- a leaflet giving general guidance on first aid (for example, 'Basic Advice on First Aid at Work' from the HSE).
- 6 individually wrapped sterile plasters (hypoallergenic plasters can be provided, if necessary).
- 2 triangular bandages.
- 2 safety pins.
- Mouth guard.
- 1 large sterile unmedicated dressings.

- Individually wrapped moist cleansing wipes; and
- A pair of disposable (non-latex) gloves.

### **3.3.2 Tablets and medication**

First aid at work does not include giving tablets or medicines to treat illness. The only exception to this is where aspirin is used when giving first aid to a casualty with a suspected heart attack in accordance with current medical advice and currently accepted first aid practice. Refer to the Medical Policy for guidance on the administration of medication in The Positive Impact Academy.

### **3.3.3 Automated external defibrillators (AED)**

There is no specific legal requirement for employers to provide AEDs in the workplace.

### **3.3.4 First aid room**

First aid rooms are generally not required unless the workplace in question is a high-risk environment. However, Education (School Premises) Regulations 1996 require The Positive Impact Academy to have a suitable room that can be used for medical treatment when required, and for the care of the pupils during school hours. The area, which must contain a washbasin and be reasonably near to a WC, need not be used solely for medical purposes, but should be appropriate for that purpose and readily available for use when needed. The Positive Impact Academy should consider using this room for first aid.

## **4 The Positive Impact Academy procedures**

In the event of an accident resulting in injury:

- The closest member of staff present will seek the assistance of a qualified first aider. The student will either be moved to the medical room, if appropriate, or remain where they are to be assessed.
- The first aider will assess the injury and decide if further assistance is needed from a colleague or the emergency services. They will remain on scene until help arrives. If the first aider judges that a pupil is too unwell to remain in The Positive Impact Academy, parents will be contacted and asked to collect their child. If emergency services are called, a member of staff will contact parents immediately. In principle a member of staff will not travel with a student to hospital unless in exceptional circumstances.
- In the event of a student self-reporting for first aid/illness/injury
- The student should report to the main reception if feeling unwell or needing first aid.
- The reception staff will locate the nearest appropriate first aider who will assess the illness and/or injury.
- No over the counter medication will be given but the illness/injury will be treated as necessary; if it is deemed necessary the parent/carer will be contacted to collect the student (please refer to the medical policy).

For all first aid/treatment the first aider will complete a report form on the same day or as soon as is practical.

## **5 Monitoring and review**

To ensure the effective application of this Policy, The Positive Impact Academy are required to have in place arrangements for monitoring and reviewing its implementation at regular intervals. The Policy review needs to promote a cycle of continuous improvement; therefore, any actions identified to ensure this, should be considered and implemented where

reasonably practicable. Successful monitoring and review; relies on commitment from managers at all levels and should therefore be included as an integral part of the annual Health and Safety review. The Positive Impact Academy also has a WCC inspection of Health and Safety, which also covers First Aid on a 3-year basis.

## **6 Further Reference & Associated Documents**

Health and Safety Policy

Medical Policy

First aid at Work, The Health and Safety (First Aid) Regulations 1981 Approved Code of Practice and Guidance, L74.

Education (School Premises) Regulations

Fire & Rescue's Service Order 01.08.16

HSE (2011), Basic advice on first aid at work leaflet, INDG 347(rev2) WEB, 03/11. Website <http://www.hse.gov.uk/pubns/indg347.pdf>

### **6.0 Responsible Officer**

Member of SLT and Head of Academy responsible for Health and Safety.

Policy Document First Aid Policy

Updated: J Armson/D Strong

Date: Sep 2022 - to be reviewed Sep 2023.

Signed by Director

A handwritten signature in black ink, appearing to read "James Armson".

James Armson

## GDPR Policy

All policies will be shared with learners prior to the beginning of their learning or course with The Positive Impact Academy. This will include the contact details of relevant people.

Designated Data Protection Lead: David Strong, Head of Academy

### **Privacy Notice - General Data Protection Regulation (UK GDPR), tailored by the Data Protection Act 2018**

We (**The Positive Impact Academy**) are a data controller for the purposes of the Data Protection Act. We collect information from you and may receive information about you from your previous school and the Learning Records Service. We hold this personal data and use it to:

- Support your teaching and learning.
- Monitor and report on your progress.
- Provide appropriate pastoral care.
- Support you in your transition to a post 16 provider of education or training and,
- Assess how well your school is doing.

This information includes your contact details, national curriculum assessment results, attendance information and personal characteristics such as your ethnic group, any special educational needs, free school meal eligibility and any relevant medical information. If you are enrolling for post-14 qualifications, we will be provided with your unique learner number (ULN) by the Learning Records Service and may also obtain from them details of any learning or qualifications you have undertaken.

The information you supply will be used by the Skills Funding Agency, an executive agency of the Department for Education (DfE), to issue you with a Unique Learner Number (ULN), and to create your Personal Learning Record. For more information about how your information is processed and shared refer to the Extended Privacy Notice available on Gov.UK.

#### ***For Secondary phase schools and academies***

Once you are aged 13 or over, we are required by law to pass on certain information to providers of information, advice, and guidance services in your area. We must provide both your and your parent's/s' name(s), address and your date of birth, and any further relevant information that we hold about you. This relevant information may include details as listed in Appendix 1 on page 4.

This is to enable the support service to contact young people directly to promote their effective participation in education and training. The information will be used to put in place support arrangements for those young people identified as not participating in education or training.

However, if you are over 16, you can ask that no information beyond names, address and your date of birth be passed to the support service or if you are under 16 your parent(s) can ask that no information beyond name and address (for pupils and parents) and your date of birth be passed onto the support service. To do this, please inform the Director. For more information about young people's' services, please go to the DirectGov Education and Learning page at <https://www.gov.uk/browse/education>.

### ***Raising of the Participation Age (RPA)***

Any provider of education or training must by law inform the Local Authority (LA) of any young person who "drops out" from post 16 education or training from their institution. It is the duty of the LA to promote the effective participation in education or training of all 16- and 17-year-olds resident in their area; and decide to identify young people resident in their area who are not participating.

If at any point a young person, by law, should be participating and they are either not in education, employment or training (NEET) or it is not known what they are doing, the LA and/or the services commissioned to provide information, advice and guidance in your area will pass on the young person's details to providers of education, training or support who will be able to assist the young person to participate.

Information will only be shared when it allows the young person to fulfil their statutory duty to participate.

### ***Post 16 Providers attended by Warwickshire Learners***

The Positive Impact Academy may share your details (as listed in Appendix 1 page 4) with post 16 providers to support successful transitions. Information will also be shared as part of the September Guarantee Process which is a statutory obligation for Warwickshire Local Authority to ensure that all young people are offered appropriate learning and training opportunities.

To publicise the availability of post 14 and post 16 choices and maximise opportunities that are available to young people like yourself, the agency commissioned by Warwickshire Local Authority to deliver information, advice and guidance services for careers guidance may, on behalf of schools, colleges, and training providers, contact you at your home address. This is to ensure that every young person has access to the information they need to make informed decisions and successful transitions into further education, employment, and training.

However, if you are over 16, you can ask that no information beyond names, address and your date of birth be passed to the providers or if you are under 16 your parent(s) can ask that no information beyond your name, address and date of birth be passed on to the providers. If as a parent, or as a pupil aged 16 or over, you wish to opt-out and do not want Post 16 providers to receive from our school/academy, information beyond name, address, and date of birth, then please contact your school administrator: David Strong, Head of Academy.

### ***Data sharing between local authorities and Post 16 providers***

1. There are two pieces of legislation local authorities will take into account when considering local information sharing arrangements for the implementation of RPA for 16- and 17-year-olds. The two relevant legislative provisions for data sharing are sections 68 and 77 of the Education and Skills Act 2008. Section 77 allows a local authority to supply information about young people to an organisation that is providing services under section 68.

2. The Department for Education (DfE) considers that by putting in place a written agreement on how they will work with the providers, local authorities will be entering into

arrangements with those providers for the provision of section 68 services. This allows the local authority to provide details of eligible young people to the providers in their area. It would also allow the local authority to confirm the status of young people who have been identified independently by the provider.

3. In keeping with normal practice, both providers and local authorities will ensure that the use of young people's' data is consistent with their Data Controller and data sharing registrations and privacy notices prior to sharing data.

4. In addition, local authorities and providers must comply with the Data Protection Act, applying the normal data protection principles that relate to processing personal data.

***We will not give information about you to anyone outside the school without your consent unless the law and our rules allow us to or as envisaged by this privacy notice***

We are required by law to pass some information about you to the Local Authority and the Department for Education (DfE). This sharing of information also applies to agencies that are prescribed in law, such as, Ofsted, the Education Funding Agency (EFA), the Department of Health (DoH) and Skills Funding Agency that require access to data for the Learner Records Service. All these agencies are data controllers in respect of the data they receive and are subject to the same legal constraints by law in how they deal with the data.

We are required by law to pass some information about you to the Department for Education (DfE) and, in turn, this will be available for the use(s) of the Local Authority. If you want to see a copy of the information about you that we hold and/or share, please contact David Strong, Head of Academy.

### **How the Local Authority (LA) and Department for Education (DfE) use your information**

The DfE may share pupil level personal data with third parties. This will only take place where legislation allows it to do so, and it follows the Data Protection Act 1998.

Decisions on whether the DfE releases personal data to third parties are subject to a robust approval process and are based on a detailed assessment of who is requesting the data, the purpose for which it is required, the level and sensitivity of data requested and the arrangements in place to store and handle the data. To be granted access to pupil level data, requestors must comply with strict terms and conditions covering the confidentiality and handling of data, security arrangements and retention and use of the data.

For more information on how this sharing process works, please visit:  
<https://www.gov.uk/guidance/national-pupil-database-apply-for-a-data-extract>

For information on which third party organisations (and for which project) pupil level data has been provided to, please visit: <https://www.gov.uk/government/publications/national-pupil-database-requests-received>

If you require more information about how the Local Authority (LA) and/or DfE store and use your information, then please go to the following websites:  
<http://www.warwickshire.gov.uk/schoolprivacynotices> and <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

If you are unable to access these websites a copy of the information can be sent to you.  
Please contact the LA or DfE as follows:

Business and Commissioning Intelligence Service  
Performance Business Unit  
Resources Group  
Saltisford Office Park  
Ansell Way, Warwick, CV34 4UL  
Website: <http://www.warwickshire.gov.uk/schoolprivacynotices>  
Email: [businessintelligence@warwickshire.gov.uk](mailto:businessintelligence@warwickshire.gov.uk)

Public Communications Unit  
Department for Education  
Sanctuary Buildings  
Great Smith Street  
London  
SW1P 3BT  
Website: [www.education.gov.uk](http://www.education.gov.uk)  
email: <http://www.education.gov.uk/help/contactus>  
Telephone: 0370 000 2288

Policy Document GDPR Policy  
Updated: J Armson/D Strong  
Date: Sep 2022 - to be reviewed Sep 2023.

Signed by Director



James Armson

***Appendix 1 – Personal Information that may be shared with local Information, Advice and Guidance Services and Post 16 providers***

- Full name (surname and forename),
- Unique Pupil Number (UPN),
- Date of Birth,
- Address including Postcode,
- Telephone number,
- E-mail address,
- Establishment/school name,
- Programme and level of study,
- Start and Leave date
- Destination
- Looked after child status
- Pupil premium status
- Special Education Need status
- Free School Meal eligibility

## Health and Safety Policy

### 1. Health & Safety Policy Statement of Intent

Within the Positive Impact Academy, we will meet all the requirements set out in The Positive Impact Academy Health and Safety Policy. We will demonstrate our commitment to health, safety, welfare, and wellbeing by recognising that effective health and safety management is equally as important as our other objectives.

Through this statement of intent and the implementation of The Positive Impact Academy Health and Safety Arrangements we will ensure that we are meeting the Policy aims, objectives and requirements. We will actively strive for continual health and safety improvement by complying with the Policy and by working in consultation with managers, employees, and other partners. We will achieve this by:

- Considering health and safety within The Positive Impact Academy planning activities.
- Establishing a proactive and positive health and safety culture.
- Encouraging ownership and responsibility at all levels.
- Ensuring that the health and safety related policies are complied with by having school documents, safe systems of work and arrangements that ensures the implementation of health and safety locally.
- Assessing and eliminating, reducing, or managing the risks that arise out of activities/ processes/and operations through the risk assessment process.
- Monitoring The Positive Impact Academy health and safety performance by reviewing arrangements and analysing accident trends to identify areas for improvement.
- Ensuring that health and safety is considered as part of our employee appraisal and supervision process.
- Ensuring that all employees within The Positive Impact Academy are made aware of this statement of intent and our arrangements.

### 2. Organisation and Responsibilities for Health and Safety

The Health and Safety at Work Act 1974 and accompanying legislation states that employers, persons in charge of premises and employees all have specific health and safety duties and responsibilities. This section details these specific health and safety roles and responsibilities and assigns them to the appropriate posts and functions.

#### 2.1 Health & Safety roles and responsibilities

Successful health and safety management depends on a systematic approach throughout The Positive Impact Academy so that health and safety become fully integrated with all other aspects of school management. A proactive health and safety culture will require strategic leadership from the Director (James Armson), with support from all other staff.

This policy assigns roles and responsibilities to The Positive Impact Academy post holders as specified below:

#### 2.2 Director

The Director has been appointed as the responsible person for Health and Safety within The Positive Impact Academy. The Director will promote the adequate and proper consideration of health and safety to senior managers and employees within The Positive Impact

Academy. The designated member responsible for Health and Safety is David Strong, Head of Academy.

The Director will present a report to the relevant Managers for Health & Safety and Safeguarding issues on a yearly and termly basis respectively on the health and safety performance of The Positive Impact Academy, which will include:

Health & Safety Manager (David Strong) - Setting performance related targets and objectives:

- Measuring health and safety performance Auditing.
- Inspection reporting via WCC - Fire, Security and Health & Safety.

Designated Safeguarding Leads (David Strong, Gemma Lish and Kate Warren) - Monitoring of Health and Safety to include:

- Accident statistics.
- Accident recording and investigation.
- Review of performance.
- First Aid Training.

Designated First Aiders

- David Strong
- Gemma Lish
- Kate Warren

The organisations First Aid Kit can be found located in the office of the premises.

**The Director (James Armson) will:**

1. Ensure that satisfactory health and safety standards are maintained through effective management and risk assessment processes.
2. Ensure that when making decisions/arranging new projects for the service area, health, safety, welfare, and wellbeing issues are considered and dealt with fully.
3. Ensure that adequate health and safety communication channels exist within their employee's area of control.
4. Ensure that adequate resources are provided to maintain health, safety, and welfare, and manage these resources on a risk priority basis.
5. Work proactively to promote a positive safety culture.
6. Ensure that procedures exist and are effectively implemented to identify and provide the information, instruction, training, and supervision needed to ensure health and safety.
7. Seek to proactively develop and improve Health and Safety within The Positive Impact Academy.
8. Ensure procedures are in place for the reporting and recording of accidents and incidents, and near miss investigations and taking appropriate action to prevent recurrence within the statutory time scales.
9. Review and monitor accidents and incident statistics to identify trends and areas of high risk. Provide support and resources to ensure adequate controls are put in place to prevent recurrence, and to ensure continual health, safety, and wellbeing improvement.

10. Ensure that their employees understand and accept their individual responsibilities regarding health and safety and are adequately trained to carry out their responsibilities.
11. In conjunction with the Senior Leadership Team/ Health and Safety Officer, monitor and review the health and safety targets and priorities in line with the overall school objectives; and ensure the provision of adequate resources to achieve compliance.
12. Ensure that health and safety arrangements and performance are formally evaluated, monitored, and reviewed at least on an annual basis.
13. Ensure that Warwickshire County Council is consulted, along with employees' representatives, and that professional health and safety advice is sought e.g., WES Safety and Premises, prior to changes in accommodation and working practices.
14. Ensure that Warwickshire County Council is informed of any breach of health and safety statutory requirements; and immediately when there is Health and Safety Executive (HSE) involvement.
15. Ensure that safe systems of work are fully discussed, recorded, implemented, and reviewed with the appropriate employees concerning:
  - Current work activities.
  - Planning new activities, methods of work etc.
  - Design/acquisition of new buildings, plant, and equipment.
16. Ensure that informal tours of the workplace are carried out to proactively identify good and poor health and safety performance. This will demonstrate visible management commitment to health and safety within their service areas.
17. Ensure that a formalised workplace inspection regime is in place to identify hazards and to take appropriate action.
18. Ensure that contractors receive an induction to the premises/area they are working, including emergency evacuation. This will provide the contractors with information/ awareness of the hazards within the area of work, action to be taken, and the monitoring of their activities.
19. Ensure consultation takes place between managers from other employers, organisations, and appropriate employees' safety representatives, when sharing premises.
20. Consult and seek advice where necessary; and
21. Provide clear leadership on health and safety and set a personal example.

The Director will delegate the day-to-day management and monitoring of Health & Safety practice and procedure to a nominated Health & Safety Officer (**See Appendix 1 iii**) who will, for the sake of clarity, be the responsible person on site.

## 2.4 Senior Leadership Team, Director, Heads of Department

All managers are responsible for managing health and safety in their area of responsibility. Departmental policies will specify the roles and responsibilities required by managers to ensure legal compliance and best practice. They will:

1. Comply with The Positive Impact Academy health and safety policies.
2. Ensure that risk assessments are undertaken for work activities/ processes/and operations.
3. Eliminate the risk or reduce to the lowest possible level by managing the risk effectively.
4. Ensure that all employees are familiar with the relevant risk assessment findings, control measures, safe systems of work, and local arrangements.
5. Set up and maintain safe, healthy working conditions.
6. Provide all new starters with a health and safety induction.
7. Audit and monitor safe working practices and procedures.
8. Ensure that procedures and training programmes are set up and maintained for all employees.
9. When designing, buying, and using new plant and equipment ensure that health, safety, and wellbeing is considered as part of the risk assessment process.
10. Ensure that new, reviewed or changed processes and services are assessed for risks before they are put into practice.
11. Ensure that accidents, incidents and near misses are reported and investigated, where necessary, so that appropriate action can be taken to prevent a recurrence.
12. Ensure that contractors and other people's activities (for example, employees from other service areas) are monitored.
13. Ensure that all employees can carry out their responsibilities and encourage them to work with managers to promote an attitude of safe working across The Positive Impact Academy.
14. Ensure that a formalised workplace inspection regime is in place to identify hazards and to take appropriate action.
15. Ensure that contractors receive an induction to the premise/area in which they are working. This will provide the contractors with information/awareness of the hazards within the area of work, action to be taken, and the monitoring of their activities.

## 2.5 Employees

**Definition:** All the Positive Impact Academy employees will include students, volunteers, agency workers and contract workers, for the terms and reference of this policy.

All employees, including those with managerial responsibilities, have an important role to play in effective health and safety management. All employees have a responsibility to:

1. Take reasonable care, while at work, to ensure that they do not endanger either themselves or anyone else who might be affected by their actions or omissions.
2. Co-operate with their employer or other person in respect of their health and safety duties and follow all instructions (written and verbal) to protect their own and other people's health and safety.
3. Not misuse or interfere with any safety equipment and/or protective clothing provided and avoid improvisation in any form, which could create unnecessary risks to health and safety.
4. Ensure that plant and equipment is in a safe condition, before use and acquaint themselves with all relevant processes, materials and substances and use as advised. Report any defects, loss or damage to their manager.
5. Be aware of their capabilities and competence, both physically and mentally and inform a manager if they feel unable to continue with their duties.
6. Always behave appropriately in the workplace.
7. Avoid taking shortcuts or changing work activities, which could create unnecessary risks to their health and safety. Use all safety equipment and/or personal protective equipment that is provided.
8. Report all accidents, incidents (including incidents of violence, diseases, and dangerous occurrence), near misses, as well as unsafe methods of work, unsafe conditions/tools/plant/equipment/premises/appliances/practices, and concerns about health, safety or wellbeing to their manager, even if an injury was not sustained.
9. Be familiar with any health and safety policies, procedures, risk assessments or any other health and safety documentation, applicable to them and their work. Follow all instructions therein (whether verbal or written).
10. Be appropriately dressed for their working environment and activity.
11. Be aware of the First Aid provision at their workplace and understand the fire/emergency evacuation and fire prevention procedures, position of fire alarms and equipment and participate in drills as required.
12. Take part in health and safety training and development as necessary.
13. Take part in health surveillance programmes, as required.
14. Set a good personal example in respect of health and safety.

Policy Document Health and Safety Policy  
Updated: J Armson/D Strong  
Date: Sep 2022 - to be reviewed Sep 2023.

Signed by Director

A handwritten signature in black ink, appearing to be "James Armson", written over a horizontal line.

James Armson

## Internal Quality Assurance Procedure

### Role of the Internal Quality Assurer

The Internal Quality Assurer is an important role as it maintains and monitors the quality and assurance of qualification and unit delivery and certification and is the main contact between the centre and Awarding Organisation in relation to monitoring activities.

Within the role, the Internal Quality Assurer is expected to:

- Develop and follow internal policies, procedures, and documentation for the carrying out and maintenance of quality systems in line with Awarding Organisation requirements
- Ensure all Assessors hold and maintain the required qualifications and occupational expertise to deliver the qualifications and units they have been assigned to
- Provide support to Assessors in relation to procedures and policies for the delivery of the qualifications and units they are assigned to
- Identify training needs and provide ongoing training to Assessors to continually improve the standard of qualification and unit delivery
- Co-ordinate the timely registration and certification claims for learners
- Maintain appropriate records of quality assurance, assessment, registration, and certification activities in line with Awarding Organisation requirements
- Ensure sampling plans consider the ratio of learners per Assessor per qualification to meet the quality assurance requirements to cover all units delivered within a 12-month period
- Facilitate standardisation activities to support the continuous improvement of qualification and unit delivery
- Ensure all assessment documentation, maintained by Assessors, is complete, up-to-date, and legible
- Ensure conflicts of interest are identified and addressed, including not allowing the quality assurance of own assessment work or cross quality assurance where two people quality assure each other's work
- Conduct observations of Assessors conducting the assessment process
- Conduct learner interviews to monitor and analyse the quality of the assessment process and learner journey
- Provide the required information to SFEDI Awards to aid and facilitate monitoring activities as required
- Impart information and feedback resulting from monitoring activities and ensure all actions are addressed by the indicated timescales

### Sampling Strategy

#### Sampling Assessments

Two forms of sampling will be carried out to ensure that quality assurance is maintained. These are:

**Interim sampling:** dipping into the assessment process whilst the learner is at different stages. This ensures that the assessment of the learner is proceeding satisfactorily following the principles of plan, judge, and feedback.

**Summative sampling:** involves the Internal Quality Assurer reviewing the quality of the assessment decisions by the Assessor. The IQA should be able to follow an audit trail, which clearly demonstrates that the Assessor has checked the validity, authenticity, reliability, currency, and sufficiency of the evidence presented.

The IQA must record and report all sampling undertaken in sufficient detail to be able to justify the decision made. IQA reports will be produced for all sampling and must be signed by both the Assessor and IQA.

Sampling plans must include sampling of all types of:

- Learner
- Assessors
- Methods of assessment
- Evidence or Elements
- Records
- Assessment sites

A sampling plan will be maintained for all samplings planned and conducted showing the following information:

- Learner name
- Qualification Title
- Registration number
- Start date
- Planned end date
- Planned interim sampling updated to show actual sampling undertaken including unit number and type of assessment sampled
- Planned summative sampling updated to show actual sampling undertaken including unit number and type of assessment sampled

### Sampling Rates

Different rates for sampling will be adopted dependent on the experience of the Assessor delivering the qualification or unit they have been assigned to as follows:

Category	Required Activities
Newly qualified Assessors or Assessors new to the centre or those Assessors who are continually falling short of the standard required	100% sampling rate
	Assessor observation every 3-months
Assessors who are in need of development but often meet the standard required	50% sampling rate
	Assessor observation every 6-months
Assessors who are experienced with the qualification or unit they have been assigned to and continually meet the standard required	25% sampling rate
	Assessor observation every 12-months

The rates above may be subject to change for instance:

- Where a qualification is new to the centre the first 2 cohorts will be sampled at a 100% rate unless otherwise authorised by the Awarding Organisation
- Where the sampling strategy of the Awarding Organisation overrides that of the centre due to the risk rating or actions resulting from monitoring activities
- Where a contractual requirement requires additional sampling to take place (N.B. this will not override the requirements of the previous two instances where this sampling rate would require a lesser sampling rate to be adopted)

### **Standardising Assessment and Quality Assurance Judgments**

Standardisation (sometimes referred to as benchmarking or moderating) is an important part of the duties of the Internal Quality Assurer.

Regular meetings will be held to conduct standardisation exercises:

- Meetings to be held on a quarterly basis (more frequent as required or on release of new standards)
- Meetings to cover feedback from Awarding Organisation monitoring activities, assessment good practice and interpretation of standards and qualification specifications
- Meetings to cover feedback from learners as to satisfaction levels of both assessment practice and sessions attended
- Exercises using real learners' evidence to be used in order to standardise the assessment decision process

Minutes of meetings to be produced and copies kept for viewing during SFEDI Awards monitoring activities

### **Managing the Quality**

The systems and processes described above have been designed to maintain the quality of assessment and to ensure that we adhere to the requirements of the Awarding Organisation.

For external monitoring activities, the Internal Quality Assurer is required to have the following information readily available:

- Centre File containing all documents
- Numbers of current registered learners per qualification/unit
- Internal Quality Assurer and Assessor details – especially CVs, up to date CPD records and current Assessor caseloads
- Copies of relevant staff certificates
- Assessment records and plans
- Internal Quality Assurance sampling strategy
- Internal Quality Assurance records including feedback to Assessors, Assessor observations and learner interviews
- Learner evidence records and documentary evidence
- Records of claims for certification

The Internal Quality Assurer will be responsible for ensuring that all action points raised through Awarding Organisation monitoring activities are addressed within the specified timescale(s).

Claims for certification can only be made by an Internal Quality Assurer holding the appropriate qualification or directive from the Awarding Organisation.

### **Assessor Observations**

The Internal Quality Assurer will complete observations of delivery and assessment to ensure the management of the quality of the programme

- Direct observation of the Assessor in action and giving feedback on performance
- Direct observation of an Assessor's planning and review activities with learners

These observations will be conducted, at a minimum, on the timeframes listed earlier in this document and clear evidence of the conducting of these will be maintained for viewing by the Awarding Organisation during monitoring activities.

Evidence of the enactment of any associated actions will be recorded and kept within the quality assurance folder for viewing by the Awarding Organisation during monitoring activities.

### **Learner Questionnaires**

The Internal Quality Assurer will complete questionnaires to gather feedback to ensure the management of the quality of the programme. These will be planned to be conducted, at a minimum, on a 6-monthly basis so that each qualification is subject to learner questionnaires being conducted every 6-months.

The results of the questionnaires will be analysed, and improvement plans developed and enacted to promote the continued improvement of the delivery and certification of qualifications and units within the centre.

Copies of the analysis of results and resulting improvement plans will be kept within the quality assurance folder for viewing by the Awarding Organisation during monitoring activities.

Policy Document Internal Quality Assurance Procedures

Updated: J Armson/D Strong

Date: Sep 2022- to be reviewed Sep 2023.

Signed by Director

A handwritten signature in black ink, appearing to read "James Armson".

James Armson

## Intimate Care Policy

### Introduction

This Policy and Guidelines have been developed to safeguard children and staff. They apply to everyone involved in the intimate care of children in our setting.

The purpose of this policy is:

- To safeguard the rights and promote the best interests of the children.
- To ensure children are treated with sensitivity and respect, and in such a way that their experience of intimate care is a positive one.
- To safeguard adults required to operate in sensitive situations.
- To raise awareness and provide a clear procedure for intimate care.
- To inform parents/carers in how intimate care is administered.
- To ensure parents/carers are consulted in the intimate care of their children.

### Definition

Intimate care may be defined as any activity required to meet the personal care needs of each individual child. Parents have the responsibility to advise staff of any intimate care needs of their child, and staff have a responsibility to work in partnership with children and parents. Intimate care can include:

- Feeding.
- Oral care.
- Washing.
- Dressing/undressing - Supporting a pupil with dressing/undressing.
- Toileting - Assisting a pupil who has soiled him/herself, has vomited or feels unwell.
- Menstrual care - Providing advice to enable a pupil to attend to their own needs.
- Supervision of a child involved in intimate self-care.

Providing comfort or support for a distressed pupil and assisting a pupil requiring medical care, who is not able to carry this out unaided are also considered as intimate care.

### Principles of Intimate Care

The following are the fundamental principles upon which the policy is based:

- Every child has the right to be safe.
- Every child has the right to personal privacy.
- Every child has the right to be valued as an individual.
- Every child has the right to be treated with dignity and respect.
- Every child has the right to be involved and consulted in their own intimate care to the best of their abilities.
- Every child has the right to have levels of intimate care that are as consistent as possible.

### Responsibilities of Staff involved with intimate care

- At The Positive Impact Academy all staff are DBS checked on application. Therefore, all individuals who provide intimate care will have been vetted correctly.
- The Director/Designated teacher for child protection must ensure that all staff undertaking the intimate care of children are familiar with and understand the Intimate Care Policy and Guidelines.

- All staff must have an awareness of the specific types of intimate care that they carry out and fully understand the Intimate Care Policy and Guidelines within the context of their work; • Intimate care arrangements must be agreed by The Positive Impact Academy, parents/guardian, and child (if appropriate) through the distribution of the policy and by the parents signing a written consent form.
- Signed consent forms will be kept in a class file. If a parent/guardian does not return a signed consent form or requires alternative arrangements made for their child, then this will also be recorded in the class file.
- If a staff member has concerns about an intimate care practice, they must report this to the Director (James Armson) or Head of Academy (David Strong)

### **Intimate Care Arrangements**

#### **Supporting dressing/undressing**

Sometimes it will be necessary for staff to aid a child in getting dressed or undressed particularly in Nursery and Foundation Stage. Staff will always encourage children to attempt undressing and dressing unaided.

#### **Providing comfort or support**

Children may seek physical comfort from staff particularly in Nursery and Foundation Stage. Where children require physical support, staff need to be aware that physical contact must be kept to a minimum and be child initiated. When comforting a child or giving reassurance, the member of staff's hands should always be seen, and a child should not be positioned close to a member of staff's body which could be regarded as intimate. If physical contact is deemed to be appropriate staff must provide care which is suitable to the age, gender, and situation of the child. If a child touches a member of staff in a way that makes him/her feel uncomfortable this can be gently but firmly discouraged in a way which communicates that the touch, rather than the child, is unacceptable.

#### **Medical Procedures**

It is preferable that medication is administered at home before or after attendance. If it is necessary for a child to receive medicine during the day parents/guardians must fill out a permission form and discuss their child's needs with a member of staff before The Positive Impact Academy agrees to administer medicines or medical care. Parents and carers should be made aware that staff administration of medicines is voluntary.

Any member of staff giving medicine to a pupil should check:

- The pupil's name.
- Prescribed dose.
- Expiry date.
- Written instructions provided by parents or doctor.
- Complete a drugs administration form and have it counter signed, when possible, by another member of staff.

Particular attention should be paid to the safe storage, handling, and disposal of medicines. The Head of Academy has prime responsibility for the safe management of medicines kept at The Positive Impact Academy. Medicines should be kept in a place not accessible to pupils. Arrangements must be in place to ensure that any medication that a pupil might need in an emergency is readily available to them.

## Medical Conditions

If a child has a medical condition which is likely to lead to soiling and subsequent staff intervention, specific medical advice may be sought from outside agencies and the parents will be asked to sign a permission form so that staff can clean and change their child if necessary. If a parent does not give consent, The Positive Impact Academy will contact the parents or other emergency contact giving specific details about the necessity for cleaning the child. If the parents or emergency contact can come promptly, the child is comforted and kept away from the other children to preserve dignity until the parent arrives. If parents/guardians cannot be contacted - staff will decide on the most appropriate care to minimise any stress, discomfort, or anxiety the child may be experiencing.

## Soiling

Staff from The Positive Impact Academy will work together in partnership with parents to support each child towards independent use of the toilet.

If tending to a child who has soiled themselves during the day staff will respond sensitively and professionally. If 'accidents' occur the child will change themselves into dry clothing, and wet items will be sent home for washing. The child's independence will be encouraged as far as possible in his/her intimate care and reassurance given. A record of the incident will be kept at The Positive Impact Academy and the parent will be informed (by a note home, verbally at home collection time or phone call) and requested to return the borrowed items of clothing when laundered.

If there is an occurrence of heavier soiling or vomiting, this may require staff to provide care at a more personal level. Staff will follow set procedures for this intimate care:

- If possible, the child will be removed to a less public place to maintain dignity and avoid a feeling of humiliation.
- If appropriate, the child will be encouraged, through guidance and assistance, to clean themselves to make them more comfortable.
- Parents should be contacted as soon as possible.
- Staff will provide further intimate care in the following situations
  1. If parents/guardians cannot be contacted - staff will decide on the most appropriate care to minimise any stress, discomfort, or anxiety the child may be experiencing.
  2. If the parents/guardians are unable to come to the setting.
  3. If the child is very distressed or suffering unduly.
  4. Intimate care will only be provided to older children in extreme circumstances. It is anticipated that older children will be able to manage any circumstances given guidance or assistance.

If staff are providing intimate care two members of staff will be always in the vicinity e.g., the second staff member could be in the adjacent room with the adjoining door open.

If incidents of soiling are a regular occurrence, then a pupil care plan will need to be put in place after consultation between The Positive Impact Academy, the pupils' parent's/guardians and if appropriate, other outside agencies.

Please note: The wellbeing and dignity of the child will always remain paramount during any incident requiring intimate care.

## Hygiene

All staff must be familiar with normal precautions for avoiding infection. They must follow basic hygiene procedures and have access to protective, disposable gloves.

## Protection for staff

Members of staff need to be aware of the potential danger of allegations being made against them and take precautions to avoid this risk. These should include:

- If staff are providing intimate care two members of staff will be always in the vicinity e.g., the second staff member could be in the adjacent room with the adjoining door open.
- Gaining a verbal agreement from another member of staff that the action being taken is necessary.
- Allow the child, wherever possible, to give verbal consent to the person assisting them.
- Allow the child a choice in the sequence of care.
- Be aware of and responsive to the child's reactions

## Guidelines for Good Practice

All children have the right to be safe and to be treated with dignity and respect. These Guidelines are designed to safeguard children and staff. They apply to every member of staff involved with the intimate care of children. Adhering to these guidelines of good practice should safeguard children and staff.

- Involve the child in their intimate care - Try to encourage a child's independence as far as possible in his/her intimate care. Where the child is fully dependant talk to them about what is going to be done and give them choice where possible.
- Treat every child with dignity and respect and ensure privacy appropriate to the child's age and situation.
- Make sure practice in intimate care is consistent.
- Be aware of own limitations. Only carry out care activities you understand and feel competent and confident to carry out. If in doubt, ask.
- Promote positive self-esteem and body image. Confident, self-assured children who feel their body belongs to them are less vulnerable to sexual abuse.
- If you have any concerns, you must report them.
- It is important to follow The Positive Impact Academy's reporting and recording procedures.
- Parents/guardians must be informed about concerns.

Policy Document Intimate Care Policy  
Updated: J Armson/D Strong  
Date: Sep 2022 - to be reviewed Sep 2023.

Signed by Director



James Armson

## Learner Induction Policy

This policy sets out the approach to induction into courses with The Positive Impact Academy that learners can expect to experience as a stage in the 'learner journey'.

### Purpose of Induction

Induction to a course of learning is a two-way process that will allow learners to establish that the course they intend to follow is appropriate to their needs and aspirations and allow The Positive Impact Academy to appropriately advise learner choice and plan for the delivery of courses according to the needs of learners. Accordingly, the following outcomes will be achieved because of induction:

- Learners will understand the expectations of them prior to commencing learning, allowing them to prepare for their course to achieve to their potential
- The suitability of the course in terms of the learner's current capabilities and aspirations will be confirmed or, if the learner is not yet ready to commence the course, there will be appropriate signposting to other provision
- Learners will understand their rights and responsibilities whilst studying with The Positive Impact Academy and be advised and aware of processes relating but not limited to health and safety, safeguarding, equality and diversity, complaints, and learner support.
- Information will be shared to allow learners the opportunity to establish progression opportunities from the course, into other learning.

### Delivering Induction

Induction is scheduled to take place prior to the commencement of learning and is an integral part of the preparation of both learner and teaching practitioner for success. As such, it is a key element of the learner journey and provides valuable opportunities, alongside initial enrolment, and initial assessment activities, to establish learner needs and aspirations. These elements may all be delivered together or separately, but all must be completed prior to the commencement of learning, with sufficient time allowed between these activities and the formal course start to allow teaching staff to evaluate and plan for everyone's needs.

Induction should be carried out for every new course commenced by a learner, regardless of how many previous courses may have been completed, to ensure that in each instance, there is the best possible preparation of and for the learner to commence learning.

Accordingly, the following principles underlie the approach to induction:

- That there is consistency of approach across the whole The Positive Impact Academy provision, to ensure that all learners are aware of universal policies, whilst still addressing any course-specific issues.
- Induction takes place before learning starts, and directly informs the planning of all subsequent learning opportunities.
- Induction will be appropriate and proportionate to the nature of the learning taking place, whilst still ensuring that all relevant information is shared. For instance, a one-off taster workshop would require a 'lighter touch' induction than a course that is scheduled to run for a whole year, but learners must still have access to all the required induction elements.
- Those delivering induction will understand the purpose and remit of the approach and be properly supported to deliver it effectively.

## Responsibilities

Tutors are responsible for the induction of learners to their courses and the duty is included as part of the expectations around delivery of teaching and learning. Thus, where an Educational Mentor is delivering a course, it is also expected that they will address the induction of learners as part of the delivery.

Senior management will review the effectiveness of the approach to induction as part of the ongoing quality management and self-assessment process to ensure that it remains relevant to learners and clearly links into subsequent actions and planning. The SENDCo will produce appropriate SEND profiles for all pupils and monitor provision through the APDR process.

Policy Document Learner Induction Policy  
Updated: J Armson/D Strong  
Date: Sep 2022 - to be reviewed Sep 2023.

Signed by Director

A handwritten signature in black ink, appearing to read "James Armson", written over a horizontal line.

James Armson

## Lone Worker Policy

### Introduction

Lone workers spend some or all their working hours alone for a variety of reasons: they may work in an isolated location, be at a client's or customer's premises, work from home or may simply be working outside normal office hours. In any case, the Company recognises that working alone may involve an increased risk to the health and safety of its employees. Consequently, the Company has a policy that helps to ensure that it succeeds in its responsibility to manage the risks faced by its employees.

- Under the terms of the Health and Safety at Work Act 1974 the Company has a duty to ensure the health and safety of its employees as far as is reasonably practical.
- The Management of Health and Safety at Work Regulations 1999 place a duty on the Company to assess the degree of risk in the workplace.

### Aims of the Policy

- To ensure the safety of lone workers when exercising their duties in the absence of any colleagues or supervisors; and
- To ensure that the Company complies with all its legal obligations.

### Risk Assessments

The Company will carry out risk assessments on all types of work that are (or are likely to be) undertaken alone with regard when doing so to the following factors:

- Risk of Violence (particularly when handling money or dealing with the public)
- Equipment (must be suitable and safe for use by one person)
- Location
- Materials (all materials used by suitable for use by one person)
- Proximity to Help

### Procedures

All lone workers should adhere to the following guidelines when working alone:

- Avoid unnecessary out of hours working where possible.
- Notify James Armson/David Strong if you are intending to work outside normal hours.
- Familiarise yourself with your location, fire safety procedures and escape routes in the event of an emergency.
- Where possible ensure that you have keys to all entrances and exits and keep them always locked.
- Do not allow unexpected visitors in unless they carry sufficient identification.
- Familiarise yourself with the alarm system at your location.
- Ensure that you leave your contact details with James Armson/David Strong.
- Make sure that people at home are aware of your movements.
- In the event that you feel unwell seek help immediately and if necessary, call 999.

- Under no circumstances should you ever undertake the following activities: consumption of any substance that may impair judgement and be of detriment to the Company, any activity that poses a high risk of injury.

### **Control Measures**

- Checks of employees located within Company premises or property will be made every 2 hours. This is because some employees may travel over the specified time.
- Employees working elsewhere than on Company premises must call in every [3 hours] [at the beginning and end of each day] during normal working hours. Such Employees will also be provided with a first aid kit that they must ensure remains adequately stocked.
- All Lone workers will have a mobile phone which they must ensure they keep charged and switched on while working and have updated contact numbers.
- In the event of an emergency the main points of contact will be as follows: James Armson/David Strong.
- All lone workers must comply fully with this policy and with any complementary instructions received from the Company. Failure to do so may constitute a disciplinary offence.

Policy Document Lone Worker Policy  
Updated: J Armson/D Strong  
Date: Sep 2022 - to be reviewed Sep 2023.

Signed by Director

A handwritten signature in black ink, appearing to be "James Armson", written over a horizontal line.

James Armson

## Malpractice & Maladministration Policy

All policies will be shared with learners prior to the beginning of their learning or course with The Positive Impact Academy. This will include the contact details of relevant people.

### Introduction

This policy is aimed at our staff and learners, who are delivering regulated qualifications or units or courses within or outside the UK. It is used by staff to ensure they deal with all malpractice or maladministration in a consistent manner.

It sets out the steps Centres, learners or other personnel must follow when reporting suspected or actual cases of malpractice and maladministration and The Positive Impact Academy responsibilities in dealing with such cases. It also sets out the steps we will follow when reviewing the cases.

### The Positive Impact Academy responsibility

It is important that Centre staff involved in the management, assessment and quality assurance of qualifications or units or courses, and all registered learners, are fully informed of the contents of the policy.

Any failure to report suspected or actual malpractice and maladministration cases or have in place effective arrangements to prevent such cases, may lead to sanctions being imposed on staff.

The Positive Impact Academy staff compliance with this policy and how they take reasonable steps to prevent and/or investigate instances of malpractice and maladministration will be reviewed by management periodically.

Should an investigation be undertaken, management must:

- Ensure the investigation is carried out by competent investigators who have no personal involvement in the incident or interest in the outcomes.
- Ensure the investigation is carried out in an effective, prompt, and thorough manner and that the investigator(s) look beyond the immediate reported issues to assure them that arrangements at the Centre are appropriate for all qualifications.
- Respond speedily and openly to all requests relating to the allegation and/or investigation.
- Ensure their staff cooperate fully with any investigation and/or request for information.

Designated Malpractice & Maladministration Lead: David Strong

### Review arrangements

The Positive Impact Academy will review the policy annually as part of the self-evaluation arrangements and revise it as and when necessary, in response to staff and learner feedback, changes in internal practices, actions from the regulatory authorities or external agencies or changes in legislation.

In addition, this policy may be updated considering operational feedback to ensure the arrangements for dealing with suspected cases of malpractice and maladministration remain effective.

## Definition of Malpractice

Malpractice is defined as any deliberate activity, neglect, default, or other practice that compromises the integrity of the internal and external assessment process, and/or the validity of certificates. It covers any deliberate actions, neglect, default, or other practice that compromises, or could compromise:

- The assessment processes
- The integrity of a regulated qualification
- The validity of a result or certificate
- The reputation and credibility of The Positive Impact Academy

Malpractice may include a range of issues from the failure to maintain appropriate records or systems to the deliberate falsification of records to claim certificates. For the purpose of this policy, this term also covers misconduct and forms of unnecessary discrimination or bias towards certain or groups of learners.

## Definition of Maladministration

Maladministration is defined as any activity or practice which results in noncompliance with administrative regulations and requirements and includes the application of persistent mistakes or poor administration within a Centre (e.g., inappropriate learner records).

## Examples of Malpractice\_

The categories listed below are examples of staff and learner malpractice. Please note that these examples are not exhaustive and are intended as guidance on the definition of malpractice:

Examples of Centre malpractice:

- Failure to satisfactorily implement conditions of Centre recognition within stated timescales.
- Denial of access to resources (premises, records, information, learners, and staff) for any authorised external representative and/or the regulatory authorities.
- Actions required by External Quality Assurers / Standards Verifiers not being met within agreed timescales.
- Deliberate failure to carry out delivery, internal and external assessment, internal verification in accordance with the requirements.
- Deliberate failure to adhere to learner registration and certification procedures.
- Deliberate failure to continually adhere to qualification approval criteria.
- Deliberate failure to maintain auditable records, e.g., certification claims.
- Fraudulent claim for certificates.
- Persistent instances of maladministration.
- The unauthorised use of inappropriate materials / equipment in assessment settings (e.g., mobile phones).
- Intentional withholding of information from external staff which is critical to maintaining the quality assurance rigor.
- Misrepresentation of a The Positive Impact Academy relationship with awarding bodies
- Collusion or permitting collusion in exams.
- Learners still working towards a qualification after certification claims have been made.
- Condoning plagiarism by learners.

- Creation of false records.
- Impersonation of a learner for internal or external assessment.
- Cash for certificates (e.g., the selling of certificates for cash).
- A loss, theft of, or a breach of confidentiality, in any assessment materials.
- Unauthorised amendment, copying or distributing of exam papers and controlled assessments.
- Inappropriate assistance to learners by Centre staff (e.g., unfairly helping them to pass a unit or qualification).
- Submission of false information to gain a qualification or unit.

Examples of Learner malpractice:

- Forgery of evidence.
- Plagiarism of any nature by learners.
- Collusion in an exam or controlled assessment.
- Tampering with another learner's assessment evidence.
- Not adhering to exam or controlled assessment conditions.
- Not following instructions from invigilators, examiners or The Positive Impact Academy staff during supervised exam or controlled assessments.
- Obtaining, receiving, exchanging or passing on information relating to and during an exam or controlled assessment by talking, written paper or notes or electronic means.
- Copying from other learners during an exam or controlled assessment.
- A loss, theft of, or a breach of confidentiality, in any assessment materials.
- Destruction of another learner's work.
- Submission of false information to gain a qualification or unit.
- False ID used in the registration process.
- Making a false declaration of authenticity.
- Impersonation of a learner for an internal or external assessment.
- Disruptive behaviour during an exam or controlled assessment.
- Accessing prohibited websites during an exam or controlled assessment.
- Inappropriate use of technology during assessments (e.g., mobile phone or tablet computer).
- Cheating.

### **Examples of maladministration**

The categories listed below are examples of maladministration. Please note that these examples are not exhaustive and are only intended as guidance on our definition of maladministration:

The Positive Impact Academy examples:

- Persistent failure to adhere to our learner registration and certification procedures.
- Persistent failure to adhere to Centre recognition and/or qualification requirements and/or associated actions assigned to the Centre.
- Persistent late learner registrations.
- Unreasonable delays in responding to requests and/or communications from awarding bodies
- Failure to train invigilators adequately.
- Failure to invigilate to awarding body requirements.
- Failure to ensure that assessment venues meet awarding body requirements.
- Inaccurate claim for certificates.
- Failure to maintain appropriate auditable records (3 years), e.g., certification claims and/or forgery of evidence.

- Withholding of information, by deliberate act or omission, from awarding bodies which is required to assure awarding bodies of The Positive Impact Academy ability to deliver qualifications appropriately.

### **Process for making an allegation of malpractice or maladministration**

Anybody who identifies or is made aware of suspected or actual cases of malpractice or maladministration at any time must immediately notify Management. In doing so they should put this in writing and enclose supporting evidence.

All allegations should include (where relevant):

- The learner's name and qualification registration number.
- The name and position of any staff member(s) involved in the case.
- Details of the course/qualification affected, or nature of the service affected.
- Nature of the suspected or actual malpractice or maladministration.
- Date of the report and the informant's name, position, and signature.

If a member of staff has conducted an initial investigation prior to formally notifying management, the management should ensure that staff involved in the initial investigation are competent and have no personal interest in the outcome of the investigation. However, it is important to note that in all instances that management must immediately notify awarding bodies if they suspect malpractice or maladministration has occurred.

In all cases of suspected malpractice or maladministration reported to management the organisation will protect the identity of the 'informant' in accordance with the duty of confidentiality and/or any other legal duty.

### **Confidentiality and whistleblowing**

Sometimes a person making an allegation of malpractice or maladministration may wish to remain anonymous. Although it is always preferable to reveal your identity and contact details, if you are concerned about possible adverse consequences, you may request awarding bodies not to divulge your identity. If it helps to reassure you on this point, The Positive Impact Academy can confirm that awarding bodies are not obliged (as recommended by the regulator Ofqual) to disclose information, if to do so would be a breach of confidentiality and/or any other legal duty.

While The Positive Impact Academy is prepared to investigate issues which are reported anonymously, the organisation shall always try to confirm an allegation by means of a separate investigation before taking up the matter with those to whom the allegation relates. For example, where appropriate:

- The police, fraud prevention agencies or other law enforcement agencies (to investigate or prevent crime, including fraud).
- The courts (in connection with any court proceedings).
- Other third parties such as the relevant regulatory authority (e.g., Ofqual in England or SQA in Scotland).

At all times The Positive Impact Academy will investigate such allegations from whistleblowers in accordance with relevant whistleblowing legislation.

## **Responsibility for the investigation**

In accordance with regulatory requirements, all suspected cases of malpractice and maladministration will be examined promptly by The Positive Impact Academy to establish if malpractice or maladministration has occurred, and all reasonable steps will be taken to prevent any adverse effect from occurring.

Management will be responsible for ensuring the investigation is carried out in a prompt and effective manner and in accordance with the procedures in this policy and will allocate a relevant member of staff to lead the investigation and establish whether the malpractice or maladministration has occurred, and review any supporting evidence received.

At all times The Positive Impact Academy will ensure that personnel assigned to the investigation have the appropriate level of training and competence and they have had no previous involvement or personal interest in the matter.

## **Notifying relevant parties**

In all cases of suspected or actual malpractice or maladministration, The Positive Impact Academy will notify the awarding body involved in the allegation that the organisation will be investigating the matter and/or in the case of learner malpractice, may ask staff to investigate the issue in liaison with awarding body personnel – in doing so details of the person making the allegation may be withheld if to do so would breach a duty of confidentiality or any other legal duty.

Where applicable, management will inform the appropriate regulatory authorities promptly if it is believed there has been an incident of malpractice or maladministration which could either invalidate the award of a qualification or if it could affect another awarding organisation. We will keep them informed of progress in large and/or complex cases.

Where the allegation may affect another awarding organisation and their provision, The Positive Impact Academy will also inform them in accordance with the regulatory requirements and obligations imposed on it by the regulator Ofqual.

## **Investigation timelines and process**

The Positive Impact Academy aims to action and resolve all stages of the investigation within 20 working days of receipt of the allegation. Please note that in some cases the investigation may take longer. In such instances, The Positive Impact Academy will advise all parties concerned of the likely revised timescale.

The fundamental principle of all investigations is to conduct them in a fair, reasonable, and legal manner, ensuring that all relevant evidence is considered without bias. In doing so investigations will be based around the following broad objectives:

- To establish the facts relating to allegations/complaints to determine whether any irregularities have occurred.
- To identify the cause of the irregularities and those involved.
- To establish the scale of the irregularities and whether other qualifications may be affected.
- To evaluate any action already taken by staff.
- To determine whether remedial action is required to reduce the risk to current registered learners and to preserve the integrity of the qualification.
- To ascertain whether any action is required in respect of certificates already issued.
- To obtain clear evidence to support any sanctions to be applied to the staff/learners

- To identify any adverse patterns or trends.

Where a member of The Positive Impact Academy staff is under investigation the organisation may suspend them or move them to other duties until the investigation is complete.

If The Positive Impact Academy believes there is sufficient evidence to implicate an individual in malpractice/ and/or maladministration it will:

- Inform them (in writing) of the allegation.
- Provide them with details of the evidence found to support the judgment.
- Inform them of the possible consequences.
- Inform them that information in relation to the allegation and investigation may be, or has been, shared with the regulators and other relevant bodies (e.g., police).
- Provide them with an opportunity to consider and respond to the allegation and findings.
- Inform them of the Appeals policy should they wish to appeal against the decision.

After an investigation, The Positive Impact Academy will produce a draft report for the parties concerned to check the factual accuracy.

Throughout the investigation management will be responsible for overseeing the work of the investigation team to ensure that due process is being followed, appropriate evidence has been gathered and reviewed and for liaising with and keeping informed relevant external parties.

### **Investigation report**

After an investigation, The Positive Impact Academy will produce a draft report for the parties concerned to check the factual accuracy. Any subsequent amendments will be agreed between the parties concerned. The report will:

- Identify the breach of the regulatory conditions, if any, that occurred.
- Confirm the facts of the case.
- Identify who is responsible for the breach (if any).
- Confirm an appropriate level of remedial action to be applied.

The Positive Impact Academy will make the final report available to the parties concerned and to the regulatory authorities and other external agencies as required.

If it was an independent/third party that notified The Positive Impact Academy of the suspected or actual case of malpractice or maladministration, the organisation will also inform them of the outcome – normally within 10 working days of making the decision - in doing so some details may be withheld if to disclose such information would breach a duty of confidentiality or any other legal duty.

### **Investigation outcomes**

If the investigation confirms that malpractice or maladministration has taken place The Positive Impact Academy will consider what action to take to.

- Minimise the risk to the integrity of certification now and in the future.
- Maintain public confidence in the delivery and awarding of qualifications.
- Discourage others from carrying out similar instances of malpractice and maladministration.

The action The Positive Impact Academy may take includes:

- Impose actions with specified deadlines to address the instance of malpractice or maladministration and to prevent it from recurring. For example, by:
  - Undertaking additional/increased visits to staff to provide them with a greater level of support and/or monitoring depending on their needs and performance.
  - Requiring specific staff to undergo additional training and/or scrutiny if there are concerns about their ability to undertake their role in the delivery of qualifications.
  - Not permitting specific Centre staff to be involved in the delivery or assessment of qualifications offered by The Positive Impact Academy (e.g., not permitting an individual to assess).
  - Appointing independent invigilators to observe an examination when appropriate at The Positive Impact Academy if there are concerns around The Positive Impact Academy arrangements.
- Impose sanctions on staff – if so, these will be communicated in accordance with the Sanctions Policy along with the rationale for the sanction(s) selected.
- Act against a learner(s) in relation to proven instances of cheating, plagiarism, fraud, as suggested by Ofqual in their guide to “Authenticity”, such as:
  - Loss of credits/ marks for the related work/unit.
  - Disqualification from the unit(s)/qualification.
- Amend aspects of the qualification assessment and/or monitoring arrangements and associated guidance to prevent the issue from recurring.
- Inform relevant third parties (e.g., funding bodies) of the findings in case they need to take relevant action.
- Carry out additional, related investigations if we suspect the issue may be more widespread.

In addition, to the above management will record any lessons learnt from the investigation and pass these onto relevant internal colleagues to help The Positive Impact Academy prevent the same instance of malpractice or maladministration from reoccurring.

If staff/learners wish to appeal against the decision to impose sanctions, please refer to the Appeals Policy.

Policy Document Malpractice & Maladministration Policy  
 Updated: J Armson/D Strong  
 Date: Sep 2022 - to be reviewed Sep 2023.

Signed by Director



James Armson

## Managing Contractors Policy

### Aims

This policy outlines the process that The Positive Impact Academy will assume to comply with the appropriate legislation regarding the use of contractors on our premises. This will safeguard learners, staff and as far as is feasible any other individual who may be affected by our activities.

This policy sets out our intention that any contractor who attend our premises carry out their work in a manner that does not create any risk to learners, staff, or our neighbours. Clearly, emergency repairs and maintenance cannot be planned for – however we will endeavour to ensure that they are executed safely.

Our definition of a contractor is any individual (contractor, sub-contractor, or consultant) who is not employed by The Positive Impact Academy.

### Introduction

All contracted maintenance and repairs work should be thoroughly planned and properly risk assessed. This is to help to ensure that the possibility of accidents and incidents are minimised. Unexpected circumstances could make it necessary to alter pre-planned arrangements even if the work has commenced. This will always be done in consultation and agreement with the Director and the contractors.

### Selecting Contractors

The Positive Impact Academy will always use reputable contractors who are suitable qualified, insured, and experienced.

It is the Directors responsibility to select each contractor. If necessary, the Contractor checklist will be used (Appendix 1).

Where the value of the contract exceeds £1000, a minimum of two competitive estimates will be sought.

Where the value of the contract exceeds £3000 a minimum of 3 competitive estimates will be sought.

### Responsibilities

It is essential that communication between the Director and the contractors is frequent and clear to execute a low risk and well organised project.

The Director is responsible for ensuring that:

- A risk assessment is carried out
- Learners, staff members and any visitors are safe, and that no individual interferes with the contractor's legitimate work.
- Learners and staff are clearly notified of any area of the premises that they may not enter
- Contractors work in a safe way, using suitably safe and risked assessed safe systems of work. This is a legal obligation.
- To review all completed work and fills out the Contractors on site checklist with the contractor (Appendix 2)
- The company's insurance covers the activity.

The main contractor is responsible for ensuring that:

- Rules set out in the Contractors pack are adhered to (Appendix 2)

- The health and safety of their staff and safeguarding checks and ID of their staff have been verified.
- Adequate notice of disturbance or interruption to usual business has been provided
- Any required documents and equipment are provided. These include risk assessments and permits.

### **Safeguarding**

Children and young people should not be permitted in any areas where contractors are working to ensure their health and safety from accident or injury and to ensure they have no contact with workers. However, it may be impossible to implement this and there may be occasions when contractors meet children, perhaps by entering and leaving the school.

To keep all children safe from any potential harm, the Director will make sure that such workers have DBS clearance by the contracting company (in accordance with KCSIE 2019).

All contractors should sign in and out when attending and leaving the premises.

### **Minor repairs and maintenance**

Occasionally small repairs and maintenance will need to be carried out and will not be possible to wholly isolate the workers from the activities of the centre and learners. It is, therefore, key that an initial meeting occurs the Director and the main contractor discuss the extent and consequences of the recommended work. During this meeting appropriate risk assessments will be agreed, and safe working practises will be discussed and possibly included within the contract.

### **Major work**

This will include significant refurbishment of existing building and/or areas of buildings and new builds and extensions. This type of major development will need to be separated off by fencing and responsibility for that area effectively handed over to the contractor until the work is complete and signed off. Any such areas will be out of bounds to everyone save the contractors workers.

Any proposed visits by school staff (ie the Director) must be arranged with the main contractor and visitors must respect all the pertinent rules and regulations for example wearing appropriate protective clothing and reporting to the site office.

School staff must not make unofficial or unsupervised visits to any area of major work or development. For the duration of the work, such areas are the responsibility of the contractor, and the members of staff may not be insured against accidents or for public liability.

If the Director has reason to believe that work is being executed in a manner that is not safe or posing any risks to staff or learners, he will instruct the contractor to cease working. If this were to happen the project manager must be informed and the reason of any such incident recorded.

Policy Document Managing Contractors Policy  
Updated: J Armson/D Strong  
Date: Sep 2022 - to be reviewed Sep 2023.

Signed by Director

A handwritten signature in black ink, appearing to be "James Armson", written over a horizontal line.

James Armson

## Appendix 1 – New Contractors checklist

Can the company provide fixed priced contracts?	
Have professional qualifications and trade body memberships been viewed?	
Public Liability cover minimum £5000000 confirmed	
Are any sub-contractors being used? Has the contractor vetted these ?	
Obtain minimum of 2 references	
Are there arrangements for DBS clearance checks?	
Can late penalty clauses be implemented?	
Is it possible to confine the proposed work to outside of term time?	

## Appendix 2 – Contractor’s information

- This document has been put together so that you may be informed of the layout of our centre and the names of key staff who may assist you while you are on site. Additionally, it outlines some key health and safety arrangements which you should familiarise yourself with.
- Please can you read the following points and sign the document.
- All contractors must:
- Report to the Director upon arrival at the centre
- Sign in and out of the visitors’ book
- Observe the centre’s Health and Safety Policy
- Ensure that all workers, included those who are sub-contracted are informed of the contents of this document and observe the centre’s code of conduct policy and safeguarding policy
- Not leave the site without clearing any debris and /or waste materials left because of activities
- Not leave the site without first making safe any on-going work

## Personal Relationships at Work Policy

We recognise that employees who work together may form personal friendships and, in some cases, close personal relationships. Generally, we do not wish to interfere with these personal friendships and relationships. However, we must also ensure that employees behave in an appropriate, professional, and responsible manner at work and that they continue to fulfil their job duties both diligently and effectively. These rules are therefore aimed at striking a balance between your right to a private life and our right to protect our business interests.

### Specific Subject Matter

The following rules apply to employees embarking on close personal relationships at work, whether the relationship is with a fellow employee, client, customer, supplier, agency worker or contractor and they apply to all employees at all levels of the business:

- You must not allow your personal relationship to influence your conduct at work. Intimate behaviour during working time is prohibited. This includes, but is not limited to, holding hands, other close physical contact, discussions of a sexual nature or kissing.
- If you embark on a personal relationship with another employee who also works in your department, you should declare this to your manager as soon as reasonably practicable.
- If you embark on a personal relationship with a client, customer, supplier or contractor and your job allows you authority over the client, customer, supplier, or contractor, you must declare the relationship to your manager as soon as reasonably practicable. In these circumstances, the Company reserves the right to elect to transfer you to a job in another Department where you will not be able to exert undue influence over the other party, either on a temporary basis or permanently. We will consult with you to try and reach an amicable agreement on transfer. Alternatively, we reserve the right to alter working arrangements, either on a temporary basis or permanently, so that you no longer have any authority over the client, customer, supplier, or contractor.

If you are having or have had a personal relationship at work and you are found to have afforded either more or less favourable treatment to the other employee because of this relationship, or you have exercised undue influence over a client, customer, supplier, or contractor, this is a serious disciplinary offence and will lead to disciplinary action up to and including dismissal.

Policy Document Personal Relationships at Work Policy  
Updated: J Armson/D Strong  
Date: Sep 2022 - to be reviewed Sep 2023.

Signed by Director



James Armson

## Physical Restraint Policy

This policy is drawn from advice issued pursuant to the Use of Force guidance from the Department for Children Schools and families, which supersedes the DfES Circular 10/98 – “Section 550(a) of the Education Act 1996: The Use of Force to Control or restrain Pupils”; and subsequent clarification of the aforementioned act provided by the Department for Education in 2011 and ‘Use of Reasonable Force’ - advice for head teachers, staff and governing bodies (DfE July 2013) as well as the Health & Safety at Work Act 1974.

The use of force upon any pupil by a member of staff is a serious matter and should only be considered as a last resort. However, the law is clear, and the Director has a responsibility to all concerned, to support any member of staff who as a last resort uses reasonable force in accordance with the law, and with this policy.

### What the Law means

Section 93 of the Education and Inspections Act 2006 enables school staff to use such force as is reasonable in the circumstances to prevent a pupil from doing or continuing to do any of the following:

- Committing a criminal offence.
- Causing personal injury to themselves or others.
- Causing damage to property belonging to them or others, including The Positive Impact Academy.
- Any behaviour prejudicing the maintenance of good order and discipline in The Positive Impact Academy.

### Who may use force?

The staff to which this lawful power is granted are defined in the Act. They are:

- Any tutor who works at The Positive Impact Academy, and
- Any other person expressly authorised by the Director to have control or charge of pupils. The Director may also give temporary authorisation to those who do not usually have such control or charge.

The Director will keep a record of which staff have been authorised under the terms of the Act. There is no definition of what reasonable force is but precedent shows there are two principal considerations.

They are:

- The use of force can only be reasonable if the circumstances of the incident warrant it; and the degree of force used must be in proportion to the circumstances of the incident and the seriousness of the behaviour or consequence the force is used to prevent. Any force shall only be the minimum required to achieve that objective.
- In other words, each use of force must be justified in the specific circumstances, and the use of any force will be the minimum to overcome the behaviour or prevent the consequence of the behaviour. Staff are reminded that the use of any force upon a pupil may need to be justified at some time after the incident, potentially before an internal enquiry or even ultimately at a Court of Law. Whilst it is not intended that this should be a deterrent from using force where it is appropriate, it will always lie with the individual to justify.

## **Deciding whether to use force.**

Generally, staff should only use force when:

- The potential consequences of not intervening are sufficiently serious to justify it.
- The chance of achieving the desired outcome by other non-physical means are low; and
- The risk associated with not using force outweighs the risk of using it.

## **Using Force**

Before using force, staff should where practicably tell the pupil to stop misbehaving. Care should be taken to avoid giving the impression that the member of staff is angry or frustrated or are acting to punish the child. It should be made clear with calm language that as soon as the need for force ceases, it will stop.

Appropriate use of force will range from physical passive presence in between pupils, to blocking a pupil's path, ushering them by placing a hand in the centre of the back, leading them by the hand or arm, to in more extreme circumstances using appropriate retraining holds which may need specific training and expertise.

Whilst it is highly desirable that staff should avoid acting in any way which might reasonably be expected to cause an injury, in truly exceptional circumstances it is recognised that it may not always be possible to avoid. Any such injury caused will be properly investigated by The Positive Impact Academy and will require justification.

## **Planning for Incidents**

Where there is an awareness that a pupil is likely to behave in a way which may require physical control or restraint, The Positive Impact Academy will plan how to respond if the situation arises. Particular attention will be given to individuals' needs which arise from statements of SEN or Disability. In such cases of severe disability and extreme behaviour reference would be made to 'Guidance on the Use of Restrictive Physical Interventions for Staff Working with Children and Adults who display Extreme Behaviour in Association with Learning Disability and/or Autistic Spectrum Disorders' (2002) and 'Guidance on the Use of Restrictive Physical Interventions for Pupils with Severe Behavioural Difficulties' (2003).

## **Training for Staff**

Physical restraint is an available option, only to be used when other means of dealing with the situation have failed. For guidance reference should be made to the 'Use of Reasonable Force' - advice for head teachers, staff, and governing bodies (DfE July 2013).

## **Searching pupils**

If a pupil is suspected of being in possession of something they should not have in school, then the pupil should be asked to hand it over. If the pupil should refuse no attempt should be made to take the item from the pupil or search the pupil's belongings. The matter should be reported to the Director or Head of Academy.

If a pupil is suspected of being in possession of a weapon or drugs, then a senior member of staff should be contacted immediately. Either the police will be called immediately, or the pupil will be seen by two senior members of staff and every effort made to persuade the pupil to hand over the item voluntarily. If the pupil refuses and it is considered serious enough to proceed along formal lines, the police will be called. In the meantime, if the pupil decides to make a run for it, then he/she should not be prevented from doing so. Physical

restraint should not be attempted in circumstances such as these, as it may amount to an unlawful detention.

In any situation where a pupil is suspected of having something illegal in his/her possession and where he/she has been asked to empty their pockets or bag, parents must be contacted, regardless of whether the result was positive or negative. This guidance stems from approaches outlined in the DfES publication *Drugs: Guidance for Schools*, Feb 2004.

### **Physical contact with pupils**

There are occasions when physical contact with a pupil may be proper or necessary. Some physical contact may be necessary to demonstrate exercises or techniques during PE lessons, sports coaching, Music, Art, or DT, or if a member of staff must give first aid. Younger pupils or those with SEN may need staff to provide physical prompts or help. Touching may also be appropriate where a pupil is being congratulated or praised, or where the pupil is in distress and needs comforting.

Teachers should use their own professional judgment when they feel a pupil needs this kind of support but take care that such contact cannot be misinterpreted. As a general principle, staff must not make gratuitous physical contact with their pupils. It is particularly unwise to attribute touching to their teaching style or as a way of relating to pupils.

Any form of physical punishment of pupils is an unlawful assault as is any form of physical response to misbehaviour unless it is by way of restraint. It is particularly important that staff understand this both to protect their own position and the overall reputation of The Positive Impact Academy.

### **Recording Incidents**

The Positive Impact Academy will keep a record of the use of force to control and restrain. The purpose of recording is to ensure that policy guidelines are followed, to inform parents, to inform future planning as part of school improvement processes, to prevent misunderstanding or misinterpretation of the incident and to provide a record for any future enquiry. Staff may find it helpful to seek advice from a senior colleague or a representative of their staff association when compiling the report. Differing accounts may sometimes be given of the same incident, however all should be recorded.

Incidents involving the use of force may cause parents of the pupil in question great concern. It is school policy to inform parents of such an incident involving their child and to give them the opportunity to discuss it. Parents should be told when and where the incident took place, which members of staff were directly involved (anonymised where necessary), why they decided that force had to be used, what force was used, whether there were any injuries and what follow-up action (support and/or disciplinary) was being taken in relation to their child. The Director or member of staff to whom the incident is reported will consider whether that shall be done straight away or at the end of the day, and whether the pupil's parents should be told orally or in writing.

### **Unacceptable force**

The DfE identifies certain restraint techniques which present an unacceptable risk when used on children and young people. These techniques are:

- The 'seated double embrace' which involves two members of staff forcing a person into a sitting position and leaning them forward, while a third monitors breathing.
- The 'double basket-hold' which involves holding a person's arms across their chest.
- The 'nose distraction technique' which involves a sharp upward jab under the nose.

## **Post-incident support**

If there are injuries medical help should be sought straight away. It is also important to ensure that staff and pupils are given emotional support. If injuries occur then as soon as possible after the incident, parents should be informed. This will be followed up in writing confirming the details. At the time of writing parents should be provided with a copy of this policy.

When assessing the incident consideration will be given to involving multi-agency partners. This could include local authority children's services, Child and Adolescent Mental Health Services or the Youth Offending Team.

Where a pupil is responsible for injury to another, as well as holding him to account and issuing appropriate sanction, the pupil will be given the opportunity to repair the relationships with staff and pupils affected by the incident and/or to develop their social and emotional skills. The pupil and staff will be offered help to develop strategies for avoiding such crisis points in future and given continuing support, if necessary, in respect of:

- Physical consequences.
- Support to deal with emotional stress or loss of confidence.
- Opportunity to analyse, reflect and learn from the incident.

## **Complaints and allegations.**

If a specific allegation of abuse is made against a member of staff, then The Positive Impact Academy will follow the guidance set out in Safeguarding Children and Safer Recruitment in Education 2007 and Keeping Children Safe in Education 2014. Other complaints will be dealt with under The Positive Impact Academy's complaints procedure.

Policy Document Physical Restraint Policy  
Updated: J Armson/D Strong  
Date: Sep 2022 - to be reviewed Sep 2023.

Signed by Director

A handwritten signature in black ink, appearing to read "James Armson", written over a horizontal line.

James Armson

## Plagiarism Policy

### Plagiarism

Plagiarism is defined as a specific form of cheating that applies to all assessment, taking someone else's intellectual effort and presenting it as one's own work.

Examples:

- Unacknowledged incorporation into a learner's work of materials derived from published (such as books, articles, and internet materials) or unpublished (such as work submitted or about to be submitted by another learner) work by another person and presented as if it were the learner's own work.
- Unacknowledged copying from published sources or incomplete referencing.
- Using a choice phrase or sentence that you have come across.
- Copying word-for-word directly from text.
- Paraphrasing the words from a text very closely.
- Using text downloaded from the internet.
- Borrowing statistics or assembled facts from another person or source.
- Copying or downloading figures, photographs, pictures, or diagrams without acknowledging your sources.
- Copying from notes or portfolio from another candidate doing the same award.
- Copying from your notes, on a text, tutorial, video, etc. that contain direct quotations.

### Collusion

Collusion is defined as a form of plagiarism that involves unauthorised co-operation between at least two people with the intent to deliberately mislead or deceive

Examples:

- Two or more learners conspiring to produce a piece of work together with the intention that it is submitted as his/her own work.
- Submitting the work of another learner, with their consent, as his/her own individual work.
- Working collaboratively with other candidates, beyond what is permitted.
- Copying from another candidate including the use of IT to aid the copying.
- Allowing work to be copied e.g., posting written coursework on social networking sites prior to an assessment.
- The offence of encouraging or enabling plagiarism includes the act of posting work onto any public website whether it is done with the intention of enabling or encouraging plagiarism.

### Investigation process

In all suspected cases of Plagiarism and/ or Collusion, the centre is required to notify the awarding organisation within 10 working days.

In most cases, this will be followed by a full investigation by the centre; including the gathering of evidence and obtaining written statements from all parties involved. The centre will then present a record of the full investigation and evidence to the awarding

organisation, for consideration by the relevant independent Malpractice Panel or Committee.

Further to consideration of the investigation and its findings, the awarding organisation will determine:

- Whether malpractice has occurred.
- Where the culpability lies for the malpractice the nature of any sanction or penalty to be applied to both the candidate and the centre.

### Potential implications

The conclusion of the investigation involves the awarding organisation advising the centre whether any sanctions are to be imposed. The following sanctions may be applied individually or in combination

- Written warning: the awarding organisation will issue a warning to warn that if the offence is repeated further sanctions may be applied.
- Assessment evidence will be disallowed: submitted evidence is disallowed, either in part (for the relevant section or unit) or in full (the entire qualification) and learner must submit new evidence for assessment.
- Disqualification from the unit: the learner is disqualified from a unit or qualification for a set period, the learner can only re-submit work after the set period has elapsed.
- Disqualification from the whole qualification: the learner is disqualified from the whole qualification for a set period, the learner can only re-enter for the qualification after the set period has elapsed.
- Further and future registration of the learner will not be accepted (for qualifications or programmes).
- Certificate will not be issued or will be cancelled: the awarding organisation may withhold a certificate that has not yet been claimed or cancel a certificate that has been issued if there is evidence to prove or found that the certificate issued is invalid due to learner malpractice.

### Further Information

Each awarding organisation publishes a policy relating to Learner Malpractice. You should be aware of the policy that applies to your qualification and the awarding organisation you are registered with.

Policy Document Plagiarism Policy  
Updated: J Armson/D Strong  
Date: Sep 2022 - to be reviewed May Sep 2023.

Signed by Director



James Armson

## Safer Recruitment Policy

The safe recruitment of staff in education is the first step to safeguarding and promoting the welfare of children in education. The Positive Impact Academy is committed to safeguarding and promoting the welfare of all pupils in its care. As an employer, The Positive Impact Academy expects all staff and volunteers to share this commitment.

### Aims and Objectives

The aims of the Safer Recruitment policy are to help deter, reject, or identify people who might abuse pupils or are otherwise unsuited to working with them by having appropriate procedures for appointing staff.

The aims of The Positive Impact Academy's recruitment policy are as follows:

- To ensure that the best possible staff are recruited based on their merits, abilities, and suitability for the position.
- To ensure that all job applicants are considered equally and consistently.
- To ensure that no job applicant is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief, sex, or sexual orientation, marital or civil partner status, disability, or age.
- To ensure compliance with all relevant legislation, recommendations and guidance including the statutory guidance published by the Department for Education (DfE), Keeping Children Safe in Education - September 2018 (KCSIE), the Prevent Duty Guidance for England and Wales 2015 (the Prevent Duty Guidance) and any guidance or code of practice published by the Disclosure and Barring Service (DBS); and
- To ensure that The Positive Impact Academy meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.

Employees involved in the recruitment and selection of staff are responsible for familiarising themselves with and complying with the provisions of this policy.

The Positive Impact Academy has a principle of open competition in its approach to recruitment and will seek to recruit the best applicant for the job. The recruitment and selection process should ensure the identification of the person best suited to the job at The Positive Impact Academy based on the applicant's abilities, qualification, experience, and merit as measured against the job description and person specification.

The recruitment and selection of staff will be conducted in a professional, timely and responsive manner and in compliance with current employment legislation, and relevant safeguarding legislation and statutory guidance (including KCSIE 2018 and Prevent Duty Guidance).

If a member of staff involved in the recruitment process has a close personal or familial relationship with an applicant, they must declare it as soon as they are aware of the individual's application and avoid any involvement in the recruitment and selection decision-making process.

The Positive Impact Academy aims to operate this procedure consistently and thoroughly while obtaining, collating, analysing, and evaluating information from and about applicants applying for job vacancies at The Positive Impact Academy.

### Roles and Responsibilities

It is the responsibility of the Governing Body to:

- Ensure The Positive Impact Academy has effective policies and procedures in place for recruitment of all staff and volunteers in accordance with DfE guidance and legal requirements
- Monitor The Positive Impact Academy's compliance with them.

It is the responsibility of the Director, Head of Academy and other SLT involved in recruitment to:

- Ensure that The Positive Impact Academy operates safe recruitment procedures and makes sure all appropriate checks are carried out on all staff and volunteers who work at The Positive Impact Academy
- Monitor contractors' and agencies' compliance with this document
- Promote welfare of children and young people at every stage of the procedure.
- The Governing Body has delegated responsibility to the Director and Head of Academy to lead in all appointments. Governors may be involved in staff appointments, but the final decision will rest with the Director.

### **Definition of Regulated Activity and Frequency**

Any position undertaken at, or on behalf of The Positive Impact Academy will amount to "regulated activity" if it is carried out:

- Frequently, meaning once a week or more
- Overnight, meaning between 2.00 am and 6.00 am
- Satisfies the "period condition", meaning four times or more in a 30-day period
- Provides the opportunity for contact with children

Roles which are carried out on an unpaid/voluntary basis will only amount to regulated activity if, in addition to the above, they are carried out on an unsupervised basis.

The Positive Impact Academy is not permitted to check the Children's Barred List unless an individual will be engaging in "regulated activity". The Positive Impact Academy is required to carry out an enhanced DBS check for all staff, supply staff and governors who will be engaging in regulated activity. However, The Positive Impact Academy can also carry out an enhanced DBS check on a person who would be carrying out regulated activity but for the fact that they do not carry out their duties frequently enough i.e., roles which would amount to regulated activity if carried out more frequently.

### **Recruitment and Selection Procedure**

#### ***Advertising***

To ensure equality of opportunity, The Positive Impact Academy will advertise all vacant posts to encourage as wide a field of applicant as possible; normally this entails an external advertisement.

Any advertisement will make clear The Positive Impact Academy's commitment to safeguarding and promoting the welfare of children.

All documentation relating to applicants will be treated confidentially in accordance with the Data Protection Act (DPA).

#### ***Application Forms***

The Positive Impact Academy uses its own application form and all applicants for employment will be required to complete an application form containing questions about their academic and full employment history and their suitability for the role (in addition all applicants are required to account for any gaps or discrepancies in employment history). Incomplete application forms will not be shortlisted.

The application form will include the applicant's declaration regarding convictions and working with children and will make it clear that the post is exempt from the provisions of the Rehabilitation of Offenders Act 1974. CVs will not be accepted.

It is unlawful for The Positive Impact Academy to employ anyone who is barred from working with children. It is a criminal offence for any person who is barred from working with children to apply for a position at The Positive Impact Academy. All applicants will be made aware that providing false information is an offence and could result in the application being rejected or summary dismissal if the applicant has been selected, and referral to the police and/or the DBS.

### ***Job Descriptions and Person Specifications***

A job description is a key document in the recruitment process and must be finalised prior to taking any other steps in the recruitment process. It will clearly and accurately set out the duties and responsibilities of the job role.

The person specification is of equal importance and informs the selection decision. It details the skills, experience, abilities, and expertise that are required to do the job. The person specification will include a specific reference to suitability to work with children in a boarding environment.

### ***References***

References for shortlisted applicants will be sent for immediately after shortlisting. The only exception is where an applicant has indicated on their application form that they do not wish their current employer to be contacted at that stage. In such cases, this reference will be taken up immediately after interview.

All offers of employment will be subject to the receipt of a minimum of two references which are considered satisfactory by The Positive Impact Academy. One of the references must be from the applicant's current or most recent employer. If the current / most recent employment does / did not involve work with children, then the second reference should be from the employer with whom the applicant most recently worked with children. The referee should not be a relative. References will always be sought and obtained directly from the referee and their purpose is to provide objective and information to support appointment decisions.

All referees will be asked whether they believe the applicant is suitable for the job for which they have applied and whether they have any reason to believe that the applicant is unsuitable to work with children. Referees will also be asked to confirm that the applicant has not been radicalised so that they do not support terrorism or any form of "extremism".

Please note that no questions will be asked about health or medical fitness prior to any offer of employment being made.

Any discrepancies or anomalies will be followed up. Direct contact by phone will be undertaken with each referee to verify the reference.

The Positive Impact Academy does not accept open references, testimonials, or references from relatives.

## **Interviews**

There will be a face-to-face interview wherever possible, and a minimum of two interviewers will see the applicants for the vacant position. The interview process will explore the applicant's ability to carry out the job description and meet the person specification. It will enable the panel to explore any anomalies or gaps have been identified to satisfy themselves that the chosen applicant can meet the safeguarding criteria (in line with Safer Recruitment Training).

Any information regarding past disciplinary action or allegations, cautions or convictions will be discussed and considered in the circumstance of the individual case during the interview process, if it has not been disclosed on the application form.

At least one member of any interviewing panel will have undertaken Safer Recruitment Training or refresher training as applicable.

All applicants who are invited to an interview will be required to bring evidence of their identity, address, and qualifications. Original document will only be accepted, and photocopies will be taken. Unsuccessful applicant documents will be destroyed six months after the recruitment programme.

## **Offer of Appointment and New Employee Process**

In accordance with the recommendations set out in KCSIE and the requirements of the Education (Independent School Standards) Regulations 2014, The Positive Impact Academy carries out several pre-employment checks in respect of all prospective employees.

If it is decided to make an offer of employment following the **formal interview**, any such offer will be conditional on the following:

- The agreement of a mutually acceptable start date and the signing of a contract incorporating The Positive Impact Academy's standard terms and conditions of employment
  - Verification of the applicant's identity (where that has not previously been verified)
  - The receipt of two references (one of which must be from the applicant's most recent employer) which The Positive Impact Academy considers to be satisfactory
  - For positions which involve "teaching work"
- i. The Positive Impact Academy being satisfied that the applicant is not, and has never been, the subject of a sanction, restriction or prohibition issued by the Teaching Regulation Agency (formerly National College for Teaching and Leadership), or any predecessor or successor body, or by a regulator of the teaching profession in any other European Economic Area country which prevents the applicant working at The Positive Impact Academy or which, in The Positive Impact Academy's opinion, renders the applicant unsuitable to work at The Positive Impact Academy; and
  - ii. The Positive Impact Academy being satisfied that the applicant is not, and has never been, the subject of any proceedings before a professional conduct panel or equivalent body in the UK or any other country for any reason which prevents the applicant working at The Positive Impact Academy or which, in The Positive Impact Academy's opinion, renders the applicant unsuitable to work at The Positive Impact Academy.
    - Where the position amounts to "regulated activity" the receipt of an enhanced disclosure from the DBS which The Positive Impact Academy considers to be satisfactory

- Where the position amounts to "regulated activity" confirmation that the applicant is not named on the Children's Barred List\*
- Confirmation that the applicant is not subject to a direction under section 142 of the Education Act 2002 which prohibits, disqualifies, or restricts them from providing education at a school, taking part in the management of an independent school or working in a position which involves regular contact with children
- Confirmation that the applicant is not subject to a direction under section 128 of the Education and Skills Act 2008 which prohibits, disqualifies, or restricts them from being involved in the management of an independent school
- Verification of the applicant's medical fitness for the role
- Verification of the applicant's right to work in the UK
- Any further checks which are necessary because of the applicant having lived or worked outside of the UK; and
- Verification of professional qualifications which The Positive Impact Academy deems a requirement for the post, or which the applicant otherwise cites in support of their application (where they have not been previously verified).

\*The Positive Impact Academy is not permitted to check the Children's Barred List unless an individual will be engaging in "regulated activity". The Positive Impact Academy is required to carry out an enhanced DBS check for all staff, supply staff and governors who will be engaging in regulated activity. However, The Positive Impact Academy can also carry out an enhanced DBS check on a person who would be carrying out regulated activity but for the fact that they do not carry out their duties frequently enough i.e., roles which would amount to regulated activity if carried out more frequently.

Whether a position amounts to "regulated activity" must therefore be considered by The Positive Impact Academy to decide which checks are appropriate. It is however likely that in nearly all cases The Positive Impact Academy will be able to carry out an enhanced DBS check and a Children's Barred List check.

A personal file checklist will be used to track and audit paperwork obtained in accordance with Safer Recruitment Training. The checklist will be retained on personal files.

### ***The Rehabilitation of Offenders Act 1974***

The Rehabilitation of Offenders Act 1974 does not apply to positions which involve working with or having access to pupils. Therefore, any convictions and cautions that would normally be considered 'SPENT' **must be** declared when applying for any position at The Positive Impact Academy.

### ***DBS (Disclosure and Barring Service) Certificate (formerly known as CRB Disclosure)***

The Positive Impact Academy applies for an enhanced disclosure from the DBS and a check of the Children's Barred List (now known as an Enhanced Check for Regulated Activity) in respect of all positions at The Positive Impact Academy which amount to "regulated activity" as defined in the Safeguarding Vulnerable Groups Act 2006 (as amended). The purpose of carrying out an Enhanced Check for Regulated Activity is to identify whether an applicant is barred from working with children by inclusion on the Children's Barred List and to obtain other relevant suitability information.

It is The Positive Impact Academy's policy that the DBS disclosure **must be** obtained before the commencement of employment of **any** new employee.

It is The Positive Impact Academy's policy to re-check employees' DBS Certificates every three years and in addition any employee that takes leave for more than three months (i.e.: maternity leave, career break etc) must be re-checked before they return to work.

Members of staff at The Positive Impact Academy are aware of their obligation to inform the Bursar or the HR Department of any cautions or convictions that arise between these checks taking place.

DBS checks will still be requested for applicants with recent periods of overseas residence and those with little or no previous UK residence.

### ***Portability of DBS Certificates Checks***

Staff may wish to join the DBS Update Service if they are likely to require another check in the future. Applicants may sign up to the Service for a fee of £13 per annum, which is payable by the applicant.

This allows for portability of a Certificate across employers. The Positive Impact Academy will:

- Obtain consent from the applicant to carry out an update search.
- Confirm the Certificate matches the individual's identity.
- Examine the original certificate to ensure that it is for the appropriate workforce and level of check, ie enhanced certificate/enhanced including barred list information.

The Update check would identify and advise whether there has been any change to the information recorded, since the initial Certificate was issued. Applicants will be able to see a full list of those organisations that have carried out a status check on their account.

### ***DBS Certificate***

The DBS no longer issue Disclosure Certificates to employers; therefore employees/applicants should bring their Certificate to the Human Resources Department, The Bursary, Kingsland House (for employees within 7 days of issue or applicants before they commence work or any project involving regulated activity).

### ***Dealing with convictions***

The Positive Impact Academy operates a formal procedure if a DBS Certificate is returned with details of convictions. Consideration will be given to the Rehabilitation of Offenders Act 1974 and:

- The nature, seriousness, and relevance of the offence.
- How long ago the offence occurred.
- One-off or history of offences.
- Changes in circumstances,
- Decriminalisation and remorse.

A formal meeting will take place face-to-face to establish the facts with the Director and Head of Academy. A decision will be made following this meeting. If relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or obtained through a disclosure check, the Director will evaluate all the risk factors above before a position is offered or confirmed.

If an applicant wishes to dispute any information contained in a disclosure, they may do so by contacting the DBS. In cases where the applicant would otherwise be offered a position were it not for the disputed information, The Positive Impact Academy may, where practicable and at its discretion, defer a final decision about the appointment until the applicant has had a reasonable opportunity to challenge the disclosure information.

### ***Secretary of State Prohibition Orders (Teaching & Management roles)***

In all cases where an applicant is to undertake a teaching role of any kind, a Prohibition Order check will be made using the Employer Access Online Service. It is anticipated that this will be performed at offer stage. A person who is prohibited from teaching must not be appointed to work as a teacher in such a setting.

Prohibition orders are made by the Secretary of State following consideration by a professional conduct panel convened by the National College for Teaching and Leadership (NCTL). Pending such consideration, the Secretary of State may issue an interim prohibition order if it is in the public interest to do so. A section 128 direction 39 prohibits or restricts a person from taking part in the management of an independent school.

A person who is prohibited is unable to participate in any management of an independent school, a governor on any governing body in an independent school, or a management position that retains or has been delegated any management responsibilities. A check for a section 128 direction will be carried out using the Teacher Services' system. Where the person will be engaging in regulated activity, a DBS barred list check will also identify any section 128 direction.

### ***Proof of identity, Right to Work in the UK & Verification of Qualifications and/or professional status***

All applicants invited to attend an interview at The Positive Impact Academy will be required to bring their identification documentation such as passport, birth certificate, driving licence etc. with them as proof of identity/eligibility to work in UK in accordance with those set out in the Immigration, Asylum and Nationality Act 2006 and DBS identity checking guidelines. The Positive Impact Academy does not discriminate on the grounds of age.

Where an applicant claims to have changed their name by deed poll or any other means (e.g., marriage, adoption, statutory declaration) they will be required to provide documentary evidence of the change.

In addition, applicants must be able to demonstrate that they have obtained any academic or vocational qualification legally required for the position and claimed in their application form.

### ***Medical Fitness***

The Positive Impact Academy is legally required to verify the medical fitness of anyone to be appointed to a post at The Positive Impact Academy, **after** an offer of employment has been made but **before** the appointment can be confirmed.

All applicants are requested to complete a medical questionnaire and where appropriate a doctor's medical report may be required. This information will be reviewed against the Job Description and the Person Specification for the role, together with details of any other physical or mental requirements of the role.

The Positive Impact Academy is aware of its duties under the Equality Act 2010. No job offer will be withdrawn without first consulting with the applicant, obtaining medical evidence and considering reasonable adjustments.

### ***Overseas checks***

The Positive Impact Academy, in accordance with the UK Visas and Immigration (UKVI) will, if applicable, sponsor new foreign nationals (see Certificate of Sponsorship section).

In addition, applicants who have lived/travelled abroad for more than 3 months will need to obtain criminal records check from the relevant country. The applicant will not be permitted to commence work until the overseas information has been received and is considered satisfactory by The Positive Impact Academy.

### ***Certificates of Sponsorship (CoS)***

If an appointed applicant is a national of a non-EEA country, a CoS may be required. Before any offer of employment is made, the Interviewing Managers should consult with the Director to establish whether The Positive Impact Academy has any unallocated Sponsorship Certificates.

Criteria for issuing a CoS are:

- The job is in a “designated shortage” occupation, or
- It passes the Resident Labour Market Test (RLMT)
- The job is at NQF6 Level or above
- Minimum salary levels as stated by the UKVI are met.

Only the Director will be able to issue a CoS. In addition to the CoS the applicant must apply for entry clearance/leave to remain through the UK Visas and Immigration (UKVI) and comply with the UKVI requirements.

The process can take up to three months and staff cannot, under any circumstances, be employed until permission is given.

Detailed advice on the above is available from the Director.

### ***Induction Programme***

All new employees will be given an induction programme which will clearly identify The Positive Impact Academy policies and procedures, including the Child Protection Policy, the Code of Conduct, and KCSIE, and make clear the expectations which will govern how staff carry out their roles and responsibilities.

### ***Single Centralised Register of Members of Staff***

In addition to the various staff records kept on site and on individual personnel files, a single centralised record of recruitment and vetting checks is kept in accordance with the Education (Independent School Standards) Regulations 2014 requirements. This is kept up-to-date and retained by the Human Resources Office in Kingsland House. The Single Centralised

Register will contain details of the following:

- All employees who are employed to work at The Positive Impact Academy.
- All employees who are employed as supply staff to The Positive Impact Academy whether employed directly or through an agency.
- All others who have been chosen by The Positive Impact Academy to work in regular contact with children.

This will cover volunteers, Governors, peripatetic staff and people brought into The Positive Impact Academy to provide additional teaching or instruction for pupils but who are not staff members eg: sports coaches etc.

A designated Governor will be responsible for auditing the Single Centralised Register and reporting his/her findings to the full Governing Body during the Summer Term meeting.

### ***Record Retention/Data Protection***

The Positive Impact Academy is legally required to undertake the above pre-employment checks. Therefore, if an applicant is successful in their application, The Positive Impact Academy will retain on their personnel file any relevant information provided as part of the application process. This will include copies of documents used to verify identity, right to work in the UK, medical fitness and qualifications. Medical information may be used to help The Positive Impact Academy to discharge its obligations as an employer e.g., so that The Positive Impact Academy may consider reasonable adjustments if an employee suffers from a disability or to assist with any other workplace issue.

This documentation will be retained by The Positive Impact Academy for the duration of the successful applicant's employment with The Positive Impact Academy. All information retained on employees is kept centrally in the Human Resources Office in a locked and secure cabinet.

The same policy applies to any suitability information obtained about volunteers involved with The Positive Impact Academy activities.

The Positive Impact Academy will retain all interview notes on all unsuccessful applicants for a period of 6 months, after which time the notes will be confidentially destroyed (i.e.: shredded). The 6-month retention period is in accordance with the General Data Protection Regulations (GDPR).

### ***Ongoing Employment***

The Positive Impact Academy recognises that safer recruitment and selection is not just about the start of employment but should be part of a larger policy framework for all staff. The Positive Impact Academy will therefore provide ongoing training and support for all staff, as identified through the Annual Review/appraisal procedure.

### ***Leaving Employment at The Positive Impact Academy***

Despite the best efforts to recruit safely, there will be occasions when allegations of serious misconduct or abuse against children and young people are raised. This policy is primarily concerned with the promotion of safer recruitment and details the pre-employment checks that will be undertaken prior to employment being confirmed. Whilst these are pre-employment checks The Positive Impact Academy also has a legal duty to make a referral to the DBS in circumstances where an individual:

- Has applied for a position at The Positive Impact Academy despite being barred from working with children; or
- Has been removed by The Positive Impact Academy from working in regulated activity (whether paid or unpaid), or has resigned prior to being removed, because they have harmed, or pose a risk of harm to, a child.

If the individual referred to the DBS is a teacher, The Positive Impact Academy may also decide to make a referral to the Teaching Regulation Agency.

### ***Contractors and agency staff***

Contractors engaged by The Positive Impact Academy must complete the same checks for their employees that The Positive Impact Academy is required to complete for its staff. The Positive Impact Academy requires confirmation that these checks have been completed before employees of the Contractor can commence work at The Positive Impact Academy.

Agencies who supply staff to The Positive Impact Academy must also complete the pre-employment checks which The Positive Impact Academy would otherwise complete for its staff. Again, The Positive Impact Academy requires confirmation that these checks have been completed before an individual can commence work at The Positive Impact Academy.

The Positive Impact Academy will independently verify the identity of staff supplied by contractors or an agency in and will require the provision of the original DBS certificate before contractors or agency staff can commence work at The Positive Impact Academy.

### **Visiting Speakers (and Prevent Duty)**

The Prevent Duty Guidance requires The Positive Impact Academy to have clear protocols for ensuring that any visiting speakers, whether invited by staff or by pupils, are suitable and appropriately supervised.

The Positive Impact Academy is not permitted to obtain a DBS disclosure or Children's Barred List information on any visiting speaker who does not engage in regulated activity at The Positive Impact Academy or perform any other regular duties for or on behalf of The Positive Impact Academy.

All visiting speakers will be subject to The Positive Impact Academy's usual visitors signing-in protocol. This will include signing in and out.

The Positive Impact Academy will also obtain such formal or informal background information about a visiting speaker as is reasonable in the circumstances to decide whether to invite and/or permit a speaker to attend The Positive Impact Academy. In doing so The Positive Impact Academy will always have regard to the [Visitors and Security Policy], the Prevent Duty Guidance and the definition of "extremism" set out in KCSIE which states: *"'Extremism' is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas. Terrorist groups very often draw on extremist ideas developed by extremist organisations."*

In fulfilling its Prevent Duty obligations The Positive Impact Academy does not discriminate on the grounds of race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age.

### **Volunteers**

The Positive Impact Academy will request an enhanced DBS disclosure and Children's Barred List information on all volunteers undertaking regulated activity with pupils at or on behalf of The Positive Impact Academy (the definition of regulated activity set out above will be applied to all volunteers). Under no circumstances will The Positive Impact Academy permit an unchecked volunteer to have unsupervised contact with pupils.

It is The Positive Impact Academy's policy that a new DBS certificate is required for volunteers who will engage in regulated activity but who have not been involved in any activities with The Positive Impact Academy for three consecutive months or more. Those volunteers who are likely to be involved in activities with The Positive Impact Academy on a regular basis may be required to sign up to the DBS update service as this permits The Positive Impact Academy to obtain up to date criminal records information without delay prior to each new activity in which a volunteer participates.

In addition, The Positive Impact Academy will seek to obtain such further suitability information about a volunteer as it considers appropriate in the circumstances. This may include (but is not limited to) the following:

- Formal or informal information provided by staff, parents, and other volunteers.
- Character references from the volunteer's place of work or any other relevant source;  
and
- An informal safer recruitment interview.

Policy Safety Recruitment Policy  
Updated: J Armson/D Strong  
Date: Sep 2022 - to be reviewed Sep 2023

Signed by Director

A handwritten signature in black ink, appearing to be "James Armson", written over a horizontal line.

James Armson

## SEND Policy

This policy refers to pupils with special educational needs and disabilities (SEND). The Positive Impact Academy recognises the importance that each of its schools play in terms of school arrangements for pupils with SEND. The guiding principle informing this policy is to ensure that pupils with SEND are given equal opportunities to fulfil their academic and personal potential.

The Children's and Families Act 2014 states that a child has special education needs if they have a learning difficulty or disability, which calls for special educational provision to be made for them. They have a learning difficulty or disability if they have a significantly greater difficulty in learning than most pupils in the same age group, or a disability that either prevents or hinders them from making use of facilities of a kind generally provided for pupils of the same age group in mainstream schools. Special educational provision includes that which is additional to, or different from, the provision generally made for pupils of the same age.

The Equality Act 2010 defines disability as 'a person with a physical or mental impairment which has a substantial long-term adverse effect on their ability to carry out normal day-to-day activities.' Thus, the legal definition of disability is not same as the definition of special educational needs. It is therefore possible to be disabled under the Equality Act 2010 and not have SEN, and vice versa. It is also possible to be both disabled under the Equality Act 2010 and have SEN. The Academy accepts that a medical diagnosis may mean that a child is disabled but does not necessarily have SEN. Schools will always consider the pupil's educational needs as well as a medical diagnosis or disability.

Pupils with SEND could have difficulties with one or more of the following four areas of need:

- Cognition and learning - for example, moderate/severe/profound and multiple learning difficulties, dyslexia, dyspraxia
- Communication and interaction - for example autistic spectrum conditions, speech, and language difficulties
- Social, emotional, and mental health difficulties - for example, attention deficit hyperactivity disorder (ADHD), depression, anxiety
- Sensory and/or physical needs - for example, visual impairment, hearing impairment, physical disability.

### Aims

This policy aims to:

- Set out the Academy's commitment to support and make provision for pupils with special educational needs and disabilities (SEND)
- Outlines the roles and responsibilities for members of staff involved in providing for pupils with SEND

### Legislation and guidance

This policy and procedure are based upon the statutory Special Educational Needs and Disability (SEND) Code of Practice and the following legislation:

- Part 3 of the Children and Families Act 2014, which sets out schools' responsibilities for pupils with SEN and disabilities
- The Special Educational Needs and Disability Regulations 2014, which set out schools' responsibilities for education, health, and care (EHC) plans, SEN co-ordinators (SENCOs) and the SEN information report This policy and procedure also comply with the Academy's funding agreement.

## **Roles and responsibilities**

The Positive Impact Group will appoint a SEND Coordinator, to organise and lead SEND provision across the Academy and Foundation. A newly appointed SENDCo must have a recognised and relevant qualification, with extensive experience in the field.

The SENDCo is Amelia Goodhew.

The SENDCo will:

- Work with the Head of Academy and SEND governor to determine the strategic development of the SEND policy and provision in their school.
- Have day-to-day responsibility for the operation of their SEND policy and the coordination of specific provision made to support individual pupils with SEND, including those who have EHC plans.
- Consult pupils with SEND to involve them in their education, consider their wishes and feelings in relation to their provision.
- Provide professional guidance to colleagues and members of staff, parents/carers, and other agencies to ensure pupils with SEND receive appropriate support and high-quality teaching.
- Advise on the graduated approach to providing SEND support.
- Advise on the deployment of the schools' delegated budget and other resources to meet the pupils' needs effectively.
- Be the point of contact for external agencies, especially the local authority and its support services.
- Consult with parents of pupils with SEND and involving them in their education.
- Liaise with potential next providers of education to ensure the pupils and their parents/carers are informed about options and a smooth transition is planned.
- Work with the Head of Academy and governing board to ensure that the academy meets its responsibilities under the Equality Act 2010 regarding reasonable adjustments and access arrangements.
- Ensure that the Academy keeps records of all pupils with SEND up to date.

## **Trustees and Governors**

The relevant trustee for Education and SEND will:

- Help to raise awareness of SEND and disability issues to board meetings.
  - Monitor the quality and effectiveness of SEND provision within the school and update the board on this.
- Ensure that any areas of development brought to their attention are addressed.
- Work with the Head of Academy and SENDCO to determine the strategic development of their policy and provision, and that it adheres to the Academy's policy and procedure.

## **Head of Academy**

The Head of Academy will:

- Work with the SENDCo and relevant trustee to determine the strategic development of the SEND policy and provision, and that it adheres to the Academy's policy and procedure.
- Have overall responsibility for the provision and progress of learners with SEND and/or a disability.

## **Education Mentors**

Education Mentors are responsible for:

- The progress and development of every pupil in their class. Quality First Teaching (QFT) is the first step in responding to pupils with SEND. This will be tailored for individual pupils where necessary.
- Working closely with any specialist staff to plan and assess the impact of support and interventions and how they can be linked to classroom teaching.
- Working with the SENDCO to review each pupil's progress and development and decide on any changes to provision.
- Ensuring they follow this SEND policy.

## **Parents/Carers**

The Academy aims to involve parents/carers and pupils are involved in decisions about what SEND provision should be made. The Academy recognises that parents/carers hold key information, knowledge, and experience to contribute to the shared view of the best way to support learning.

The aim is to have a productive partnership between home and school by:

- Ensuring parents/carers are kept informed of the provision in place for pupils.
- Providing opportunities to share concerns that parents/carers may have and to discuss the progress of pupils.
- Discussing ideas and materials for parents/carers to support learning at home.
- Everyone understanding the agreed outcomes sought for the pupil and what the next steps are.

## **Identifying pupils with SEND and assessing their needs**

We will assess each pupil's current skills and levels of attainment on entry, building on previous settings and key stages, where appropriate. Education Mentors will make regular assessments of progress for all pupils and identify those whose progress:

- Is significantly slower than that of their peers starting from the same baseline.
- Fails to match or better the pupil's previous rate of progress.
- Fails to close the attainment gap between the pupil and their peers.
- Widens the attainment gap.

This may include progress in areas other than attainment, for example, social needs.

Slow progress and low attainment will not automatically mean a pupil is recorded as having SEND.

When deciding whether special educational provision is required, the Academy will start with the desired outcomes, including the expected progress and attainment, and the views and the wishes of the pupil and their parents/carers. The Academy will use this to determine the support that is needed and whether they can provide it through Quality First Teaching, or whether something different or additional is needed.

## **Assessing and reviewing pupils' progress towards outcomes**

The SENDCO will work with Education Mentors to carry out a clear analysis of the pupil's needs and performance. This will draw on:

- Assessment data.
- Their previous progress, attainment, and behaviour.
- Other professionals' assessments, where relevant.

- The individual's development in comparison to their peers and national data.
- The views and experience of parents/carers.
- The pupil's own views.
- Advice from external support services, if relevant

The SENDCo will have regular meetings with all Education Mentors regarding the progress of pupils with SEND.

### **Admission arrangements for pupils with SEND**

Please refer to the Academy's admission arrangements for further information. Where the Academy has been named on a child's Education, Health & Care Plan (EHC) the child will be admitted. The naming of the Academy is undertaken after a statutory consultation with the school to consider whether the school is suitable for the child's age, ability, aptitude, or special educational needs.

### **Supporting pupils moving between phases and preparing for adulthood**

The Academy will share information with the new school, college, or other setting the pupil is moving to. They will agree with parents/carers and pupils which information will be shared as part of this.

### **Evaluating the effectiveness of SEND provision**

The Academy will evaluate the effectiveness of provision for pupils with SEND by:

- Reviewing pupil's individual progress towards their goals.
- Reviewing the impact of interventions.
- Consulting with pupils who have SEND.
- The SENDCo using the graduated approach to monitor effectiveness of provision.
- Holding annual reviews for pupils with EHC plans.

### **Enabling pupils with SEND to engage in activities available to those who do not have SEND**

All extra-curricular activities and visits are available to all our pupils.

All pupils are encouraged to take part in activities outside of usual lessons e.g., sports day/special workshops/extra-curricular lessons like baking and road safety. Provision will be put in place to enable pupils with SEND to access these activities.

### **Complaints about SEND provision**

Complaints about SEND provision within our schools should be made to the Head of Academy in the first instance. They will then be referred to the complaints policy.

The parents/carers of pupils with disabilities have the right to make disability discrimination claims to the first tier SEND tribunal if they believe that an individual academy has discriminated against their children.

They can make a claim about alleged discrimination regarding:

- Exclusions.
- Provision of education and associated services.
- Making reasonable adjustments, including the provision of auxiliary aids and services.

### **Monitoring arrangements**

This policy will be reviewed centrally by the Education Department and locally in line with WCC and the review date by the SENDCo. The outcomes of the review will ensure the policy is current, will be shared with the Director of The Positive Impact Academy and the relevant trustee.

Policy Document: SEND Policy

Updated: J Armson/D Strong

Date: Sep 2022- to be reviewed Sep 2023.

Signed by Director

A handwritten signature in black ink, appearing to be "J Armson", written over a horizontal line.

James Armson

## Staff Absence Policy

The Positive Impact Academy is committed to maintaining the welfare of all its staff, ensuring a safe and healthy environment in which to thrive at work and therefore, strive to fully support staff in all areas of their well-being. Likewise, it is a firm expectation that all staff will attend work every day that they are able to do so. It is accepted that from time-to-time employees will have a genuine health reason that prevents them from attending. When this occurs, management will offer appropriate support to the employee whilst they are absent, aiming to facilitate their return to work as soon as is practicable.

The main objective of this policy is to minimise staff absence from work. This strategy for this will be through promoting a healthy working environment as set out in the Well Being Policy and promoting a healthy lifestyle outside of work. All staff will regularly be encouraged to access a range of health-promoting activities via team meetings and staff one-to-ones.

### Organisational responsibilities

- To provide employees with details of the Staff Absence Policy and procedures.
- To maintain accurate records of staff absences.
- To keep reasonable contact with employees (which may involve meeting with them) whilst absent from work and on their return to work.
- To monitor sickness absences at regular intervals.
- To address absences during staff performance reviews.
- To decide the most appropriate actions with any staff member who has accrued an unacceptable number of absences.
- To promote a safe workplace and healthy lifestyle.

### Employee responsibilities

- To attend work, unless genuinely unable to carry out duties due to illness or injury.
- To observe the organisations procedure for reporting sickness absence.
- To keep in contact with management and to attend any required meetings over the course of the absence.

### Staff Absence Procedure

- To arrange the appropriate lesson cover, a simple absence process is necessary, and all employees must adhere to it. Failure to observe this procedure may result in the absence being considered as unauthorised in alignment with the organisations disciplinary procedure and / or sick pay being with-held.
- On the first day of absence the employee must telephone David Strong, on 07772652082, no later than 7am. If there is no answer to your call, you must leave a voicemail message and David will call you back. You must speak to David before the absence can be authorised. The employee has a duty to keep in contact with David throughout the duration of the absence.
- If the absence lasts for more than 7 consecutive days, the employee must provide a fit note from their GP without which further absences will not be authorised.
- If management are concerned that a reason for absence is not genuine – either at the beginning of the absence, during the absence, or after the absence has occurred – then this would be considered a conduct issue and the disciplinary procedure may be actioned.

### Returning to work

A fit note certificate issued by a GP should state the period that the individual will be unfit and whether they need to see the employee again. If the doctor has not advised that they

will need to see the employee again, then the employee must return to work immediately after the fit note has expired.

A return-to-work interview between the employee and their line manager will be conducted after an absence period last 1 day or longer. Wherever possible this should be conducted during the employee's first day back, but not longer than 3 days after their return. The reasons for this meeting are:

- To greet the employee and welcome them back to work, and to update them on any changes that have occurred whilst they were away. To make available to the employee any minutes from team meetings, training updates or other relevant information pertinent to their role.
- To enquire whether the employee requires any form of support or reasonable adjustment to their role for an appropriate period. For example, if the employee has been absent due to a foot/ankle injury, arrangements could be made for them to work on the ground floor of the building.
- If the employee's absences are a cause for concern, a discussion should take place about the history of the absences, the reasons, any clear pattern, and an action plan drawn up with the aim of reducing further absences.
- If appropriate, the employee will be advised of the next stage in the procedure. For example, a stage 1 Absence meeting (See below).
- Clear, accurate and factual minutes of this meeting must be recorded and signed by the manager and the employee.

To manage attendance accurately, absence should be monitored and reviewed. Outlined below are the trigger points which will ascertain when a staff members level of absence has reached a cause for concern.

### **Trigger points**

- 3 or more incidents of absence in a six-month period.
- 6 or more incidents of absence in a twelve-month period.
- 4 weeks of continual absence.
- Where specific patterns of absence are apparent i.e.: every Friday, before school holidays

These trigger points should not be used as an automatic system to take further action – any such action should depend on the actual reasons for absence. Every employee's circumstance should be duly considered to ensure that all members of staff are treated consistently.

*For part time staff members, trigger points should be pro – rata*

### **Procedure**

This procedure may be implemented where, regardless being discussed during the return-to-work interviews, absences have continued, and the stated trigger points have been passed.

### **Stage 1 Absence meeting**

The director/manager will invite the employee to a Stage 1 absence meeting, providing the date, time, and venue, in writing. The employee must be provided with at least 5 working days' notice of the meeting.

The meeting can go ahead if the employee does not attend, and they will be notified in writing of any decisions made to manage their absences.

During the Stage 1 Absence meeting, the Director will:

- Explain the reason for the meeting and why the levels of absences are of concern.
- Explore the reasons for absences and if there are any issues inside work or in the employee's personal life that may be contributing to the absences.
- Listen attentively to everything that the employee has to say and respond appropriately.
- Implement an agreed plan of identified support to improve attendance.
- Advise that it is expected that there will be a sustained improvement in attendance. Issue an appropriate period to monitor attendance.

Prospective Outcomes:

- No further action required at this stage.
- Set or, if necessary, extend a period of informal attendance monitoring.
- Issue the staff member with a Stage 1 warning, which will stay on record for 6 months. Issue a period of attendance monitoring with the express understanding that further absences within this timeframe may trigger the next stage in the procedure.

### **Stage 2 Absence meeting**

The director/manager will invite the employee to a Stage 2 Absence meeting if no improvements have been made when the target period (of formal or informal monitoring) terminates.

The director/manager will invite the employee to a Stage 1 absence meeting, providing the date, time, and venue, in writing. The employee must be provided with at least 5 working days' notice of the meeting.

The meeting can go ahead if the employee does not attend, and they will be notified in writing of any decisions made to manage their absences.

The director/manager must ensure that all the information relating to the employee's absence is accurate and correct AND that any offers of support to the employee via return-to-work meetings or Stage 1 Absence meetings have been given and documented. If the employee would like medical evidence to be considered during this meeting, it must be submitted prior to the event to provide time for the director or manager to give it due consideration.

During the Stage 2 Absence meeting, the Director will:

- Discuss their concerns about the continued absences and why it remains a management issue.
- Establish the reasons for absence. Are there any issues inside or outside of work that are contributing to or causing absences?
- Review any support measures that have already been put in place to assist staff members to reduce absences.
- Carefully consider the employees responses and identify any further support that can be offered to help the staff member reduce such absences.

Possible outcomes:

- No further action needed at this stage.
- An extension of the support plan and absence monitoring set out in stage 1.
- Issue the employee with a Stage 2 warning, which will remain on file for 9 months. Issue a formal absence monitoring time frame. Explain (and provide in writing) that further absences will lead to a Stage 3 absence meeting that could result in dismissal.

### **Stage 3 Absence hearing**

The member of staff should receive a letter, 10 days in advance of the meeting. This letter should detail:

- The date and time of the hearing and where it will take place. Due consideration must be given to these particulars.
- Any evidence that the organisation will rely on during the hearing. This includes medical evidence.
- Their entitlement to have in attendance a trade union representative / professional association representative or work colleague not involved in the matter. No other person may attend.
- The possible consequences of the hearing.
- That the employee must submit to the director any supporting evidence that he or she will present at the hearing at least 3 working days prior to the hearing.

The member of staff may be granted one extension of up to 5 days if their chosen representative cannot attend on the date or time of the meeting. Moreover, the hearing may go ahead in the absence of the employee and / or the representative. If this were to happen, the member of staff will be notified in writing of any decisions made during the hearing.

The objective of the meeting is to carefully deliberate whether the staff member can continue to be employed with the organisation. This deliberation will consider their health, level of absences and the effect that this has had on their capability to perform their role to the expected standard. Consideration will also be given relating to the organisations ability to absorb the staff member's level of absence.

Possible outcomes:

- If a case for dismissal cannot be ascertained, a final formal warning may be issued which will stay on the employee's record indefinitely. A formal attendance target will be set which, if failed, will result in dismissal without notice, on the grounds that the required levels of attendance have not been sustained.
- If the director decides that the staff member's level of absences is unacceptable and unlikely to improve given the heard evidence, then the employee may be dismissed without notice on the grounds that the required levels of attendance have not and will not be sustained.

### **The management of long-term absence due to sickness**

If an employee is absent for 4 weeks or longer, they will receive regular contact from the director or their line manager. These contacts may include regular reviews to talk about their continued absence, a potential time frame for their return to work with any reasonable adjustments that could be considered to help their return to duties.

### **Accrual of annual leave**

All staff have the right to accrue annual leave whilst absent from work due to sickness.

Policy Document Staff Absence Policy  
Updated: J Armson/D Strong  
Date: Sep 2022 - to be reviewed Sep 2023.

Signed by Director

A handwritten signature in black ink, appearing to be "J Armson", written over a horizontal line.

James Armson

### Return to work interview

The purpose of this meeting is to document the reason for absence and to establish if together we can consider strategies to avoid further absences

Name of employee:		
Name of manager present:		
Date of 1 <sup>st</sup> day of absence	Date of return to work	No of days absent
Reason for absence:	Any absences that are not agreed will be unauthorised and will be:  Paid Not paid Delete as necessary	
Was medical advice sought? Was any advice given followed?		
Was the absence related to an accident at work? Was it reported? Provide details		
Is the member of staff fit to return to work? If not provide details		

Is there anything else that may affect recovery or the chances of this type of absence occurring again?

What support can The Positive Impact Academy provide?

Any further action. Additional meeting? Attendance target? Fit note to be adhered to?

Signature of employee:

Date:

Signature of director / manager:

Date:

## Staff Behaviour Policy

The Positive Impact Academy expects all its staff to set the highest standards of professionalism and behaviour to provide all our students with role models they can look up to respect. This policy sets out the boundaries of behaviour and highlights the way in which staff are expected to behave.

This policy needs to be read in conjunction with the following policies:

- The Positive Impact Academy Staff Code of Conduct (Appendix 1)
- Child Protection and Safeguarding Policy
- E-Safety Policy
- Health & Safety Policy
- SEND Policy
- Administration of Medicines Policy
- Whistleblowing Policy

### Overall Aims

This policy will contribute to safeguarding our students/students and promoting their welfare by:

- Clarifying standards of behaviour for staff
- Contributing to the establishment of a safe, resilient, and robust ethos in The Positive Impact Academy, built on mutual respect, and shared values

### Expectations

All staff will:

- be subject to Safer Recruitment processes and checks, whether they are new staff, supply staff, contractors, or volunteers etc.
- receive appropriate induction training on their responsibilities in being alert to the signs of abuse, bullying or children at risk of radicalisation and on the procedures for recording and referring any concerns to the DSL
- read and sign to confirm that they have read Part 1 of Keeping Children Safe in Education
- read and sign to confirm that they have read The Positive Impact Academy Code of Conduct.
- read and sign to confirm that they have read The Positive Impact Academy Safeguarding Policy.
- receive safeguarding training at intervals of no more than three years. Key staff will undertake more frequent specialist child protection training.

### Obligations

All staff should adhere to their relevant code of conduct.

Staff should be aware that it is not appropriate to use social media to communicate with students. Staff are reminded that it is a criminal offence for a person aged 18 or over to have a sexual relationship with a student under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual.

There are occasions when it is entirely appropriate and proper for staff to have physical contact with students, but it is crucial that they only do so in ways appropriate to their

professional role. Staff should, therefore, always use their professional judgement. Staff should not have unnecessary physical contact with students and should be alert to the fact that minor forms of friendly physical contact can be misconstrued by students or onlookers.

A member of staff can never take the place of a parent in providing physical comfort and should be cautious of any demonstration of affection.

Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority. If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be recorded as soon as possible, and a senior member of staff made aware.

Any restrictive physical intervention should only be used:

- To prevent a student from harming himself/herself
- To prevent a student from harming others
- To prevent a student causing significant damage to property
- To prevent a student from engaging in a criminal act
- When a student engages in behaviour prejudicial to maintaining good order at the school or among any of the students, whether that behaviour occurs in the classroom during a teaching session or elsewhere within the curriculum provision.

Then only as a last resort when all efforts to diffuse the situation have failed.

Where exercises or procedures need to be demonstrated or supported extreme caution should be used if this involves direct contact with a student and, wherever possible, contact should be avoided. It is acknowledged that some staff, for example, those who teach PE and games, or who offer music tuition, will, on occasions, must initiate physical contact with students to support a student so they can perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or assist them with an exercise. This should, whenever possible, be done with the student's agreement.

Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in an open environment. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the student.

Policy Document Staff Behaviour Policy  
Updated: J Armson/D Strong  
Date: Sep 2022 - to be reviewed Sep 2023

Signed by Director

A handwritten signature in black ink, appearing to read "James Armson", written over a horizontal line.

James Armson

## Appendix 1

### Code of Conduct

#### 1. INTRODUCTION

1.1 This Code of Conduct is intended as a guide and a help to all The Positive Impact Academy staff. It sets out standards of conduct which staff are expected to follow when within or representing the organisation. This code is not exhaustive but is written to assist staff and it is important that staff should take advice and guidance if necessary. If in doubt, ask.

1.2 The purpose is to ensure that the organisation provides a high-quality service to its students and partners in accordance with the Mission Statement and to promote public confidence in the integrity of The Positive Impact Academy.

1.3 It takes in the requirements of the law and attempts to define the required levels of professionalism to ensure the well-being of the organisation, its staff, and its customers.

1.4 It has been drafted to comply with the organisations Policies and Procedures.

1.5 Staff are requested to read this Code carefully and consider the issues which it raises.

1.6 The Head of Academy should also ensure that all staff are aware of the Code's contents and are fully briefed on its implications.

1.7 Reference to this Code will be made in all contracts of employment, and copies will be given to all staff. In addition, the induction programme for all new staff will reinforce the principles of this Code.

1.8 Investigations of alleged breaches of this Code will be covered under The Positive Impact Academy's disciplinary procedures and related codes of practice.

#### 2. CODE OF CONDUCT

##### EXCLUSIVITY OF SERVICE

1. Staff's off-duty hours are their personal concern, but they should avoid a position where duty and private interest's conflict. This includes:
  - Staff members making online associations/friendships with current pupils via social networking sites such as Facebook, Snapchat, and Twitter.

The above amendments have been included to safeguard the safety of pupils and the safety and professional integrity of The Positive Impact Academy staff.

2. The School does not seek to preclude staff unreasonably from undertaking additional employment, but you are required to devote your full time, attention, and abilities to your duties during your working hours and to act in the best interests of the organisation at all times. Accordingly, you must not, without the written consent of the Head of Academy, undertake any employment or engagement which might interfere with the performance of your duties or conflict with the interests of the organisation.

3. It follows that, regardless of whether you are employed on a full-time or part-time contract, you are required to notify the Head of Academy of any employment or engagement which you intend to undertake whilst in the employment of the organisation.

### **SPECIFIC ASPECTS**

1. **Discrimination:** Staff must always observe the organisations Equal Opportunities Policies for staff and pupils and treat pupils, parents, and partners in accordance with those policies.

2. **Health and Safety:** Staff must take care of their personal hygiene, safety, and welfare, and that of other persons who may be affected by their acts or omissions. All staff must comply with the requirements of the organisations Health and Safety policy and relevant legislation and regulations, and ensure that pupils do likewise.

3. **Fire:** Staff must familiarise themselves with the fire precautions, procedures, and drill routines. They must regard practice fire drills or building evacuations in a positive manner, and ensure they are perceived by pupils as an essential precaution to prevent risk of injury or fatality.

4. **Business Practice:** Staff must maintain an impeccable standard of integrity in all their professional relationships.

5. **Media:** Other than on matters of publicity, only the Head of Academy is authorised to speak or send any communication on behalf of the The Positive Impact Academy Academy to members of the press or broadcast media. This decision is to avoid any embarrassment or unfair pressure on staff. This authorisation may be extended by the Head of Academy to other staff members.

6. **Copyright:** Staff shall observe copyright laws on computer software, audio-visual and printed material.

### **7. Data Protection Act**

It is the responsibility of all employees to ensure the organisation's compliance with the Data Protection Act. Personal data must only be used to assist you to carry out your work; it must not be given to people who have no right to see it. All staff should maintain the security of all computerised databases of information on individuals, whether they are staff, pupils or members of the general public. Staff should refer any queries to the Head of Academy.

### **GENERAL POINTS**

1. Staff should display the highest possible standards of professional behaviour that is required in an educational establishment (see also Appendix 1).

2. Staff should seek to co-operate with their colleagues, providing support, help and guidance as required by them and their line manager, and enable effective communication throughout the organisation.

3. Staff should not use their position in the organisation for private advantage or gain.

4. Staff should avoid words and deeds that might bring the organisation into disrepute or might undermine colleagues in the perception of others (staff/pupils/parents/community).

5. Staff should retain professional independent objectivity and not promote political bias to others in their working activities.
6. Staff should be aware of, and should follow organisation policies, systems, and procedures. They should normally communicate through the line management structure and should ensure pupils do likewise.
7. Continuing professional development and support shall be provided by The Positive Impact Academy and, where appropriate and agreed, will be based on the objectives of the organisations Development Plan. Periodically, employees will be required to attend certain training activities.
8. Staff should attend their place of work punctually in accordance with their conditions of service and at the times agreed with their line manager. Those unable to avoid being late or absent should, whenever possible, give as much notice to the Head of Academy so that alternative cover arrangements may be made.
9. The Positive Impact Academy uniform should be always worn, if additional uniform is required each member of staff should email the Head of Academy detailing reasons for this.

### **ADMINISTRATIVE DUTIES**

1. Delivery staff shall inform the Head of Academy at the earliest opportunity of any student absence, and reasons for this absence.
2. To ensure safeguards both for staff and pupils, staff must obtain permission from the Director:
  - before taking pupils off the organisation's premises.
  - before arranging for any visiting speakers.
  - before incurring any expenditure on behalf of the organisation.

### **CONFIDENTIALITY**

Staff shall maintain the appropriate levels of confidentiality with respect to student and staff records and other sensitive matters. They should take care not to discuss issues of particularly sensitive matters within the organisations community which could cause distress to staff, pupils or parents.

### **WHEN IN DOUBT, ASK!**

If any member of staff is in any doubt regarding the guidelines of this Code, and how they apply in any situation, then please consult with the Head of Academy. It is re-emphasised that this Code is intended to be a help and to enable fairness and equity between all staff.

## APPENDIX 1

### PROFESSIONAL BEHAVIOUR

Professional behaviour is a generic term, but within this Code of Conduct includes such aspects as:

- Acting in a fair, courteous, and mature manner to pupils, colleagues, and other partners.
- Co-operating and liaising with colleagues, as appropriate, to ensure pupils receive a coherent and comprehensive educational service.
- Endeavouring to assist the organisation achieve its corporate and strategic objectives – in particular, by adopting a positive attitude to marketing and the achievement of quality and equality.
- Respect for The Positive Impact Academy property.
- Maintaining the image of the organisation through standards of dress, general courtesy, correct use of organisation stationery, etc.
- Taking responsibility for the behaviour and conduct of pupils in the classroom and sharing such responsibility elsewhere on the premises.
- Being fit for work (i.e., not adversely influenced by drugs, alcohol, etc.)
- Not taking any illegal substances either in or out of the workplace.
- Being familiar with job requirements (e.g., proper preparation, uniform, use of suitable methods/systems, maintenance of appropriate/required records, etc), including keeping up to date with developments relevant to the job.
- Being familiar with communication channels and organisational procedures applicable to both students and staff.
- Ensuring all assessments/exams/tests are conducted in a fair and proper (prescribed) manner, and that procedures are strictly followed with respect to confidentiality and security.
- Respect for the rights and opinions of others.

This list is not exhaustive, but the examples are given as a summary.

## APPENDIX 2

### DISCIPLINARY RULES

The following are examples of behaviour which the organisation finds unacceptable. The list is not exhaustive, and it is acknowledged that it will be necessary to exercise judgement in all cases and to be fair and reasonable in all the circumstances.

1. Any form of physical/verbal violence towards students.
2. Physical violence, actual or threatened towards other staff or visitors to the organisation.
3. Sexual offences, sexual insults or sexual discrimination against students, other staff, or visitors to the organisation.
4. Racial offences, racial insults or racial discrimination against students, other staff, or visitors to the organisation.
5. Theft of organisations monies or property and of monies or property of colleagues or visitors to the organisation. Removal from organisations premises of property which is not normally taken away without the express authority of the Head of Academy or of the owner of the property may be regarded as gross misconduct.
6. Deliberate falsification of documents such as expense claims for the purpose of gain.
7. Acceptance of bribes or other corrupt financial practices.
8. Wilful damage of The Positive Impact Academy property or of property belonging to other staff or visitors to the organisation.
9. Wilful disregard of safety rules or policies affecting the safety of students, other staff, or visitors to the organisation.
10. Any wilful act which could result in actionable negligence for compensation against the organisation.
11. Refusal to comply with reasonable instructions given by staff with a supervisory responsibility.
12. Gross neglect of duties and responsibilities.
13. Unauthorised absence from work.
14. Being untruthful and/or engaging in deception in matters of importance within the organisation's community.
15. Deliberate breaches of confidentiality particularly on sensitive matters.
16. Being incapable by reason of alcohol or drugs (not prescribed for a health problem) from fulfilling duties and responsibilities of employment.
17. Using illegal substances either in or out of the workplace.
18. Conduct which substantially brings the name of the organisation into disrepute, or which seriously undermines confidence in the employee.

All the above disciplinary rules are examples of behaviour which could lead to formal disciplinary warnings.

Name:.....

Date:.....

Sign:.....

## Student Substance Policy

The Positive Impact Academy are responsible employers, and we take our obligations to our students very seriously. Therefore, we have set out this policy to help us ensure the health, safety, and welfare of our students and to help us comply with our legal duties.

- Section 2(2)(e) of the Health and Safety at Work Act 1974 places a duty on employers to provide a safe and healthy working environment.
- It is an offence to supply, produce, offer to supply, or produce controlled drugs.
- The Misuse of Drugs Act 1971 makes it an offence for the occupier of premises to permit knowingly the production or supply of any controlled drugs or allow the smoking of cannabis or opium on those premises.
- It is also an offence to aid or abet any of these offences.

Any reference in this Policy to a non-prescription drug refers only to controlled or illegal substances and does not refer to medicines, supplements and similar substances that are legally and commercially available in the United Kingdom.

### Aims of the Policy

This Policy aims to:

- Comply with the Company's legal obligations to provide a safe and healthy working environment for all students.
- Comply with all the requirements imposed by law.
- Raise awareness of the effects of drug misuse and its likely symptoms.
- Ensure that students are aware of their responsibilities regarding drug misuse and related problems; and
- Ensure that students who have a drug-related problem affecting their education are dealt with sympathetically, fairly, and consistently.

### Health and Safety

Misuse of drugs can lead to reduced levels of attendance, reduced efficiency, and performance, along with impaired judgement and decision-making. Students should be aware that anyone under the influence of controlled drugs is a risk to everyone around them and should be alert to possible signs of drug abuse. Such indicators commonly include:

Sudden changes in behaviour.

- Confusion.
- Irritability.
- Fluctuations in mood and energy.
- Impairment of performance; and
- Increase in short term sickness absence.

If employees notice a student displaying any or all these symptoms, employees should encourage them seek assistance through their education mentor. If they will not seek help themselves, employees should draw the matter to the attention of their manager. Employees should always follow the Child Protection Policy if a student discloses or is under the influence of substances.

If students are prescribed medication, they must seek advice from their GP about the effect on their ability to engage in education. If unable to attend, parents/carers should advise the allocated education mentor at the earliest opportunity.

## Prohibition

- Students are expected to arrive at education fit to engage in education and to be able to perform their duties safely without limitations due to the use or after-effects of drugs. The use of drugs also includes the use of substances formerly known as “legal highs” or psychoactive drugs, which are legal substances which have the effect of illegal drugs.
- No non-prescription drugs and cigarette tobacco can be consumed in, or brought onto, company premises, land, or vehicles at any time by any person.
- The prohibition of non-prescription drugs and cigarette tobacco extends to all activities carried out by students whilst they are at education.
- No student should be found under the influence of, or in possession of prohibited substances and cigarette tobacco. If found in possession of, education mentors have the right to remove the substance. If the student refuses, they shall be sent home immediately, and parents/carers and the police informed.
- If found under the influence of, education mentors will inform James Armson/David Strong immediately.

## Disciplinary Action

A breach of these rules will be defined as gross misconduct, and it is likely that the student in question will face consequences. The student will no longer be able to take part in any extracurricular activities during that week, or longer if deemed necessary by James Armson/David Strong.

## Principles

- All information relating to a student’s health including, but not limited to, matters involving drugs, will be collected, held, and processed in accordance with the Company’s Data Protection Policy.
- If a student is diagnosed as having a drug-related problem the Company will treat it as a health matter. This does not however excuse the student from any of the disciplinary matters that may fall within the scope of the Company’s student disciplinary action.
- Drug-related problems may develop for a variety of reasons and over a long period of time. All drug-related issues will be dealt with, as far as possible, in a constructive and sympathetic manner. The persons responsible for all such issues in the Company are James Armson and David Strong who will also provide students with the details of where to seek further information and help.
- If it is considered that the learning environment or culture is the cause or a contributor to a drug related problem, the Company will take all reasonably practicable steps to ensure a reduction of such problems.

Policy Document Student Substance Policy  
Updated: J Armson/D Strong  
Date: Sep 2022 - to be reviewed Sep 2023.

Signed by Director



James Armson

## **Employee Substance Policy**

The Positive Impact Academy are responsible employers, and we take our obligations to our employees very seriously. Therefore, we have set out this policy to help us ensure the health, safety, and welfare of our employees and to help us comply with our legal duties.

- Section 2(2)(e) of the Health and Safety at Work Act 1974 places a duty on employers to provide a safe and healthy working environment.
- It is an offence to supply, produce, offer to supply, or produce controlled drugs.
- The Misuse of Drugs Act 1971 makes it an offence for the occupier of premises to permit knowingly the production or supply of any controlled drugs or allow the smoking of cannabis or opium on those premises.
- It is also an offence to aid or abet any of these offences.

This policy covers all employees, consultants, contractors, volunteers, agency workers and service users [students].

All managers have a specific responsibility to operate within the boundaries of this policy, to ensure that all staff understand the standards of behaviour expected of them and to act when behaviour falls below its requirements.

Any reference in this Policy to a non-prescription drug refers only to controlled or illegal substances and does not refer to medicines, supplements and similar substances that are legally and commercially available in the United Kingdom.

### **Aims of the Policy**

This Policy aims to:

- Comply with the Company's legal obligations to provide a safe and healthy working environment for all staff and service users.
- Comply with all the requirements imposed by law.
- Raise awareness of the effects of drug misuse and its likely symptoms.
- Ensure that employees are aware of their responsibilities regarding drug misuse and related problems; and
- Ensure that employees and service users who have a drug-related problem affecting their work are dealt with sympathetically, fairly, and consistently.

### **Health and Safety**

Misuse of drugs can lead to reduced levels of attendance, reduced efficiency, and performance, along with impaired judgement and decision-making. Employees should be aware that anyone under the influence of controlled drugs is a risk to everyone around them and should be alert to possible signs of drug abuse. Such indicators commonly include:

Sudden changes in behaviour.

- Confusion.
- Irritability.
- Fluctuations in mood and energy.
- Impairment of performance; and
- Increase in short term sickness absence.

If employees notice a colleague displaying any or all these symptoms, employees should encourage them seek assistance through their manager [or James Armson]. If they will not seek help themselves, employees should draw the matter to the attention of their manager.

Employees should not, under any circumstances, discuss their concerns with any other colleagues.

If employees are prescribed medication, they must seek advice from their GP about the effect on their ability to carry out their job and whether duties should be modified. If so, employees should advise James Armson/David Strong immediately.

### **Prohibition**

- Employees are expected to arrive at work fit to carry out their job and to be able to perform their duties safely without limitations due to the use or after-effects of drugs. The use of drugs also includes the use of substances formerly known as “legal highs” or psychoactive drugs, which are legal substances which have the effect of illegal drugs.
- No non-prescription drugs can be consumed in, or brought onto, company premises, land, or vehicles at any time by any person irrespective of their status in, or business with, the Company.
- The prohibition of non-prescription drugs extends to all activities carried out by staff whilst they are at work. These activities include, but are not restricted to, driving on company business, when on call or standby duties or when on trips for company business, training, or social events.
- No service user should be found under the influence of, or in possession of prohibited substances. If found in possession of, employees have the right to remove the substance.
- If found under the influence of, employees will inform James Armson/David Strong immediately.
- The Positive Impact Academy reserve the right to drug test all employees, refusing to do so or a positive test may result in disciplinary action.

### **Disciplinary Action**

A breach of these rules will be defined as gross misconduct, and it is likely that the employee in question will face summary dismissal. If, however, an employee agrees to undertake appropriate treatment and/or rehabilitation for an acknowledged drug-related problem, the Company may decide to suspend any ongoing disciplinary action for related misconduct or poor performance pending the outcome of the treatment.

### **Principles**

- All information relating to an employee’s health including, but not limited to, matters involving drugs, will be collected, held, and processed in accordance with the Company’s [Employee] Data Protection Policy.
- If an employee is diagnosed as having a drug-related problem the Company will treat it as a health matter. This does not however excuse the employee from any of the disciplinary matters that may fall within the scope of the Company disciplinary policy.
- Drug-related problems may develop for a variety of reasons and over a long period of time. All drug-related issues will be dealt with, as far as possible, in a constructive and sympathetic manner. The person responsible for all such issues in the Company is James Armson who will also provide employees with the details of where to seek further information and help.
- All requests for help will be treated in the strictest confidence and all information gathered as a result will be held in accordance with the Company’s [Employee] Data Protection Policy. However, it must be recognised that, in supporting staff, some degree of information-sharing is likely to be necessary.

- The Company reserves the right to give affected employees lighter duties at the same rate of pay or require them to take paid leave if it is deemed appropriate.
- Following effective treatment and in the absence of any disciplinary action the Company will endeavour to return an affected employee to the same role previously fulfilled by the employee [and, where this is not possible, to a suitable alternative].
- If an employee following successful treatment for a drug related problem suffers a relapse the Company [will not make] [is under no obligation to make] provision for any further treatment and the employee in question [will] [may] face summary dismissal.
- If it is considered that the working environment or culture is the cause or a contributor to a drug related problem, the Company will take all reasonably practicable steps to ensure a reduction of such problems.

Policy Document: Employee Substance Policy  
Updated: J Armson/D Strong  
Date: Sep 2022 - to be reviewed Sep 2023.

Signed by Director

A handwritten signature in black ink, appearing to be "James Armson", written over a horizontal line.

James Armson

## Transporting Students Policy

The issue of transporting children/young people in cars, particularly members of staff's own cars is one which causes concern to some staff. It is, however, a necessary part of the work that some staff carry out. These guidelines aim to give advice to those staff who undertake this task to keep themselves and the people they are transporting safe.

### Guiding Principles

The guiding principle should be that transporting children/young people in staff cars should be the exception to the rule rather than the norm unless it is an accepted part of a member of staff's role and included in their job description. Any journeys undertaken should always be planned and necessary.

In certain circumstances children/young people may need to be transported in an emergency where management cannot be contacted to approve this. It is anticipated that these by the nature of them being emergencies would be very rare. This guidance, however, still needs to be followed to ensure the safety of staff and young people. Services should therefore put plans in place for such situations that will allow workers to carry out such transport functions with delegated management approval to ensure we act in the best interests of the child/young person.

In situations that have not been planned for or where a section has not agreed its procedures workers will still need to act in the best interest of young people. If this means they must be transported in a car then as long as the worker is acting in accordance with their job role, is following this guidance and associated risk assessment and is not breaking any road traffic legislation, then they will be covered by the local authority for this action as long as they are not acting in a negligent manner.

### Drivers and their Vehicles

Drivers are responsible for their own vehicle's roadworthiness and appropriateness for the task to be undertaken and their fitness to drive. Managers are responsible for monitoring and verifying this. All staff who drive as part of their role and their managers must be fully familiar with the Councils Management of Occupational Road Risk Policy and Guidelines and ensure that these are complied with.

Key features of this document include drivers must ensure that they:

- Have an appropriate valid driving license
- Are insured for the journey (Business Use)
- Have a valid MOT certificate
- Have a valid Excise licence (TAX)
- Have checked the vehicle is in a roadworthy condition
- Are not excessively tired, fatigued or under the influence of alcohol or drugs.
- Meet minimum eyesight standards for driving. If they need to wear glasses or contact lenses to meet minimum standards, these must be always worn.
- Have no medical condition including the taking of medication or infirmity that may affect their ability to drive safely.

Additionally, all drivers should ensure that they have regular eyesight tests to ensure that their eyesight remains within minimum standards for driving. Drivers should also ensure that if their health changes and this could affect their ability to drive then they inform their manager of this immediately. Drivers are also obliged to notify their manager of any driving convictions, endorsements, or disqualifications immediately.

## **Managers**

Managers of those who transport children/young people in their cars must ensure that the staff being asked to carry out this role have the necessary competence and experience. Whilst defining driver competence is always a subjective decision drivers will not normally be deemed competent unless they are between the ages of 18 and 70 and have at least 1 years driving experience after passing their driving test. Managers deeming staff competent to drive outside their parameters will need to fully justify and record the reasons for this decision, equally where a member of staff meets the criteria, but the manager has concerns regarding their competence to drive the reasons a member of staff is not deemed competent and therefore not allowed to transport children/young people, should be recorded.

In making any such decision the needs of the service need to be balanced against the safety of the children/young people and members of staff, and where there is any doubt the safety of the children/young people and staff should take priority.

Managers should check the documentation of their drivers and vehicles before they have staff driving for them in the first instance and then periodically at an interval relevant to the service after that, for the staff who regularly transport children/young people as part of their role, an annual check may well be appropriate and for staff who only carry this out very infrequently a check each time this happens may be more appropriate.

## **Children / Young People**

Before children/young people are transported in staff cars the need and reasons for this method of transportation should be clearly established. Once this has been established a full picture of the needs of the child/young person (including physical, emotional, behavioural, and medical) and the risks that this may present to them, or the staff involved when transporting them needs to be established. This should involve gathering and sharing information with all agencies involved with supporting the child/young person. This information is required to inform specific risk assessment for transporting the child/young person. The information will need to be reviewed regularly to ensure it remains valid.

## **Risk Assessment**

Each section/service area should produce a risk assessment for transporting children/young people based on their circumstances and way of working. The generic risk assessment for this activity can be adapted and used for this. Over and above this where information gathered on a child/young person or staff members safety poses significant risk to the child/young person or staff members safety during transportation, then a specific risk assessment relating to this activity must be carried out. It is not possible to give full detailed control measures for such risk assessments as they will relate to the needs of the individual and the specific circumstances involved.

However, when considering children/young people with medical conditions their transport and any control measures required during transport if this is to be a regular occurrence, should be included in their individual care/treatment plan. This should be used to inform any risk assessment. A second person, trained in administering medication or the relevant medical procedure should always be provided where necessary.

For children/young people who present with behavioural issues a range of control measures could be considered; from not transporting the person if it is felt their behaviour is such that doing so is not safe, providing an escort to ensure the driver can concentrate safely on

driving, placing the child/young person so they cannot easily distract the driver (diagonally across from the driver in the back seat) amongst others.

Child locks should be used when transporting children/young people as a control measure.

### **Travelling**

Only pre planned journeys should be undertaken and these should always be pre-approved by a manager. All journeys should have a fixed start and finish time, and these should not be altered without authorisation.

A system needs to be put in place and communicated to staff to ensure an appropriate response is summoned and action taken in the event of an accident or emergency during transport. All staff who transport children/young people as part of their role should have access to a mobile phone or the appropriate means of communication.

All journeys should only be for named children/young people and their family, if necessary, other people should not be transported with the child/young person if they are not named and part of the arrangement.

The law makes drivers responsible for ensuring those under 14 years of age wear an appropriate seatbelt or child restraint. However, where staff are transporting children/young people as part of their job then they will always be responsible for ensuring the children/young people they are transporting are wearing a suitable restraint irrespective of their age. As there are very clear dangers to passengers and drivers if restraints are not worn then if a driver becomes aware of this, they should stop the journey as soon as it is safe to do so. If the passenger continues to refuse to wear a seatbelt/restraint, then the contract system should be implemented, and the journey ceased until a solution is found.

Drivers must not use mobile phones, drink, or smoke while transporting children/young people and should be aware of the highway code and drive appropriately and within speed limits. To facilitate this when planning journey's adequate time for the journey must be allowed.

### **Child Restraints**

When staff are transporting children/young people they should ensure that the correct type of restraint is used and that it meets the required standards. Restraints should also be checked before use to ensure that they are well-maintained and fit for purpose, with no defects.

If no seat belts are fitted in the front, then passengers including children and young people cannot travel in the front.

**NB: - CARS, VANS, GOODS VEHICLES WHICH DO NOT HAVE SEATBELTS FITTED MUST NOT BE USED TO TRANSPORT YOUNG PEOPLE.**

### **Children/Young People**

Parents must give their permission for children/young people to be transported in a staff member's vehicle, where this is necessary. Every effort should be made to gain written consent but where this is not practically possible; details of the verbal consent should be recorded. If no type of consent is obtained, transportation should not be permitted.

Children/young people must behave appropriately while travelling in the vehicle. If there are any concerns during the journey a dynamic “on the spot” risk assessment should be carried out to determine if there is a significant risk to the driver or passenger and appropriate action taken.

If the child/young person has a medical condition that is likely to require additional support/medication, a copy of their Education, Health and Care Plan plus appropriate medication must be available. A parent or member of staff who has received training in administering support/medication should accompany the young person in the vehicle.

### **Accidents/Incidents**

In the case of a road traffic accident, these must be reported by the driver, to their own insurance company and passengers must be advised of the name and address of the insurance company, if wishing to make a claim.

Policy Document Transporting Students Policy  
Updated: J Armson/D Strong  
Date: Sep 2022 - to be reviewed Sep 2023.

Signed by Director

A handwritten signature in black ink, appearing to be "James Armson", written over a horizontal line.

James Armson

## Wellbeing Policy

The Positive Impact Academy aims to reduce absences through ill health, retain its valued staff, increase productivity and efficiency, and improve job satisfaction. The methods in which this will be done is set out in this policy.

Leadership at The Positive Impact Academy are fully engaged in developing a happier and healthier team and appreciate that our place of work can be utilised to foster an environment that champions healthier working practices.

The organisation aims to promote the benefits of making healthy lifestyle choices outside of work. Senior management lead by example in their commitment to a healthy lifestyle by regularly exercising, not smoking, maintaining a healthy weight and importantly by investing in the workforce by offering a bespoke health insurance scheme.

All staff are signed up to Vitality health insurance which encourages regular exercise, healthy eating, meditation and relaxation through discounts, rewards, and benefits.

### Physical health

Being physically active is crucial for maintaining good health and wellbeing. Many causes of ill health among adults are associated with a lack of physical exercise and increasing physical activity can alleviate and improve symptoms of existing health issues.

Exercise can help alleviate stress and anxiety, improve mood and musculoskeletal conditions. There is evidence to suggest that regular activity results in a quicker recovery from any illnesses that are experienced. Staff are encouraged to access the range of benefits provided by the Vitality programme – reduced gym subscriptions, reduced bills for healthy food and discounted membership to WW (Weight Watchers) and access to same day consultations with private GPs.

Staff are also encouraged to adhere to the Health and Safety policy, and report anything that may compromise the health of any employee, such as broken or faulty furniture or equipment.

### Mental Health

Being mentally unwell and suffering from work related stress is linked to disease and disability and is responsible for approximately 12.7% of absence from work. Protecting the mental health of staff is a priority of The Positive Impact Academy and as such the Director is committed to promoting staff being mentally healthy in the following ways:

- By signing up to the West Midlands Combined Authority (WMCA) Thrive at Work Wellbeing Commitment. This is an obligation by The Positive Impact Academy to carry out a series of actions that will support staff and positively influence the culture of the organisation as one that advocates health and wellbeing.
- Mental Health Awareness training. SLT will undertake yearly training to update their knowledge, understanding and awareness of mental health issues, management of MH issues in the workplace and the Disability Discrimination Act.
- Staff will also have full access to Big White Wall – an online service that provides an anonymous forum where they can access support from qualified 'Wall Guides'. Additionally, staff benefit from heavily discounted app subscriptions that promote mindfulness and relaxation and from relaxing stays at spas across the region.

- Where there is long term absence due to MH issues, wherever possible a graduated return to work will be implemented
- Any member of staff experiencing MH problems will be treated impartially and consistently. Matters regarding their health will be treated with strict confidentiality and will only be shared on a need-to-know basis with the express consent of the individual.

### **Healthy Eating**

Healthy nutritional choices are key to maintaining good health and an appropriate weight. Unhealthy diets contribute to the prevalence of obesity, type 2 diabetes, back and knee problems, coronary heart disease, some cancers and poor mental health. Staff are supported to make healthy food choices while at work by having access to a well-equipped kitchen and food storage areas in which healthy meals can be prepared and shared away from their desks.

Each year one week is designated as Healthy Eating Week and a range of activities are organised to promote healthy food choices.

Health at work will be shared on SLT meeting agendas.

### **Communication and Distribution**

Staff will be made aware of this policy via emails and team meetings and will be asked to sign a pro forma confirming that it has been read. This policy will be placed on the shared drive, therefore being always available staff.

This policy will also be included in the staff induction handbook.

Policy Document Well Being Policy  
Updated: J Armson/D Strong  
Date: Sep 2022 - to be reviewed Sep 2023.

Signed by Director

A handwritten signature in black ink, appearing to read "James Armson".

James Armson

## Whistleblowing Policy

Whistleblowing is what happens when an employee reports their concern(s) about practices or incidents that have occurred or are occurring in the workplace. Such practises could include unlawful conduct, financial misconduct or negligence, danger to the staff, learners or any visitors to the centre, or the poor conduct or misconduct of employees. This policy complements The Positive Impact Academy's Safeguarding Policy, Code of Conduct and Health and Safety Policy.

The aim of this policy is to encourage and empower staff to report serious concerns rather than ignore any arising issues.

The Director (James Armson) and management are committed to the highest possible standards of transparency and accountability and will take actions to deal with any inappropriate or unsuitable practice. The Director and management will:

- Provide avenues for staff to report concerns outside of their line management.
- Will not allow any staff member who comes forward with an issue reported in good faith to be treated unfairly or victimised in any way.
- Make sure that all reports are dealt with in strict confidence and do their utmost to protect the identity of the whistle-blower.
- Look into any concerns brought to their attention and provide a response to the issue raised.
- Act against the wrong doers in line with The Positive Impact Academy's Code of Conduct, Health and Safety Policy and Safeguarding Policy.
- Similarly, action will be taken against any staff member found to have made a deliberate false allegation.

### When should the Whistleblowing Policy apply?

The Public Interest Disclosure Act 1998 outlines when statutory whistleblowing protection applies. These are:

- A criminal Offence
- Failure to comply with a statutory or legal duty
- Improper or unauthorised use of funds
- A miscarriage of justice
- Sexual or physical abuse of any staff member or learner
- Any discrimination of any staff member or learner on the grounds of sex, age, race, disability, religion, belief, or sexual orientation.
- Endangering of a person's health and safety
- Damage to the environment
- Deliberate concealment of any of the above.

Similarly, the Director will provide protection to any employee who raises concerns deemed to be contravening The Positive Impact Academy's Code of Conduct. This policy will be implemented encompassing relevant legislation.

### How to raise a concern

The Director (James Armson) will accept any concern made verbally or in writing and respond to any concern raised under the Whistleblowing Policy, within 3 days. This response will include:

- An acknowledgement that the issue has been received.
- Details of how the investigation will be made and when.

Depending on the nature of the concern raised, the investigation may involve

- The Police
- The Health and Safety Executive
- The Local Authority
- Ofsted

However, some issues could be settled without any required investigation.

The Director accepts that the decision whether to disclose a concern can be difficult, fear of retaliation from those responsible for the alleged issue can be one reason for a member of staff not to come forward. The Director will not tolerate any bullying or harassment and will be proactive in taking steps to ensure this does not happen.

If a member of staff would like to raise a concern outside of the company, or believes that the Director has not appropriately dealt with their concern the contact points detailed below may be relevant:

- Ofsted
- The Police
- Your Solicitor
- The Health & Safety Executive

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Signed by Director

A handwritten signature in black ink, appearing to read "James Armson".

James Armson