Approved Policies for Adoption by Schools

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This document contains 10 policies and 16 documents, for use by Globeducate schools.

1. Admissions Policy and Procedures

Introduction

The aims of this policy are:

1. To define consistent and fair admissions procedures in Globeducate schools

2. To clarify academic and other abilities appear to match the ethos and standards of the school and whose personal qualities suggest they have the potential to contribute sufficiently to the school community and benefit from the opportunities here.

- The Head of School is accountable for implementing the admissions policy.

- Those involved in selection and interviewing have received appropriate training.

Equality of Opportunity regarding Admissions

All Globeducate schools are committed to the promotion of equal opportunities amongst staff, students and prospective students, regardless of gender, gender identity, sexual orientation, age, gender reassignment, creed/religion, race or colour, nationality or ethnic background, pregnancy or maternity, social or marital status or special needs including disability.

All students and employees are of equal value and are entitled to equal provision, access, respect, courtesy and consideration.

Admission of Students with Special Educational Needs or Disabilities (SEND)

The School will do all that is reasonable to accommodate the needs of applicants who have disabilities for whom, with reasonable adjustments, the school could cater adequately. Parents of a child who has any disability or special educational or medical need should specify this information on the application form and provide the school with further details as requested.

The school needs this information in order to assess those needs to ensure that the school can provide adequately for the pupil throughout the admissions process (including at interview, on attendance at the School, taster days and during the Entrance Examination, or as appropriate).

Where there is a diagnostic report from an educational psychologist, medical expert or other professional report to support special arrangements, the school will make appropriate provision during entry assessments.

The school will consult with parents about the adjustments which can reasonably be made for the child, both during the admissions process and later as a pupil. However, the school is a mainstream school and not a special school and therefore teaching staff may not necessarily be trained in specific areas. It is the parents' responsibility to ensure that the provision matches their child's needs on admission.

Typical Entry Points & Procedures

Our schools typically admit pupils from a wide range of abilities but a small number fall outside the ability range that we cater for. Progress to the next stage of education is dependent on a pupil making sufficient progress and the school judging that it can meet the pupil's needs for the following level of education. Any doubts about progression will be discussed with parents as early as possible before the end of the preceding spring term and a formal review will take place before the summer half-term.

The Early Years & Primary School Sections
Places are offered subject to availability following, as applicable, successful taster days and reports from the previous school.

The Secondary or Middle & High School Sections
After parents have applied for a place, and the application form has been reviewed, most pupils will be invited to the school for a visit. The school may also request information from previous schools before making an offer of a place.

Post-16 (Baccalaureate or VI Form)
Existing pupils will normally progress to the baccalaureate or VI Form years post-16, subject to prior satisfactory academic progress. New applicants are internally assessed by each Globeducate school. If it is not possible for an overseas pupil to visit the school, this interview will be carried out by the school´s chosen online meeting platform.

Admissions Procedures for students who are not fluent in English or the main language of instruction may be required to take a language test as well as an appropriate mathematics examination.

Selection

1. **The preconditions for admissions are that:**

- The applicant is of the appropriate age and sufficient maturity;
- The applicant has the ability to access the curriculum;
- The school is able to provide adequately for any learning difficulties, disabilities and other special needs (if any) the applicant may have;
- The student's current school reports on a satisfactory attitude and conduct
- Fees (at the present school) have been paid.

2. **Applicant's age**

In exceptional cases, Globeducate schools may offer places to pupils one year ahead or behind their standard year group if it is considered, as a matter of professional judgment, that this would be in the best interests of the pupil and the school.

3. **Special circumstances**

We recognise that a candidate's performance in admissions tests or taster days may be affected by particular circumstances and will take these into account when making a judgement for example:

- If the candidate is unwell when taking tests or has had a lengthy absence from school;
- If there are particular family circumstances such as a recent bereavement;
- If there is a relevant educational history, e.g. education outside the relevant education system;
- If the candidate has a disability or specific learning difficulties;
- If the candidate's is not fluent in the language(s) of instruction.

Admissions Process

1. Enquiry

- All admissions enquiries made to the school are recorded
- All communication between the prospect family and the school is recorded

Prospective parents are encouraged to visit the school in order to assess the suitability of the school for their children. Open days are held at least once a term.

2. Application

a. Application Form

i. Parents are asked to fill in an application form and pay any application fee in line with school policy
ii. The prospect parent should send all documents requested as outlined on the application form, as outlined in school policy

If any documentation is missing, the school will seek the additional information needed before inviting the prospective student to school:

- Prior School References (where applicable)
- The School may ask for a written reference from the candidate´s current school, as to the candidate's academic progress, attitude, involvement in the school community, talents and interests, and any other special circumstances such as special education needs or a disability. The reference may also include the results of academic attainment.

3. Interview

Students will typically be asked to attend an interview with a senior teacher or senior leadership team member.

4. Acceptance

Confirmation Letters
i. Letters offering places will normally be sent out shortly after completion of the admissions process
ii. To accept the offer, parents will typically be asked to complete and return the enrolment forms and pay the acceptance deposit
iii. Waiting list – where a place in not currently available, parents will be informed that their child has cannot yet be given a place but has been placed on the waiting list.

5. Enrolled

- A student is officially enrolled at the school once the offer of place has been accepted by the prospective family, all documentation pertaining to the Admissions Process is fully complete and all payments have been made.
- Enrolment Certificates can be issued at this point if required by the prospective family.

6. Started
A student has officially started at the school once the first day of class for the student's programme commences and the student is present and counted.

Complaints regarding the Admissions Process

Parents of prospective students who are unhappy with how the admissions policy has been handled and would like to lodge a complaint should refer to the Globeducate Complaints Policy.

2a. School Policy for Conflict Resolution between Students
(including preventing bullying)

This policy should be read and used in conjunction with the following documents:

- Safeguarding and Child Protection Policy
- Exclusion Policy

Rationale

This policy is based on the principle that all members of the school community have the right to enjoy their lives in a safe and caring environment, free from disruption, violence, and any form of harassment. Our mission is to prepare each student to become a global citizen who can shape the world. We uphold a culture of developing skills and attitudes that enable every student to flourish academically and personally.

Tension between children from time to time is natural and it is normal and inevitable that students will disagree and not everyone will be friends with everyone they meet; however, we expect high levels of mutual respect and of personal integrity. We will not tolerate unkind, disrespectful, or bullying behaviour.

Members of staff investigate all forms of conflict and are committed to dealing proactively where behaviour is not within our set of expectations. We acknowledge that sometimes it might not be an intention to cause distress and hurt, but that this can be a consequence of a student's actions. We expect students to respond positively to the clearly articulated expectation to be respectful of one another but understand that this might need reinforcement and practical explanation, especially for younger students.

Definitions

In all Globeducate schools we define bullying behaviour as repeated, intentional, malicious actions or words, which either directly or via other media cause distress, or make others feel unhappy, intimidated, humiliated, or insecure.

Bullying is not:

- Falling out between friends after a quarrel or disagreement
- A disagreement where both sides express their views

Bullying hurts another student or group physically or emotionally. It can cause psychological damage and may be motivated by prejudice against particular students on grounds of race, religion, culture, sex, gender, gender identity, sexual orientation, SEN/disability, or because a child is adopted.

Bullying can be carried out directly and indirectly through cyber-technology, often through social media, and may include photographs or video. We acknowledge bullying is damaging to those who experience it and those who perpetrate it and that there are criminal laws which apply to harrassment and threatening behaviour or communication.

Bullying can become a safeguarding/child protection issue and in these circumstances, cross reference should be

made with the Globeducate policy on Child Protection and Safeguarding. Students and their parents must be aware of the school's responsibility to involve other statutory agencies where there is evidence of a crime having been committed or where child protection issues are involved.

Forms of bullying include:

- **Physical** - being punched, pushed, or hurt; made to give up money or belongings; having property, clothes or belongings damaged; being forced to do something they do not want to.

- **Verbal** - name-calling, sarcasm, teasing, insulting, making threats, spreading rumours, making comments which are racist, sexist, or homophobic in nature or which focus on special educational needs, disabilities or religious or cultural differences. Gender reassignment and transphobic bullying is also included.

- **Emotional** - excluding, isolating, or ignoring, tormenting, being unfriendly, graffiti, chastising, teasing, name calling, making gestures, mimicking, mocking, being indifferent, spreading rumours, passing messages, and whispering.

- **Sexual** - unwanted physical contact or comments of a sexual, sexist, or homophobic nature.

- **Electronic or 'cyber' bullying** - bullying of any of the above types which makes use of electronic forms of communication e.g., messaging, posting offensive materials on the internet, sending pictures/video-clips, silent calls or abusive messages, emails, chat rooms, instant messaging and the use of personal websites or online personal polling sites.

- **Encouraging other to engage in bullying** - manipulating a third party to tease or torment someone is considered to be bullying and it can involve complicity that falls short of direct participation.

Students who are aware of bullying taking place but who choose not to report it will be considered associates of the bully.

Procedures for managing allegations of conflict or bullying behaviour

Allegations of bullying or behaviour that falls short of our expectations will often initially be raised with a student's tutor. The tutor should inform the Senior Leadership Team and/or the Designated Safeguarding Lead, and ensure that the affected student feels safe and has been listened to. Other individuals involved in the incident should be interviewed separately.

We regard our students as individuals and acknowledge that they do not always want the same response when they raise concerns about unkind or disrespectful behaviour or make allegations of bullying. We make clear that the person they are talking to cannot keep what they are told to themselves and that they will have to share the information with other people in the school. Concerns raised by one child against another must be substantiated through investigation.

During the investigation, staff members will ascertain from an 'affected party' if they wish to be:

- heard but not want action taken
- heard and require advice or support or require support (see appendix 1)
- heard and require immediate intervention and action by staff

Wherever possible, the affected student's wishes will be respected, and they should feel empowered by the school's actions to ensure that appropriate action will be taken to end the unacceptable behaviour or threats of bullying. Where direct intervention or action by staff is required, this will be explained to the student concerned.

The parents of students who are either affected parties or perpetrators of substantiated bullying will be fully

informed of actions taken to ensure the ongoing support of their children; however, they are not invited to attend meetings between students or to observe any other discussions that take place.

Reporting incidents of conflict

Students can raise their concerns about unkind or disrespectful behaviour or make allegations of bullying, in a variety of ways:

By talking to:
- their tutor
- any member of staff they trust
- school nurse or school counsellor
- a senior student or prefect

Tracking and recording incidences of conflict and bullying

All allegations of bullying behaviour or serious conflict are discussed with the Designated Safeguarding Lead or a Senior Leader, who will record the incident and investigation. This enables a consistent and coordinated response, as appropriate, while retaining the ability to deal with instances of bullying on a case-by-case basis. It also enables the school to maintain a record of all instances where a conflict between students has been investigated. Senior staff can identify trends and respond accordingly.

All substantiated allegations of bullying are reported to the Senior Leadership Team for review.

Strategies for preventing bullying and conflict

Globeducate schools use a range of measures and initiatives to promote a safe and caring school environment where difference and diversity are celebrated. Stereotypes are challenged by staff and students across the school. We promote an atmosphere in which 'telling' is safe and acceptable. As a community, we recognise and celebrate international days relating to tolerance and anti-bullying.

We place importance on offering support and assistance to younger and to vulnerable students. We also provide in-service training which allows staff to understand and identify bullying, appreciate its consequences, understand where and when bullying is most likely to take place.

The catering, maintenance, and administrative staff are all encouraged to share concerns directly with teachers or a member of the Leadership Team, should they witness incidences of poor behaviour or suspect that bullying is taking place within the school.

We receive feedback from our students through channels such as questionnaires, tutorials, personal social and health education (PSHE) lessons, school councils and other teams to determine whether students believe that bullying is an issue for the school. We use their feedback to help develop the ways we deal with incidents of bullying and in turn shape future school policy.

Our IT department monitors the school's network and internet access. Certain sites are blocked by our filtering system and all students and staff have to sign the IT/ICT Acceptable Use Policy to indicate that they have read and understood its terms. The document lays down the way in which the computer network and associated technology should be used. The school imposes sanctions for the misuse, or attempted misuse of digital technology, including the internet.

We offer guidance on keeping names, addresses, passwords, and other personal details safe, through ICT and PSHE lessons, e-safety presentations, and assemblies. These sessions explain what cyber-bullying is, the law in relation to digital safety and how to report cyber-bullying, as well as the importance of maintaining the same standards of online behaviour as in other aspects of one's personal behaviour.

Proactive Classroom Management

Every member of staff should adopt a positive culture towards differing opinions, lifestyles, and attitudes to ensure that students see that discriminatory behaviour is not acceptable.

If members of staff see signs of tension or witness unkind behaviour, they should challenge the behaviour in a non-threatening manner on the spot, e.g., "that was nasty", "that was unnecessary" "why is that funny?" Teachers must ensure they record incidents along with any action they have taken, including verbal reprimands.

We expect teachers to have in place an 'open door' policy with students – confrontations may not be reported if the teaching staff does not appear approachable or if students worry they will not be taken seriously.

Support and Sanctions

Any sanctions will be applied fairly, consistently, and reasonably, considering any special educational needs or disabilities and the needs of vulnerable students. Regard will be paid to the individual circumstances in each case of all students involved, including the age of students, their ability to understand the consequences of their actions and previous behaviour. It may be necessary to draw up a welfare plan / risk assessment to support students concerned.

Depending on circumstances, a range of sanctions and support strategies may be utilised including:

- Reflective practice sessions to reinforce to the 'aggressor' that their behaviour is unacceptable
- Where appropriate, the students will be reconciled through restorative practice
- 1:1 intervention sessions with the school counsellor or pastoral tutor
- Raised awareness of unintentional distress or hurt caused, resulting in modified future behaviour by the 'aggressor'
- Acknowledgement of intentional distress or hurt caused, resulting in modified behaviour and cessation of actions that fall short of the school's behaviour expectations
- An offer of genuine apology, either verbally or in writing, by the aggressor and its acceptance by the affected party
- A period of internal exclusion
- Entry on a school behaviour log for the aggressor in order to dissuade against repetition or retaliation

In serious or repeated cases of bullying:
- A fixed term exclusion
- Permanent exclusion from school / boarding

We would expect to see in an 'aggressor' an acceptance of the seriousness of the situation, the need to avoid unkind behaviour and to demonstrate respectful behaviour at all times. In addition, we would ensure that the 'aggressor' is aware that any repetition is likely to be considered as bullying and would lead to more serious sanctions.

Early Years Settings

Our youngest children are encouraged to behave towards each other with kindness and consideration. We model and embed our school ethos and personal learning goals from Pre-School onwards and expect our children to behave accordingly. They should respect everyone and learn to value differences and diversity. Any concerns are quickly raised and addressed. We explain to children why some forms of behaviour are unacceptable and can be hurtful to others using and, though very rare, any instances that need to be referred to senior staff will be communicated to parents.

Appendix 1: Giving advice to students

Managing conflict

Staff members may explain conflict to students with a tone of:

'It's okay to not get on with some people – we can't always be friends with everyone we meet. Sometimes you might not like someone when you first meet them, but you might find that as time goes on you start to like them more. Try not to judge someone before getting to know them!'

'We can't choose how we feel, but we can choose how we act. If you don't really like someone it is still possible to get along with them without being good friends.'

Some ideas on how to minimise conflict may be:

- Always treat others as you would like to be treated yourself.
- Be open minded. Don't listen with pre-conceived ideas - consider other people's opinions and points of view.
- Stay calm and in control – take a deep breath, mentally remove yourself from the situation
- When someone else is being 'picked on' or is in distress, tell the aggressor their behaviour is not acceptable, then walk away (take the affected party with you) and report it to a member of staff.
- Don't argue back or become aggressive
- Learn the difference between aggressive, passive, and assertive – be assertive
- Watching and doing nothing may suggest you support the aggressor. This is especially the case in cases of cyber-bullying. Even if you are a bystander, or if you belong to an on-line group or use social media, YOU become involved!

Are they really friends?
Friends are different to family or classmates. This is because you choose who you are friends with, and they choose you.

Friends should never:
- put you down
- make fun of you, your religion, sexuality, or culture
- put you in danger or make you feel unsafe.

Sometimes friends fall out. Usually they make up again soon, but things can sometimes be more serious, and you may need support from a trusted adulted in school to help you resolve these issues.

Childline also has some good advice for managing friendship issues!

https://www.childline.org.uk/info-advice/friends-relationships-sex/friends/friendships/

Advice on combatting cyber bullying:

- Always respect others - be careful what you say online or what images you send
- Remember that when you send a message to someone, you cannot see the impact that your words or images may have on the other person.
- What you think is a joke may really hurt someone else
- Always ask permission before you take a photo of someone
- If you receive a rude or nasty message or picture about someone else, do not forward it, (You could also be breaking the law!)

- Think before you send
- It is important to think before you send any images or text about yourself or someone else by email or mobile phone, or before you post information on a website.
- Don't let anyone know your passwords and change them regularly
- Remember that what you send can be made public very quickly and could stay on line forever. Do you really want your teacher, parents, or future employer to see that photo?
- Only give your mobile number or personal email address to trusted friends.
- Don't retaliate or reply. Replying to nasty messages, particularly in anger, is just what the aggressor wants.
- Save the evidence. Learn how to keep records of offending messages, pictures, or online conversations
- Take screenshots.
- Tell an adult (e.g. a parent, your tutor / teacher)
- Stand up for your friends - if you see cyber-bullying going on, report it to a member of staff (and your parents) and on-line reporting tools embedded into the programs or apps you are using.

2b. Student Exclusion

1) The aims of this policy:

    a. To ensure procedural fairness and natural justice.
    b. To assist the individual in recognition of unacceptable behaviour and the need to change
    c. To promote co-operation between parents and Globeducate schools, when it is necessary for a student to be temporarily excluded or to leave school earlier than expected.

The policy applies to all students at Globeducate schools but does not cover cases when a student has to leave because of ill health, non-payment of fees or withdrawal by their parents in circumstances not relating to disciplinary incidents.

References to "Parent" includes one or both of the parents, a legal guardian or carer.

2) Exclusions from School

The examples of the circumstances which may lead to serious sanctions, including temporary or permanent exclusion, are stated in the school's Behaviour and Discipline Policy. Other circumstances which could also lead to exclusion include breaches of the law, dangerous or reckless behaviour, and a persistent attitude or behaviours which are inconsistent with the school's expectations.

3) Procedure for investigation of behaviour that may result in serious sanctions

1. An investigation and any subsequent meetings will be conducted fairly and appropriately, in a way that supports all parties, without formal legal procedures.

2. The investigation of an incident, allegation or rumour of serious misconduct will normally be co-ordinated by a member of the Senior Leadership Team and its outcome will be reported to the Head of School. If the investigation is of a nature that could result in permanent exclusion, parents will be informed as soon as possible.

3. An appropriate search of a student's space and belongings may be made as part of an investigation and, if deemed necessary, the local authorities be called. However, forced personal searches or intimate searches will not take place.

4. Students may be interviewed by a member of the Leadership Team about an incident, allegation, complaint or rumour. In such cases, arrangements will be made for the students to be accompanied by a member of staff, such as a tutor or teacher. If a student who is waiting to be interviewed needs to be in isolation for a short time, he/she will be accompanied or visited regularly by a member of staff and will

be made as comfortable as possible.

5. The member of staff conducting the investigation will present their findings to the Head of School for consideration. Before deciding if a ´serious sanction´ is appropriate, the following steps will have been taken:

   a. An appropriate investigation will have been conducted
   b. All the relevant evidence will have been considered.
   c. The student will have had an opportunity to be heard
   d. Other relevant individuals will have been consulted, as required

4) Issuing of sanctions

If a student is to be excluded for a fixed term, a member of the School Leadership Team will issue a serious sanction. This may be an internal or external exclusion from the school for a defined period. Exclusions are recorded on a student's disciplinary record and in school records. The Head of School may alert an appropriate senior governing body.

The student's parents will be informed about the nature and duration of the exclusion and any discussion of permanent exclusion will first involve a meeting with the Head of School. In making decisions about fixed term exclusions, the Head of School and Leadership Team will consider any special educational needs, disabilities, gender, and cultural differences that may be relevant to the case.

Permanent exclusion would only take place once all other options had been explored and exhausted, including one-to-one interventions. Some circumstances may require immediate exclusion for the safety of others in the school community.

An external exclusion constitutes a clear warning about continued membership of the school and this warning may be regarded as final. Our schools are very reluctant to sanction students with an external fixed term exclusion more than twice in any stage of their school career.

During a temporary or fixed-term internal exclusion, students will typically undertake some reflective work to reflect on and consider their actions. Student may also access homework and details about work missed.

Following any external exclusion the Head of School will consider the evidence, the nature of the incident and the student's record in the school. If a temporary exclusion is deemed sufficient the student will normally meet with the Head of School before returning to lessons.

In no circumstances shall the school or its staff be required to divulge to parents or others, any confidential information or the identities of students or others who have given information that has led to serious sanctions.

5) Absence from school during disciplinary investigations

In some instances, the school may require parents to withdraw their child from school pending the investigation of an allegation, complaint or incident. This is a neutral, not disciplinary, measure to allow an unimpeded investigation and may also be taken for the good of the student by separating him or her from school pressures. The Head of School will make any such decision in consultation with senior staff.

6) Permanent exclusion / withdrawal of a student from school

The decision to permanently exclude a student is not taken lightly and the best interests of all members of the school community must be given weight whilst making every effort to act with due regard for the future of the student who has engaged in significant misconduct. A student may be permanently excluded if, after appropriate consultation, the Head of School is of the opinion that:

- the student's conduct (whether on or off school premises, in or out of term time) has been prejudicial to good order or School discipline or to the reputation of the school.
- it is not in the best interests of the student or of the school, that he/she remains at the school.

In making decisions about a permanent exclusion, the Head of School will consider any special educational needs, disabilities, gender, and cultural differences that may be relevant to the case.

Some parents, after due consideration, may choose to voluntarily withdraw their child rather than the school imposing permanent exclusion. However, it must clearly be understood that the Head of School reserves the right to insist on permanent exclusion. In addition, if a parent has treated the school, members of its staff or any member of the school community unreasonably to a point that leaving the school is in the best interests of the student or the school, the Head of School can ask the parents to remove their child from the school. This would also be considered as voluntary withdrawal, not permanent exclusion.

Following the permanent exclusion of a student or following their withdrawal from the School, the Head of School will write to the parents to communicate the following:

1. The student's status as a leaver
2. Arrangements for transfer of any course or project work to the student, parents or another school
3. The conditions under which the student may re-enter school premises in the future.

7) Financial aspects

There will be no refund of school fees following permanent exclusion of a student on disciplinary grounds and payment of any outstanding fees and extras is required. The refund of prepaid fees will be made.

8) Directors' review of a permanent exclusion on disciplinary grounds

Parents aggrieved at the Head of School´s decision to exclude their child permanently may make a written application for a Directors' Review. In their application the parents must state the grounds on which they are asking for a review and the outcome which they seek. A directors' review of the Head of School decision should take place within seven working school days. The nominated director will communicate directly with the parents prior to conducting the review. The director has the authority to uphold the permanent exclusion, rescind the exclusion, convert the exclusion into a further fixed-term exclusion or change the leaving status to 'withdrawn'. Parents will be informed in writing of the outcome.

3. Code of Conduct for Staff

This policy should be read in conjunction with the school's current Child Protection and Safeguarding Policy.

Purpose

Relationships between staff and students in Globeducate schools are friendly and mutually respectful. This code has been formulated in order to maintain this balance.

The purpose of the code is to:
1. confirm and reinforce the professional responsibilities of staff (both teaching and non-teaching)
2. clarify our position in relation to sensitive aspects of staff and student relationships.
3. set out the expectations of standards to be maintained within the school.

This Code of Conduct covers:

- One-to-one contact with students including private tutoring outside of school
- Conduct and behaviour including style of dress and use of language
- "Crushes"
- Cases in which restraint is necessary
- Action taken in self-defence or in an emergency
- Physical contact
- Home visits, after school clubs and school trips
- Communication with students and technology
- Photographs and videos
- Confidentiality and data protection
- Whistle blowing

Introduction

All individuals who work in an educational setting have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of students.

All staff must adopt high standards of personal conduct in order to maintain the confidence and respect of their colleagues, students, and the public in general.

1. Allegations of unprofessional or improper conduct, contact or words can arise at any time. All members of staff are reminded that professionalism and vigilance are required to ensure the safety of children in our care and to reduce the risk of an allegation of impropriety against a member of staff. This guidance applies to all adults working in a Globeducate school, not just teachers.
2. Members of staff need to take particular care when dealing with a student who
   a. appears to be emotionally distressed or generally vulnerable, and/or is seeking expressions of affection from a member of staff
   b. appears to hold a grudge against a member of staff

     c.   acts in an over-familiar or flirtatious way with adults
     d.   may have reason to make up an allegation

Some of these behaviours may be indications that a child has been, or is currently being, abused and should therefore be reported to the Designated Safeguarding Lead (DSL) under the school's child protection procedures.

Staff members should be aware of the general guidance that will apply in all cases. In particular staff members:

a. need to exercise professional judgment but always act within the spirit of these guidelines. If members of staff are involved in a situation for which no specific guidance exists, they should discuss the circumstances with a senior colleague. A written record should be kept that includes justifications for any action taken.

b. must be familiar with procedures for handling allegations against staff.

c. must be aware of the school's child protection procedures.

d. Any concerns staff members may have about the appropriateness of another member of staff's conduct towards a student should be made a senior colleague or the Designated Safeguarding Lead.

e. Any allegation of abuse or sexual impropriety by a member of staff or volunteer must be reported immediately to the Head of School, or in their absence the Designated Safeguarding Lead.

f. If the concern is about the Head of School, staff must contact the school's managing director or the Chief Education Officer by emailing daniel.jones@globeducate.com

g. Written records are essential. Any incident involving children that could give cause for concern, whether should be recorded with justifications for any action taken. In addition, incidents should be promptly reported to a senior member of staff. Recording procedures are available from the Head of School or Designated Safeguarding Lead.

One-to-one contact with students

1. Members of staff teaching one student, or conducting a one-to-one meeting or teaching session with a student should take particular care in the following ways:

a. use a room that has sufficient windows so the occupants can be seen, keep the door open or inform a colleague that the lesson/meeting is taking place.

b. arrange the meeting during normal school hours when there are plenty of other people about.

c. do not continue the meeting for any longer than is necessary to achieve its purposes.

d. avoid sitting or standing in close proximity to the student, except as necessary to check work.

e. avoid idle discussion.

f. avoid all unnecessary physical contact and apologise straight away if there is accidental physical contact.

g. avoid any conduct that could be taken as a sexual advance.

h. report any incident that causes you concern to the Designated Safeguarding Lead for Safeguarding and make a written record (dated and signed).

2. Pre-arranged meetings with students outside school should not be permitted unless approval is obtained from their parents and a senior member of staff, and staff should inform colleagues before the meeting.

a. Private tutoring outside of school for current students is not permitted, unless written approval has been given by the Head of School.

b. Staff who use students to babysit or provide other services for their own children should declare this arrangement to the Head of School.

3. In exceptional circumstances, home visits may be necessary. In these cases staff members should:

a. discuss the purpose of any visit with senior colleagues

b. not visit unannounced if it can be avoided
c. leave the door open where they will be alone with students
d. keep records detailing time of arrival and departure and work undertaken
e. discuss with their manager anything that gives cause for concern and refer to other agencies if felt appropriate
f. have a mobile phone and an emergency contact

In Early Years settings, staffing arrangements must meet the needs of all children, ensure their safety, and abide by statutory staff-student ratios. Children should be within sight of staff and always within hearing.

Conduct and behaviour

Safe practice by staff involves using judgement and integrity about their behaviour both at work and outside of it.

1. Smoking is not permitted in any part of the premises or at school entrances at any time, by any person regardless of their status or business with the school.

2. There may be times when a member of staff's behaviour or actions in their personal life comes under scrutiny from local communities, the media, or public authorities. Misuse of drugs, alcohol or acts of violence would be examples of such behaviour. All staff members must therefore report any such examples to the Head of School.

3. The school recognises and embraces the benefits and opportunities that social media offers. However, employees should also be aware of the associated risks, especially around issues of safeguarding, bullying and personal reputation. Employees should:

a. Be aware of their online reputation and recognise that their online activity may be seen by others including parents, students and colleagues;
b. Ensure that any use of social media is carried out in line with this policy and other relevant policies;
c. Be responsible for their words and actions in an online environment.
d. Consider whether any comment, photograph or video posted on social media is something they want students, colleagues, or other employees of the school to read. If in doubt, do not post it.
e. Managers are responsible for addressing any concerns and/or questions employees may have on the use of social media.
f. Be aware that social media is a broad term for any kind of online platform which enables people to directly interact each other.

4. A member of staff arrested or questioned by the police is expected to inform the school at the earliest opportunity. Consideration will be given to all the relevant circumstances and implications.

5. Staff members should ensure that they use appropriate language at all times:
a. avoid words or expressions that have any unnecessary sexual content or innuendo
b. avoid displays of affection either personally or in writing
c. avoid contact such as holding, pushing, pulling, or hitting
d. avoid aggressive or threatening language
e. avoid any words or actions that are over-familiar
f. do not swear, blaspheme, or use any sort of offensive language in front of students.
g. the use of sarcasm or derogatory words should be avoided when punishing or disciplining students
h. unprofessional criticism or personal comments about others should be avoided

Staff Dress Code

Please refer to the school's internal guidelines regarding the professional expectations relating to professional dress and self-presentation

"Crushes"

1   "Crushes", fixations, or infatuations are part of normal adolescent development; however, they need sensitive handling to avoid allegations of exploitation.
2   Where a member of staff suspects that a student may have a "crush" on him or her, or on another colleague, this should be brought to the attention of a senior colleague.

Cases in which physical force or restraint is necessary

1.   All forms of corporal punishment are unlawful. However, there are times when teaching or other staff members may need to use such force or physical contact as is reasonable in the circumstances to prevent a student from doing, or continuing to do any of the following:

a.   committing a criminal offence
b.   injuring themselves or others
c.   causing damage to property, including their own
d.   engaging in prejudicial behaviour to other members of the school community, either in school or during school-related activities

2.   This should only apply where no other form of control is available and where it is necessary to intervene after a student ignores the teacher's instructions to stop. The staff member must not act in a way that might reasonably be expected to cause injury.

3.   The member of staff involved should inform the Designated Safeguarding Lead (DSL) or Head of School immediately following an incident in which physical force has been used and produce a written report as soon as possible afterwards. This is to help prevent any misunderstanding or misrepresentation of the incident, and will be helpful in the event of a complaint. Parents or carers must be informed on the same day, or as soon as is reasonably practicable.

Action taken in self-defence or in an emergency

1.   Action taken in self-defence against an attack may be justified, provided that no more force is used than is necessary. Similarly, where a student is at risk of immediate injury or on the point of inflicting injury on someone else, a member of staff may intervene. This is dependant on compliance with local laws.

2.   Please note that:
     a.   physical force could not be justified to prevent a student from committing a trivial misdemeanour.
     b.   any force should always be the minimum needed to achieve the desired result.
     c.   whether it is reasonable to use force and the degree of force that could be reasonably employed might also depend on the age, understanding and sex of the student.

Physical contact in other circumstances

Physical contact between a member of staff and a student may be necessary and beneficial in order to demonstrate a required action, or a correct technique in, for example, singing and other music lessons or during PE, sports, and games.

Members of staff should observe the following guidelines (where applicable):
   a. explain the intended action to the student.
   b. not proceed with the action if the student appears to be apprehensive or reluctant, or if the member of staff has other concerns about the student´s likely reaction.
   c. ensure that the door is open and, if in any doubt, ask a colleague or another student to be present during the demonstration

If members of staff are at all concerned about any instance of physical contact, they should speak to a senior member of staff as soon as possible afterwards and produce a written report which is passed to a member of the Senior Leadership Team.

Touching may be appropriate where a student is in distress and needs comforting. Staff should use their own professional judgement when they feel a student needs this kind of support and should be aware of any special circumstances relating to the student. For example, a child who has been abused may find physical contact particularly difficult. Staff should always notify a senior colleague when comfort has been offered and should seek guidance if unsure whether it would be appropriate in a particular case.

Where staff are administering First Aid they should explain to the student what is happening and ensure that another adult is either present or is aware of the action being taken.

Children are entitled to privacy when changing or showering. However, there must be an appropriate level of supervision to ensure safety. Adults should:
   a. avoid physical contact or intrusive behaviour when children are undressed.
   b. announce themselves when entering changing rooms and avoid remaining unless required.
   c. not shower or change in the same place as children.

Sometimes intimate care is required, for example when assisting with toileting or removing wet clothes. Staff should:
   a. comply with the school's guidelines, for example a nappy changing policy in the Early Years.
   b. explain to the child what is happening as appropriate.

Where a child has previously been abused, staff should be informed on a 'need to know' basis and should be extra cautious when considering the necessity of physical contact.

Contact outside school & home visits

Staff should avoid unnecessary contact with students outside school:

   a. they should not give students their home address, home phone number, mobile phone number or personal e-mail address.
   b. they should not send personal communications to students (i.e., communications not pertaining to school 'work' and professional matters) unless agreed by a senior colleague.
   c. they should not decide to meet students, individually or in groups, outside school other than on school trips authorised by the Senior Leadership Team.
   d. they should avoid contacting students at home unless this is strictly necessary; they should keep a record of any such occasion.
   e. they should not give a student a lift in their own vehicle other than on school business and with permission from the Head of School.
   f. they should avoid inviting students, groups or individuals, to their home or hotel room unless there is a

good reason, and it has been approved by the School Leadership Team. This prohibition also applies where staff have on-site accommodation.

g. they should ensure that students do not see anything in their home that may cause embarrassment or that might become the subject of inappropriate gossip or rumour

Staff should be aware that when they meet children or parents socially, their contact could be misinterpreted. Any social contact that could give rise to concern should be reported to a senior colleague.

Members of staff who are friends with parents of students or who, for example, are voluntary workers in youth organisations attended by students, will, naturally have contact with those students outside school. However, they should still respect the above advice wherever possible and should keep the Head of School informed of such relationships.

Where staff members are arranging planned social contact with parents or students, such as part of a reward scheme or pastoral care programme, they should still seek the approval of senior colleagues.

The same guidelines should be applied to after school clubs, school trips, and especially trips that involve an overnight stay away from the school. They also apply to contact with children or young people who are students at another school.

Consumption of food and drinks

Our schools have a number of students with food allergies and intolerances. Staff members should follow school policy regarding bringing food into school that may cause an allergic reaction, such as nuts.

Staff members and students should be allowed to drink water in classrooms, unless instructed otherwise by senior leaders. Staff members must exercise caution with hot drinks and take appropriate precautions to avoid spillage, according to school policy.

Where possible, all Globeducate staff, academic and non-teaching, are encouraged to avoid single-use plastic as part of their eating and drinking arrangements. Reusable drinking water bottles are preferred. Staff are also encouraged to be proactive and visible about responsible waste disposal of food and drink packaging. There may be a separate Eco-School Code available from the Eco-School Coordinator.

Mobile phones, photographs and videos

The safety of our students is paramount. All staff must be aware of the need to act responsibly when using their own mobile phone or camera / portable device. Casual or inappropriate use of mobile devices by staff may pose a risk if staff are distracted from caring for a student. It is the responsibility of staff who bring mobile devices to school to abide by these guidelines. Personal use of mobile phones is restricted to lunch/ break times and non-contact periods. Staff should make personal calls in an office or an area out of the sight and sound of students. Mobile phones should be turned off or kept on silent, and kept out of sight.

Staff members should not use their personal mobile phone to contact a parent except in an emergency. Staff should not give out their mobile phone number to a student or contact a student from their personal mobile unless there is a legitimate reason to do so and permission has been given by the Head of School.

The school will not accept liability for loss or damage to personal mobile devices. Inappropriate use of a mobile phone or device will result in disciplinary action.

Photographs and videos are used as part of the learning experience in school and, as such, staff members have a responsibility to ensure that they not only educate our students about the safe and appropriate use of digital images, but also model good practice themselves.

Staff should check the file of parental permissions for student photographs that permission has been received

before taking photographs or video camera footage of any students in class, at any school events or on a trip. They should also check this file before displaying these photographs. Staff should not take images of children using personal mobile phones. Members of staff should only use personal equipment, e.g., cameras or video equipment, when permission has been granted by a member of the Senior Leadership Team and there has been an agreed timescale for transfer and deletion of the image.

1. Where permission has been obtained, the following should be considered:
   a. the purpose of the activity should be clear as what should happen to the photos. Staff members must be able to justify images in their possession.
   b. staff will ensure that students are at ease and comfortable with any images being taken.
   c. all images should be available in order to determine acceptability.
   d. images should not be made during one-to-one situations.
   e. if an image is to be displayed in a place to which the public have access, it should not have the student's full name. Similarly, where a student is named (in a school prospectus, for example) the name should not be accompanied by a photograph.
   f. all images of children should be stored securely and only accessed by those authorised to do so.

2. Staff must ensure children are not exposed to inappropriate or indecent images. Inappropriate material, such as pornography, must not be brought to work and staff members must not use school property to access such material. If members of staff discover material that is potentially illegal, they must isolate the equipment and contact the School's Designated Safeguarding Lead immediately.

Confidentiality and data protection

1. Members of staff must respect the privacy of students, parents and colleagues and must not share personal information such as addresses or telephone numbers to others, without checking first with the person concerned.
2. Students' and parents' names and contact details must not be used for any purpose without the consent of the Head of School. Information about students, parents or colleagues should never be disclosed to telephone enquirers. Staff should ask the enquirer to put the request in writing so that it can be dealt with appropriately.
3. Confidential information should only be disclosed on a need-to-know basis. Where it is not necessary to disclose a child's identity the information should be anonymised. If members of staff are not sure whether they should disclose information, they should seek advice from a senior colleague.
4. In certain cases, members of staff may be required to disclose information to the school's DSL; for example, where abuse is alleged or suspected. Staff members should never promise confidentiality to a student where child protection issues are involved (see separate Safeguarding & Child Protection Policy). The storing of personal information must not breach the School's Data Protection Policy (see separate Data Protection Policy).

Accepting gifts

1. Where staff members receive a gift they should:
   a) declare the gift to the Head of School where there is any possibility that it could be misconstrued, or it is of significant value.
   b) decline gifts that could be seen as a bribe or those that could create an expectation of preferential treatment or raise a conflict of interests. Although it is accepted for parents or children to make small gifts to show appreciation, a teacher must not receive gifts on a regular basis.

Whistle blowing

Staff should report any activities or behaviour of colleagues that gives them cause for concern. Staff should be familiar with the School's whistle blowing policy.

Legal Implications

1. "Meeting a child following sexual grooming" applies where an adult arranges to meet a child aged under 16 in any part of the world, if he/she has met or communicated with that child on at least two earlier occasions and intends to commit a sexual offence against that child. The law is clearly intended to apply where adults contact children through the internet. However, the prior meetings or communications need not have an explicitly sexual content.

2. Most sexual activity involving a person under the age of 16 (male or female) is an indecent assault which is both a criminal offence and a matter for which damages can be awarded. This is so, even when the younger person is alleged to have provoked or encouraged the activity.

3. Schools must refer to the authorities anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed a child protection offence and has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

4. In line with national laws, Globeducate expects all staff members to have due regard to the need to prevent people from being drawn into terrorism and challenge any extremist ideas from students, staff or visitors to the school. Any such concerns must be reported immediately to a member of the Safeguarding and Child Protection Team.

4. Complaints Procedure for Parents

Introduction

A complaint is an expression of dissatisfaction where the complainant requires a way of having their concern heard, investigated, and resolved.

All complaints will be recorded and treated by the School Leadership at all Globeducate schools in accordance with this procedure.

The procedure applies only to complaints raised by parents of current students, unless the complaint is already under investigation at the time of a student leaving a school.

- Parents, and prospective parents, may request details of the number of complaints registered under the formal procedure during the preceding school year.
- Working weeks / days refer to Monday to Friday during school term-time.
- If a student has been "permanently excluded", any appeal must be conducted under the terms set out in the Exclusion Policy

Documentation associated with complaints will remain confidential except where an official body requests access to them.

Stage 1 – Informal Resolution

Complaints and concerns will be resolved quickly and informally.

- If parents have a complaint they should contact their child's tutor. Depending on the scale of the problem, the complaint may be passed to a more senior member of staff.

- The relevant staff member dealing with the complaint will keep a written record of all concerns and complaints and the date on which they were received. Should the matter not be resolved within two working weeks from receipt or in the event that the tutor and the parent fail to reach a satisfactory resolution, then parents will be advised to proceed with their complaint in accordance with Stage 2 of this procedure.

Stage 2 – Formal Resolution

- If the complaint cannot be resolved informally, parents should write to the Head of School and should receive a response within one working week of receiving the complaint.

- If the Head of School has to gather further information, regular updates will be provided. The Head of School will keep written records of all meetings and interviews. When a decision based on the relevant facts has been established, this will be communicated to the parents.

- If parents are still not satisfied with the decision, they should proceed to Stage 3 of this procedure by contacting the Head of School within seven days of being notified of the Stage 2 decision. The complaint will then be referred to the Chair of Directors within three working days.

Stage 3 – Complaints Panel Hearing

- At Stage 3, the complaint is passed on to the Globeducate Executive Committee. An acknowledgement of the complaint will be given within 5 working days of receipt. Cases will be heard by the Complaints Panel within 14 working days.

- The Globeducate Executive Committee will appoint a Complaints Panel of three people who are not directly involved in the matters detailed in the complaint, and a Clerk. One member of the Panel shall be independent of the management and running of the school. The Clerk may be a member of the school staff. The Chair of Directors will pass particulars of the complaint to the Panel, who will meet independently in advance of the hearing. The Panel members will decide upon a Chair for the Panel.

Procedures for Preparation for a Complaints Panel Hearing

- The Clerk should convene an initial meeting of the Complaints Panel and arrange a date and time for the hearing. The Clerk will provide all relevant documentation and evidence. The Panel may request additional information or evidence in advance of the hearing.

- The Clerk should then write to the Complainant, the Head of School and any other relevant staff witnesses to inform them of the essential information for the hearing, including the date, time and venue, and the objective of the hearing. The Panel will have access to the documentation no later than three working days before the hearing takes place. The complainant may bring along one other person to provide support, for example, a relative, teacher or friend. However, legal representation will not be permitted. The letter will also explain how and when the Panel will reach and communicate their decision in writing.

- It is the Clerk's responsibility to ensure that all parties receive relevant documents at least three working days before the date of the hearing to allow individuals to familiarise themselves with the evidence.

Format of a Complaints Panel Hearing

- The Chair of the Panel will introduce all parties to one another and explain the principles, objectives, and format of the hearing. The Clerk will take minutes, which will be made available at the same time as the Panel's decision.
- The Complainant will be given the opportunity to explain the complaint. Following this, the Head of School and the Panel members may ask the complainant questions.
- The Head of School will then be given an opportunity to explain the school's official response, interpretation or view about the complaint. Following this, the complainant and panel members will be allowed to question the Head of School.

- Each party will be given the opportunity to call any witnesses and question witnesses called by the other parties.
- The Head of School and Complainant will be given the opportunity to give final statements in relation to the matter.
- The Chair of the Panel should bring the hearing to a conclusion.

The Complaints Panel members will reach a majority decision on the complaint findings; decide together whether the complaint outcomes sought are upheld in full, partially upheld, or not upheld; decide upon the appropriate action (if any) to be taken; and suggest changes to, or request review of, the School's existing policy or procedures to ensure that problems of a similar nature do not happen again.

Within five working days of the hearing, the Chair of the Panel should write to the complainant, directors and, where relevant, the person complained about, setting out the panel´s findings and recommendations.

5. Data Protection Policy for Students and Parents

What this policy is for

Each Globeducate school is a Data Controller for the purposes of Data Protection law. This policy is intended to provide information about how our schools will use (or "process") personal data about individuals including: its staff; its current, past and prospective students; and their parents, carers or guardians (referred to in this policy as "parents"). Collectively, we refer to these individuals as the school's community.

This information is provided because Data Protection law gives individuals rights to understand how their data is used. Staff, parents and students are all encouraged to read this Privacy Notice and understand each school's obligations to its entire community.

This Privacy Notice applies alongside any other information the school may provide about a particular use of personal data, for example when collecting data via an online or paper form.

This Privacy Notice also applies in addition to our schools' other relevant terms and conditions and policies. These may include:

- Any contract between the school and its staff or the parents of students
- A school´s policy on taking, storing and using images of students
- A school´s CCTV policy
- A school´s retention of records policy
- A school´s safeguarding, wellbeing, behaviour, health and safety policies, including how concerns or incidents are recorded
- A school's IT Acceptable Use policy

Anyone who works for, or acts on behalf of, the school (including staff, volunteers, directors and service providers) should also be aware of and comply with the school's Data Protection Policy for Staff, which also provides further information about how personal data about those individuals will be used.

Responsibility for data protection

Each school has appointed a Data Protection lead. This member of staff will deal with all your requests and enquiries concerning the school's uses of your personal data (see section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this policy and Data Protection Law.

Why the school needs to process personal data

In order to carry out its ordinary duties to staff, students and parents, the school needs to process a wide range of personal data about individuals (including current, past and prospective staff, students or parents) as part of its daily operation.

Some of this activity the school will need to carry out in order to fulfil its legal rights, duties or obligations – including those under a contract with its staff, or parents of its students.

Other uses of personal data will be made in accordance with the school's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals, and provided it does not involve special or sensitive types of data. The school expects that the following uses will fall within that category of its (or its community's) 'legitimate interests':

- For the purposes of student selection (and to confirm the identity of prospective students and their parents);
- To provide education services, including musical education, physical training, career services, and extra-curricular activities to students, and monitoring and reporting on students' progress and educational needs;
- To provide transport to and from the school
- For maintaining relationships with alumni and the school community, including social activities and fundraising activity;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as tax, diversity or gender pay gap analysis);
- To enable relevant authorities to monitor the school's performance and to intervene or assist with incidents as appropriate;
- To give and receive information and references about past, current and prospective students, including rating to outstanding fees or payment history, to/from any educational institution that the student attended or where it is proposed they attend; and to provide references to potential employers of past students;
- To enable students to take part in national or other assessments, and to publish the results of public examinations or other achievements of students of the school;
- To safeguard students' welfare and provide appropriate pastoral care;
- To monitor (as appropriate) use of the school's IT and communications systems in accordance with the school's Acceptable Use of IT policy;
- To make use of photographic images of staff, students and/or parents in school publications, on the school website and (where appropriate) on the school's social media channels in accordance with the school's policy on taking, storing and using images of students;
- For security purposes, including CCTV in accordance with the school's CCTV policy;
- To carry out or cooperate with any school or external complaints, disciplinary or investigation process; and
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school.

In addition, the school will on occasion need to process special category personal data (concerning health, ethnicity, religion, biometrics or sexual life) or criminal records information in accordance with rights or duties imposed on it by law. This includes matters about safeguarding and employment, or from time to time, will include by explicit consent as required. Reasons for processing will include:

- To safeguard students' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so: for example for medical advice, for social protection, safeguarding, and cooperation with police or social services, for insurance purposes or to caterers or organisers of school trips who need to be made aware of dietary or medical needs;
- To provide educational services in the context of any special educational needs of a student;
- In connection with employment of its staff, for example background checks, welfare, union membership or pension plans;
- As part of any school or external complaints, disciplinary or investigation process that involves such data, for example if there are Special Educational Needs or Disabilities (SEND), health or safeguarding elements; or
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care.

Types of personal data processed by the school

- This will include by way of example: names, addresses, telephone numbers, e-mail addresses and other contact details;
- Car details (about those who use our car parking facilities)
- Bank details and other financial information, e.g., about parents who pay fees to the school;
- Past, present and prospective students' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- Personnel files, including in connection with academics, employment or safeguarding;
- Where appropriate, information about individuals' health and welfare, and contact details for their next of kin;
- References given or received by the school about students, and relevant information provided by previous educational establishments and/or other professionals or organisations working with students;
- Correspondence with and concerning staff, students and parents – past and present;
- Images of students (and occasionally other individuals) engaging in school activities, and images captured by the school's CCTV system (in accordance with the school's policy on taking, storing and using images of children);

How the school collects data

Generally, the school receives personal data from the individual directly (including, in the case of students, from their parents). This may be via a form, or simply in the ordinary course of interaction or communication (such as email or written assessments). However, in some cases personal data will be supplied by third parties (for example another school, or other professionals or authorities working with that individual).

Who has access to the data and who the school shares it with

Occasionally, the school will need to share personal information relating to its community with third parties, such as:
- Professional advisers, e.g., solicitors, insurers, PR advisers and accountants;
- Government authorities
- Organisers of sporting or extra-curricular events in which the school´s students are participating;

- Operators of transport services for the school;
- Examination boards;
- Appropriate regulatory bodies

Personal data collected by the school will remain within the school, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Particularly strict rules of access apply in the context of:
- Medical records, which are held and accessed only by the school nurses and appropriate medical staff under his/her supervision, or otherwise in accordance with express consent; and
- Pastoral or safeguarding files.

A certain amount of any SEND student's relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the student requires.

Staff, students and parents are reminded that the school is under duties imposed by law and statutory guidance to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity.

Finally, some of the school's processing activity is carried out on its behalf by third parties, such as IT systems, web developers or cloud storage providers. This is always in accordance with Data Protection Law, and only in accordance with the school's specific directions. It is always subject to contractual assurances that personal data will be kept securely, including if data is transferred outside the European Economic Area (EEA).

If the parent of a student is based outside the EEA, we may transfer a student's personal data to the correspondence address provided by that parent. We will take all reasonable steps to ensure that such transfers are secure.

How long we keep personal data

The school will retain personal data only for the length of time necessary for a legitimate and lawful reason.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process your personal information and whether we can achieve those purposes through other means.

Files for accounting purposes are retained for according to local law, student files are retained according to local law and ordinary staff files are retained according to local laws. Incident reports and safeguarding files are retained in accordance with specific legal requirements. Where a minimum retention period is required by law, we comply with that minimum period plus additional time for us to anonymise or delete information in accordance with our internal processes.

A limited and reasonable amount of information will be kept indefinitely for archiving purposes. Access to archives is strictly limited.

If you have any specific queries about how our retention policy is applied, or wish to request that personal data you no longer believe to be relevant is considered for erasure, please contact the designated staff member.

Also note that even where you have requested we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfil your wishes (called a "suppression record").

Keeping in touch and supporting the school

The school will use the contact details of parents, alumni and other members of the school community to keep them updated about the activities of the school, or alumni and parent events of interest, including by sending updates and newsletters, by email and by post. Unless the relevant individual objects, the school will also:

- Share personal data about parents and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the school community
- Contact parents and/or alumni by post and email in order to promote and raise funds for the school or other worthy causes;
- Should you wish to limit or object to any such use, or would like further information about them, please contact the school offices. You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, the school is nonetheless likely to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

Your rights

Individuals have various rights under Data Protection Laws to access and understand personal data about them held by the school, and in some cases ask for it to be erased or amended, to have it transferred to others, or for the school to stop processing it – but this is subject to certain exemptions and limitations.

Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should put their request in writing to the school.

The school will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits (which is one month in the case of requests for access to information, but actually fulfilling more complex requests may take 1-2 months longer).

The school will be better able to respond quickly to smaller, targeted requests for information made during term time. If the request for information is manifestly excessive or similar to previous requests, the school may ask you to reconsider, or require a proportionate fee (but only where Data Protection Law allows it).

Requests that cannot be fulfilled

You should be aware that the right of access is limited to your own personal data, and certain data is exempt from the right of access. This will include information which identifies other individuals (and parents need to be aware this may include their own children, in certain limited situations – please see further below), or information which is subject to legal privilege (for example legal advice given to or sought by the school, or documents prepared in connection with a legal action).

The school is also not required to disclose any student examination scripts (or other information consisting solely of student test answers), provide examination or other test marks ahead of any ordinary publication, nor share any confidential reference given by the school itself for the purposes of the education, training or employment of any individual.

You may have heard of the "right to be forgotten". However, we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your (or your child's) personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this Privacy Notice. All such requests will be considered on their own merits.

Student requests

Students can make subject access requests for their own personal data, provided that, in the reasonable opinion of the school, they have sufficient maturity to understand the request they are making (see section Whose Rights? below). A student of any age may ask a parent or other representative to make a subject access request on his/her behalf.

Indeed, while a person with parental responsibility will generally be entitled to make a subject access request on behalf of younger students, the law still considers the information in question to be the child's: for older students, the parent making the request may need to evidence their child's authority for the specific request.

Students aged 13 and above are generally assumed to have this level of maturity, although this will depend on both the child and the personal data requested, including any relevant circumstances at home. Slightly younger children may however be sufficiently mature to have a say in this decision, depending on the child and the circumstances.

Parental requests

It should be clearly understood that the rules on subject access are not the sole basis on which information requests are handled. Parents may not have a statutory right to information, but they and others will often have a legitimate interest or expectation in receiving certain information about students without their consent. The school may consider there are lawful grounds for sharing with or without reference to that student.

Parents will in general receive educational updates about their children. Where parents are separated, the school will, in most cases, aim to provide the same information to each person with parental responsibility, unless there is a court order to the contrary, or there are other reasons which justify withholding information to safeguard the welfare and best interests of the child.

All information requests from, on behalf of, or concerning students – whether made under subject access or simply as an incidental request – will therefore be considered on a case-by-case basis.

Consent

Where the school is relying on consent as a means to process personal data, any person may withdraw this consent at any time (subject to similar age considerations as above). Examples where we do rely on consent are: use of student images together with full name. Please be aware however that the school may not be relying on consent but have another lawful reason to process the personal data in

question, even without your consent.

That other lawful reason will usually have been asserted under this Privacy Notice, or may otherwise exist under some form of contract or agreement with the individual (e.g. an employment or parent contract, or because a purchase of goods, services or membership of an organisation such as an alumni or parents' association has been requested).

Whose rights?

The rights under Data Protection Law belong to the individual to whom the data relates. However, the school will often rely on parental authority or notice for the necessary ways it processes personal data relating to students – for example, under the parent contract, or via a form. Parents and students should be aware that this is not necessarily the same as the school relying on strict consent (see section on Consent above).

Where consent to process data is required, it may in some cases be necessary or appropriate to seek the student's consent. Parents should be aware that in such situations they may not be consulted, depending on the interests of the child, the parents' rights at law or under their contract, and all the circumstances.

In general, the school will assume that students' consent is not required for ordinary disclosure of their personal data to their parents, e.g. for the purposes of keeping parents informed about the student's activities, progress and behaviour, and in the interests of the student's welfare. That is unless, in the school's opinion, there is a good reason to do otherwise.

However, where a student seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, the school may be under an obligation to maintain confidentiality. Exceptions to this may be if, in the school's opinion, there is a good reason to do otherwise; for example where the school believes disclosure will be in the best interests of the student or other students, or if required by law.

Students are required to respect the personal data and privacy of others, and to comply with the school's IT acceptable use policy and the school rules. Staff are under professional duties to do the same covered under the relevant staff policies.

Data accuracy and security

The school will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must please notify the relevant school staff of any significant changes to important information, such as contact details, held about them.

An individual has the right to request that any out-of-date, irrelevant or inaccurate or information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law): please see above for details of why the school may need to process your data, and who you may contact if you disagree.

The school will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to school systems. All staff and directors will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

This policy

The school will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

Queries and complaints

Any comments or queries on this policy should be directed to the school directly through the school's administration offices.

If an individual believes that the school has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the school Complaints procedure and should also notify the designated officer through the school office.

6. Equal Opportunities Policy

Introduction

All Globeducate schools are committed to the promotion of equal opportunities amongst staff and students regardless of gender, gender identity, sexual orientation, age, gender reassignment, creed/religion, race or colour, nationality or ethnic background, pregnancy or maternity, social or marital status or special needs including disability.

All students and employees are of equal value and are entitled to equal provision, access, respect, courtesy and consideration.

Globeducate schools are equal opportunities employers. Everyone has an entitlement to equal opportunity for growth, fulfilment, achievement and advancement.

Any evidence of harassment, involving staff and/or students should be reported in the knowledge that it will be investigated.

The Head of School should be informed if any member of staff considers they have been subject to discrimination of any form.

Equal Opportunities Policy – Students

Equal Opportunities is about helping people to develop their potential. Teachers are rightly concerned when students underachieve and are aware that educational outcomes may be influenced by factors which are outside the control of the school.

The school has a responsibility to promote good relationships and mutual respect. Each academic department is responsible for promoting equality of opportunity in its own subject so that all students can develop their potential within an inclusive environment where all contributions are equally valid.

Classroom activities will encourage interaction between students and show no bias, thus enabling them to appreciate alternative perspectives, approaches and learning styles.

We endeavour to ensure that this approach is inherent in all aspects of a student´s pastoral, academic and co-curricular provision and in our policies on admissions, curriculum, personal, social, health and spiritual development.

We seek to provide a supportive and structured environment where students and staff can interact with each other without the threat of any prejudice or discrimination.

Every Globeducate school seeks to foster the self-esteem and confidence of all its students. All students are valued and are encouraged to participate in all aspects of school life.

The equal opportunities policy involves the whole school including students, leaders, teaching and support staff.

A commitment to equal opportunities should be demonstrated through:

- Positive role models
- Suitable curriculum provision for all students
- Suitable and varied assessment strategies to enable all students to demonstrate their potential
- The setting of realistic and achievable targets which are reviewed on a regular basis
- Recognition of differences in learning styles
- An environment which fosters good relationships and encourages mutual respect
- Monitoring of student success
- An inclusive approach to teaching, ensuring that all students feel able to participate in lessons
- Staff vigilance over their use of classroom language to ensure they are not consciously or unconsciously introducing any prejudices
- Clear and equal expectations with regard to academic effort
- A tutorial personal, social and health programme which reinforces values and attitudes that are important for adulthood.

7a. Health and Safety Policy

All Globeducate Schools recognise that they have a responsibility for the health and safety of their employees and anyone else using the school premises.

This policy should be read in conjunction with the School Safeguarding policy.

First Aid

The school will arrange adequate and appropriate training and guidance for staff who are appointed as First Aiders. There will be enough trained staff to meet statutory requirements and assessed needs..

 The main duties of a First Aider are to:
- Give immediate help to casualties with common injuries or illnesses and those arising from specific hazards at school
- When necessary, ensure that an ambulance or other professional medical help is called

Qualifications will be renewed every three years or as otherwise indicated by local legislations.

Accident Recording

1. All accidents should be recorded, however minor, on the school's Accident Recording system.

2. Any "near miss" accidents, as well as slips, trips and falls should be recorded and records kept for auditing and monitoring purposes by the designated person/team responsible for Health and Safety.

3. During the school day, students with medical concerns will be assessed by the school nurse or a designated medical officer. One of the following courses of action would then result as appropriate:

- The student would be treated appropriately and return to lessons
- The student would remain under observation
- Parents would be contacted to arrange collection from school
- Emergency services would be contacted if required
- If any treatment is given to a student parents / guardians will be informed

First Aid Kits

There are several First Aid kits located strategically around the school.

The restocking of First Aid Kits is the responsibility of the School Nurse/Medical Officer; this is carried out every term. Member of staff or senior leaders may request a re-stock at any time. Tablets and medicines will not be stored in First Aid Kits. First Aid Kits contain disposable plastic gloves which must be used if body fluids are involved. If the injury is slight, any responsible adult may clean a cut or graze and apply a plaster.

First Aid Kits are available for use, and must be taken, on all school trips.

EpiPen

Globeducate Schools will have at least one member of staff who is trained to use an EpiPen.

Arrangements for students with particular medical problems

Any student with a specific medical need that requires shared information with school staff, will be assessed by the school nurse/medical officer on admission to the school. A medical plan will be produced for their care on the school site and on school trips and updated at least annually. A Medical Alert is posted on the student's school file.

Guidance on when to call an ambulance

A First Aider, the School Nurse or medical officer attending the incident will assess the situation and make a decision to call an ambulance. As a general rule, if there is any doubt that a limb has fractured or that the injured person has lost consciousness, then an ambulance should be called.

Contact details for 'Contacting Emergency Services' must be prominently displayed in school.

Automated External Defibrillator

In schools that have external defibrillators, these are clearly marked. Information is clearly displayed including the members of staff trained to use the defibrillators and where / how to locate them.

Concussion

Concussion management includes three action steps:

- Education of coaches, parents, and 'athletes' about concussion through training and/or a concussion information sheets
- Removal of athlete play if they are believed to have a concussion: 'If in doubt sit them out'
- Permission to return to play, an athlete can only return to play or practice after at least 24 hours and with permission from a health care professional.

Administration of Medicines

Before administering medicines, staff must be able to demonstrate an understanding of how medication should be handled. This includes knowledge about receipt and storage of medications, administration and disposal of medication, appropriate documentation of medication, how to obtain consent and what to do if an administration mistake happens. Medicines must always be stored in accordance with product instructions and in the original container with the prescribers' instruction for administration.

Written permission will be obtained from parents for each medication before it can be administered. This is completed by the parents with using an individual medication sheet. If a child requires unexpected medication recommended by the school nurse/medical officer during the school day, parents will be contacted for verbal consent and arrange for the child to be collected if appropriate.

Extra training will be provided if a student requires specific individual care.

School Trips

A First Aid kit will be taken on every school trip. These can be requested from the Medical Office/Health Centre and form part of the risk assessment. A qualified First Aider will accompany any school trip that will be staying overnight or visiting a high-risk location. Students' emergency orange bags must be collected and returned by the Trip Leader.

Visiting students

Students who are undertaking a taster day at a Globeducate school must complete a medical declaration prior to their visit. Students visiting the school as part of a trip/ event, including exchange trips Globeducate visits / events are under the care of their staff. Host school staff are able to assist with emergency situations, but the visiting members of staff have ultimate responsibility for the care of their students.

Early Years Settings

At least one member of staff with a current Paediatric First Aid certificate (relevant to infants and young children) is on the premises or present on outings.

At the time of admission to a Globeducate Early Years department, parents' written permission for emergency medical advice or treatment is sought as well as permission for the application of sun cream. Parents sign and date their written approval.

Parents are informed of any accidents or injuries sustained and of any First Aid treatment.

Early Years Accident Records:

- All staff are aware of the location and how to complete the records
- These are reviewed regularly to identify any potential or actual hazards

First Aid Kits:

- These are regularly checked by the School Nurse/medical officer and re-stocked as necessary

- They are easily accessible to adults and kept out of the reach of children

Local authorities will be notified of any serious accident, injury, serious illness or death of an Early Years child; any advice given is acted upon.

Procedures for monitoring and reviewing.

The Health and Safety Officer will monitor and review the First Aid provision at the school every year unless an incident occurs which necessitates a review before that date.

7b. Health and Safety: Accessibility Plan

What is an 'Accessibility Plan'?

An Accessibility Plan is a pragmatic framework used to support the implementation of the school's policies, facilitating access to disabled students and those with learning difficulties. The plan provides evidence of reasonable adjustments made to mitigate against potential sources of discrimination at Globeducate schools.

An Accessibility Plan covers the following areas:
- Increasing the extent to which disabled students can access the curriculum
- Improving the availability of accessible information for disabled students
- Improving access to the physical environment of the school, adding specialist facilities as necessary and appropriate. This covers improvements to the physical environment of the school and physical aids to access education.

The plan should be reviewed annually by the Special Educational Needs and Disabilities (SEND) Committee or Senior Leadership Team.

Current Range of Known Disabilities and Prioritising Accessibility Solutions

Globeducate schools have children and young people with a wide range of disabilities, both medically identified, such as visual impairments, and learning difficulties such as ASD, ADHD/ADD and dyslexia. This list is not exhaustive.

Prioritising Accessibility Solutions

This is shown on a 1-5 scale where the following potential impacts on members of the school community apply:

1. low priority with very low impact
2. low priority with low impact
3. medium priority with moderate potential impact
4. medium priority with moderate current impact
5. high priority with significant current impact

Where identified as 'current' impact, we have a student for whom an item is relevant. 'Potential' impact allows for current students, whose needs may change and need further assessment.

Feasibility of Accessibility Solutions:

Feasibility of solutions is scored as follows:

1. Problematic due to building/planning restrictions, such as 'listed' status
2. Problematic due to internal financial constraints.
3. Requires specific time/financial and external input. May be included in updates if necessary
4. Requires specific time/financial planning and internal input. May be included in updates if necessary
5. Can be updated 'as and when' necessary via the internal maintenance team.

Where identified as 'external', input would require work to be undertaken by external contractors. 'Internal' input would require the school maintenance team to undertake the work.

Where a 'solution' has high priority but low feasibility, risk assessments are undertaken to mitigate potential negative impact on individuals/groups

Access to the Sport Curriculum

It will be hard for a student with a mobility impairment to access fully the team sports and games programme. However, an alternative fitness programme may be constructed as necessary. Students with sight impairments may find it hard to fully access team sports programmes; however, there will be sports in which they can participate should they wish to do so. Students with a hearing impairment should be able to take a full part in the sports programme. If they wish to do so, they may wear hearing aids during matches.

Curriculum trips & co-curricular activities require individual students' needs to be considered in order to ensure appropriate staffing/supervision and safety provision and to devise a suitable activity programme. The vast majority of venues now include access arrangements which will enable students with a mobility impairment to be able to partake fully in curriculum trips. An exception might be a Geography field trip, for example. Many venues now include audio/visual technology that enhances the experience for partially sighted people and care would be taken to choose these venues where possible over others. To support students with a hearing impairment, due regard is given to the facilities offered for hearing aid loops etc.

Recreational and co-curricular activities include excursions and trips, and consideration is given according to the needs of the individual, to include appropriate supervision and safety precautions.

Measures outlined here are in addition to measures or reasonable adjustments outlined in student's individual plans, school SEND policies and procedures and the schools Equality policy.

APPENDIX 1: ACCESSIBILITY PLAN

Please amend as appropriate:

Objective	Implementation	By whom	Success Criteria for Monitoring	Date reviewed & comments
E.g. Improve curriculum accessibility via use of appropriate technology				
E.g. Facilitate access to sport curriculum				
E.g. Allow students with visual difficulties to participate in lessons				

Date of Next Review: _____

Signed: _____   (Head of School)

8. Special Educational Needs & Disabilities (SEND) Provision
(including Early Years Settings)

1. Overview

Our SEND policy and information report aims to:

- Set out how Globeducate schools will support and make provision for students with special educational needs (SEND)
- Explain the roles and responsibilities of everyone involved in providing for students with SEND.
- Raise the aspirations for, and expectations of, all students with additional needs through creating a focus on outcomes and furnishing them with the skills and attitudes to flourish academically and personally.
- Put our students at the heart of the process, working with them, their families, and teachers to seek the best possible outcomes for their development.

2. Definitions

Special educational provision is additional to, or different from, that made generally for other children or young people of the same age.

Students have SEND if they have a learning need or disability which calls for special educational provision to be made for them. They have a learning need or disability if they have:

- A significantly greater difficulty in learning than the majority of others of the same age, or
- They have learning needs that are different to those made for other children
- A disability which prevents or hinders them from making use of facilities of a kind generally provided for others of the same age in mainstream schools

3. Roles and responsibilities

3.1 The SENCO

The SENCO will:
- Work closely with the Senior Leadership Team and Globeducate Education Department to determine the strategic development of the SEND policy and provision in the school
- Have day-to-day responsibility for the operation of this SEND policy and the co-ordination of specific provision made to support individual students with SEND
- Provide professional guidance to colleagues and work with staff, parents, and other agencies to ensure that students with SEND receive appropriate support and high quality teaching

- Advise on the deployment of the resources required to meet students' needs effectively
- Be the point of contact for external agencies, such as local authorities and support services
- Liaise with potential next providers of education to ensure students and their parents are informed about options and a smooth transition is planned
- Work with the Senior Leadership Team to ensure that the school meets its responsibilities with regard to reasonable adjustments and access arrangements
- Ensure the school keeps the records of all students with SEND up to date

3.2 The Globeducate Education Directors
The Globeducate Education Directors will:
- Help to raise awareness of SEND issues through liaison with the Senior Leadership Team and the SENCO regarding the quality and effectiveness of SEND provision within the school and update the directors on this
- Work with the Senior Leadership Team to determine the strategic development of the SEND policy and provision in the school

3.3 The Head of School
The Head of School will lead the Senior Leadership Team to:
- Work with the SENCO to determine the strategic development of the SEND policy and provision in the school
- Have overall responsibility for the provision and progress of learners with SEND and/or a disability

3.4 Class teachers
Each class teacher is responsible for:
- the progress and development of every student in their class
- working closely with any learning support teachers or 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 student's progress and development and decide on any changes to provision
- ensuring they follow this SEND policy

4. SEND Information Report

4.1 The kinds of SEND that are provided for:

Our schools typically provide additional and/or different provision for a range of needs, including:
- Communication and interaction: for example, autistic spectrum disorder, speech, and language difficulties
- Cognition and learning: for example, dyslexia, dyspraxia, dyscalculia, gifted students
- Social, emotional, and mental health: for example, attention deficit hyperactivity disorder (ADHD), attachment needs
- Sensory and/or physical needs: for example, visual impairments, hearing impairments, processing difficulties

4.2 Identifying students with SEND and assessing their needs

The school will use a range of tools to assess each student's current skills and levels of attainment, as appropriate.

Class teachers will make regular assessments of progress for all students and identify those whose progress:

- Is significantly slower or faster than that of their peers starting from the same baseline
- Fails to match or better the child's previous rate of progress
- Fails to close the attainment gap between the child 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 student is recorded as having SEND. When deciding whether special educational provision is required, the school will start with the desired outcomes, including the expected progress and attainment, and the views and the wishes of the student and their parents. This will be used to determine the support that is needed and whether the school can provide it by adapting its core programme, or whether something different or additional is needed.

4.3 Consulting and involving students and parents

The school will have an early discussion with the student and their parents when identifying whether they need special educational provision. These conversations will make sure that:

- everyone develops a good understanding of the student's areas of strength and difficulty
- parents' concerns are taken into account
- everyone understands the agreed outcomes sought for the child
- everyone is clear on what the next steps are

The student's needs will be summarised on the student's profile and notes of these early discussions will be added to the student's record. The school will formally notify parents when it is decided that a student needs to receive SEND support.

4. 4 Assessing and reviewing students' progress towards outcomes

The school will follow the graduated approach and the four-part cycle of **assess, plan, do, review**. The class or subject teacher will work with the SENCO to carry out a clear analysis of the student's needs.

This will draw on:

- the teacher's assessment and experience of the student
- their previous progress and attainment and behaviour
- other teachers' assessments, where relevant
- the individual's development in comparison to their peers and national data
- the views and experience of parents
- the student's own views
- advice from external support services, if relevant

The assessment will be reviewed regularly.

All teachers and support staff who work with the student will be made aware of their needs, the outcomes sought, the support provided, and any teaching strategies or approaches that are required. The school will regularly review the effectiveness of the support and interventions and their impact on the student's progress.

4.5 Supporting students moving between phases and preparing for adulthood

As part of the admissions process parents are asked to share details of their child's needs and any relevant reports from professionals. Each application by a student identified as SEND will be carefully considered to ensure that the student's needs can be met with the current provision in place. Once a member of the school, each stage will be transitioned with an individual plan which is shared with parents for discussion.

If a student leaves the school, the SENCO will liaise with the next setting to ensure the student's needs are known and understood. The school will agree with parents and students which information will be shared as part of this and where appropriate we will provide transitional support to the student.

4.6 Our approach to teaching students with SEND

Teachers are responsible and accountable for the progress and development of all the students in their class. High quality teaching is our first step in responding to students who have SEND. This will be personalised for individual students.

Common support approaches include:
- Small group oracy, literacy and numeracy interventions matched to students' specific needs and levels of attainment.
- Small group social skills groups
- Fine motor skills and handwriting interventions
- Interventions to support social, emotional and health needs
- Students with more specific difficulties may be withdrawn for specialist intervention by a member of the Learning Support Department.

Some support approaches may incur a cost.

4.7 Adaptations to the curriculum and learning environment

The following are examples of adaptations that may be used to ensure all students' needs are met:

- Differentiating our curriculum to ensure all students are able to access it, for example, by grouping, 1:1 work, teaching style, content of the lesson
- Adapting our resources and staffing
- Using recommended aids, such as laptops, coloured overlays, visual timetables, larger font,
- Differentiating our teaching, for example, giving longer processing times, pre-teaching of key vocabulary, reading instructions aloud,
- An 'Enhanced Learning Programme' may be offered to students with more complex learning difficulties. This may involve modification of the curriculum to include a reduced number of subjects and more individual and small group support.

4.8 Equipment and facilities

There is a range of resources to support a wide variety of needs and effective interventions available for a variety of identified needs. The SENCO, teachers and Teaching Assistants develop or buy resources for specific students to use according to need and within the necessary budgetary constraints.

4.9 Evaluating the effectiveness of SEND provision

Our SEND provision is evaluated through:

- Monitoring by the SENCO
- Using student feedback
- Using provision maps to measure progress for students with complex needs
- Reviewing some students' individual progress towards their goals each term
- Holding annual reviews for students
- Ensuring that the views of all stakeholders are heard and incorporated into practice where appropriate.

4.10 Enabling students with SEND to engage in all activities

- Globeducate is an inclusive group of schools, and Globeducate schools must ensure that all students have the opportunity participate in all activities offered. Communication with parents and carers is crucial to ensure this happens.
- Extra-curricular activities are available to all students.
- All students are encouraged to go on residential trips.
- No student is ever excluded from taking part in these activities because of their SEND or disability. If appropriate, a risk assessment may be carried out. If the student has a physical disability which will make challenging for them, such as transport issues or building access, the school will work with the other parties involved as well as the parents and carers to ensure that the best possible solution can be found.
- The Head of School is responsible for developing accessibility of the school for students with disabilities and evacuation plans for individual students where needed.
- Further information can be found in the school's accessibility statement

4.11 Complaints about SEND provision

Any concerns about SEND provision in school should be made to the SENCO in the first instance. Any written complaints will be managed in line with the school's complaints policy.

The parents of students with disabilities have the right to make disability discrimination claims if they believe that our school 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

9. Relationships and Sex Education Policy

Relationships and Sex Education (RSE) is learning about the emotional, social, and physical aspects of growing up, relationships, sex, human sexuality, and sexual health. Globeducate schools teach aspects across the curriculum including in science and as part of personal, health and social education.

All Globeducate schools recognise that students will have different abilities and needs based upon their emotional and physical development, sex, sexual orientation, gender identity, ethnic or natural origin, life experiences, faith, or culture as well as literacy levels and learning difficulties. RSE is a key part of ensuring that we meet our safeguarding obligations to our students.

Our schools provide an age-appropriate programme which offers students information about the body, reproduction, sex, and sexual health as well providing essential skills for building positive, enjoyable, respectful, and non-exploitative relationships and staying safe both on and offline. Where appropriate, some content will be developed and delivered by school staff or may involve outside speakers.

Outline of RSE Programme content

In all Globeducate schools, Relationships and Sex Education is delivered to students using a staged approach in a way that is suitable for their development and maturity. Each school has its own programme, although topics that are typically covered are listed below.

- Puberty
- Relationships & Parenthood
- Self-esteem, safety, and self-worth
- Consent
- Sexual Health
- Contraception
- Drugs & alcohol
- Abuse
- Pornography

Each Globeducate school´s RSE programme is designed to provide students with the opportunity to acquire knowledge and to develop life skills, respectful attitudes and values towards themselves and others. Across the educational stages, teachers encourage students to talk openly and answer questions honestly in a way that contributes to a better student understanding of diversity and inclusion while fostering respectful relationships.

In the primary years, the focus will always be on families, and healthy and loving relationships, building up to the topics of "growing up" and puberty. Where appropriate RSE lessons may be taken in single sex groups.

More information on the school´s programme can be supplied by the school upon request. Please contact the member of staff responsible for RSE in the year group or school stage you are interested in.

Confidentiality & Child Protection Procedures

During the course of the RSE sessions teachers may become party to sensitive information about students.

Teachers should explain and reinforce the need for ground rules in lessons to protect students from making inappropriate personal disclosures. Teachers should not offer students unconditional confidentiality and be clear about this when establishing ground rules with students; further information can be found in the school's Safeguarding Policy and Code of Conduct for Staff. Any information divulged that is likely to cause harm to students or to others must be dealt with in line with the school's Child Protection and Safeguarding Policy.

Teachers are not obliged to pass on information about students to their parents providing they have followed the procedures and policies detailed above. However, if the teacher believes a student is at moral or physical risk or in breach of the law, it is their duty to act in accordance with school safeguarding procedures and encourage the student to seek support from their parents where appropriate.

Child Withdrawal Procedures

Parents have the right to withdraw their children from part, or all, of the Relationship and Sex Education programme beyond the content delivered within the Science curriculum. Parents wishing to withdraw their child should contact the Senior Leadership Team who will invite them to a meeting to discuss their request. Following the meeting, if parents still wish to withdraw their child, they will be asked to put their request in writing stating which part of the programme they wish their child to be exempt from.

10a. Safeguarding and Child Protection

All Globeducate schools are committed to safeguarding and promoting the welfare of children and we aim to create a culture of vigilance.

Introduction

Safeguarding is defined as:
- ensuring that children grow up with the provision of safe and effective care
- taking action to enable all children to have the best life chances
- preventing impairment of children's health or development and
- protecting children from maltreatment

The term 'safeguarding children' covers a range of measures including child protection procedures. It encompasses a preventative approach to keeping children safe that incorporates student health and safety; school behaviour and preventing bullying; supporting students with medical conditions; personal, health, social economic education; providing first aid and site security.

Child Protection is one element of safeguarding. It refers to those actions that are taken to protect specific children who may be suffering, or at risk of suffering, significant harm.

Consequently, this policy should be read in alongside other policies relevant to the safety and welfare of our students.

For the purposes of this policy:

- Staff refers to all those working for or on behalf of the school, full time or part time, in a paid or regular voluntary capacity.
- A volunteer is a person who performs an activity that involves spending time, unpaid in school (except for approved expenses).
- Parent refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.
- Child refers to all children on our school roll and any child under the age of 18 who comes into contact with our school. T
- We use the terms "must" and "should" throughout the guidance. We use the term "must" when the person in question is required to do something and "should" when the advice set out should be followed unless there is good reason not to.
- Any safeguarding concerns or disclosures of abuse relating to a child during the school day or outside of school hours are within the scope of this policy.

Expectations

Safeguarding is the responsibility of everyone in the organisation and we should always act in the best interests of the child.

All staff, whether teaching or non-teaching, volunteers or Globeducate Directors, play an important part in safeguarding for children. They are required to ensure that the correct procedures are followed, in order to protect children from abuse or further abuse.

All members of staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned and should understand they have a responsibility to take appropriate action and report concerns or allegations of risk of harm to students.

To this effect, all staff should be:

- familiar with this safeguarding policy.
- alert to signs and indicators of possible abuse.
- able to record and report concerns as set out in this policy.
- able to deal with a disclosure of abuse from a student.

In addition, all teaching staff are:
- involved in the implementation of individual education programmes, integrated support plans,

All staff and volunteers in school must be familiar with, and understand, the school's safeguarding policy and have completed the mandatory Safeguarding training and certification.

If staff have any concerns about a child's welfare, they should act on them immediately. If staff are unsure, they should always speak to the designated safeguarding lead (or deputy).

Mandatory Procedures

Staff Behaviour Policy (for safer working practice)

Globeducate schools are committed to positive academic, social and emotional outcomes for our students underpinned by a strong safeguarding ethos. All staff members have a responsibility to provide a safe environment in which children can learn. Globeducate is equally committed to the protection and welfare of our staff, who are expected to adhere to the highest standards of professional behaviour.

The Staff Code of Conduct sets out staff behaviours that should be avoided, as well as those that constitute safe practice, and supports our commitment to safeguarding children.

Staff are required to wear the official school Identification lanyard/badge or branded clothing when on site during the school day.

Visitors

All visitors complete a signing in/out form, wear a school Visitor ID and are provided with key safeguarding information including the contact details of safeguarding personnel in school.

Scheduled visitors in a professional role are asked to provide evidence of their role and employment details (usually a photo identity badge) upon arrival at school. If the visit is unscheduled and the visitor is unknown to the school, the school will contact the relevant organisation to verify the individual's identity.

Curriculum – teaching about safeguarding

Our students access a broad and balanced curriculum that promotes their spiritual, moral, cultural, mental and physical development, and prepares them for the opportunities, responsibilities and experiences of life.

We provide opportunities for students to develop skills, concepts, attitudes and knowledge that promote their safety and well-being. Our school curricula focus on areas of personal, social, health and citizenship education and specifically focus on the following objectives:

- Developing student emotional and mental resilience, self-esteem and communication skills
- Developing strategies for self-protection including online / 'e-safety' safety
- Developing a sense of the boundaries between appropriate and inappropriate behaviour in adults and within peer relationships (positive relationships and consent)
- Recognising when they are at risk and how to get help when they need it
- Globeducate schools ensure that curriculum content and themes of all literature, texts, plays and material used with or performed to students are suitable for the age group of the students involved.
- Pastoral programmes are in place to support all students in Globeducate schools. These may include topics such as Relationships & Sex Education, ways to stay safe and free from harm.

Online safety

Students are safeguarded from potentially harmful and inappropriate online material appropriate filters and monitoring systems without unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

Safer recruitment

Globeducate schools follow a safer recruitment policy, detailing the procedures followed for the recruitment of all staff, including volunteers.

Early help

Early help means providing support as soon as a problem emerges at any point in a child's life, from the early years through to the teenage years. Staff should be prepared to identify a child who may benefit from early help; they should discuss their concerns with the designated staff member for safeguarding.

Any member of staff may be required to support other agencies and professionals in an early help assessment and in some cases act as the lead professional in undertaking an early help assessment. Any such cases should be kept under constant review and consideration may be given to a referral to local authorities if the situation does not appear to be improving or is getting worse.

Any child may benefit from early help, but all school staff should be particularly alert to the potential need for early help for any child who:

- is disabled and has specific additional needs
- is misusing drugs or alcohol themselves
- is a young carer at risk of modern slavery, trafficking or exploitation
- is frequently missing/goes missing from care or from home
- has special educational needs
- is showing signs of being drawn into anti-social or criminal behaviour
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- has returned home to their family from social care
- is showing early signs of abuse and/or neglect
- is at risk of being radicalised or exploited
- is a privately fostered child
- is frequently missing/goes missing from home or care

Children missing from education

Globeducate schools put in place appropriate safeguarding responses to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual abuse or exploitation, and to help prevent the risks of them going missing in future.

As part of the admissions process, we request more than one emergency contact number for each student to ensure the school can make contact with a responsible adult when a child is identified as a welfare and/or safeguarding concern.

Children with Special Education Needs and Disabilities (SEND)
Students with additional needs face an increased risk of abuse and neglect. Staff take extra care to interpret correctly apparent signs of abuse or neglect. We never assume that behaviour, mood or injury relates to the student's additional needs without further exploration. Staff understand that additional challenges can exist when recognising abuse and neglect in students with SEND, including communication barriers.

Staff recognise that children with SEND are also at a higher risk of peer group isolation and can be disproportionately affected by bullying. To address those additional challenges, extra pastoral support is considered for children with SEND and they are also encouraged to discuss their concerns.

Looked-after Children

When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group. The Designated Safeguarding Lead (DSL) ensures that the Local Authority and appropriate staff members have all the information they need about the child's status, contact arrangements with parents, care arrangements. This also includes their looked-after legal status, whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order, and the child's contact arrangements with birth parents or those with parental responsibility, any delegated authority to carers as well as details of the child's social worker.

The safeguarding team are aware that a previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe.

The DSL also has responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care.

Designated safeguarding leads should hold the details of the local authority's point of contact appointed to guide and support students, and should liaise with them as necessary regarding any issues of concern.

Visits: School trips and exchanges

Globeducate Schools carry out a risk assessment prior to any off-site visit. School documentation designates the specific roles and responsibilities of each adult, whether employed or volunteers. We use the Globeducate code of conduct for host families and work with Globeducate schools abroad to ensure that similar assurances are undertaken prior to any overseas visit by our students.

Mobile Devices & Communication with Students:

Personal mobile phones and non-school devices such as personal tablets or cameras should not be used by staff or students while in school unless in an emergency. Staff and students are not permitted to use mobile phones or any other mobile / recording devices in areas where students are changing.

Staff should avoid any contact with students outside school and should not give students their home address, personal phone number or e-mail address or send personal communications to students (i.e., communications not pertaining to school 'work' and professional matters), unless agreed by a senior leader.

Types of Abuse & Specific Safeguarding Issues

All staff members should be alert to the signs of neglect and abuse (emotional, physical, sexual) and be aware of and know how to respond to the following specific safeguarding issues:

- Allegations involving sexual impropriety
- Children and the court system
- Children with family members in prison
- Child sexual exploitation (CSE)
- Child criminal exploitation
- 'County lines'
- Domestic abuse
- Faith (& Spiritual) abuse
- Female Genital Mutilation (FGM)
- Forced Marriage
- Gangs and youth violence
- Homelessness
- 'Honour-based' violence (HBV)
- Hate crime
- Peer on Peer abuse
- Radicalisation and vulnerability to extreme viewpoints
- Sexual violence and sexual harassment between children in schools
- Trafficking
- Youth Produced Sexual Imagery or "Sexting"

Mental Health

Any concerns regarding self-harm, eating disorders, suicidal thoughts or ideation should be raised with the school nurse / medical officer immediately, who will in turn liaise with the DSL. Where it is suspected that a student's behaviour may be related to an on-going or emerging mental health problem, the school nurse / medical officer will make a professional judgement about how best the student can be supported; this may include a 'suicide risk assessment'. This may include consultation with parents, the school doctors (for registered students) or referral to other outside agencies.

Students who raise concerns about another child should be dealt with sensitively to minimise potential distress, however, staff members cannot promise confidentiality regarding the source of the concern, particularly if there the concern is raised in isolation.

Reporting and Responding to concerns, disclosures or allegations

The Designated Safeguarding Lead is the most appropriate person to advise colleagues on how to respond to safeguarding concerns. Staff members should never assume that another colleague or professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

If in any doubt about sharing information, staff should speak to the DSL. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.

- Disclosures of abuse including peer on peer allegations should be reported immediately to the DSL or the Head of School

- Mental Health Concerns, disclosures of self-harm, suicidal thoughts should be reported immediately to the school nurse or medical officer who will liaise with the DSL.

- During term time, the DSL should always be available during school hours for staff to discuss any safeguarding concerns.

- The voice of the child is central to our safeguarding practice and students are encouraged to express and have their views given due weight in all matters affecting them.

Where a child is suffering, or likely to suffer, significant harm, the DSL will consider further actions required, including consultation with, and referral to, the local children's social care authorities.

Staff involved in supporting a child or receiving information about a safeguarding concern will be expected to play a part in any referrals/assessments.

The options available for the child will then include:-
- managing any support via the school´s own support processes; or
- a referral for statutory services, for example as the child might be in need, is in need or suffering, or is likely to suffer harm.

Contextual Safeguarding

All staff should be aware that safeguarding incidents or behaviours can be associated with factors

outside school. All staff, but especially the DSL, should always consider the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding. This will allow any assessment to consider all the available evidence and the full context of any abuse.

Record Keeping, Escalation and Whistle blowing procedures

Record keeping and information sharing

Information sharing is vital in identifying and tackling all forms of abuse and neglect. Data Protection Acts and GDPR do not prevent or limit the sharing of information for the purposes of keeping children safe. This includes sharing information without consent.

All Globeducate Schools must:
- keep clear written records (including discussions, decisions made, and the reasons for those decisions) of all student safeguarding and child protection concerns.
- ensure the records incorporate the wishes and views of the student
- ensure information about students at risk of harm is shared with members of staff on a "need to know" basis. Children who change school will have their child protection information transferred to the DSL at their new school as soon as possible
- Where appropriate, the DSL will also consider if it would be appropriate to share any information with the new school in advance of a child leaving. This is particularly important where the information will allow the new school to continue supporting victims of abuse and have support procedures in place for when the child arrives.

Globeducate is committed to work in partnership with parents and carers. In most situations, we will discuss initial concerns with them. However, the DSL may not share information if there are concerns that this would:

- place a child at increased risk of significant harm
- place an adult at increased risk of serious harm
- prejudice the prevention, detection or prosecution of a crime

Escalating concerns

It is important for children to receive the right help at the right time to assess risks and prevent issues from escalating. Staff members must feel confident and able to professionally disagree and challenge decision-making, as this forms a part of their professional responsibility to promote the best safeguarding practice. If, after a referral, the child's situation does not appear to be improving, the DSL and any staff involved should consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

Whistleblowing

All staff can raise concerns about poor or unsafe practice and potential failures in the school's safeguarding practice. Our whistleblowing procedures, which are reflected in staff training and our Code of Conduct, are in place for such concerns to be raised with the Head of School.

All staff should remember that the welfare of a child is paramount and should not delay raising concerns because a report could jeopardise their colleague's career. Any allegation of abuse will be dealt with in a fair and consistent way that provides effective protection for the child and at the same

time supports the person who is the subject of the allegation.

The circumstances should be kept strictly confidential and the school / parents / carers should make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

In situations where there is deemed to be an immediate risk to children or there is evidence of a possible criminal offence, the school will want to involve the police immediately. Where there is no such evidence, the school will discuss the allegations with local authorities to determine whether police involvement is necessary. Where a crime may have been committed, discussions will be held with local authorities and the police may be informed. Allegations against a teacher who is no longer teaching at the school and any historical allegations of abuse will be referred to the police.

If a staff member feels unable to raise an issue with the Head of School, or if there is a concern against the Head of School, they may contact Katherine Tyler, the Globeducate Safeguarding & Welfare Officer: Katherine.tyler@globeducate.com

In the case of allegations against boarding or residential staff, arrangements for alternative accommodation will be made for the child or children in question, pending an investigation into the safeguarding concern.

Teacher misconduct

For all cases involving serious professional misconduct, the Head of School has a statutory duty to make a referral to the appropriate authorities.

Directors: Monitoring and review

As key strategic decision makers and vision setters for the school, Globeducate Directors will make sure that policies and procedures are in line with local and national safeguarding requirements.

The Directors ensure that safeguarding is an agenda item for every board meeting. Heads of School must ensure that safeguarding is an agenda item for Senior Leadership meetings.

The Directors ensure that this policy is reviewed annually or earlier as required by changes to legislation or statutory guidance. Our Directors monitor schools' safeguarding and safer recruitment practice. The Globeducate Designated Safeguarding Officer will meet with the school DSLs every term and will work with senior leaders to make sure that robust safeguarding practices are in place:

New Staff

All staff including volunteers are informed of our safeguarding procedures during induction. This includes:

•   Meeting the Designated Safeguarding Lead
•   Receiving a copy of the following documents which staff are required to read and sign:

1.   The school's safeguarding and child protection policy
2.   The staff code of conduct
3.   The school's behaviour policy (for students)
4.   A copy of the school's whistle blowing polic

Staff Training

Whole school safeguarding training occurs every September. In addition, all staff members receive safeguarding and child protection updates (via email & staff meetings) as necessary and at least annually. Staff are also required to complete online safeguarding training certificated by Educare.

Advanced training

The DSLs and The Heads of School all receive advanced safeguarding training. This is updated at least every two years. Their knowledge and skills are refreshed at least annually, e.g. via e-bulletins or safeguarding networking events with other DSLs.

Safeguarding training for students

Safeguarding training is provided by the DSL to the school community. This includes appropriate action to take should they receive any allegations of abuse or have concerns about the safety and welfare of students.

Safer Recruitment

At least one person on any appointment panel has undertaken Safer Recruitment Training. This training is updated every five years as a minimum.

The role of the Designated Safeguarding Lead

It is the responsibility of the Designated Safeguarding Lead to ensure that any deficiencies or weaknesses in Safeguarding and Child Protection arrangements are remedied without delay.

10b. Safeguarding: ICT Acceptable Use

This policy is in conjunction with the School Safeguarding Policy and the Code of Conduct for Staff.

Summary of key policy details

This policy covers, but is not limited to, all devices listed below (private and school-owned):

- School computers
- Mobile telephones
- Digital Tablets
- Mobile games consoles
- Digital cameras
- Digital recording devices
- Smart watches

This policy applies to online behaviour towards other members of the school community inside and outside of school by students or staff, connecting via the Local Area Network (LAN), Wi-Fi networks, mobile data or other means.

User responsibility

Whilst the school embraces the use of technology for educational purposes it also recognises its daily use in social environments and the need to protect students and safeguard the learning environment.

Use of all digital devices should be in line with the school's code of conduct and behaviour expectations. Devices may be used for educational reasons in lessons with the class teacher's permission. Access to the internet must be via school Wi-Fi. 'Hot spotting' is not allowed. It is forbidden to use the school network to access, create or send material, which is offensive in the normal context of a school, or in breach of the law.

Mobile devices should be turned off or set to silent and may not be used when moving around the school campus. Mobile devices must never be used in changing rooms or toilets, when moving about the school campus, at the front of school, in corridors, or the dining room, regardless of the time of day / day of the week.

It is forbidden to distribute information about a member of the school community without their permission, or share any information that defames, undermines, misrepresents, or tarnishes the reputation of the school or its users.

Electronic communication between staff and students must be through official school-approved platforms.

Students and staff should report any suspicious online sexual advances or threatening behaviour to the Designated Safeguarding Lead (DSL) or Head of School, and also to local authorities where appropriate.

The school may, at any time and without further notice, monitor the use of IT systems and online behaviour to maintain safety and also compliance with this policy. It is not permitted to share passwords or log on details for accessing the school network.

The school accepts no responsibility for the safety or replacement of personal devices which are lost, stolen or damaged, unless the device has been issued as part of the school's own digital technology roll-out provision. It is recommended that individuals take out their own insurance for all personal devices.

Behaviour expectations

What individuals do or say online is covered by a number of laws, and increasingly people are being prosecuted for offensive and illegal comments made by electronic communications and on social media sites.

It is at all times forbidden and potentially illegal to use any online or electronic method to send or publish offensive or untrue messages or post unpleasant comments/imagery that could intimidate, harm, or humiliate others. To this effect it is strictly against school policy to use a mobile device to video, photograph, upload, distribute, store or create material containing another member of the school community without their express permission or that of a member of staff.

Individuals should at no time use mobile devices to bully, harass, denigrate, post or distribute private information about a third party whether that be through the use of email, messaging, telephone calls, apps, photographs or video images, social networking or any form of electronic or printed communication.

It is forbidden to use the school network to access, create or send material, which is:

- violent or which glorifies violence
- criminal, terrorist or which glorifies criminal activity (including drug abuse)
- racist or designed to incite racial hatred
- of extreme political opinion, blasphemous or mocking of religious beliefs / values
- racist or homophobic
- could be construed as bullying or harassment
- vulgar, pornographic or with otherwise unsuitable sexual content
- crude or with unsuitable language
- offensive in the normal context of a school
- in breach of the law including copyright law, data protection and computer misuse

Any individual who breaches this policy and causes harm or distress to another member of the school community will result in disciplinary action in accordance with school policies.

Any individual caught using a mobile device to cheat in examinations or other formal testing opportunities will face disciplinary actions in line with those as laid down by the relevant examining body and in line with the school rules.

Protecting identities online

Identity theft is an online danger that is increasing. Students and staff are recommended not to upload or reveal personal details of themselves, their family or other school users online (e.g., address, phone number, date of birth, financial details, passwords etc.) School members should be aware that the use of a mobile device may reveal their precise GPS location at a given date and time, and therefore may reveal movements and locations to third parties.

Unauthorised access to IT systems, accessing others' social networking accounts, e-mail accounts etc., without their permission is an offence.

Reporting concerns

Students should immediately report any suspicious or inappropriate sexual advances, messages or similar online behaviour to their parent, teacher or DSL; they may also report serious or urgent suspicions to the police. Staff should report any concerns to a member of the Leadership Team and safeguarding concerns to the DSL.

Log-ons

By logging onto the school network and any other school IT systems, staff and students agree to the guidelines and policies for ICT use at the school. Passwords should be difficult to guess, and should not be seen by others. It is good practice to have different passwords for different systems rather than the same password for all. IT support must be informed if any member of the school community believes someone has obtained their passwords.

Do not log on to a computing device or any ICT system using another person's password, or use such devices or systems that have been left logged on prior to your use. At the end of a session, all members of the school community should exit and close any IT systems and always log off computers and any password protected sites.

Consequences of Unacceptable Use

The school will act strongly against anyone whose use of ICT could bring the school into disrepute or risks the work of other users; this remains valid even if the incident occurs outside of school. The consequences of misuse, abuse, illegal use or the breaking of any of the rules, as set out in this policy will be dealt with by the Head of School and could include referral to outside agencies such as the Police as appropriate.

Any device that is suspected to have been used to bully, harass or transmit offensive material may be searched by a member of staff, in accordance with the school's search policy.

Students who infringe any of the expectations set out within this policy could face having the devices in question confiscated and permissions to access the school network revoked. Any student device that is used inappropriately in school is liable to be confiscated. Staff must record any confiscations.

Repeated infringements or refusal, by a student to hand over the mobile device when asked to by a member of staff will be seen as a serious infringement of the school's policies. Should the infringement pertain to a Child Protection matter, the device will be given to the DSL, who will log receipt of the device and act in accordance with the relevant school policy and advice from external agencies.

Theft or damage

All devices should make use of security features to ensure that they cannot be accessed by a third party should they become lost; thereby eliminating the ability of a third party to distribute unsolicited information by pretending to be the owner of the device.

Students and staff are solely responsible for the safekeeping of their devices and should ensure that they are kept securely and marked with the owner's name so they can be returned to their owner if found.

Items that are found and are not clearly marked or identifiable will be handed to the Head of School. Students and staff will be made aware that such devices are held in lost property.

Email

School email addresses are supplied to staff and students for all school-related communication. The school cannot accept responsibility in any way for the content of emails transmitted or received by third-party email servers.

Monitoring & Filtering

The welfare of students is of paramount importance. To this end, the school uses systems to monitor internet use and e-mail traffic whilst respecting privacy at all times. The school reserves the right to inspect data files and network logs if automatic detection of illicit content is triggered.

Manual investigation of email transmissions will only be carried out with the approval of the Head of School or another member of the Senior Leadership Team. Emails may be automatically forwarded to IT Support when detecting viruses, forbidden words, forbidden attachment file types.

Although the school cannot control the content of the Internet, third-party software is used to block sites which are illegal. Filters are constantly updated and amended to prevent unacceptable media entering the school system. Parents are encouraged to contact the IT staff if they have any concerns over the use of email or the internet by their child.

Liability

The school accepts no responsibility for the repair or replacement of personal mobile devices that are lost, stolen or damaged whilst on school property or during extracurricular activities, trips or when travelling to and from school on school transport. It is recommended that staff/parents/guardians take out their own insurance for all personal devices not issued by the school.

Although the systems offer a very high level of protection, the school cannot be held responsible or accept liability for any damage or loss of data, or the consequences of such damage or loss, whilst any member of the school uses the school system. The school accepts no liability for any damage caused by any type of computer virus, however it originates. The school accepts no liability in the unlikely event that damage is sustained to a privately owned computer as a result of its being connected to the network.

Any questions regarding this policy should be directed to the Head of School.

10c. Safeguarding: Safer Recruitment

This policy should be read in conjunction with the school's current Child Protection and Safeguarding policy

Introduction

All Globeducate schools are fully committed to safeguarding and promoting the welfare of children and young people and expect all staff and volunteers to share this commitment. The selection of employees is therefore conducted in a manner that is legal, systematic, efficient and effective and which promotes equality of opportunity.

Statutory Requirements

The school's Safer Recruitment Policy is based upon best practices, guidance or requirements outlined in statutory documentation.

Aims and Objectives

- To prevent unsuitable people working with children and young people by having appropriate procedures for appointing staff and vetting visiting 'speakers' and contractors.

- To operate such procedures consistently and thoroughly while obtaining, collating, analysing and evaluating information from, and about, applicants.

- To secure a safe environment for children and young people by ensuring all staff are suitably trained in recognising and responding to signs of abuse or at risk of harm

Roles and Responsibilities

It is the responsibility of every Globeducate Senior Leadership Team to:

- Ensure the school has effective policies and procedures in place for recruitment of all staff and volunteers in accordance with statutory guidance and legal requirements.
- Monitor the school's compliance

It is the responsibility of the Head of School and Senior Leaders involved in recruitment to:

- Ensure that the school operates safe recruitment procedures as outlined in the Safer Recruitment Checklist *(see Appendix 1)*.
- Make sure all appropriate checks are carried out on all staff and volunteers who work at the school.
- Monitor contractors (please refer to the Health and Safety Policy) and agencies' compliance with this document.
- Promote welfare of children and young people at every stage of the procedure.
- Ensure that visiting 'speakers' and extra-curricular events are only permitted with the authorisation of the Head of School.
- Ensure that at least one person on the interview panel has had appropriate Safer Recruitment training.

Short Listing and References

- Short listing of candidates will be against the person specification for the post.

- References for short listed applicants will normally be requested immediately after shortlisting, unless an applicant has indicated that they do not wish their current employer to be contacted. In such cases, references may be requested immediately after interview.

- The Globeducate Reference Request form should be used for all teaching positions

- Any offer of employment must be conditional pending reference and background checks.

- A minimum of two professional references must be provided, including a reference from the current employer. If there is no current employer, a reference will be obtained from the most recent employer, including reasons for leaving.

- Referees should hold a senior position with appropriate authority to provide the reference.

- Open references or testimonials must not be accepted.

- References from friends or relatives must not be accepted and the school will verify that any references received electronically originate from a legitimate source.

- Referees will be contacted by telephone or email in order to clarify any anomalies or discrepancies. A detailed written note will be kept of such exchanges.

- Where appropriate, previous employers who have not been named as referees may be contacted in order to clarify any anomalies or discrepancies, with the agreement of the applicant. A detailed written record will be kept of such exchanges.

- Referees must provide a written reply to the specific questions about:

  - The candidate's suitability for working with children and young people.
  - Any disciplinary warnings, including time-expired warnings, that relate to the safeguarding of children.

Candidates will always be required:

- to provide proof of identity.

- to complete relevant disclosures, as appropriate to the country.

- to explain satisfactorily any anomalies or discrepancies in the information provided

- to declare any information that is likely to appear on a bacground check.

- To demonstrate their capacity to safeguard and protect the welfare of children and young people.

Employment Checks

Before the start of their employment all successful applicants are required to:

- provide proof of identity.

- Provide background vetting checks

- provide original certificates of qualifications.

- complete a confidential health questionnaire, as appropriate

- provide proof of eligibility to live and work in the country.

A personnel file will be used by the HR team to keep all paperwork obtained, and a checklist will be retained on personnel files.

In exceptional cases, it is possible for an employee to start work before all procedures are completed as long as:

- background checks have been carried out.
- a risk assessment made,
- appropriate supervision is in place and the employee is aware of restrictions.

Members of staff are aware of their obligation to inform the Designated Safeguarding Lead of any cautions or convictions that arise between these checks taking place.

Dealing with convictions

The school operates a formal procedure if a Disclosure Certificate is returned with details of convictions. Consideration will be given to:

- 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 to establish the facts with the Designated Safeguarding Lead, a risk assessment will be undertaken, and decision will be made, in conjunction with the Head of School and the DSL following this meeting.

Proof of identity, Right to Work and Verification of Qualifications and/or professional status.

All applicants invited to attend an interview at the school will be required to bring their identification documentation such as passport, birth certificate, driving licence, with them as proof of identity/eligibility to work in the country in accordance with statutory legislation.

In addition, applicants must be able to demonstrate that they have actually obtained any academic or vocational qualification required for the position and claimed in their application form by producing original certificates.

Medical Fitness

Anyone appointed to a post involving regular contact with children must possess the appropriate level of physical and mental fitness before any appointment is confirmed. A medical questionnaire and where appropriate a doctor's medical report may be required.

Overseas checks

At the Head of School's discretion, satisfactory police check in the relevant country will be required if it is felt that a background checks have limited relevance due to the time spent abroad.

Induction

All new employees will be given an induction programme which will clearly identify the School policies and procedures. All staff will be required to undertake Safeguarding training.

Single Central Record (SCR) of Members of Staff

In addition to the various staff records kept in School and on individual personnel files, a single centralised record of employment checks should be kept up to date and retained by the Human Resources Team.

The Single Central Record will contain details of the following:

- All employees who are employed to work at the school

- All employees who are employed as supply staff to the school whether directly employed or through an agency. When employed through an agency, confirmation that the relevant checks have been carried out by the business supplying the staff.

- All others who have been chosen by the school to work in regular contact with children.

Record Retention/Data Protection

The school will retain all interview notes on all unsuccessful applicants for a period of time that complies with local legislation, after which time they will be destroyed. This will also allow the school to deal with any data access requests, recruitment complaints or to respond to any complaints made to an Employment Tribunal.

All information retained on employees should be kept centrally in the Human Resources office. With the exception of the Single Central Record, records on former employees are retained after the employee's last day of employment, according to local legislation, after which time they will be destroyed.

Use of Agencies or Third-parties

The school will obtain written notification from any agency or third-party organisation that they have carried out the checks on the individual as required by this policy. Identity checks will be carried out by the school on arrival.

Ongoing Employment

The school 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, as identified through the appraisal procedure. Renewed or additional employment checks will be carried out on existing staff if there are any concerns about their suitability.

Leaving Employment at the school

Despite the best efforts to recruit safely, there will be occasions when allegations of abuse against children and young children are raised. In cases relating to the behaviour of an employee, the school's Disciplinary Policy will apply.

Oversight

The Head of School and Human Resources Manager will be responsible for ensuring that this policy is monitored and adhered to throughout the school.

Appendix 1: Safer Recruitment Checklist

Actions	Notes	Date Recorded	Signed by:
1. **Planning**	Define Timescales for recruitment		
	Create Application Info Pack with Person Specification, Job Description and statement regarding safeguarding procedures during recruitment. Add statement that DBS/police & suitability checks will be carried out		
	Insist that shortlisted candidates have completed the school or **Globeducate Application Form**		
2. **Application review &** **shortlisting**	Scrutiny of dates, gaps, discrepancies on Application Form and review of suitability using Person Spec/JD, judged against criteria. Shortlist of strongest candidates created.		
3. References **requested**	Send **Globeducate Reference Request Form** to at least two appropriate referees (one must be the head of current school where applicable). Safeguarding questions must be completed		
4. References review	Compare information with that of Application Form. Note any issues of concern that must be followed up with candidate or referee		
5 **Invitation to interview**	Candidate told he/she must provide proof(s) of identity, evidence of qualifications and right to work in the country.		
6. **Social Media Check**	Internet Search check of all main Social Media Channels		
7. **Interviews**	Panel must include at least one person who has completed Safer Recruitment training. Panel must include people who are authorised to appoint staff (normally SLT). The same panel interviews all candidates Check any discrepancies in application form/ references/ identity/qualification evidence, suitability to work with children Explore safeguarding / child protection understanding Records made of questions/answers		
8. Conditional offer of **employment**	Make clear to successful applicant that the offer of employment is conditional on successful vetting and other employment checks (eg medical) Unsuccessful candidates: keep data for 6 months* from date of appointment of successful candidate (include name of interviewers with safer recruitment training) Successful candidate: placed in personnel file and kept until termination of employment plus 6 years* (include name of interviewers with safer recruitment training) *timings may vary according to country legislation		

10d. Safeguarding: Risk Assessments

Overview

This policy has been developed to ensure that suitable and sufficient risk assessments are undertaken for activities where there is likely to be significant risk, including school trips. It requires that major risks are identified and managed as part of an overarching policy with a view to safeguarding students, staff and other persons so far as is reasonably practicable.

This policy applies to staff in all Globeducate schools with responsibility for implementing risk management strategy and undertaking risk assessments for activities which are under their control.

The Risk Assessments Policy is in place to control major risks and to identify sufficiently detailed procedures for risk assessment. It should include:

1. When to complete risk assessments
2. Who is responsible for checking the risk assessments
3. Records to be kept
4. Training requirements for staff

Access

This policy is available on request from the school offices. We also inform parents and guardians about this policy when their children join the school, through our newsletters and our website.

The policy is provided to all staff, temporary and permanent, during the induction process, and to anyone who volunteers at the school.

Failure to comply

As part our commitment to Safeguarding and Child Protection, all members of staff who are responsible for creating risk assessments must follow the contents of this policy. Failure to do so will result in intervention and may lead to disciplinary action by the Senior Leadership Team.

Risk management and assessment policy

The Head of School will be responsible for the school´s overarching risk management and assessment policy. The strategy will be reviewed formally on an annual basis.

Risk assessments are recorded and reviewed when appropriate.

Senior leaders will identify those in the school who are responsible for conducting risk assessment and monitoring its implementation. However, anyone that organises any form of activity within the school or outside is required to assess the risks in relation to their activity.

Those affected by school activities will receive suitable information on what to do through the risk management strategy and individual risk assessments.

Identified control measures are implemented to control risks as far as reasonably practicable.

Key risk areas

- Student supervision (including safeguarding and welfare requirements). This will include implementation of the school designated safeguarding lead (DSL) role and also covers a range of responsibilities outside safeguarding e.g., break and lunchtime play
- School trips
- Management of visitors on school premises
- Fire and emergencies
- Traffic and pedestrian interaction site
- Management of hazardous substances
- Use of hazardous equipment e.g., in Tech, Art, Science etc
- The suitability of staff to undertake designated roles and checks to ensure that they are suitable including staff not employed by the school who work with students off-site
- Risk areas which are not directly related to health and safety, including but not limited to:
  - Financial
  - Recruitment procedures including Board oversight
  - Reputational
  - Terrorism, including the prevention of fundamentalism and extremism
  - Student self-harming
  - Security
  - Security in the Early Years

Training & Procedures

All staff will receive guidance on risk assessment as part of their induction. Risk assessment training will be provided on specific areas where a need is identified.

A template risk assessment form is included at Appendix 1 to this guidance.

Risk assessments will take into account:
- Hazard - something with the potential to cause harm
- Risk - an evaluation of the <u>likelihood</u> of the hazard causing harm
- Risk rating - assessment of the <u>severity</u> of the outcome of an event
- Control measures - physical measures and procedures put in place to mitigate the risk

The risk assessment process will consist of the following 6 steps:
1. What could go wrong

2. Who might be harmed
3. How likely is it to go wrong
4. How serious would it be if it did
5. What you are going to do to stop/minimise it
6. How you are going to check that your plans are working

Monitoring

The Head of School and Leadership Team will be responsible for the maintenance of risk assessment records. The policy is reviewed annually by the Senior Leadership Team (SLT).

Risk assessments will also be reviewed:
▪ When there are changes to the activity
▪ After a near miss or accident
▪ When there are changes to the type of people involved in the activity
▪ When there are changes in good practice
▪ When there are legislative changes

Further Guidance on risk assessment is included in Appendix 2.

Sensible Risk Management

Sensible risk management is about:

▪ Ensuring that workers and the public are properly protected
▪ Providing overall benefit to society by balancing benefits and risks, with a focus on reducing real risks – both those which arise more often and those with serious consequences
▪ Enabling innovation and learning, not stifling them
▪ Ensuring that those who create risks manage them responsibly and understand that failure to manage real risks responsibly is likely to lead to robust action
▪ Enabling individuals to understand that as well as the right to protection, they also have to exercise responsibility.

Sensible risk management is not about:
▪ Creating a totally risk-free society
▪ Generating paperwork
▪ Scaring people by exaggerating or publicising trivial risks
▪ Stopping important recreational and learning activities for individuals where the risks are managed
▪ Reducing protection of people from risks that cause real harm and suffering.

Appendix 1: Risk Assessment Template

Risk Assessment Template should contain the following information:

Location:	
Staff supervision ratio:	
Activity or Work Area:	
Assessor:	
Date of assessment:	
Date for review:	
Hazard:	
Harm:	
Persons at risk:	
Control Measures:	
Risk Rating: L x S = R	

	Likelihood	Severity
1	Improbable	No injury
2	Remote	Minor injury – first aid only
3	Possible	Three day or more serious injury
4	Probable	Major injury
5	Very likely to occur	Fatal injury

RISK RATING

	Risk Rating	Action
1 – 9	Low	No further action
10 - 15	Medium	Action needed soon
16 - 25	High	Immediate action needed

Risk rating is calculated by multiplying the likelihood by the severity

Example:

A possible chance of an accident resulting in a major injury = 3 x 4 = 12. This is a **medium risk** meaning action is needed soon to reduce the risk to as low as is reasonably practicable.

Once completed, risk assessments must be sent to DSL for approval. Approval of the risk assessment may be dependant on amendments and comments from the DSL or Head of School.

You should review your risk assessment if you think it might no longer be valid, e.g., following an accident in the workplace, or if there are any significant changes to the hazards in your workplace, such as new equipment or work activities.

Appendix 2: Further Guidance

Hazard - Something that has the POTENTIAL to cause harm

When undertaking a risk assessment, the specific activity must, wherever possible, be conducted within recognised guidelines, rules, laws and standards, e.g. sports: in accordance with the national body for that sport. The websites of these bodies usually have these rules, standards, laws etc. freely available and some very good examples of best practice. In many cases, they will have plans and processes that may give you a starting point to planning your activity.

Typical examples:

- When crossing a road – the hazards are cars, buses, taxis, motorbikes, bicycles etc
- When playing in the park or undertaking sports in the park, the hazards may be –
  ruts, potholes, 'lumps and bumps', rocks, fallen branches, litter, human and animal debris or cleanliness
- changes in level (steps and ramps), wet grass, long grass, no grass (patchy), snow/ice …. slips, trips and falls
- strong winds, rain, snow, fog, flooding, waterlogged play areas etc ….. adverse weather

'People' type hazards may be:

- student or staff becoming ill, hyperthermia, hypothermia (heat and cold extremes) …. Illness
- worsening of existing medical condition/s, adverse reaction to an allergy or existing medical condition
- student/staff behaviour
- 'stranger danger', safeguarding, public disorder, acts of violence and aggression from public (others)
- students wandering off …. personal safety and/or security
- Students requiring specific individual support should be assessed to ensure their needs are being met

Harm

What sort of harm could you reasonably expect when the groups of people identified in the 'Persons at Risk' column come into contact the hazard? Typical harms could be:
- Grazing
- Bruising
- Cuts
- Amputation
- Sprains and strains
- Fractures (broken bones)
- Unconsciousness
- Paralysis
- Worsening of existing medical condition
- Worsening of existing injuries
- Allergic reaction
- Anaphylactic shock
- Death

Control Measures

What are you doing or putting in place to prevent harm from the hazard? ALWAYS use the hierarchy of control – ERIC PD:

E	Eliminate	Get rid of the hazard completely
R	Reduce	OK so we cannot eliminate but can we improve it by putting in place some additional controls so that we need to do it less often, can we reduce the number of people who are allowed to come in contact or be exposed to the hazard.
I	Isolate	Completely separate the hazard from people
C	Control	This is where we consider organizational and technical controls such as safe systems of work, procedures, training, supervision, local exhaust ventilation, machine guards, safety devices and tools to carry out the task
P	PPE (Personal Protective Equipment)	Where you can't make everybody safe, then, having applied the above principles, you safeguard the individual by providing PPE, training them in its safe use and make sure they use correctly and at all times when exposed to the hazard
D	Discipline	Enforce the safety process through disciplinary processes and be prepared to give sanctions against offenders, but mostly to instil personal discipline on those that may be exposed to the hazard

Risk Rating

This is where you make a judgement call … taking your experience, knowledge and training into consideration and all the control measures listed, what could you reasonably expect the chances of harm being realised?

Using the keys provided, multiply the figures provided for the likelihood and severity but realistic. If in doubt, always take the cautious approach. It is better to be over cautious than not cautious enough.

You need to be REALISTIC – it is no good saying that falling off a kerb stone could cause death – 5 (after all, it can in reality) and saying the likelihood is remote – 1, making a risk rating of 5, when the realistic assessment would be minor injury – 3 and this being possible – 2 and a risk rating of 6.

Once complete, attach it to your activity plan, process or procedure, share the information with those involved in your activity, monitor the risk during the activity and revise:
- if you think it can be improved
- if there are significant changes
- prior to carrying out that activity again
- if the law changes
- if you feel it's no longer accurate or applicable

Educational

- science experiments
- design & technology
- food technology
- sport and PE activity including swimming
- art
- music
- drama & dance
- general classroom
- school trips

Support

- catering and cleaning
- caretaking and security
- maintenance
- traffic management
- office
- site visitors
- fire & emergencies
- Student Safeguarding and Welfare
- Legal Requirements & Education Standards
- Any other activity or environment not yet experienced by employees

APPENDIX 3

What is risk assessment?

A risk assessment is an important step in protecting your students and colleagues, and the service you provide on behalf of the school, as well as complying with the law. It helps you focus on the risks that really matter in your area – the ones with the potential to cause harm. For most, that means simple, cheap and effective measures to ensure your most valuable asset – your workforce – is protected.

The law does not expect you to eliminate all risk, but you are required to protect people as far as is 'reasonably practicable'. These arrangements tell you how to achieve that with minimum disruption and cost.

The Risk Assessment Process

1. Identify the hazards

First you need to work out how people could be harmed. When you work in a place every day, it is easy to overlook some hazards. Walk around your workplace and look at what could reasonably be expected to cause harm.

- Check manufacturers' instructions or data sheets for chemicals and equipment as they can be very helpful in spelling out the hazards and putting them in their true perspective.
- Have a look back at your accident and ill-health records – these often help to identify the less obvious hazards.
- Remember to think about long-term hazards to health (e.g., high levels of noise or exposure to harmful substances) as well as safety hazards.

2. Decide who might be harmed and how

For each hazard you need to be clear about who might be harmed; identify groups of people (e.g., 'people working in the storeroom' or 'passers-by'). In each case, identify how they might be harmed or affected.

Remember:
Some workers have particular requirements; for example, new and young workers, migrant workers, new or expectant mothers and people with disabilities may be at particular risk. Extra thought will be needed for some hazards;

- Cleaners, visitors, contractors or maintenance workers who may not be in the workplace all of the time
- Members of the public, if they could be hurt by your activities
- Students

If you share your workplace, you will need to think about how your work affects others present, as well as how their work affects your staff.

3. Evaluate the risk and decide on control measures

The law requires you to do everything 'reasonably practicable' to protect people from harm but your risk assessment should only include what you could reasonably be expected to know – you are not expected to anticipate unforeseeable risks. First, you should look at what you are already doing, think

about what controls you have in place and how the work is organised.

When controlling risks, apply the principles in the risk hierarchy of control, on page 4.

4. Record your findings and implement them

Write down the results of your risk assessment and share them with your colleagues.

5. Review your risk assessment and update if necessary

Regularly review what you are doing

It is recommended that you review your risk assessments sooner if:

- there is an accident or near miss
- you have new equipment
- you change premises
- you have new staff
- or anything else significant changes.

10e. Whistleblowing

Introduction

All organisations face the risk of things going wrong or of unknowingly harbouring malpractice. In Globeducate schools, we encourage staff and members of the school community to raise worries or concerns. With this in mind, it is important that all members of our community are aware that:

- All instances of malpractice (moral, ethical, and financial) will be taken seriously.
- Confidentiality is respected for those who raise concerns and that it is possible to raise these concerns outside the line management structure or normal lines of communication for students.
- Sanctions may exist for those making false and malicious allegations.
- Everyone in our school community has the right to follow their sense of right and wrong.

A *Whistle Blower* is the term used to describe someone who becomes aware of a serious problem and then raises this matter so that it can be investigated and corrected. Examples could include:

- Financial fraud or malpractice and other types of corruption
- Attempts to cover up earlier problems
- Abuse or neglect of vulnerable people
- Failure to deliver proper standards of teaching or service
- Damaging conflicts at a senior level
- Bullying, harassment or victimisation in the school at any level

Our whistle blowing policy will ensure that concerns are properly raised and expressed in the school and will encourage a culture of openness and accountability, reassure everyone that no one will be victimised for expressing concerns, deter fraud and malpractice, help staff to feel valued, identify and help resolve damaging personal conflicts, avoid public criticism and potential crises.

1. The staff code of conduct makes clear what is expected of staff and the school rules makes clear what is expected of students. Anything that is unclear to members of staff should be discussed with line managers or senior leaders, with normal lines of communication for students.

2. If it is preferred, a concern can be raised through a colleague or friend.

3. The school will support employees and students who report a concern and will protect them from reprisals or victimisation. Such reporting will not affect a staff member's career nor enjoyment of the job, nor the student's enjoyment of school life.

4. The school will do everything that it can to respect confidentiality, although both staff and students have to be made aware that, under certain conditions, confidentiality cannot be kept, but the school will ensure that only relevant people are informed.

5. If attempts are made to discourage, victimise, or criticise either students or staff concerned from raising concerns, the school will treat this as a disciplinary offence.

Who to Contact?

In the vast majority of cases, the correct procedure for raising concerns is through the line manager for staff and through the normal lines of communication for students. However, employees may speak to the Head of School or other member of the School Leadership Team, asking them for a confidential meeting.

In any case involving child protection issues, it is vital that the procedure laid down in the Safeguarding Policy is followed and advice is sought from the Designated Safeguarding Lead (DSL) for the school.

If there is a serious concern involving the Head of School, it may be deemed necessary to contact the school's Directors directly. In these cases, please contact Daniel Jones, Chief Education Officer:
daniel.jones@globeducate.com

Dealing with Concerns

Anyone raising concerns needs to be aware that such issues will need to be fully investigated by the school. The school needs to treat with absolute fairness both the person raising the concern and also any others who might be involved.

Should they request it, anyone raising a concern will be informed of the results of any investigation which has taken place and of any proposed action which might result, except in the case of child protection issues.

No one reporting a concern in good faith has anything to fear, however abuse of this reporting system by maliciously and deliberately raising unfounded allegations will result in serious action being taken.

This procedure is separate from the school's procedures regarding grievances and employees should not use the whistleblowing procedure to raise grievances about their personal employment situation.