Mission Statement

Circles Alternative Education C.I.C Ltd strives to engage young people in learning through vocational team work and social development.

Ethos

Circles Alternative Education Ltd is committed to providing a happy, caring and safe learning environment for all, where they feel valued and are able to grow in confidence and independence.

We promote Happiness through a creative, exciting and practical curriculum, which generates a love of, and interest in, learning. Great value is placed on pupils' self-esteem which is developed through a well-motivated attitude to learning, a healthy lifestyle, good social skills, self-discipline and a positive self-image.

We promote the highest standards of achievement in all areas of the curriculum and help all pupils to fulfil their potential regardless of gender, race or ability. We foster respect for all by establishing good relations between the school, home and community. Pupils are taught respect for themselves, others and the environment.

We teach our students to take responsibility for their actions, belongings and school community.

We encourage truth and honesty in all aspects of school life - relationships, work and the curriculum. We develop spirituality so that calm, quiet, reflective times are part of school life and the beauty of the environment is appreciated.

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Admissions Policy

Created: March 2016   Reviewed: Annually   To be reviewed again: Nov 2024

Vision

• Promoting progress and achievement with quality learning and specialist support

• Enabling fresh starts

• Promoting effective partnerships for the benefit of our pupils

Policy

Circles Alternative Education Ltd has been established to deliver education programmes to young people.

We can be responsible for:

• Secondary pupils who are permanently excluded from school

• Pupils who are unable to attend school because of medical needs, who will be absent for 3 weeks or more

• Children and young people who are hospitalised for 3 days or more or admitted on a regular basis
We are committed to the support of children and young people who are at risk of exclusion from school and the provision of specific individual pupil programmes.

Who can refer?

1. Mainstream schools, specialist schools, social care and pupil referral units.

2. Education Officer in Special Education Needs Section

3. Parent/Carer/Guardian

4. Social Care / Appropriate Agencies

How to refer

1. Obtain consent of parents/ carers, consult with young person/ child

2. Arrange a tour of Circles Alternative Education Ltd.
In order that referrals can be properly considered, please include supporting evidence of thorough prior assessment with proposed outcomes. E.g. - Evidence of implementation of PIP process for a pupil in a secondary school. - Pastoral Support Plans - Essential baseline information, i.e. academic, social/emotional, current educational provision/ curriculum, details of SEN - In case of a medical referral, written support from a paediatrician - Evidence

of ongoing interventions - In case of all exclusions, copy of Head Teacher's letter of exclusion to parents.

Circles Alternative Education Constitution

Name of organisation: Circles Alt Ed C.I.C.

Aims

The core focus and thus aim of Circles Alt. Ed. C.I.C. (Circles) is to explore, implement and develop techniques and operations to help in the social development and educational engagement of young people, mainly between the ages of 4 – 17.

Circles primary base is in Stock, Billericay, with satellite sites in Felmores, Basildon and East Bergholt, Suffolk. Catchment area is Essex wide and South Suffolk.

Our team re-engage people in learning, primarily focusing on building self-esteem and confidence through vocational training and team work. We are a not-for-profit organisation and are entirely self-funded.

We offer the space and freedom to participate in real life projects, helping individuals to take ownership of their own learning development. We entrust our learners with a lot of responsibility allowing them to understand and appreciate acceptable behaviour.

The aim of Circles is to encourage and enable learners to develop a variety of life skills. Time spent at Circles is devised to be as rich and varied as is possible, more specifically, we aim to encourage hard work, to face up to the challenge, to think independently, accept responsibility, take pride in achievement, and to develop wider skills and interests.

Objectives

We will fulfil our aims by:

* Promoting the health and well-being of its students and residents of the local area and working together as residents regardless of age, ethnic origin, ability, sex, belief or political affiliation recognising the value of our many differences.

* Involving local people in improving the area.

* To carry out and promote both environmental improvement and practical conservation, to educate, encourage and support the local population in environmental practice by working with statutory and non-statutory agencies.

* Promoting appropriate behaviour, community recreation and community facilities.

* To raise funds and receive contributions where appropriate to finance the work.

* To publicise and promote the work.

* Open bank accounts.

* Make rules and standing orders for categories of members and their rights.

* Take out insurance.

* Organise meetings, training courses and events.

* Work with similar groups and exchange information and advice with them.

* Take any action that is lawful, which would help it to fulfil its aims.

Finance

(a) Any money obtained by the group must be applied towards the group and all of its income must be applied towards its objects and for no other purpose.

(b) Any bank accounts opened for the group shall be in the name of the group.

(c) The Management Committee will ensure that the group stays within the budget.

Alteration of the Constitution

(a) Proposals for amendments to this constitution, or dissolution must be delivered to the Directors in writing. Directors shall then decide on the date of a forum meeting to discuss such proposals, giving at least four weeks (28 days) clear notice.

(b) Any changes to this constitution must be agreed by both Directors.

Dissolution

The group may be wound up at any time if agreed by both Directors. Any assets shall be given to a charity/non profit organisation with similar aims and not to the organisation's members.

Anti-Bullying Policy

Statement of Intent
We are committed to providing a caring, friendly and safe environment for all our pupils so they can learn in a relaxed and secure atmosphere. Bullying of any kind is unacceptable at Circles Farm. If bullying does occur, all pupils should be able to report instances and know that incidents will be dealt with promptly and effectively. We are a telling school and encourage open speech. This means that anyone who knows that bullying is happening is expected to tell the staff.

What Is Bullying?

Bullying is the use of aggression with the intention of hurting another person. Bullying results in pain and distress to the victim.

Bullying can be:

- Emotional - being unfriendly, excluding, tormenting (e.g. hiding books, threatening gestures)
- Physical - pushing, kicking, hitting, punching or any use of violence
- Racist   racial taunts, graffiti, gestures
- Sexual - unwanted physical contact or sexually abusive comments
- Homophobic - because of, or focussing on the issue of sexuality
- Verbal   name-calling, sarcasm, spreading rumours, teasing
- Cyber   All areas of internet, such as email & internet chat room misuse
  Mobile threats by text messaging & calls
  Misuse of associated technology, i.e. camera &video facilities

Why is it Important to Respond to Bullying?

Bullying hurts. No one deserves to be a victim of bullying. Everybody has the right to be treated with respect. Pupils who are bullying need to learn different ways of behaving.
Schools have a responsibility to respond promptly and effectively to issues of bullying.

Objectives of this Policy

- All staff be it employed or volunteer, teaching and non-teaching, pupils and parents should have an understanding of what bullying is.
- All teaching and non-teaching staff should know what the school policy is on bullying and follow it when bullying is reported.
- All pupils and parents should know what the school policy is on bullying, and what they should do if bullying arises.

- As an education centre we take bullying seriously. Pupils and parents should be assured that they will be supported when bullying is reported.
- Bullying will not be tolerated.

Signs and Symptoms

A child may indicate by signs or behaviour that he or she is being bullied. Adults should be aware of these possible signs and that they should investigate if a child:

- is frightened of walking to or from school
- doesn't want to go on the school / public bus
- begs to be driven to school
- changes their usual routine
- is unwilling to go to school (school phobic)
- begins to truant
- becomes withdrawn anxious, or lacking in confidence
- starts stammering
- attempts or threatens suicide or runs away
- cries themselves to sleep at night or has nightmares
- feels ill in the morning
- begins to do poorly in school work
- comes home with clothes torn or books damaged
- has possessions which are damaged or " go missing"
- asks for money or starts stealing money (to pay bully)
- has dinner or other monies continually "lost"
- has unexplained cuts or bruises
- comes home starving (money / lunch has been stolen)
- becomes aggressive, disruptive or unreasonable
- is bullying other children or siblings
- stops eating
- is frightened to say what's wrong
- gives improbable excuses for any of the above
- is afraid to use the internet or mobile phone
- is nervous & jumpy when a cyber message is received

These signs and behaviours could indicate other problems, but bullying should be considered a possibility and should be investigated

Procedures

1. Report bullying incidents to staff
2. In cases of serious bullying, the incidents will be recorded by staff
3. In serious cases parents should be informed and will be asked to come into a meeting to discuss the problem
4. If necessary and appropriate, police will be consulted
5. The bullying behaviour or threats of bullying must be investigated, and the bullying stopped quickly
6. An attempt will be made to help the bully (bullies) change their behaviour

Outcomes

1) The bully (bullies) may be asked to genuinely apologise. Other consequences may take place.

2) In serious cases, suspension or even exclusion will be considered

3) If possible, the pupils will be reconciled

4) After the incident / incidents have been investigated and dealt with, each case will be monitored to ensure repeated bullying does not take place.

Prevention

We will use various methods for helping children to prevent bullying. As and when appropriate, these may include but are not limited to:

- writing a set of school rules
- signing a behaviour contract
- writing stories or poems or drawing pictures about bullying
- reading stories about bullying or having them read to a class or assembly
- making up role-plays (or using KIDSCAPE role-plays)
- having discussions about bullying and why it matters

HELP ORGANISATIONS:

Advisory Centre for Education (ACE)   0808 800 5793
Children's Legal Centre   0845 345 4345
KIDSCAPE Parents Helpline (Mon-Fri, 10-4)   0845 1 205 204
Parentline Plus   0808 800 2222
Youth Access   020 8772 9900
Bullying Online   www.bullying.co.uk

Visit the Kidscape website www.kidscape.org.uk for further support, links and advice.

Anti- Fraud Policy and Fraud Response Plan for Circles Alt Ed Ltd

Created: March 2016   Reviewed: Annually   To be reviewed again: Nov 2024

Policy Statement

Circles Alt Ed Ltd is committed to the prevention of fraud and the promotion of an anti-fraud culture.

Circles Alt Ed Ltd operates a zero-tolerance attitude to fraud and requires all staff, governors and volunteers to act honestly and with integrity at all times, and to report all reasonable suspicions of fraud.

Circles Alt Ed Ltd will investigate all instances of actual, attempted or suspected fraud and will seek to recover any losses and pursue appropriate sanctions against the perpetrators. This may include criminal prosecution, disciplinary action, legal proceedings and professional sanctions.

This policy applies to all staff (full time, part time, temporary and casual), consultants, volunteers and the school's Governing Body.

Definition of Fraud

The term 'fraud' is often used to describe complex financial offences such as false accounting. However, in its simplest form, fraud is lying. Some people will lie, or withhold information, or generally abuse their position to try to trick someone else into believing something that isn't true. Examples might include:

- Sending fake invoices for goods and services that weren't ordered or received.
- Use of the school's purchase card to make personal purchases.
- Intercepting a school cheque and amending the name of the payee and/or the amount.
- Submitting false claims for sickness or expenses.

Individuals caught committing fraud can be prosecuted under the Fraud Act 2006 if they make a false representation, fail to disclose information or abuse their position.

Further examples of the types of fraud that ECC are currently aware of are available on pages 6 & 7.

Key Responsibilities

The Head Teacher is responsible for:

- Developing, implementing and maintaining adequate systems of internal control that prevent and detect fraud.

- Testing the system of internal control and seeking independent assurance when appropriate.

- Regularly reviewing the school's anti-fraud policy and compliance with it to ensure it remains effective and relevant to the needs of the school.

- Reporting compliance with the policy on at least an annual basis to the Governing Body.

- Reporting allegations of actual, attempted or suspected fraud to the Full Governing Body and Essex County Council's Section 151 Officer - Andy Wood, Corporate Director of Finance and Procurement) and/or the Director of School's Resources and Deputy s.151 Officer - Keith Abbott.

- Ensuring all allegations of fraud are investigated appropriately, in compliance with relevant policies, procedures and legislation and commencing disciplinary and/or legal action where appropriate.

The Governing Body are responsible for:

- Overseeing the financial performance of the school, including its assets, making sure the school's money is well spent and measures are in place to prevent losses or misuse, including arrangements for preventing and detecting fraud.

Staff are responsible for:

- Familiarising themselves with the types of fraud that might affect the school.

- Ensuing they adhere to the agreed policies and procedures, thereby protecting the school's reputation and assets from fraud.

- Reporting allegations of actual, attempted or suspected fraud to the Head Teacher, and/or the Governing Body and/or Essex County Council's Section 151 Officer.

- Assisting in the investigation of suspected fraud when requested to do so, for example by providing witness statements.

Reporting Suspicions

The Governing Body and staff are an important element the school's stance on fraud and are required to raise any concerns that they may have. The Head Teacher and Governors will deal with any financial irregularities robustly.

Staff should immediately report any concerns about actual, attempted or suspected fraud to the Head Teacher. However, if the concerns relate to the Head Teacher, staff should report their concerns to the Chair of Governors.

Under no circumstances should staff investigate the matter themselves.

Should a member of staff, including the Head Teacher and/or Governors wish to seek advice about how to deal with an allegation of fraud, or want to report the matter anonymously, they can call the Essex County Council whistleblowing helpline which is operated by Internal Audit. Alternatively, staff can email Essex County Council's Internal Audit team.

The Public Interest Disclosure Act 1998 protects employees who raise concerns about certain matters of public interest in good faith. Staff can obtain free independent advice from the charity Public Concern at Work on **020 7404 6609** and find other helpful information at http://www.pcaw.org.uk/.

A copy of the school's Whistleblowing Policy can be found on it's website or can be obtained from South Hill Farm, Ingatestone Road, Stock Essex CM4 9PD.

A referral form has been provided at Appendix 2 which staff and Governors may wish to use as a guide to the type of information that should be captured when an allegation of fraud arises.

Contact Details

Telephone: Alex Stone 07794 205046 & Brad Kaylor 07531951616

Email: info@circlesalted.co.uk

Fraud Response Plan

Circles Alt Ed Ltd has established guidelines for senior staff and the Governing Body on the immediate actions to be taken in the event of a fraud being discovered or suspected. It covers how and when to seek professional advice, securing evidence and preventing further losses (see Appendix 1).

Fraud Response Plan

It is important that allegations of actual, attempted and suspected fraud aren't ignored. Even seemingly insignificant concerns may later reveal a larger, previously unknown problem.

Securing Evidence

Ensure that any concerns are recorded fully. Whenever possible keep written notes that cover:

- Names, addresses and dates of birth.
- Descriptions (height, build, hair colour, ethnicity, clothing, distinctive features)
- Dates and times of key events.
- Vehicle registration numbers and descriptions.
- Details of any conversations had or overheard.
- Details of any actions or incidents that were observed.
- Telephone numbers
- Company and/or business details

Secure any physical evidence such as original invoices, receipts, letters, cheques and application forms. Try to minimise how many people and how often evidence is handled. Fingerprint evidence can very quickly be destroyed.

If any of the evidence is on a computer, immediately unplug the computer from its power source. Don't attempt to shut the computer down through its operating system as this can alter or destroy key files and documents.

Whilst initially securing the evidence it is important not to be tempted to begin a more substantial investigation, or accuse individuals directly, without seeking professional advice (see 'Seeking Advice' below).

If an investigation is undertaken without following the appropriate policies, procedures and legislation, or if individuals are accused without sufficient evidence, it may lead to the perpetrators avoiding a disciplinary, criminal or civil sanction.

Preventing Further Losses

It is important to minimise any additional losses. For example, if the allegations concern the theft or loss or banking passwords, PIN's or similar credentials notify the bank immediately.

Equally, if the losses relate to a weak process, for example cash is routinely kept unsecured in a drawer, ensure that the process is changed, at least temporarily, until more permanent and improved processes can be implemented.

Seeking Advice

When an allegation of fraud is discovered it is important to seek professional advice as soon as possible. Advice can be sought from ECC's Internal Audit Team, School's Financial Services, School's Personnel Service, Legal Services and the Police. General advice about fraud is available form Action Fraud:
http://www.actionfraud.police.uk/

Support for Witnesses

Members of staff, Governors and the public may be feeling vulnerable before, during and after they have brought an allegation of fraud to the attention of the school.

Reassure witnesses that they have acted appropriately by raising their concerns. Members of staff should be provided with a copy of the **Whistleblowing Policy** and reminded that the school does not tolerate reprisals, victimisation or harassment and will take all reasonable action to protect them.

In addition, the school will take steps to minimise any difficulties members of staff may experience as a result of raising a concern. For instance, if they are required to give evidence in criminal or disciplinary proceedings, the school will advise or arrange for them to receive advice and support about the process being followed.

<u>Examples of Fraud</u>

Below are some examples of the types of fraud that have affected ECC and schools across Essex.

<u>Leases</u>

Schools are often offered leases and rental or hire agreements for equipment such as photocopiers, phones and computers. Whilst technically schools have the freedom to sign operating leases, finance leases are not allowed (see section 3 'Financing Major Purchases, ECC Loans, Salix Loans and Leases' of the Financial Controls guidance on KELSI). Some of the deals look too be good to be true with low or zero upfront costs, although they often entail high life time costs and severe exit penalties. These penalties can cost the same amount as the total amount of the lease. One school fell victim to sharp sales tactics and ended up committing the school to 14 financial agreements for 12 photocopiers which resulted in expenditure of almost £900,000.

<u>Recruitment</u>

Issues can arise if a senior member of staff recruits a family member or friend. By doing this a number of conflicts of interest can arise such as the senior member of staff signing off additional hours of work that have not been completed by a family member. There is also the possibility of the candidate not being the best person for the role.

If there is a potential conflict of interest, for example a family member has applied for a post within the school, the member of staff concerned must disclose the potential conflict to the Head Teacher or the Chair of Governors immediately. The Head Teacher or Chair of Governors should ensure that appropriate controls are put in place to manage the potential conflict in an open and transparent manner and the risk of impropriety is minimised.

<u>Cheque Fraud</u>

School cheque fraud has become an increasing problem within Essex, 10% of all cases referred to Internal Audit from April 2014 to January 2015 were a result of cheques being amended and forged. There have been instances where cheques have been stolen from the cheque books and cashed or legitimate cheques have been intercepted and amended. Additionally, cheque amounts have been changed by the payee.

Some staff fail to line off after the payee's name on the cheque, which has resulted in the payee inserting an additional hundred before the actual amount. Cheque books should be regularly checked and reconciled with payments that have been taken out of the schools account.

<u>Purchase Cards</u>

There are usage agreements that are in place to prevent the misuse of purchase cards. However, there have been instances where members of staff have used the card for their own personal purchases. A recent investigation, examined the use of a

purchase card that had been used for petrol, electrical goods, food, holidays and DIY. It transpired that both the Head Teacher and Office Manager had been extensively using the purchase card for their own personal use.

BACS

BACS payments are not immune to fraud. There are a number of scams such as 'phishing' and 'vishing' which is where fraudsters attempt to obtain log in details by pretending to call from genuine high street banks. They often sound very professional, and the fraudsters will sometimes ask staff to call them back on authentic sounding telephone numbers (such as 0845 223344) which the fraudsters have purchased to help them commit the fraud. Equally, it is important to ensure that BACS log in credentials are stored securely and not shared, and when members of staff leave their log in credentials must be deleted.

Invoices

There have been instances where fraudulent invoices have been sent to schools for goods that haven't been ordered or received. Sometimes these invoices are for small amounts and sent out in their thousands to schools up and down the country. These invoices are often sent during the holidays in the hope that staff will be too busy to check each invoice when they return for the start of term.

Income

It is common for schools to rent out their facilities in order to generate income. Fraud can occur when the income received, especially if payment is made in cash, is stolen by staff or third parties if not properly banked and/or secured.

Fraud Reporting Form

If you have any concerns about fraud please contact Essex County Council's Internal Audit Team.

You do not need to give your name. All the information provided will be treated in confidence.

Name of the person(s) or organisation you suspect:

Address: (if known)

Place of work / department / job title: (If known)

Please provide details of your suspicions. You should include as much information as possible. For example, what was said in telephone or other conversations, dates, times and places, vehicles used, as well as the names of any other parties involved: (Continue on a separate page if necessary and attach any additional evidence you may have)

Your details: **(please leave blank if you wish to remain anonymous)**

Name:

Telephone number or contact address:

Staff Appeals Policy & Procedure

Created: March 2016   Reviewed: Annually   To be reviewed again: Nov 2024

SCOPE

The purpose of this policy and procedure document is to set out the process for any staff member to raise an appeal towards a decision or judgment made by a manager or director that they feel is not a fair outcome or representation.

RAISING AN APPEAL

Where a staff member wishes appeal a decision or judgement, they should email either their line manager or a director that wasn't part of the original decision or judgment. If both line manager and both directors were part of the original decision or judgement, then the appeal email should be address to the meeting chairperson.

CONTENT OF APPEAL EMAIL

The content of the email should be concise while covering all areas you feel are an unfair representation. This can be presented in any format but need to include;

1. The point being appealed
2. The reason for appeal
3. Evidence or explanation to justify the appeal
4. Any other relevant information

TIME FRAME

All appeals should be lodged within 10 days of decision or hearing (unless alternative time frame agreed during lead up meetings).
Receipt of Appeal will be acknowledged within 10 days of email, with a time frame set out for appeal to be heard. This will normally be withing 20 school days of appeal being lodged.

SUBSEQUENT APPEAL MEETINGS

During any subsequent appeal meetings, the employee has a right of representation at this hearing by a colleague.

CONCLUTION OF APPEAL

At the conclusion of appeals process, all parties will be informed in writing of the outcome.
Written conclusion of the appeal is considered final.

Circles Alt Ed Business Continuity Plan

Policy last review: **November 23**

Review frequency: Annual

Next review: **November 24**

<u>**Synopsis**</u>

To provide a flexible framework to manage Circles response to any disruption or emergency while maintaining critical activities and recover from any incidents quickly and effectively while limiting disruption to students, service users and staff.

Sites covered under this plan are;

Circles Farm	Circles Salon & Study	Circles Woodland
Ingatestone Road	The Boiler House	East End Lane
Stock, Essex	Malyons Place	East Bergholt
CM4 9PD	Felmores, Basildon	Suffolk
	Essex	
	SS13 1PS	

As Circles works in partnership with all of its school partners, this business continuity plan may also where relevant be linked to the individual school's continuity plans through areas identified as part of each individual school's service level agreement.

<u>**Plan Activation**</u>

Circumstances

This plan will be activated to manage Circles response to any incident causing significant disruption to normal service delivery particularly the delivery of key activities that might also be time critical. Triggers to this plan may include;

- loss of key personnel as a result of sickness, injury, transport disruption, short term severe weather impact or people leaving the organisation.
- Loss of critical systems such as, computer network issues, telephone/broadband outages, power cuts, general third-party disruption.
- Loss of or limited use of buildings due to instances of fire or flood, utility 's failure, limited access enforced by emergency services, vandalism and/or any reason that limits access to buildings.
- Loss of a key resource such as an external supplier to a vital area of delivery, such as transport, exam board assessments, ETC.
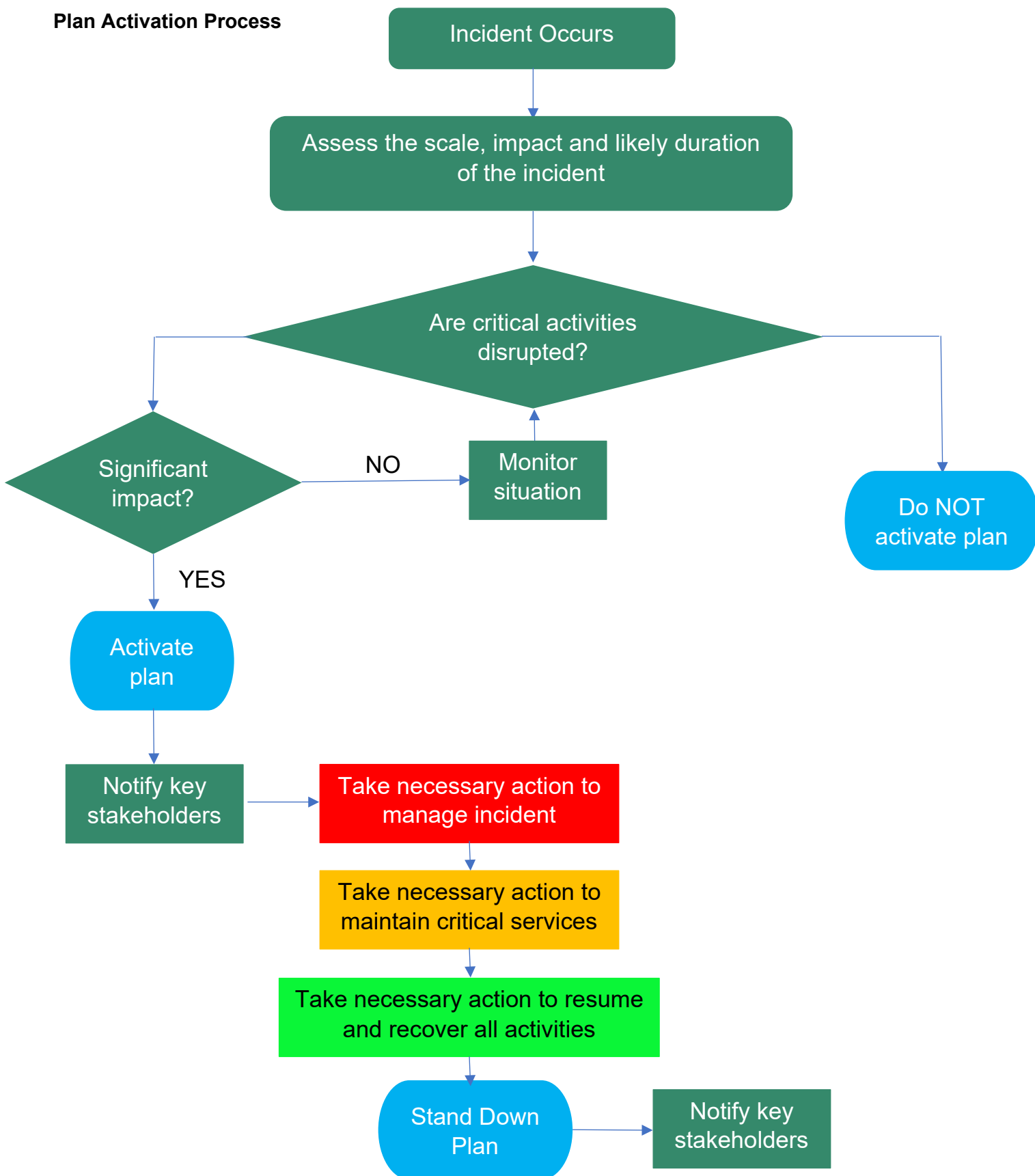
Authority for Plan Activation

Circles business continuity plan can be activated by a Director, or a site-specific managers for their managed site only.
At point of plant activation, the key contacts at our partner schools will be informed.

Notification Procedures

Who?	Why?
Director	Take the decision on whether the business continuity plan should be activated and direct the resources.
Senior Leadership Team	Nominate a member of SLT to act in directors place when a director is unavailable. Responsible for strategic decisions in response to significant incidents.
Site Manager	Contact emergency services in the first instance on discovery of major incident. Liaise with school partners to maintain communication links as the plan is implemented.
Admin staff	Inform parents of the impact to their child's provision while the business continuity plan is being implemented.
Group Leaders	communicate with students on a day-to-day and step by step basis as to how the recovery plan is unfolding, noting any areas of concern displayed from students and report these concerns back to SLT.

Plan Activation Process

CIrcles
alternative education

Incident Occurs

Assess the scale, impact and likely duration of the incident

Are critical activities disrupted?

Significant impact?

NO → Monitor situation

Do NOT activate plan

YES

Activate plan

Notify key stakeholders → Take necessary action to manage incident

Take necessary action to maintain critical services

Take necessary action to resume and recover all activities

Stand Down Plan → Notify key stakeholders

Incident Management

Purpose

The purpose of the incident management phase is to;
- Protect the safety and welfare of staff, visitors and the public.
- Protect vital assets EG equipment, data, reputation.
- Ensure urgent and necessary communication takes place.
- Support the business continuity phase.
- Support the recovery and resumption of full service phase.

If the disruption is caused by a 'no notice' emergency the business continuity phase (amber) would be more relevant.

	Requirement	Action	Action Completed?	By Who? (Initials and date)
1	Make a **quick** initial assessment: • Survey the scene\ situation • Access the impact on pupils and staff. • Assess the likely scale/severity/duration/impact. • Note key information to share with others. • Call the emergency services if needed. • Evacuate buildings where necessary.	Gather and share information to facilitate decision-making and enhance the response.	☐	
2	Nominate individuals to carry out incident management roles as appropriate.	Delegate key roles to specific staff so status changes can efficiently be reported back to Directors and SLT.	☐	
3	Ensure a log of key decisions and actions is started and maintained throughout the incident.	Log to me kept and updated by a named member of SLT, with a deputy names to cover if unavailable.	☐	
4	Where appropriate record names and details of any staff or pupils that may have been injured or affected by the incident as part of the incident record log	This information should be held securely in line with GDPR. This information can be shared with emergency services as required.	☐	
5	Record details of all items lost or damaged by students staff and visitors as a result of the incident where appropriate.	Ensure level of detail was meets requirements of insurance provider	☐	
6	Assess the key priorities for the remainder of the working day and take relevant action.	Prioritise actions to ensure the health, safety and well-	☐	

		being of students, staff stakeholders affected. Consider the areas required to ensure business continuity, IE alternative ways of working, temporary relocation, online provision to minimise the level of disruption.		
7	Record all expenditure as a result of the incident, reasons why it was required, to be shared with the insurance company.	Time sensitive expenditure can be approved by SLT to a value of £5000 total. Expenditure above £5000 needs to be approved by a director.	☐	
8	Consider the communications strategy to ensure all students staff and stakeholders are kept informed about what is required of them. If the incident is taking place outside of normal working hours students and staff may need to be contacted and advised of any alterations to the normal days hours, location, etc.	All students and staff's contact details are held securely in circles cloud based servers. Notes should be made in the daily attendance register once students have been informed of any changes.	☐	
9	Ensure recording processes are in place for students and staff leaving site.	Ensure the safety of students and staff before they leave the site and identified suitable risk control measures where needed.	☐	

Business Continuity

Purpose

The purpose of the business continuity phase is to;
- To ensure that critical activities are resumed as quickly run efficiently as possible, and\or continued to be delivered during the disruption.
- To activate one or more of your businesses continuity strategies to enable alternative ways of working.
- To make best use of potentially limited resources by suspending non critical activities.
- Two prioritise time sensitive operations, i.e. assessments and/or exams

	Requirement	Action	Action Completed?	By Who? (Initials and date)
1	Take time to understand and evaluate the impact of the incident on business as usual activities are communicating with key stakeholders to gather information	Depending on the incident, you may need additional or specific input in order to drive the recovery of critical activities, this may require the involvement of external partners	☐	
2	Plan how critical activities will be maintained, utilising pre identified or knew business continuity strategies.	Consider: • Immediate and ongoing priorities. • Communication strategies. • Resources available. • Deployment of resources. • Roseanne responsibilities. • Finance. • Monitoring of the situation. • Reporting. • Stakeholder engagement. • Highlighted welfare issues. • Pausing, and then planning the recovery of non-critical activities.	☐	
3	Identify any other stakeholders who may be required in the business continuity response	Depending on the incident, you may need additional or specific input in order to drive the recovery of critical activities, this may require the involvement of external partners, agencies or contractors.	☐	
4	Log all decisions and actions, including what you decide not to do and include your decision making rationale	The events log should be maintained by a named member of SLT.	☐	

5	Log all financial expenditure incurred as a result of the incident.	Information needs to be recorded to aid directors and SLT in making decisions around viable recovery strategies.	☐	
6	Deliver appropriate communication actions as required.	The level of information content, and method of information sharing should be tailored to the needs of the individual stakeholders. i.e. Emails for professionals, phone calls for parents, etc.	☐	

Business Continuity Strategies

The purpose of the business continuity strategies is to;
- Document alternative ways of working designed to maintain critical activities and services in the event of disruption.
- To ensure alternative ways of working have been agreed, tested and are fit for purpose.

	Tactical Options to Mitigate a Loss of Premises	Additional Information
1	Alternative locations identified to enable provision to continue; • Complete site **short term** closure – No physical alternative required, go to on-line learning where appropriate. • Partial site **short term** closure – Corden off closed areas and continue to use available space. • Complete site **long term** closure – Use of temporary structures in neighbouring fields. i.e. marquee. • Complete site **short term** closure – make use of distance learning. Individual welfare checks where required for students identified as vulnerable.	
2	Each group leader should have a grab bag prepared with back up resources required to be able to continue delivery should a area of site become inaccessible.	
3	In case where student vulnerability is a concern off site engagement activities maybe used.	
4	Resources stored in the cloud so distance leaning offer can be activated at short notice.	
5	Off site activates, e.g. trips to supplies, enrichment trips, etc	
	Tactical Options to Mitigate a Loss of ICT systems	Additional Information
1	Hard copies of some resources stored as back ups.	
2	Cloud server can be accessed from any device, not Circles specific devices.	
3	Ensure anyone that requires ICT to undertake critical activities has the ability to work remotely. i.e. safeguarding, attendance reporting, etc.	
4	Mobile network equipment kept charged	

5	Pause non critical activities, redeploy staff to support critical activities and the recovery of normal system operation.		
	Tactical Options to Mitigate a Loss of Staff or Skills	**Additional Information**	
1	Redeploy staff form other sites where appropriate		
2	Cross training of staff so flexible cover is available when needed		
3	Ensure all staff build relationships with students outside of their normal working groups to make cover easier.		
4	Use different ways of working to minimise the effect of reduced staff ratio, e.g. team activities, virtual learning, etc.		
5	Suspend non critical activities		
	Tactical Options to Mitigate a Loss of Key Supplier		
1	Pre-identified alterative suppliers		
2	Ensure all external suppliers can demonstrate an established history of contract fulfilment before engaging and have a business continuity plan in place.		
3	Insurance cover		
4	Suspend non critical activities until alternative supply can be arranged		

Recovery and Resumption

Purpose

The purpose of the recovery and resumption phase is to;
- Return the business to normal operation as quickly as possible
- Ensure any non critical activities suspended as part of the business continuity response are recovered.
- Where the impact form the incident are prolonged, normal operations may need to be delivered under new circumstances, e.g. from a different building on a longer term basis.

	Requirement	Action	Action Completed?	By Who? (Initials and date)
1	Agree and plan the actions required to enable recovery and resumption of normal working practises	List required actions and set timescales with clear identification who is responsible for each action.	☐	
2	Continue to record all expenditure incurred.	Allocate expenditure to each recovery action.	☐	
3	Respond to any long term support needs to students, staff and stakeholders.	Consult and signpost to external agency's where required, e.g. counselling.	☐	
4	Once all recovery actions are complete, communicate 'business as usual' to all stakeholders	Ensure all stakeholders are aware that the business continuity plan has been stood down.	☐	
5	Complete debrief to stakeholders as needed/requested	All staff involved with the implementation of the continuity plan should have input.	☐	
6	Review business continuity plan in light of lessons learned	Implement recommendations for improvement and update continuity plan.	☐	

CHILD PROTECTION
Highly Confidential Information Sheet
'Cause for Concern'

- This form can be hand written or typed. This sheet will be kept in the CP folder separate from the student's main file.
- If handwritten: **Do Not** make a copy
- If typed: print and sign **Do Not** save on Student's File Server
- Inform your allocated Child Protection Designated Teacher **IMMEDIATELY**

Category: Child Sexual Exploitation: 　　　　　Self-Harm: 　　　　　Neglect: 　　　　　Physical Abuse:		Staff (print name):		Signature:	
		Date concern raised:		Day of week:	Time:
Name of Student:	Date of Birth:	Start Date:	CP File received from referring/previous School:		
Parent/Carer:	Siblings:		Address/Tel:		
School / Referrer:	Previous/present agencies involved:		Agencies contacted as a result of cause for concern:		

- Detail your cause/s for concern accurately
- Write exactly what you have been told
- Ask questions only to clarify information being given
- Use a body map to annotate any suspicious marks

Next Review Date: Nov 24

Action :	By When:
Signature/Date of person receiving form:	

CCTV Policy

Applies to: All sites
Created by: B Kaylor
Review program: Annual

Date of next review: November 2024

The purpose of this policy is to regulate the management and operation of the closed circuit television (CCTV) system at Circles Alt Ed sites. It also serves as a notice and a guide to data subjects (including students, parents, staff, visitors to the school and members fo the public) regarding their rights in relation to personal data recording via the CCTV system.

The CCTV systems are administered and managed by Circles who act as the data controller.

Circles purpose of using the CCTV system are set below and having fully considered the privacy rights of individuals, Circles believes these purposes are all within its legitimate interests.
Data captured within the CCTV system will not be used for commercial purposes.

Objectives of the system

- To protect students, parents, staff, visitors and any members of the public with regard to their personal safety.
- To protect Circles buildings and equipment, and any personal property of people on site.
- To support the police and community in preventing and detecting crime and to assist in the identification and apprehension of offenders.
- To monitor the security and integrity of Circles sites.
- To monitor and uphold discipline among students inline with Circles rules.
- To monitor staff and contractors for compliance related to employment and contractual obligations.
- To be used for sporadic, unintrusive lesson observations and exam observations.
- To record footage for a set period of time to enable retrospective reviewing of any incidents where CCTV footage may assist investigations

Types of system

Circles Salon & Study   -   Ring CCTV system, cloud-based storage
Circles Farm   -   Hikivision IP system, locally stored

Positioning

Locations have been selected both inside and out that Circles reasonably believes require monitoring to address the stated objectives. The locations at date of writing/review are;

Circles Salon & Study (Basildon)	Circles Farm (Stock)
1 – Reception area	1 – Side of workshop
2 – Classroom	2 – Pickup/drop off area
3 – Salon	3 – Area in front of kitchen
4 – Outside student area	4 – Area outside ICT room
	5 – Pole barn

- Adequate signage has been placed in prominent positions to inform those who enter Circles sites that CCTV is in operation.
- All CCTV cameras are in plain sight.
- No images are captured from areas in which individuals would have a heightened expectation of privacy (toilets)
- No images of public spaces will be captured except in background images from camera locations that are primarily installed to meet the objects of the system.

Operation & Maintenance

- The system will be operational 24/7, every day of the year.
- Site managers will have access to the system and will check it for operation on a regular basis, performing routine maintenance where needed.
- Where the system in malfunctioning an external specialist company will be contacted to make required repairs.

Viewing of the System Footage

- The following staff have the right to view the system footage at anytime;
    - Company directors
    - Site managers
- Other staff may be sporadically authorised to view the system footage on the authorisation of directors only.
- Staff or contractors checking and maintaining the system may from time to time inadvertently see recorded footage, but shall not purposefully access the

system for any longer than is reasonably required to performance the required maintenance.

- Viewing in this context will include both real time and stored footage.

Storage of Footage

- System data is stored for between 4 to 6 weeks before being automatically overwritten, apart from instances where footage has been downloaded from the system to meet the objects of this policy.
- All downloaded footage will be stored in a single central location and access only by company directors and site managers.

Access to Footage

- Individuals have the right to access personal data Circles holds on them, including footage held on the system if it has been retained.
- Inline with subject access requests under GDPR, Circles must be satisfied of the identity of any person wishing to view stored footage and the legitimacy of the request.
- A written request to view footage is required, including
  - Name and address or person requesting footage (ID maybe required)
  - Include location of camera
  - Description of footage, including a description of yourself, clothing, activity, etc.
  - Date of footage required
  - Approximate time
  - Reason for request
- Where images are provided under access requests, written consent will be obtained from any other person that appears in the footage, if this cannot be obtained reasonable efforts will be taken to obscure images of other persons.
- Images requested by the police will be provided unedited and as recorded.

Other CCTV systems

- Circles does not own or manage any other CCTV or video monitoring systems that are not listed in this policy, but, may from time to time include third party images within its legitimate investigations when working to achieve the objects of this policy.

Complaints and Queries

- Any complaints or quires in relation to Circles CCTV systems, its use of CCTV, or requests for copies should be referred to the Directors.

Children Missing in Education Policy

Updated: July 23 – Reviewed: November 23

Next Review: November 24

Circles Alt Ed forms a partnership with the referring school/agency/LA and so plays a vital role in monitoring and reporting any children believed to be missing in education.

The legal definition of a child missing in education is;

Children missing education (CME) is defined as those who are of a compulsory school age but are either not registered at a school or else not receiving suitable education in place of a school setting.

Some students can be more vulnerable to becoming missing in education than others, these include;

- Young people who have committed offences
- Children living in domestic abuse refuges
- Children of homeless families perhaps living in temporary accommodation
- Young runaways
- Children with long-term medical or emotional problems
- Looked after children
- Children with a Gypsy/Roma/Traveller background
- Young carers
- Children from transient families
- Teenage mothers
- Children who are permanently excluded from school
- Migrant children whether in families seeking asylum or economic migrants
- Children moving out of independent schools/academies/free schools
- Children whose parent(s) are in the Armed Forces

A student's placement at Circles can only be withdrawn by the referring school/agency/LA. In instances where a student voices that they are going to missing a period (e.g. a holiday) or not going to be returning, this should be treated as a safeguarding matter and reported as per safeguarding policy.
In instances that a parent/carer states that a student is going to be missing a period (e.g. a holiday) or not going to be returning this should be communicated with the referring school/agency/LA for conformation. If conformation cannot be made it should be reported as per safeguarding policy.

Timeline for Nonattendance

As Circles does not take students on a fulltime timetable the following steps should be followed in partnership with the referring school/agency/LA. Due to this communication between all stakeholders is vital.

Day 1
Circles telephones the child's home to find out reasons for the absence and reassurance from a parent or carer that the child is safe at home. In the event of no response from either landlines or mobile contact, staff should call back regularly, and risk assess after two hours.
When the parent/carer answers the call and the child is safe with them, ask for the reason for absence and record it in the notes section of the attendance system.

If the person answering is not the parent/carer and reassurance that the child is at home or safe can't be obtained, then the designated lead for child protection/safeguarding should be consulted.

If the parent/carer answered the call, but the child is not with them and is worried about their safety, then the parent/carer should be advised to contact the local police station to inform them that their child is missing.

Day 2
Follow up phone call – a subsequent telephone call must be made by the school to the parent/carer to ascertain the situation.

Day 3
Write to/email the parents/carer. Write or email using plain English, asking for contact to be made with Circles/LA immediately.
3 days should be allowed for a response.

Day 5/6 – A home visit – arrange a visit to the home address ensuring that risk assessments are in place.

Day 10
If the child has not been seen within a 10 day period and the parents or carers have not made contact, The child should be reported as missing from education to the local authority.

This memorandum of agreement sets out the operational arrangements and responsibilities of Circles Alt Ed Ltd as an alternative provider and the 'Home Centre' as the commissioning client for the provision of alternative education; where appropriate incorporating a mosaic of vocational learning, engagement activities and therapeutic intervention with accreditation form Edexcel Pearson.

The purpose of this document is to ensure that both parties have a mutual understanding and awareness of the roles and responsibilities of their institution in the partnership, to prevent unnecessary confusion and misunderstandings, which can sometimes occur.

This protocol agreement is intended to specify minimum standards and will be in addition to any other formal and legal contracts that may be in place between the Home Centre and Circles Alternative Education Ltd.

It is not the intent or desire of Circles Alt Ed to offer permanent full-time placements to any students.

Alternative Provider Details

Circles Alt Ed Ltd
www.circlesalted.co.uk

Main Contacts:
Brad Kaylor | Director   brad@circlesalted.co.uk   07531 951616
Alex Stone | Director   alex@circlesalted.co.uk   07794 205046

Circles Farm, Trades & Kitchen Site	**Circles Salon & Study Site**	**Circles Woodland**
South Hill Farm Ingatestone Road Stock, Essex CM4 9PD 01277 280396	The Old Boiler House Malyons Place Felmores Essex SS13 1PS 01268 727759	Woodland off East End Lane East Bergholt CO7 6XQ 01206 580133
Site Manager Matt Kinsella matt@circlesalted.co.uk	**Site Manager** Ryan Morrant ryan@circlesalted.co.uk	**Site Manager** Fez Sackett fez@circlesalted.co.uk

Home Centre Details

The home center is the school where the student is on roll.
In cases where a student is dual rolled, for the purpose of this document the agreement is with the school that made the referral.
In cases where a student is not currently on a school role, the referring agency/organization/LA is considered to be the home center.

It is the referring school/agency's responsibility to share (and update us with any changes to) **the student's complete timetable** to ensure we remain within DfE registration guidance.

Funding arrangements

The Home Centre agrees to the funding arrangements as stated at time of referral.

The key points are:

Registration Fee: £225 per student (includes one BTEC registration)
Session Cost: £93.50 per student for a standard referral
£147.50 per student for a complex referral (EHCP, LAC, SEN, YOT etc)
£225.00 per student for a complex referral with additional support
£66 per hour for 1:1 engagement
£60 per hour tuition, minimum of two hours per session.

Transport costs and Free Schools Meals allowance are not included in session or registration pricing.

Wherever possible pricing is not changed during an academic year, if in year pricing adjustments are required these will be announced before the end of term and applied the following term.

Referrals are accepted on a termly roll-on roll-off basis; if a student is removed mid- term, the session fee remains due until the end of that full term.
Y11's attending in the Spring term, cannot be withdrawn for the summer term, unless they have moved out of area.
The practical nature of our courses means that study leave isn't appropriate, our term therefore runs until the official Y11 leaving date, generally the last Friday in June.

Referrals

Referrals are accepted thought the year. Circles Alt Ed Follows the Essex school terms dates calendar.

Every student is required to complete a trial/probation period of three sessions charged at the standard rate of their referral with payment due before the trial/probation commences. This is non-refundable.

Once the trial/probation period has been completed an assessment meeting between the Student, Home Centre and Circles maybe required to evaluate the successfulness of the trial/probation period and to decide if the student is to enroll in Circles courses. If no meeting is necessary, the student will be enrolled as soon as the trial period expires unless told otherwise.

Once the decision has been made for the student to enroll, the first terms course fees are due along with the registration fee. An invoice will be sent out and payment is due in full within 30 calendar days. The student can enroll and start their studies while this invoice is pending. An administration fee of 9% of the total invoice will be applied per week if the invoice is not settled in full within the 30 days.

If the student is later withdrawn from the course for any reason the course fee is non-refundable. However, the Home Centre can replace the student with an alternative student subject to the same trial/probation period for the cost of the new students registration fee.

Service Level Agreement between Circles Alternative Education Ltd and the Home Centre

Part A: Circles Alternative Education will;

1.   Provide a program of study with indicated levels of attainment of learning with clear aims, objectives and methods, if appropriate, leading to a nationally recognised qualification.

2.   Provide appropriate cover arrangements as agreed with the Home Centre in case of staff absence.

3.   Provide the student with a mentor/main group leader.

5.   Contact the appropriate person at the Home Centre within 2 working days regarding any student whose behavior or progress is causing concern.

6.   Contact the appropriate person at the Home Centre if the student does not arrive at Circles Alternative Education on that same day by 10:30am following the agreed student procedure. Absences must be recorded.

7.   Provide the Students, Home Centres, Parents/Guardians and Local Authority with all the relevant program details i.e. term dates, contacts, timetables, etc.

8.   Provide an induction program, including Health and Safety, Drugs, Bullying and Behavior Policies at the start of the program.

9.   Provide tools, equipment and materials required for all practical and classroom based areas of the program and personal safety equipment required for all practical work where necessary and provide the necessary training.

10.   Keep all students details in accordance with the GDPR.

11.   Employ staff with relevant teaching and vocational experience and ensure that child protection regulations are adhered to and all staff working with students are DBS checked and ensure that staff receive appropriate training where necessary.

12.   Provide each Home Centre with the relevant staff data, and update through the academic year where necessary.

13.   Collect and supply the necessary data for audit requirements, e.g. attendance register for am/pm sessions.

14.   Monitor progress and provide termly written reports to the Home Centre to be forwarded at the Home Centre's discretion to the parent/Guardian following the agreed procedure. Discuss the reports with the student.

15.   Carry out risk assessments by qualified staff on all aspects of Circles programs prior to the commencement of the program. Provide the Home Centre with a copy of the risk assessments if/when required including a clear process for the reporting of accidents. Ensure that injury or loss insurance covers students under 16 years of age.

16. Provide access to an area where students can have their lunch and ensure that they know that during lunchtime they must remain on the premises. Provide an identified person for support during lunch and break periods.

17. Where practical notify the Home Centre of any timetable changes or variation.

18. Ensure that all necessary documentation is completed.

19. Produce digital marketing materials of programs for Home Centres, Students and the Local Authority.

20. Ensure moderation and quality assurance systems are robust and meet any external requirements including monitoring for collaborative provision.

21. Provide information, guidance and sign posting to a clear post-16 progression route in education, training or employment with training. Provide on-site facilities and time to allow home centre arranged careers advisors to meet with students to discuss their future aspirations.

22. Invoice the Home Centre for the agreed amount by an agreed date/time period.

23. Continue to provide the most appropriate alternative forms of provision in accordance with government guidelines throughout any pandemic or event that changes 'normal' working conditions.

Part B: The Referring Agency / Home Centre will;

1. Ensure that learners are following a cohesive pathway leading to a recognised qualification where appropriate.

2. Nominate appropriate members of staff to act as key contacts to work effectively with Circles and the Local Authority providing ongoing support to achieve the aims and objectives of the program.

3. Identify and select appropriate students following the agreed procedure and in line with the aims and objectives of the program. Carry out a risk assessment, making commitment to the program.

5. Ensure students attend any interviews and pre-programme tours/induction sessions and where possible accompany them. In normal circumstances a tour in advance of the start date is mandatory.

6. Provide in writing, prior to the beginning of the programme, relevant reports as required (to support a student application) on the application form.

7. Provide an emergency contact number and information on any known medical conditions.

8. Provide a copy of their most recent statement for students who are SEN/EHCP. Where support is allocated, send TA to Circles Alternative Education with learner where required, or fund additional support from Circles staff.

10. Take action to follow up non-attendees after notification of absence and report back to Circles Alt Ed with findings. Provide support if other problems occur.

11. Support Circles Alt Ed with carrying out the previously agreed cause for concern procedures and behaviour policies.

12. Collect any necessary data for audit and monitoring requirements.

13. Notify Circles Alt Ed of any known absence such as work experience, examinations, non-pupil days, etc and give at least two weeks notice of such.

14. Inform the Local Authority and Circles Alt Ed immediately if a student is to be withdrawn. Complete all necessary documentation.

15. Notify Circles Alternative Education Ltd of any significant change of circumstance involving the students or details likely to affect programme delivery.

16. Settle invoices for the agreed payment within the specified 30 day time. Commit to the agreed payment schedule for the full term of the program even if the Home Centre students are withdrawn or fail to attend.

17. Maintain the Home Centre statutory responsibility for the students, including responsibility for special educational needs, except as delegated to Circles by agreement.

18. Attend regular meetings to monitor all programs.

19. Visit or contact Circles to monitor students at least once per half term.

20. Assist with the review of policies and procedures which support the provision.

21. Assist with removal of student from site if required. Either via home support / taxi or private car within one hour of the issue being raised.

22. Monitor changes in costing.

23. Students cannot be withdrawn during any forced school closures as per the normal roll-on roll-off policy, placements are confirmed for the forthcoming term automatically.

24. The Roll-on Roll-off terms for a student in Y11 are modified, to once a student is confirmed for the Spring term they are to remain with us for the summer term until the Y11 leaving date in June.

This Service Level Agreement is issued by Circles Alt Ed. The Home centre agrees to be bound by the conditions within the SLA.

By the process of referring a student to Circles Alt Ed via the online referral system, you are agreeing that the school/agency/LA agree with this SLA and are bound by the conditions.

This SLA maybe reviewed at any time, where changes are made, the updated copy will be sent to the school for signing, and will replace the previous versions content.

This SLA covers all students referred from your school/organization/LA.

A referral will only be accepted from an official school/LA email address, any referral coming from an official email address will be accepted and bound by the terms in this SLA.

To be signed by a member of the Senior Leadership Team that has the authority to financially commit the school to the terms of the placement as outlined in this SLA.

School/Agency/LA name:

Staff Name: Job Title:

Signature: Date:

Complaints Procedure

Created: March 2019   Reviewed: Annually   To be reviewed again: Nov 2024

Purpose

The purpose of setting out this procedure is so that anyone with a complaint to raise is provided with a template of how to raise such a concern, is aware of what will happen once a complaint is raised, and the time frame in which the matter will try to be resolved.
This is a unilateral procedure and can be used by any stakeholder to raise a complaint towards Circles / Staff Member / Student / Referring School / Parent / Activity / etc.

Any complaints that involve a safeguarding issue should be reported immediately following the safeguarding policy.

Types Of Complaint

Informal complaint
This maybe a low level complaint that doesn't involve any serious or dangerous issues and doesn't have an extended negative impact on anyone. The best method of resolution for informal and low level complaints is verbal communication.
A formal response from Circles would not normally be needed at this level of complaint and a resolution should be able to be agreed between parties involved.
A complaint may start as an informal complaint, but after the verbal communication fails to resolve the issue, it can be escalated to a more formal complaint.

Formal complaint
Formal complaints cover any issues that cant be resolved informally, or that are more serious and need a formal process to be followed.

In the first instance a complaint should be emailed to the site manager to which the complaint applies.

Site Managers
Circles Farm: Matt Kinsella, matt@circlesalted.co.uk
Circles Salon & Study: Ryan Morrant, ryan@circlesalted.co.uk
Circles Woodland: Fez Sackett, fez@circlesalted.co.uk

If the compliant is regarding a site manager, or one of the directors the complaint should be addressed to one of the directors. Only if the complaint is about both directors should both directors be emailed at this stage, where possible one director should remain outside of the complaint so that in the event of an appeal being made, the appeal can be heard without prejudice.

Directors
Brad Kaylor, brad@circlesalted.co.uk
Alex Stone, alex@circlesalted.co.uk

Complaint content

When submitting a complaint via email you should include;
- Explanation of the issue and when it happened.
- How the issue has impacted those involved.
- Suggestion of action you would like taken to resolve the complaint.

Time Frames

Action	Time Frame
Complaint received via email	Acknowledged within 24 business hours.
Complaint reviewed and investigated	1 week
Investigation findings shared where appropriate	2 weeks
Report and control measures implemented	3 weeks
Appeal to be raised if complaint not satisfied	2 weeks from report

All complaints will be investigated, but not all complaints will be found to have substance. Where a complaint is dismissed and the person raising the complaint is not satisfied, they should escalate the complaint to a director.

What must I do?

1. **MUST**: All employees must **comply** with the requirements of Data Protection Law and Article 8 of the Human Rights Act when processing the personal data of living individuals
2. **MUST**: Where personal data is used, we must make sure that the data subjects have access to a complete and current **Privacy Notice.**
3. **MUST:** We must formally **assess** the risk to privacy rights introduced by any new (or change to an existing) system or process which involves the use of personal data
4. **MUST**: We must process only the **minimum** amount of personal data necessary to deliver services.
5. **MUST**: All employees who record **opinions** or intentions about service users must do so carefully and professionally
6. **MUST**: We must take reasonable steps to ensure the personal data we hold is **accurate**, up to date and not misleading.
7. **MUST**: We must rely on **consent** as a condition for processing personal data only if there is no relevant legal power or other condition
8. **MUST**: Consent must be obtained if personal data is to be used for **promoting or marketing** goods and services.
9. **MUST**: Consent will **expire** at the end of each 'Key Stage' period unless it is reconfirmed.
10. **MUST**: We must ensure that the personal data we process is reviewed and **destroyed** when it is no longer necessary.
11. **MUST**: If we receive a **request** from a member of the public or colleagues asking to access their personal data, we must handle it as a Subject Access Request under the Data Protection Act 2018 or a request for the Education Record under the Education (Pupil Information) (England) Regulations 2005
12. **MUST**: If we receive a request from anyone asking to access the personal data of **someone other than themselves**, we must fully consider Data Protection law before disclosing it
13. **MUST**: When someone contacts us requesting we change the way we are processing their personal data, we must consider their **rights** under Data Protection law.
14. **MUST NOT**: You must not access personal data which you have **no right to view**
15. **MUST**: You must follow system user **guidance** or other formal processes which are in place to ensure that only those with a business need to access personal data are able to do so

16. **MUST**: You must **share** personal data with external bodies who request it only if there is a current agreement in place to do so or it is approved by the Data Protection Officer or SIRO.
17. **MUST**: Where the content of telephone calls, emails, internet activity and video images of employees and the public is **recorded, monitored and disclosed** this must be done in compliance with the law and the regulator's Code of Practice.
18. **MUST**: All employees must be **trained** to an appropriate level, based on their roles and responsibilities, to be able to handle personal data securely. This training must be regularly refreshed to ensure knowledge remains current.
19. **MUST**: When using **'data matching'** techniques, this must only be done for specific purposes in line with formal codes of practice, informing service users of the details, their legal rights and getting their consent where appropriate.
20. **MUST**: We must pay an annual [Data Protection Fee](#)
21. **MUST:** Where personal data needs to be anonymised or pseudonymised, for example for **research purposes**, we must follow the relevant procedure
22. **MUST NOT**: You must not **share** any personal data held by us with an individual or organisation based in any country outside of the United Kingdom without seeking advice from the SIRO or Data Protection Officer
23. **MUST**: We must identify **Special Categories** of personal data and make sure it is handled with appropriate security and only accessible to authorised persons
24. **MUST**: When **sending** Special Category data to an external person or organisation, it should be marked as "OFFICIAL-SENSITIVE" and where possible, sent by a secure method

Why must I do it?

1. To comply with legislation
2. To comply with Data Protection legislation which requires us to make the data subject aware of how we will handle their personal data
3. To ensure that the rights of the Data Subject are protected in any proposed new activity or change to an existing one
4. The law states that we must only process the minimum amount of information needed to carry out our business purpose. It is not acceptable to hold information on the basis that it might possibly be useful in the future without a view of how it will be used. Changes in circumstances or failure to keep the information up to date may mean that information that was originally adequate becomes inadequate.
5. To maintain professional standards and to assist in defending the validity of such comments if the data subject exercises their rights to ask us to amend or delete their personal data if they feel it to be inaccurate.
6. To comply with a principle of Data Protection law
7. To comply with Data Protection law. Where processing does not rely on a legal condition other than consent
8. When using personal data for marketing and promoting services it is unlikely that any lawful condition other than consent would apply.
9. Consent can only be valid for a reasonable period of time.

10. To comply with a principle of Data Protection law.
11. To comply with the right to access personal data
12. To comply with a principle of Data Protection law.
13. To comply with the rights of the Data Subject under Data Protection law
14. Personal data must be protected by effective security controls to ensure that only those with approved business need to access the data can do so
15. Personal data must be protected by effective security controls to ensure that only those with approved business need to access the data can do so
16. To comply with the legal requirements to keep personal secure but also to ensure that where there are legal grounds to share information in a managed way that this is done correctly.
17. The law permits organisations to hold such data in order to measure the quality of services being provided, to record consent etc. In certain circumstances recordings may be accessed e.g. to investigate alleged criminal activity or breaches of Organisation policy etc.
18. To comply with a principle in Data Protection law, regulatory guidance and the Data Protection Officer governance requirements.
19. To comply with the Data Subject's rights
20. This is a regulatory requirement
21. Where personal data is used for research purposes, the processing of the data can be legitimised by provisions within Data Protection law
22. To comply with the right of the Data Subject to have equivalent legal safeguards in place over their data in another country as they would here. Personal data transferred overseas (including hosted solutions) must be securely handled under the same or substantially similar provisions that exist under the Data Protection Act.
23. To comply with Article 9 of GDPR
24. To comply with Article 9 of GDPR and comply with a principle of Data Protection law requiring personal data is processed with appropriate security measures

How must I do it?

1. By following the points in this policy
2. By approving and reviewing a compliant privacy notice in line with the Privacy Notice Procedure and making it available to the data subjects
3. By completing and approving a Privacy Impact Assessment, or Data Protection Impact Assessment where the processing is 'high risk' to the rights of the data subjects.
4. By ensuring that the means we use to gather personal data (such as forms etc.) only ask for the information that is required in order to deliver the service.

5. By considering that anything committed to record about an individual may be accessible by that individual in the future or challenged over its accuracy.
6. For example, there should be at least an annual check of the currency of data held about service users and whenever contact is re-established with a service user, you should check that the information you hold about them is still correct.
7. By following the points in the Consent Procedure
8. By following the points in the Consent Procedure
9. By following the points in the Consent Procedure. Parents/ Guardians of pupils in the last year of a key stage should expect a communication to ask them to refresh their consents. If they do not respond ahead of a deadline date then consent should be assumed to be no longer valid.
10. By following the points in the Records Management Policy. We must review personal data regularly and delete information which is no longer required; although we must take account of statutory and recommended minimum retention periods. Subject to certain conditions, the law allows us to keep indefinitely personal data processed only for historical, statistical or research purposes. The Retention Schedule will give guidance in these areas.
11. By following the points in the Statutory Requests for Information Policy. We must be aware that data subjects can ask others to make a request on their behalf. There must be evidence of consent provided by the Data Subject to support this.
12. By following the points in the Statutory Requests for Information Policy. Such requests would typically be managed under the Freedom of Information Act (if from a member of the public) or under Data Protection or Justice law if for a criminal investigation, however the decision whether or not to disclose someone's personal data to a third party must satisfy the requirements of Data Protection law
13. By reviewing the impact of any requested change on any statutory duty being fulfilled by the Organisation.
14. By being aware through training and guidance from your manager on what information is appropriate for you to access to do your job. Systems and other data storage must be designed to protect access to personal data. You must inform your manager if you have access to data which you suspect you are not entitled to view.
15. By ensuring appropriate security controls are in place and rules to support those controls are followed. The following should be in place:
    - technical methods, such as encryption, password protection of systems, restricting access to network folders;
    - physical measures, such as locking cabinets, keeping equipment like laptops out of sight, ensuring buildings are physically secure; and
    - organisational measures, such as:
        o Providing appropriate induction and training so that staff know what is expected of them
        o Taking reasonable steps to ensure the reliability of staff that access personal data, for example, by the use of Disclosure and Barring Service (DBS) checks.
        o Making sure that passwords are kept secure, forced to be changed after an agreed period and are never shared
16. Consult your manager, any procedure guidance or any library of sharing agreements managed by the Organisation. Consult the Data Protection Officer or SIRO in one-off cases of sharing.

17. By ensuring that employees and members of the public are fully aware of what personal data is being recorded about them and why, and it what circumstances that data may be used. Operation of overt surveillance equipment such as CCTV must always be done in line with relevant codes of practice captured in the Surveillance Management Procedure. Any covert surveillance must be done in line with the provisions in the Investigatory Powers Act (2016)
18. By completing compulsory training courses relevant to your role. Records will be kept of induction training and annual refresher training. Training content for each role will be determined by feedback on current training methods and the outcome of investigating security incidents. This will be reviewed frequently.
19. By ensuring an Impact Assessment has been approved for the activity
20. The payment must be made annually to the ICO
21. Follow the guidance in the Data Minimisation Procedure
22. Consult the Data Protection Officer over any proposed sharing outside of the UK. If you are a manager who is proposing a change to or implementing a new system which may involve the hosting of personal data in a nation outside the UK, this must be first assessed by a Privacy Impact Assessment, which must be approved by your SIRO and Data Protection Officer
23. Special Categories of Personal Data are information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and genetic data, biometric data for the purpose of uniquely identifying an individual, data concerning health or data concerning an individual's sex life or sexual orientation. Where this data is held it should be stored securely and in a way that access is restricted only to those internal staff that have a valid need to access it. It should only be shared externally after verifying that the recipient is entitled to access this data and through secure means.
24. Hard-copy packages must be marked as such by writing on the exterior of the package. Emails should contain the wording in the 'subject' field before the email title. Refer to the Records of Processing Activity document and the register of Data Flows for clear instruction on how you are expected to handle sending the data securely according to the particular activity you are undertaking.

Statement

How we will protect personal data, special category data and criminal convictions personal data.

It meets the requirement at paragraph 1 of Schedule 1 to the Data Protection Act 2018 that an appropriate policy document be in place where the processing of special category personal data is necessary for the purposes of performing or exercising obligations or

rights which are imposed or conferred by law on the controller or the data subject in connection with employment, social security or social protection.

It also meets the requirement at paragraph 5 of Schedule 1 to the Data Protection Act 2018 that an appropriate policy document be in place where the processing of special category personal data is necessary for reasons of substantial public interest. The specific conditions under which data may be processed for reasons of substantial public interest are set out at paragraphs 6 to 28 of Schedule 1 to the Data Protection Act 2018.

Principle 1 – Personal data shall be processed lawfully, fairly and in a transparent manner in relation to individuals. We ensure that processing is fair by providing detailed privacy notices to individuals whose personal data is being processed. All individuals are advised of their right to contact the Data Protection Officer with any queries regarding the processing of their personal data. We will only process personal data fairly, and will not mislead individuals about how their data may be used.

Principle 2 - Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes. We meet this obligation by explaining through our privacy notices which legal basis we are relying on when processing personal data. We will only use the data for the purposes for which it was collected unless we advise individuals, prior to any additional use, of our intentions and the rights they have in relation to any further use.

Principle 3 – Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. We meet this obligation by only collecting what is required for a particular purpose, and ensuring that we have sufficient relevant information for that purpose.

Principle 4 – Personal data shall be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay

We meet this obligation by ensure that personal data is accurate, and kept up to date where necessary. We will take particular care to do this where our use of the personal data has a significant impact on individuals.

Principle 5 – Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals

We meet this obligation by ensuring that personal data is managed in line with our retention schedule, and either deleted or completely anonymised when it is no longer necessary for us to use it. The period for which we retain personal data is explained in each privacy notice relevant to that service.

Principle 6 – Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures

We meet this obligation by ensuring that our technical and organisational controls. Our organisational controls include:

- Appropriate roles and responsibilities including a Data Protection Officer and Senior Information Risk Owner
- Robust policies and procedures which are regularly reviewed
- Regularly training our staff in their data protection responsibilities
- Ensuring our processing activities are transparent and secure, including
    o Records of Processing Activities
    o Data Protection Impact Assessments
- Contractual Controls to govern the use of personal data by our suppliers
- Physical security controls including
    o Restricted access to physical storage of sensitive personal data
    o Visitor management
- Security breach

management Our Technical

Controls include:

- Firewalls, anti-malware and patching

- Disaster Recovery and Business Continuity arrangements
- Role based access controls to personal data
- Password management
- Sending email securely

Principle 7 - The controller shall be responsible for, and be able to demonstrate, compliance with the principles

individuals' privacy. We have appointed a Data Protection Officer and have defined policy and
process to manage the exercising of data subjects' rights.

For further information about how we process personal data please see our online privacy notices on our website or contact a Director.

Policy for De-escalation and Positive Handling of Pupils

Created: March 2016   Reviewed: Annually   To be reviewed again: Nov 2024

The use of positive handling as a behaviour management technique will be used only with extreme caution in necessary 'crisis' situations, after other less intrusive alternatives (de-escalation) have either failed or been deemed inappropriate. In the event that positive handling is required to protect the safety of school community members in the least restrictive environment.

Specific Aims of the Positive Handling Policy

•To protect every person in the provision from harm.

•To protect all young people against any form of physical intervention which is unnecessary, inappropriate, excessive or harmful.

•To provide adequate information and training for staff so that they are clear as to what constitutes appropriate behaviour and to deal effectively with violent or potentially violent situations.

When assist may be used

The use of positive handling is proper only in the following circumstances:

- The child's behaviour poses an imminent, serious physical harm to self and/or others children, or members of the Circles Alternative Education Ltd provision.
- All less intrusive alternatives (de-escalation) have failed or been deemed inappropriate.

Positive handling is **prohibited** in the following circumstances:

- As a means of punishment
- When a child's refusal to comply with a rule or staff directive or verbal threats that **do not** constitute a threat of imminent, serious physical harm.

Staff Training

All assigned staff will receive appropriate training.

Training shall include information on the following:

De-escalation techniques, the dangers of physical assist, steps on how to monitor and watch for signs of distress, how to file incident reports, practice of physical techniques and role play for both de-escalation and physical techniques

Administration of Positive handling
When dealing with a child who moving towards 'crisis', staff will use de-escalation to attempt to defuse the situation before resorting to positive handling. All staff will be properly trained

in de-escalation and physical interventions and will follow the least restrictive method for controlling the behaviour. Staff will not physically intervene unless the student is at risk and/or is hurting self or others.

De-escalation includes, but is not limited to: observation and communication, non-verbal skills, verbal skills, time out, distraction positive phrasing, limited choices, disempowering behaviour and setting consequences. (Following the school behaviour policy)

De-Escalation techniques may include, but are not limited to:

Self-time-out
This is a time when a student who is aware that he/she is having a difficult time and needs to "cool off" may ask for a time out. The child can go to a designated area for 15- 10 minutes of quiet time. Then the child can talk with a staff member by discussing what happened and what plan can be put in place to manage the behaviour in the future. Re-joining the class will follow.

Time-out
Time out is the separation of a child from their mainstream environment to another a supervised setting, for no longer than 5-10 minutes with an opportunity to proceed and return to the mainstream setting.

Positive Handling

Physical Escort

A child can be escorted from one area to another if they are noncompliant, disruptive to the school, and have been asked to take a time out and have refused to do so. They will also be escorted from a potentially aggressive or unsafe situation if unable to follow verbal directives. This will be done using the 'Caring C' usher.

If a child's behaviour continues to escalate and the potential for danger increases or reaches 'crisis point' or if the child's presents a danger to self or others then a member of staff may physically intervene using the least amount of force necessary to redirect the aggression and to keep the child and/or others safe in the least restrictive environment.

When the child is able to communicate (2-6 minutes) he/she should be offered the opportunity to sit calmly and reflect. This should be done when it is safe to do.

Staff will complete a record of positive handling and if necessary an IBP and bound & numbered report.

Parent/guardian will be verbally informed of the interventions used as soon as possible.

Actions following the Positive Handling of a pupil.

Staff will need to debrief, positive handling incidents forms to be filed and a Risk Assessment Form to be completed with SLT.

<u>Appendix 1</u>

RECORD OF POSITIVE HANDLING

Date of incident: Time of incident:

Pupil Name: D.o.B:

Member(s) of staff involved:

Adult witnesses to restraint:

Pupil witnesses to restraint:

Outline of event leading to restraint – including other strategies tried and reasons for using Positive Handling rather than another strategy:

Outline of incident of restraint (including restraint method used):

Outcome of restraint:

Description of any injury(ies) sustained by injured pupil and any subsequent treatment:

Date parent/carer informed of incident: Time:
By whom informed:

Outline of parent/carer response:

Signature of staff completing report: Date:

Signature of Teacher-in-charge: Date:

Signature of Head: Date:

Brief description of any subsequent inquiry/complaint or action:

Statement on the use of Physical Interventions

- There are occasions when staff will have cause to have physical contact with learners for a variety of reasons, for example
    - o To comfort a learner in distress (so long as this is appropriate to their age);
    - o To gently direct a learner;
    - o For curricular reasons (for example in PE, Drama etc);
    - o In an emergency to avert danger to the learner or leaners;
- In all situations where physical contact between staff and learners take place, staff must consider the following;
    - o The learner's age and level of understanding;
    - o The learner's individual characteristics and history;
    - o The location where the contact takes place (it should not take place in private without others present).

Within Circles Alternative Education this means that as a member of staff may physically guide, touch or prompt learners in appropriate ways at appropriate times. It is extremely important that you have read and understood all relevant policy to appreciate the reasons why we may choose to use physical intervention or restrictive physical intervention with learners and the appropriate ways in which we do so.

Why do we use touch?

We may choose to use a physical intervention with learners for a variety of reasons, but in general terms we work normally do so for either comfort reward or guidance.

How do we use touch?

Hugging

At Circles Alternative Education, we encourage staff that are using touch for comfort or reward to use a "School Hug". This is a sideways on hug, with the adult putting their hands on the learner's shoulders. The discourages 'front on' cuddling and the adult's hands on the shoulders limits the ability of the learners to turn themselves into you.

Hugging can be used either standing or seated.

Hand-Holding

We recognise that learner sometimes enjoy being able to hold hands with adults around them. This is perfectly acceptable when the hand holding is complaint. However, if the handholding is being used by an adult as a method of control to move learner, this can become a restraint. Therefore, we encourage the use of 'offering an arm'. This is done by the adult holding their arm out, and the learner is encouraged to wrap their hand around the adult's lower arm. The adult's other hand can then be placed over the learner's for a little extra security if it is required.

It summary, it is generally deemed appropriate to touch others on the upper arm and shoulders.

Lap-Sitting

At Circles Alternative Education we actively discourage lap-sitting. Learners should be taught to seek comfort/ attention through other means, explored within Steps Training. If a learner attempts to sit on your lap, explain and ask them to sit next to you if it appropriate.

At times, learners may in such crisis or distress that they hold you in a way which is not described as above (e.g. 'front on' hug/lap sitting). If this should happen please ensure that you have informed a member of the Senior leadership team. You will be asked to make a note of this, this will be in order to record and monitor the amount of times the learner is seeking thus support from stadd and to analyse the learner's unmet need.

Please note that although we have a touch policy and believe that contingent touch can be a positive experience for the learner that we care for, this does not mean that you have to use physical interventions with learner.

It should also be realised that some learners will not want to touched, please respect this.

Staff have a 'Duty of Care' towards the learners in their care. Therefore if a learner is likely to be at risk from harm if you do not physically intervene in an emergency situation, you must take action. The action you take will be dependent on the dynamic risk assessment that you make at that moment in time.

We also have within our behaviour policy, a section on restrictive intervention in line with Essex Steps Training.

Parents/carers will be made aware of this statement when their child is admitted to this Educational provision.

Disciplinary Policy & Procedure

Created: March 2016   Reviewed: Annually   To be reviewed again: Nov 2024

SCOPE

The Company Disciplinary Procedure will be used only when necessary and as a last resort. Where possible, informal and/or formal counselling or other good management practice will be used to resolve matters prior to any disciplinary action being taken. The procedure is intended to be positive rather than punitive but takes cognisance of the fact that sanctions may have to be applied in some circumstances.

An employee can discuss any part of this policy with their Line Manager. They can help clarify an employees rights as well as give guidance and support where it may be needed. Every individual has the right to representation at any point during the formal disciplinary process.

SUSPENSION

Suspension is not disciplinary action. The purpose of suspension is manifold and can be used when it is necessary to remove a member of staff from the workplace pending an investigation for example, to allow time for a 'cooling down period' for both parties, for their own or others protection, to prevent them influencing or being influenced by others or to prevent possible interference with evidence. Only a Director has the authority to suspend an individual.

An employee suspended from duty will receive written confirmation within three days of :
1. the reason for the suspension
2. the date and time from which the suspension will operate.
3. the timescale of the ongoing investigation.
4. the right of appeal to a Director should the suspension last more than 7 days

PROCEDURE FOR FORMAL INVESTIGATION

Formal investigations should be carried out by the most appropriate manager. The manager may involve others to assist with the investigation process.

All the relevant facts should be gathered promptly as soon as is practicable after the incident. Statements should be taken from witnesses at the earliest opportunity. Any physical evidence should be preserved and/or photographed if reasonable to do so.

A report should be prepared which outlines the facts of the case and the proposed next steps. This should be submitted to the appropriate senior manager / Director who will arrange a disciplinary hearing if recommended. This will be chaired by the

appropriate Senior Manager / Director, who may be accompanied by an individual to make an accurate record of the meeting.

The employee has a right of representation at this hearing by a colleague.

Following the full presentation of the facts, and the opportunity afforded to the employee to state his or her side of the case, where needed the hearing may be adjourned for the hearing manager to decide on the appropriate action:

1. take no further action against the employee
2. Disciplinary action issued

Where adjourned all parties should be brought back and informed as to which option has been chosen.

Should anyone who is subject to disciplinary action resign during the course of the process, the action will cease unless there are extenuating circumstances which require it's continuance. The subject of the discipline may also request that the disciplinary action continue.

A letter outlining the decision will be issued within 7 days of the date of the disciplinary hearing, with a copy of the notes enclosed, and will give details of the right of appeal

WARNINGS

Examples of Minor Misconduct

Below are listed examples of misconduct which may warrant a First Written Warning. It is stressed however that this list is not exhaustive and that on all occasions a full and proper investigation must take place prior to the issue of a warning.
- Persistent lateness and poor time-keeping.
- Absence from work, including going absent during work, without valid reason, notification or authorisation.
- Smoking within unauthorised areas.
- Failure to work in accordance with prescribed procedures.
- Incompetence.
- Unreasonable standards of dress or personal hygiene.
- Failure to observe Company regulations and procedures.
- The recurrence or accumulation of an offence/offences, if left, will lead to more severe disciplinary action.

Examples of Gross – Misconduct

Listed below are examples of misconduct which may be considered to be Gross Misconduct and may warrant a Final Warning, Demotion or Dismissal. It is stressed however that this list is not exhaustive and that on all occasions a full and proper

investigation must take place prior to the issuing of a Final Warning, Demotion or Dismissal.

- Theft, including unauthorised possession of Company property.
- Breaches of confidentiality, prejudicial to the interest of the Company,
- Being unfit for duty because of the misuse/consumption of drugs or alcohol.
- Refusal to carry out a management instruction which is within the individuals' capabilities and which would be seen to be in the interests of the Company.
- Breach of confidentiality / security procedures.
- Bribing or attempting to bribe another individual, or personally taking or knowingly allowing another person to take a bribe;
- Physical assault, breach of the peace or verbal abuse.
- False declaration of qualifications or professional registration.
- Failure to observe Company rules, regulations or procedures.
- Wilful damage of property at work.
- Incompetence or failure to apply sound professional judgement.

Final Written Warning

A Final Written Warning is appropriate when :
- an employee's offence is of a serious nature falling just short of one justifying dismissal.
- an employee persists in the misconduct which previously warranted a lesser warning.

Dismissal

Dismissal is appropriate when:
- an employee's behaviour is considered to be Gross Misconduct.
- an employees misconduct has persisted, exhausting all other lines of disciplinary procedure.

Time Scales for the expiry of Warnings

Warnings issued to employees shall be deemed to have expired after the following periods of time.
1. First Written Warnings: 24 months (or as agreed and recorded at the hearing)
2. Final Written Warnings: 36 months (or as agreed and recorded at the hearing)

These time scales remain provided that during that period, no further warnings have been issued in respect of the employee's conduct.

APPEALS

Every employee has the right to appeal against the outcome of a disciplinary hearing. The basis of an appeal should normally relate to one of the following areas:

- that the Company's' Procedure had not been followed correctly.
- that the resulting disciplinary action was inappropriate.
- that the need for disciplinary action was not warranted.
- that new information regarding disciplinary action, has arisen

An appeal should be put in writing. The letter of appeal may be constructed by the employee or their representative.

The letter should contain the grounds for appeal and should be lodged within 10 days of receipt of the warning / dismissal letter (or time frame agreed during hearing).

An appeal will be arranged within 20 working days of receipt of the appeal letter. The outcome of any appeal is final.

This document is updated on-line so once printed may not be the most up to date version.

Drug Policy
This policy is based on DFE and ACPO drug Advice for Schools

Created: March 2016   Reviewed: Annually   To be reviewed again: Nov 2024

Purpose of the Policy

• to clarify the legal requirements and responsibilities of the school
• to reinforce and safeguard the health and safety of pupils and others who use the school
• to give guidance on developing, implementing and monitoring the drug education programme
• to enable staff to manage drugs on the Centres' premises, and any incidents that occur, with confidence and consistency, and in the best interests of those involved
• to ensure that the response to incidents involving drugs complements the overall approach to drug education and the values and ethos of the school
• to provide a basis for evaluating the effectiveness of the service drug education programme and the management of incidents involving illegal and other unauthorised drugs.

All pupils, wherever and whenever taught are covered by this policy, whether at a Centre, at home, in other providers or on a school trip.(We would not expect pupils taught at home to smoke or use drugs during a lesson) Definition of Drugs The definition of a drug given by the United Nations Office on Drugs and Crime Is: A substance people take to change the way they feel, think or behave.

This policy covers:
• All illegal drugs (those controlled by the Misuse of drugs Act 1971)
• All legal drugs, including alcohol, tobacco, volatile substances (those giving off a gas or vapour which can be inhaled), ketamine, khat and alkyl nitrates (known as poppers)
• All over the counter and prescription medicines
The School's stance towards drugs, health and the needs of pupils
• Illegal and other unauthorised drugs (as defined above) are not allowed on the site of any Centre.
• The Centres are smoke free environments and the rules state that no smoking is allowed.
• Any drugs incident will be dealt with immediately (see management of drug related incidents)
• Foremost is the health and Safety of the Centres, communities and meeting the pastoral needs of the pupils. Staff with Key responsibilities for Drugs Overall Responsibility – Directors - will take responsibility for liaison with the media. The issue of substance misuse is emotive and is likely to generate interest form local and national media. Advice and guidance should be sought from the LEA Press Office and Legal Department to ensure that any reports are in the best interests of the young person, their family and the school.
• Once a year the drug policy will be discussed with staff and other interested parties and updated.
• New staff will be informed of the drug polic0y
• There will be regular training for those delivering the curriculum.

Definition of a Drug Incident
• Drugs or associated paraphernalia found on premises
• Pupils found in possession of drugs or associated paraphernali
• Pupil found to be supplying drugs
• Pupil thought to be under the influence of drugs
• Pupil discloses that they or a family member are misusing drugs.

Management of Drugs in the Centres
If a pupil is suspected of carrying drugs he / she will be asked to give it up. Senior staff reserve the right to search students where they suspect pupils may be in possession of illegal drugs. Police will

be called when there is a suspicion of this nature. If a member of staff has to take temporary possession of an illegal drug or paraphernalia:
• Ensure that a second adult is present throughout
• Seal the sample in a plastic bag and include details of the date and time of the incident and the other adult present.
• Store in a secure location.
• Notify the police without delay who will dispose of the drug. Management of Drug related Incidents If a pupil is suspected of being under the influence of drugs or in possession of them:
• Inform senior member of staff who will take responsibility and control of the situation.
• Decide what or if medical help is needed and take necessary medical advice / and / or action.
• IN A MEDICAL EMERGENCY FOLLOW THE GUIDELINES INCLUDED IN THIS POLICY
• Make sure all other pupils are safe
• Inform parents and arrange for pupil to be taken off site.
• If illegal, notify police and take advice from Police Liaison Officer if available, and follow the guidelines for management of the drugs.
• If legal dispose of safely or return to parents
• Two members of staff should stay with the pupil(s)

Decide on next course of action, eg fixed term exclusion
• Arrange meeting with parents and other agencies eg. police, drugs agency YPDAS.
• Follow up discussions
• If necessary follow CP procedures.
• Make sure a full investigation takes place and the incident is written up fully. • Fill out the details on a CP form - Highly Confidential Information Sheet available on employee resources on server and distribute accordingly.
If there is a drug incident in a home or on other site follow the procedures which are relevant to the situation. If parents turn up under the influence of drugs A member of the SLT will: - monitor first - ask to leave - call the police.

Parental Leave Policy and Procedure

Created: March 2016   Reviewed: Annually   To be reviewed again: Nov 2024

Contents

1.   Introduction and Circles Alternative Education Ltd Policy

The aim of this policy is to set out the leave that is allowed and the associated arrangements with regards to colleagues taking paternity leave.

It ensures the terms and conditions relating to these colleagues are fair and equitable. Additionally, it ensures that the company complies with the requirements of current legislation.

1.   Scope

All colleagues working under a contract of employment with Circles Alternative Education Ltd.

2.   Policy

Circles Alternative Education Ltd recognises that career patterns may differ from person to person as colleagues choose to combine working and having children. Circles Alternative Education Ltd will give all colleagues the appropriate assistance and positive encouragement during this time so that the skills and experience of colleagues at every level will be retained.

Furthermore, the Company will ensure that the treatment of fathers and partners who are on paternity leave is consistent with the Respect for People Policy.

2.   Definitions

Certain terms used through this policy require clarification. These are defined as below:

Ordinary Paternity Leave (OPL): This is the initial period of absence due to the birth of a child. It may begin when the baby is born and no later than 56 days after the baby was born and will last for up to two weeks, taken in a block of one or two weeks.

Statutory Paternity Pay (SPP): This is the minimum amount payable during paternity leave for colleagues with at least 26 weeks' continuous service at the 15th week before the baby is due.

3.   Eligibility

You will be eligible to paternity leave and pay if you:

- Have or expect to have responsibility for the child's upbringing
- are the biological father of the child or the mother's husband or partner
- Have worked continuously for the Company for 26 weeks leading into the 15th week before the baby is due

4.   Ordinary Paternity Leave (OPL)

You can choose to take either one week or two consecutive weeks' Ordinary Paternity Leave (not occasional days or separate weeks) and you can choose to start your leave:

- From the date of the child's birth (whether this is earlier or later than expected) or
- On a chosen day after the date of the child's birth (whether this is earlier or later than expected) or
- From a chosen date which is later than the first day of the expected week of confinement.
- OPL must be taken within 56 days of the actual date of birth of the child (or adoption placement). Only one period of leave will be available to you even if more than one child is born as the result of the same pregnancy.

3.   Shared Parental Leave

For parents whose babies were expected on or after 5 April 2015, shared parental leave may be available. This also applies to adoptive parents of children matched or placed for adoption on or after 5 April 2015.

Please see the Shared Parental Leave policy for further details.

5.   Applying for Paternity Leave

- Colleagues are required to tell the Company of their intention to take ordinary paternity leave no later than the 15th week before the baby is expected, unless this is not reasonably practicable.
- Colleagues must complete the PN1 Ordinary Paternity Leave Request Form, which can be found on the intranet.
- Make sure you send a copy of your partner's MATB1 with your application. Your partner will normally receive this from their midwife when they are 20 – 24 weeks into the pregnancy.
- On the form you must tell the Company of the date you want your OPL to start and whether you are taking one or two weeks leave.
- The Company will then write to you confirming your leave and pay.
- Once your baby has arrived, please inform your Line Manager so we can update our records.

6.   Statutory Paternity Pay

The rate of **Statutory Paternity Pay** (SPP) is the same as SMP

In order to quality for SPP or ASPP the following criteria applies:

- Colleagues must have been continuously employed by Circles Alternative Education Ltd for a period of 26 weeks' or more by the 15th week before the baby is due or at the end of the week of placement in cases of adoption leave.
- Colleagues who have average weekly earnings below the Lower Earnings Limit for National Insurance purposes (currently £97 per week) will not be able to get SSP or ASPP. Colleagues who are not able to get SPP or ASPP may be able to get additional support and benefits from the government while on paternity leave. Further information is available from the local Jobcentre Plus office.

7.   Benefits

The contract of employment will continue to apply throughout Ordinary Paternity Leave unless Circles Alternative Education Ltd or the colleague provides notice of termination in accordance with that individual's statement of main terms and

conditions. In the case of a fixed term contract the contract may expire on the due date in accordance with the terms of that agreement.

Colleagues are entitled to benefit from all contractual terms and conditions, except for wages and salary throughout their entire leave.

4.   Pay and Performance Reviews

Absence due to paternity will not affect the nature or timing of Performance Development or salary reviews. These reviews will continue to take place and the colleagues will be invited to participate in these procedures in the same manner as if he/she was attending work on a daily basis.

Pay awards may affect paternity pay. On no account will the absent colleague duffer any detriment through not being at work on a daily basis when these procedures are implemented.

5.   Pension

All colleagues on Ordinary Paternity Leave who are members of the Company Pension Scheme will remain members. You should refer to your pension booklet, or speak to the Pensions Administrator for full details.

6.   Holiday entitlement

Holiday entitlement will continue to accrue during OPL period, but paid holiday cannot be taken whilst receiving SPP. Holidays must, therefore be taken before and/or after the paternity leave. Any outstanding holiday entitlement from a previous year will be carried over to the next holiday year.

8.   <u>Leaving the Company</u>

A colleague must not work for another employer whilst on paternity leave. It is the colleagues responsibility to inform the Company as entitlement to SPP will cease and employment may be terminated.

Colleagues who know that they do not wish to return to work must give the required contractual notice in writing. If the contractual notice is to start later than the date given, the colleague must inform the Company of the effective date the notice period will commence. The colleague will continue to receive their SPP (if applicable) and

will remain in the Company's employment until the end of their paternity leave period. His/her P45 will be made payable as soon as the last paternity payment has been made or contractual notice has expired, whichever is the later.

9.   Returning to work

Colleagues returning to work from leave on the expected date (as previously notified) are not required to give notice to the Company.

A colleague has no right to delay their return to work beyond their entitlement. If he/she is sick then they must provide a medical certificate to this effect. Provided the colleague complies with this requirement the Company will then treat him/her as having returned, but absent due to sickness.

10. Contact during paternity leave

The Line Manager and colleague should agree before the paternity leave commences what kind of contact there will be during the paternity leave, if any. For example:
- Let the colleague know about changes happening at work
- Let the colleague know about job vacancies
- Let the colleague know of any training opportunities that may occur during the paternity period.

11. Protection against dismissal

The dismissal of a colleague will automatically be unfair, regardless of his/her length of service or hours of work, if:

- It is on maternity-related grounds and takes place during Ordinary Paternity Leave period
- It occurs after the end of his/her Paternity Leave period of absence and is on the grounds that he/she has taken or availed herself of the benefits of that leave
- It is on the grounds of redundancy and the Company has not first complied with the requirement to offer him/her any suitable alternative vacancy which is available; or
- He/she is unfairly selected for redundancy for one of the above reasons

A colleague who is dismissed at any time and for any reason during his/her Ordinary Paternity Leave period will be entitled to receive a written statement of the reasons for dismissal without having to request it and regardless of length of service or hours of work.

12. Responsibility

All those persons referred to within the scope of this policy are required to adhere to its terms and conditions. They must understand that this policy is also incorporated into their employment contract.

Individual Managers are responsible for ensuring that this policy is applied within their own area. Any queries on the application or interpretation of this policy must be discussed with a Director prior to any action being taken.

Appendix One

PN1
ORDINARY PATERNITY LEAVE NOTIFICATION FORM

Please use this form to let us know that you would like to take ordinary paternity leave. It will help if you read the Paternity Leave Policy before completing and submitting this to us. If your partner has received her MATB1 Form, this should be attached with this form (please do not delay in returning this form as the MATB1 can be sent later if not yet received). If you are adopting a child, please attach a copy of the adoption placement letter, which details the date you will be matched with your child.

It is helpful to be informed of your intention to take paternity leave at an early stage but to qualify for leave; you must inform us no later than the end of the 15th week before the baby is expected.

NAME:	
DEPARTMENT:	
MANAGER:	
DATE PATERNITY LEAVE PROPOSED TO START AND FINISH: (You can commence your leave at any time once the baby is born (or adoption placement) and no later than 56 days after the birth/adoption placement.	

SIGNED:	
PRINT NAME:	
DATE:	

13. <u>Maternity Policy</u>
14.

15. <u>Contents</u>

17.   <u>1.   Introduction and Circles Alternative Education Ltd Policy</u>

This policy is intended to support pregnant colleagues at work and during a period of absence due to maternity. It ensures that the terms and conditions relating to these employees are fair and equitable. Additionally, it ensures that the Company complies with the requirements of current legislation.

18.   <u>2.   Scope</u>

All female employees working under a contract of employment with Circles Alternative Education Ltd.

19.   <u>3.   Policy</u>

Circles Alternative Education Ltd recognises that career patterns may differ from person to person as many women choose to combine working and having children. Women will be given the appropriate assistance and positive encouragement to return to the Company, so that the skills and experience of employees at every level will be retained.

The Company believes that the most effective approach is a personal one; taking into account as far as is practicable, special needs associated with the time prior to the birth and subsequent to it. Close communication is vital in order to discuss and plan the time away from work, the continued communication during absence, and to talk through other issues including information regarding statutory rights and the Company's policy.

By adopting this approach, potential concerns about the maternity absence which women may have can be allayed; it will also benefit the Company as a whole because it works towards an early and effective renewal of the contribution which can be made by experienced employees who wish to return to the Company after maternity leave.

In particular, the Company will ensure that the treatment of pregnant employees or those on maternity leave is consistent with the Respect for People Policy.

4.   Definitions

20.   Certain terms used throughout this policy require clarification. These are defined as follows:
21.

- **Compulsory leave:** a period of two weeks (four weeks if the woman works in a factory) immediately after giving birth during which the woman is not permitted to work.

- **Statutory Maternity Leave (SML):** the term for the 52 weeks of leave a woman may take. There is no qualifying period for the 52 weeks but there is a qualifying period for some of the statutory maternity pay.

- **Shared Parental Leave (SPL)**: the term for shared maternity and paternity leave available to parents of babies which were expected on or after 5 April 2015.

5.   Maternity Leave
            22.

The earliest date a woman can start maternity leave is the beginning of the eleventh week before the baby is expected. She must provide her employer with details of the week the baby is expected and the start date of her maternity leave.

Employers should assume that employees will take all 52 weeks of the SML entitlement unless notified to the contrary. Employees may wish to curtail part of their SML to enable their partner to take Statutory Parental leave (See the SPL policy), Alternatively, they may need to return earlier than the date they originally notified, in which case the employee should give at least eight weeks' notice, unless the employer agrees to shorten this period.

5.1   Minimum leave

In accordance with Health & Safety legislation employees must take a minimum of 2 weeks' leave after the birth.

5.2   Ordinary Maternity Leave

All pregnant employees may take 26 weeks' Ordinary Maternity Leave. This leave can commence from the eleventh week before the expected week of childbirth or later when:

- She has provided notice that she is pregnant, when the expected date of childbirth will be and of her intention to take Maternity Leave and of the date upon which she wishes her leave to begin. This notice should be in writing and be provided no later than the end of the 15th week before her baby is due. (Appendix 1 may be used for this purpose). If the employee subsequently wishes to change the date her leave begins, she must give 28 days notice to the Company. (Appendix 1 may be used for this purpose).

- The birth occurs. Leave begins automatically at this time, but the employee must inform the Company at the earliest opportunity or Statutory Maternity Pay will be reduced.

     or

- She is absent during the last 4 weeks before the expected week of childbirth, due wholly or partially to her pregnancy. She must inform the Company as quickly as possible of the reason for her absence. Her Maternity Leave will then have automatically begun unless the Company agrees to her returning to work.

5.3   Additional Maternity Leave

All pregnant employees are also eligible to take Additional Maternity Leave. This will begin the day after the 26 weeks of Ordinary Maternity Leave finishes and will last for up to 26 weeks, extending the total period of absence up to 52 weeks.

The Company will assume that an employee will take Additional Maternity Leave unless she informs them to the contrary.

23.   6.   Statutory Maternity Pay

Statutory Maternity Pay is payable during the first 39 weeks of maternity leave and will be paid as complete weeks, but employees will continue to be paid on a monthly basis in accordance with the normal payroll timetable and payment method. If the employee fails to comply with the notification provisions outlined above she may lose her entitlement to SMP. Normal pay applies whilst the employee is at work. All SMP ceases upon return to work.

Mothers who qualify are entitled to up to 39 weeks' **Statutory Maternity Pay** (SMP). To qualify, the employee must:

- work for an employer who is liable (or would be liable but for the employee's low earnings) to pay the employer's share of Class 1 National Insurance contributions

- have average weekly earnings in the eight weeks up to and including the qualifying week at or above the lower earnings limit for the payment of National Insurance contributions

- have 26 weeks' continuous service with her employer assessed at the 15th week before the week the baby is due.

The first 6 weeks of SMP is paid at 90% of average weekly earnings and the remainder at the lower statutory level (or 90% of the average weekly earnings, if this is less than the lower level). SMP rates are normally increased in April each year. Current rates can be found on our Employment Law at Work data web page or via the GOV.UK website

6.1   Employees with less than 26 weeks' service

If the employee has not been continuously employed by the Company for at least 26 weeks ending on the 15th week before the expected week of childbirth the only payment during Maternity Leave may be the "Maternity Allowance" claimed from the Department for Work and Pensions. Maternity Allowance can be claimed, as soon the employee has been pregnant for 26 weeks.

24.   7.   Benefits

The contract of employment will continue to apply throughout both Ordinary and Additional Maternity Leave unless the Company or the employee provides notice of termination in accordance with that individual's Contract of Employment. In the case of a fixed term contract the contract may expire on the due date in accordance with the terms of that agreement.

7.1   Pay and Performance Reviews

Absence due to maternity will not affect the nature or timing of Performance Development Reviews, or salary review. These reviews will continue to take place and the employee will be invited to participate in these procedures in the same manner as if she was attending work on a daily basis.

Pay awards may affect the level of Maternity Pay. On no account will the absent employee suffer any detriment through not being at work on a daily basis at the time when these procedures are implemented.

7.2   Pension

All employees on Ordinary and Additional Maternity Leave who are members of a Company pension scheme will remain members. You should refer to the pension administrator for full details.

7.3   Holiday Entitlement

Holiday entitlement will continue to accrue during the total Maternity Leave period, but paid holidays cannot be taken whilst receiving SMP. Holiday must, therefore, be taken before and/or after the maternity absence. Any outstanding holiday entitlement from a previous year will be carried over to the next holiday year.

Should an employee wish to take her accrued holiday before the end of the Additional Maternity Leave period (i.e. after SMP has been paid) paid holiday can be allowed providing the employee returns to work immediately after the holiday. Under these circumstances the period of maternity absence will be deemed to have been concluded before the holiday is taken.

25.   8.   Time off for ante-natal care

Any pregnant colleague, irrespective of length of service, is entitled to time off with pay to attend an antenatal clinic or visit a doctor. Such time will not be unreasonably withheld but must be associated with her pregnancy. Colleagues must request time off and, except in the case of the first request for time off, produce their appointment card as confirmation.

9. Leaving the Company

A colleague may not work for another employer whilst on Ordinary or Additional Maternity Leave. It is her responsibility to inform the Company as entitlement to Maternity Pay will cease and employment may also be terminated.

Colleagues who know that they do not wish to return to work must give the required contractual notice in writing. If the contractual notice is to start later than the date given, the employee must inform the Company of the effective date the notice period will commence. The employee will continue to receive her Maternity Pay and will remain in the Company's employment until the end of her Maternity Leave period. Her P45 will be made available as soon as possible after either the last Maternity Payment has been made or contractual notice has expired, whichever is the later.

10. Returning to Work

Employees must be employed up to and including at least one day into the 11th week before the expected week of childbirth in order to qualify for the Company and statutory provisions regarding the right to return to work. It is important to note that if an employee leaves employment prior to the 11th week before confinement she will lose her right to return to work.

Under Health and Safety legislation an employee may not return to work having taken less than two weeks leave after the birth of the baby.

If the employee wishes to return to work on her expected date of return she is not required to give notice to the Company.

If the employee wishes to return to work before the end of her full maternity leave period, she must give the Company eight weeks' notice of her return to work. If the employee fails to provide such notice, the Company may postpone her return until the full eight weeks' notice has been given.

The employee has no right to delay her return beyond her leave entitlement. If she is sick she must provide a doctor's certificate to this effect. Provided that she complies with this requirement the Company will then treat her as having returned, but absent due to sickness.

If it is not practicable to offer the old job back because the position has become genuinely redundant, the employee must be offered alternative employment, if such suitable alternative employment exists, under comparable terms and conditions. "Suitable" in this context means suitable to the employee and appropriate in the circumstances, although the employee's decision must still be reasonable if that alternative employment is refused. If there is no suitable vacancy the employee is entitled to a redundancy payment, if eligible.

26. 11. Additional Facilities

11.1 Contact during Maternity Leave

The Line Manger and the employee should agree before the maternity leave what kind of contact there will be, if any, during the maternity leave period e.g.

- Let the employee know about changes happening at work
- Let the employee know any job vacancies
- Let the employee know of any training opportunities that may occur during the maternity period

An employee is able, if both the employee and the Company agree, to do up to 10 days work during the maternity leave period. These are known as "keeping in touch" days and can be used, for example, to attend training events. However, such days cannot take place until after the first 2 weeks following the birth. The Company may not require the employee to work such days, nor does an employee have the right to work such days if the Company does not agree to them. Any payments made to an employee for attending keeping in touch days will need to be agreed between the Company and the employee.

11.2 Working Hours on Return to Work

Employees may return to work early and it may be possible to use accrued holiday to enable temporary part-time working on return from Maternity Leave.

Employees wishing to return to work and who need to regularly work fewer hours than prior to the birth will have their request considered sympathetically, although there is also the need to take account of the Company's business requirements.

It must be stressed that the Company may have to refuse such requests where operational requirements make it impossible or uneconomical to adopt such a reduction in hours of work.

27. 12. Health and Safety

In order to protect the health and safety of an employee and her unborn child it is in the employee's best interests that the Company is informed as soon as is practicable that she is pregnant. The employee and manager must ensure that a risk assessment is carried out at the earliest opportunity. This guidance usually applies prior to the absence period and, upon her return, whilst she is breast-feeding.

Anyone who is pregnant must not lift, push or pull any package, which may weigh 5kgs or more.

Anyone who is pregnant and has any concern regarding health and safety at work, because of her pregnancy, must seek advice from her manager before undertaking the task about which she has a concern.

The Company reserves the right to request that pregnant employees attend a medical consultation, and, if necessary, allocate work in accordance with medical opinion. Acting on advice from a doctor regarding the health of the mother/child, the Company may transfer a pregnant employee into suitable alternative work rather than put the individual's or her colleagues' safety or health at risk. This action would only be contemplated in extreme circumstances and would be carried out with full and proper consultation. However, it is the responsibility of the individual to fully co-operate with this process. In the unlikely event that a suitable alternative is not available suspension from work on average earnings will be considered

28. 13. Protection against dismissal

The dismissal of an employee will automatically be unfair, regardless of her length of service or hours of work, if:

- It is on maternity-related grounds and takes place during her pregnancy or Ordinary/Additional Maternity Leave period
- It occurs after the end of her Maternity Leave period of absence and is on the grounds that she has taken or availed herself of the benefits of that leave
- It is on the grounds of a Health and Safety provision which could give rise to maternity suspension
- It is on the grounds of redundancy and the Company has not first complied with the requirement to offer her any suitable alternative vacancy which is available; or
- She is unfairly selected for redundancy for one of the above reasons

An employee who is dismissed at any time and for any reason while she is pregnant or during her Ordinary/Additional Maternity Leave period will be entitled to receive a written statement of the reasons for her dismissal without having to request it and regardless of her length of service or hours of work.

Environmental and Sustainability Policy

The environment is everything, without it we are nothing.

Policy last review: **September 23**

Review frequency: Annual

Next Review: **September 24**

Synopsis

Circles Alt Ed (Circles) is focused on minimizing any detrimental impact it has on the environment, and through this sustainability policy is committed to reduce our carbon footprint via holding environmental impact indices at the forefront of any decision making, with the end goal of achieving net carbon neutrality by 2030.

This policy also sets out to ensure that environmental impact is worked into every student session and is embedded as a natural part of everyday life at Circles, with the aim that students build positive environmental choices into their daily lives.

Key Policy Aims

- Opt for the use of renewable alternatives where ever possible.
- Consider all procurement in terms of its delivery, use and end of life recyclability.
- Champion environmental issues to staff and pupils, encouraging them to take actives roles in environmental projects.
- Facilitate all stakeholders to promote environmentally behaviour both within Circles, and outside.

Actions within Circles

Everyday actions and activities within Circles should be dynamically considered to ensure environmentally friendly gains can be achieved wherever possible. Areas of focus should include;

- Paper
    - Limit printing of online resources when ever possible and use electronic devices.
    - When printing print doubled sided where possible.
    - Re-purpose printed sheets as scrap paper where possible before recycling.
- Laptops & Electronics
    - Close laptop lids into sleep mode when not being used in-between sessions.
    - Shut down all laptops completely at the end of each day.
- Recycling
    - Recycling and upcycling to be promoted in all sessions.

- o Actively encourage recyclable materials to be separated from general waste at all times.
- o Promote the use of recycled materials throughout Circles from tools – cutlery – consumables – etc.
- Transport
    - o Staff and students should be encouraged to use environmentally friendly methods of travel to and from school.
    - o Champion walking, cycling and public transport.

Current Calculations and Targets

The Table below shows that current calculation on Carbon footprint line items along with their target figure for the next period. These figures have been calculated using calculator tools from WWE, The Carbon Trust and the Normative Business Carbon Calculator.

All figures are annual unless otherwise stated, where no value is given this is due to the site not using this line item, or the site not being open in the period.

Fuel and Power						
	Circles Farm (Stock)		Circles Salon & Study (Basildon)		Circles Woodland (East Bergholt)	
	2022 figures	2023 Target	2022 figures	2023 Target	2022 figures	2023 Target
Electricity	12888 Kwh	11500 Kwh	4300 KwH	3950 Kwh	-	1500 Kwh
Diesel	5220 lts	4698 lts	1263 lts	1137	1532	1379
LPG	90kg	81kg	-	-	-	40kg
Petrol	75lts	67.5	-	-	-	90lts
Aim Across the board we aim to achieve a 10% reduction in fuel and power consumption year on year through constant review and limiting usage where ever possible. **How** We have started a phased replacement plan of all fossil fuelled power equipment to electric alternatives. Our plan aims to achieve a positive gain by ensuring current equipment is recycled or repurposed as part of the replacement project. We aim to replace our vehicle fleet to 100% electric at the end of each current vehicles serviceable life cycle.						

2022 Carbon Calculations

Estimated total emissions

tonnes CO$_2$e

123

Country
United Kingdom of Great Britain and Northern Ireland

Sector
Education

Scope 1	% of emissions	tonnes CO$_2$e
Fuel combustion	100.0 %	18.8

Scope 2	% of emissions	tonnes CO$_2$e
Electricity	100.0 %	6.04

Scope 3	% of emissions	tonnes CO$_2$e
Business travel	0.8 %	0.824
Upstream transportation and distribution	0.6 %	0.582
Purchased goods and services	63.6 %	62.2
Capital goods	35.0 %	34.3

Equality, Diversity & Inclusion Policy

Created: March 2016   Reviewed: Annually   To be reviewed again: Nov 2024

Circles Alternative Education Ltd is committed to valuing diversity by providing equality of opportunity and anti-discriminatory practice for all children in line with the Every Child Matters Agenda. We value our staff and are committed to good employment practice. Circles Alternative Education Ltd seeks to ensure that no member of the school community, or any person through their contact with us, will receive less favourable treatment on the grounds of a protected characteristic. These include: race, colour, nationality, ethnic or national origin, religion or belief, gender, marital status, responsibility for children or other dependents, disability, sexual orientation, gender reassignment, age, trade union or political activities, socio-economic background, living situation, or spent convictions.

Circles Alternative Education Ltd does not discriminate against, harass or victimise a pupil or potential pupil:
- in relation to admissions
- in the way it provides education for pupils
- in the way it provides pupils access to any benefit, facility or service, or
- by excluding a pupil or subjecting them to any other detriment.

In this we include all members of the extended Circles community - pupils, staff, stakeholders, parents and others from our local community. Partners, contractors and other visitors to Circles are also expected to adhere to this policy.

Legal Framework

In putting together this Single Equality Scheme in the form of our Equality, Diversity and Inclusion Policy, we are responding to the introduction of the Equality Act 2010. This replaces all previous policies and legislation relating to Race Equality, Gender Equality and Disability Equality. This policy has been devised to enable Circles Alternative Education Ltd to meet its general duty in:
- Eliminating unlawful discrimination, harassment, victimisation and other prohibited conduct
- Advancing equality of opportunity between those who have a protected characteristic and those who do not
- Fostering good relations between those who have a protected characteristic and those who do not

We do this by:
- Providing a secure environment in which all of our children can flourish and in which all contributions are valued
- Including and valuing the contribution of all families to our understanding of equality and diversity
- Providing positive non-stereotyping information about gender roles, diverse ethnic and cultural groups and people with disabilities
- Reviewing our knowledge and understanding of issues of anti-discriminatory practice, promoting equality and valuing diversity
- Making inclusion a thread that runs through all of the activities of Circles Alternative Education Ltd

Definitions

Direct discrimination occurs when one person treats another less favourably, because of a protected characteristic, than they treat – or would treat – other people. This describes the most clear-cut and obvious examples of discrimination.
Indirect discrimination occurs when a "provision, criterion or practice" is applied generally but has the effect of putting people with a characteristic at a disadvantage when compared to people without that characteristic. It is a defence against a claim of indirect discrimination if it can be shown to be "a proportionate means of achieving a legitimate aim". This means both that the reason for the rule or practice is legitimate, and that it could not reasonably be achieved in a different way which did not discriminate.
Harassment is "unwanted conduct, related to a relevant protected characteristic, which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person". This covers unpleasant and bullying behaviour, but potentially extends also to actions which, whether intentionally or unintentionally, cause offence to a person because of a protected characteristic.

Definition of parents A parent is a wide reference (as in education law generally) not only to a pupil's birth parents but to adoptive, step and foster parents, or other persons who have parental responsibility for, or who have care of, a pupil.

Race includes colour, nationality and ethnic or national origins. Religion is any religion, and "belief" as any religious or philosophical belief. A lack of religion or a lack of belief is also protected characteristics.

Disability is when a person has a 'physical or mental impairment which has a substantial and long term adverse effect on that person's ability to carry out normal day to day activities.' Some specified medical conditions, HIV, multiple sclerosis and cancer are all considered as disabilities, regardless of their effect. Long term is defined as lasting, or likely to last, for at least 12 months.

Online / E-Safety Policy

Created: March 2016   Reviewed: Annually   To be reviewed again: Nov 2024

E-safety is part of the school's safeguarding responsibilities. This policy relates to other policies including those for behaviour management, safeguarding and child protection, anti-bullying, computing, data protection and the use of photographic images.

The purpose of this policy is to:
- Safeguard and protect all members of the school community in the use of computers and other devices and the internet.
- Identify approaches to educate and raise awareness of online safety throughout the school's community.
- Enable all staff to work safely and responsibly, to model positive behaviour online and to manage professional standards and practice when using technology.
- Identify clear procedures to use when responding to online safety concerns.

Using this policy
- The Headteacher is the Computing and E-safety subject leader.
- Our E-safety Policy has been written by the school, building on best practice and government guidance. It has been agreed by governors.
- The E-safety policy covers the use of all technology which can access the school network and the internet or which facilitates electronic communication from school to beyond the bounds of the school site. This includes, but is not limited to, workstations, laptops, mobile phones, tablets and hand held games consoles used on the school site.

The Designated Safeguarding Lead (DSL) will:
- Act as a named point of contact on all online safeguarding issues and liaise with other members of staff or other agencies, as appropriate.
- Keep up-to-date with current research, legislation and trends regarding online safety and communicate this with the school community, as appropriate.
- Ensure all members of staff receive regular, up-to-date and appropriate online safety training.
- Work with staff to coordinate participation in local and national events to promote positive online behaviour, such as Safer Internet Day.
- Ensure that online safety is promoted to parents, carers and the wider community, through a variety of channels and approaches.
- Maintain records of online safety concerns, as well as actions taken, as part of the schools safeguarding recording mechanisms.
- Monitor online safety incidents to identify gaps and trends, and use this data to update the education response, policies and procedures.
- Report online safety concerns, as appropriate, to the Deputy Safeguarding Leads, the Safeguarding and E Safety governor and the governing body.
- Work with governors and staff to review and update online safety policies.
- Meet regularly with the governor with a lead responsibility for safeguarding.
- Ensure that online safety is viewed as a safeguarding issue and that practice is in line with national and local recommendations and requirements.

- Ensure there are appropriate and up-to-date policies regarding online safety; including a Code of Conduct /Acceptable Use Policy for staff and governors.
- Ensure that suitable and appropriate filtering and monitoring systems are in place.
- Work with technical staff to monitor the safety and security of school systems and networks.
- Ensure that online safety is embedded within a progressive whole school curriculum, which enables all pupils to develop an age-appropriate understanding of online safety.
- Ensure there are robust reporting channels for the school community to access regarding online safety concerns, including internal, local and national support.
- Ensure that appropriate risk assessments are undertaken regarding the safe use of technology. Audit and evaluate online safety practice to identify strengths and areas for improvement.

It is the responsibility of all members of staff to:
- Contribute to the development of online safety procedures.
- Read and adhere to this E-safety Policy, the Safeguarding and Child Protection Policy, the ICT Code of Conduct /Acceptable Use Policy and the Staff Code of Conduct.
- Take responsibility for the security of school systems and the data they use, or have access to.
- Model good practice when using technology and maintain a professional level of conduct in their personal use of technology, both on and off site.
- Embed online safety education into the curriculum.
- Have an awareness of a range of online safety issues and how they may be experienced by the children in their care.
- Identify online safety concerns and take appropriate action by following the school's safeguarding policies and procedures.
- Know when and how to escalate online safety issues, including signposting to appropriate support, internally and externally.
- Take personal responsibility for professional development in this area.

It is the responsibility of the Headteacher to:
- When required, develop and implement appropriate online safety policies and procedures.
- Implement appropriate security measures to ensure that the school's IT infrastructure/system is secure and not open to misuse or malicious attack, whilst allowing learning opportunities to be maximised.
- Investigate any filtering breaches and ensure that any safeguarding concerns, identified through monitoring or filtering breaches are dealt with appropriately.
- Monitor the on-line activity of staff and pupils and deal with any issues as appropriate.
- Ensure that staff adhere to this this E-safety Policy, the Safeguarding and Child Protection Policy, the ICT Code of Conduct and the Staff Code of Conduct.

It is the responsibility the school's technical support company to:
- Provide technical support and perspective to the school, especially in the development and implementation of appropriate online safety policies and procedures.
- Implement appropriate security measures, including password policies and encryption, to ensure that the school's IT infrastructure/system is secure and not open to misuse or malicious attack, whilst allowing learning opportunities to be maximised.
- Ensure that the school's filtering policy is applied and updated on a regular basis; responsibility for its implementation is shared with the leadership team.
- Report any filtering breaches to the DSL and leadership team, as well as, the school's Internet Service Provider or other services, as appropriate.

Pupils are taught to:

- Engage in age appropriate online safety education opportunities under the direct supervision of school staff. Understand child-friendly online safety procedures during curriculum and teaching time.
- Read and adhere to the school's pupil-friendly Acceptable Use posters that are displayed in the classrooms and the ICT suite.
- Understand how to use 'Hector the Protector' should an on-line concern be experienced.
- Seek help from a trusted adult if they experience an on-line concern.

It is the responsibility of governors to:
- Hold the school to account to ensure that robust safeguarding, E-safety and on-line procedures and policies are in place and are being adhered to.
- Undertake safeguarding and child protection training that includes on-line and E-safety training.
- Read and adhere to this policy and to the school's Acceptable Use Policy.

It is the responsibility of parents and carers to:
- Support the school in their online safety approaches by discussing online safety issues with their children and reinforce appropriate, safe online behaviours at home.
- Role model safe and appropriate use of technology and social media.
- Abide by the school's home-school agreement statements that relate to the use of social media and other e-safety issues.
- Identify changes in behaviour that could indicate that their child is at risk of harm online. If appropriate parents should inform the school for extra support and advice.
- Seek help and support from the school, or other appropriate agencies, if they or their child encounter risk or concerns online.
- Take responsibility for their own awareness in relation to the risks and opportunities posed by new and emerging technologies.

Education and engagement with pupils.

The school will establish and embed a progressive online safety curriculum throughout the whole school to raise awareness and promote safe and responsible internet use amongst pupils by:-

- Ensuring education regarding safe and responsible use precedes internet access.
- Including online safety in the Personal, Social and Health Education (PSHE) and Computing programmes of study, covering use both at home school and home.
- Reinforcing online safety messages whenever technology or the internet is in use.
- Educating pupils in the effective use of the internet to research; including the skills of knowledge location, retrieval and evaluation.
- Displaying acceptable use posters in all rooms with internet access and supporting pupils to read and understand it.
- Seeking pupil voice when writing and developing school online safety policies and practices, including curriculum development and implementation.
- Using support, such as external visitors, where appropriate, to complement and support the schools internal online safety education approaches.

Vulnerable Pupils
- Valley End C of E Infant School is aware that some pupils are considered to be more vulnerable online due to a range of factors. This may include, but is not limited to children in care, children with Special Educational Needs and Disabilities (SEND) or mental health

needs, children with English as an additional language (EAL) and children experiencing trauma or loss.

- Valley End C of E Infant School will ensure that differentiated and ability appropriate online safety education, access, monitoring and support is provided to vulnerable pupils.

Training and engagement with staff

The school will:

- Provide and discuss the online safety policy with all members of staff as part of induction.
- Provide up-to-date and appropriate online safety training for all staff on a regular basis, with at least annual updates. This training will be part of the annual safeguarding and child protection training or part of regular safeguarding updates throughout the year. The training will cover the potential risks posed to pupils as well as professional practice expectations.
- Make staff aware that school systems are monitored and activity can be traced to individual users; staff will be reminded to behave professionally and in accordance with school's policies when accessing school systems and devices.
- Make staff aware that their online conduct out of school, including personal use of social media, could have an impact on their professional role and reputation within school.
- Highlight useful educational resources and tools which staff should use, according to the age and ability of the pupils.
- Ensure all members of staff are aware of the procedures to follow regarding online safety concerns affecting pupils, colleagues or other members of the school community.

Awareness and engagement with parents and carers

- Valley End C of E Infant School recognises that parents and carers have an essential role to play in enabling children to become safe and responsible users of the internet and associated technologies.
- The school will build a partnership approach to online safety with parents and carers by:
  - Providing information and guidance on online safety in a variety of formats. This will include offering specific online safety awareness training and highlighting online safety at other events such as parent evenings or transition events.
  - Drawing their attention to the school online safety policy, procedures and expectations.

Reducing Online Risks

Valley End C of E Infant School recognises that the internet is a constantly changing environment with new apps, devices, websites and material emerging at a rapid pace. We will:

- Regularly review the methods used to identify, assess and minimise online risks.
- Examine emerging technologies for educational benefit and undertake appropriate risk assessments before use in school is permitted.
- Ensure that appropriate filtering and monitoring is in place and take all reasonable precautions to ensure that users can only access appropriate material.
- Due to the global and connected nature of the internet, it is not possible to guarantee that unsuitable material cannot be accessed via a school computer or device.

All members of the school community are made aware of the school's expectations regarding safe and appropriate behaviour online and the importance of not posting any content, comments, images or videos which could cause harm, distress or

offence to members of the community. This is clearly outlined in the school's Acceptable Use Policy and codes of conduct and highlighted through a variety of updates and training approaches

Classroom and ICT Suite Use
- Valley End C of E Infant School uses a wide range of technology. This includes access to:
  - Computers, laptops and mobile tablets (Learnpads)
  - Internet which may include search engines and educational websites.
  - Tablet and computer based educational applications and games.
  - Digital cameras, web cams and video cameras.
  - Programmable robots and toys.
  - Walkie talkies
- Members of staff will always evaluate websites, games and apps fully before use in the classroom/ICT Suite or recommending for use at home.
- The school will use the age appropriate search engine called '*Junior Safe Search for Kids'.*
- The school will ensure that the use of internet-derived materials, by staff and pupils, complies with copyright law and acknowledge the source of information.
- Pupils' access to the internet will be by adult demonstration, with directly supervised access to specific and approved online materials, which support the learning outcomes planned for the pupils' age and ability.
- Pupils will be taught not to give out personal details or information which may identify them or their location.
- Posters explaining the 'Acceptable Use of the School Computers' will be displayed in classrooms and the ICT Suite. Children will be taught to understand the content of these posters.
- The school will provide an age-appropriate e-safety curriculum that teaches pupils how to stay safe, how to protect themselves from harm and how to take responsibility for their own and others' safety.

Filtering and Monitoring
- The Headteacher and governors have ensured that the school has age and ability appropriate filtering and monitoring in place, to limit children's exposure to online risks.
- The Headteacher and governors are aware of the need to prevent "over blocking", as that may unreasonably restrict what children can be taught, with regards to online activities and safeguarding.
- Changes to the filtering and monitoring approach will be risk assessed by the Headteacher and all changes to the filtering policy are logged and recorded.
- The Headteacher and the Administration Officer will ensure that regular checks are made to ensure that the filtering and monitoring methods are effective and appropriate. The outcomes of this monitoring will be reported to governors.
- All members of staff are aware that they cannot rely on filtering and monitoring alone to safeguard pupils and that effective classroom management and regular education about safe and responsible use is essential.
- The school uses educational broadband connectivity through BT Unicorn.
- The school uses BT Smoothwall as a filtering system which blocks sites which can be categorised as: adult content (pornography), criminal activity, racial hatred, radicalisation and extremism, suicide and bullying
- The school works with BT Smoothwall and Addcom (technical support) to ensure that our filtering policy is continually reviewed.

Dealing with filtering breaches
- The school has a clear procedure for reporting filtering breaches.
  - If pupils discover unsuitable sites, they will be required to block any content by using 'Hector Protector' and report the concern to a member of staff. The member of staff will report the concern including the URL of the site if possible to the Designated Safeguarding Lead.
  - The breach will be recorded and escalated as appropriate.
  - Parents/carers will be informed of filtering breaches involving their child.
  - If any members of staff discover unsuitable sites, they will report the concern to the DSL.
- Any material that the school believes is illegal will be reported immediately to the appropriate agencies, such as: The Internet Watch Foundation (IWF), Surrey Police or The Child Exploitation and Online Protection (CEOP).

Monitoring
- The school will appropriately monitor internet use on all school owned or provided internet enabled devices. This is achieved by monitoring internet use through individual staff log-ins
- Any concerns identified via monitoring approaches will be reported to the DSL who will respond in line with the Safeguarding and Child Protection Policy and its procedures for dealing with allegations against members of staff.
- All users will be informed that use of school systems can be monitored and that all monitoring will be in line with data protection, human rights and privacy legislation.

Security and Management of Information Systems
- The school takes appropriate steps to ensure the security of our information systems, including:
  - Virus protection being updated regularly.
  - Encryption for personal data sent over the Internet or taken off site, for example via portable media storage or access via appropriate secure remote access systems.
  - Not using portable media without specific permission from the Headteacher. Before any use, portable media will be checked by the Headteacher using anti-virus /malware scanning before use.
  - Not downloading unapproved software to work devices or opening unfamiliar email attachments. Any new software downloads have to be approved and agreed by the Headteacher.
  - The Headteacher and the Administration Officer, regularly checking files held on the school's network.
  - The appropriate use of user logins and passwords to access the school network.
  - All users are expected to log off or lock their screens/devices if systems are unattended.

Passwords

All members of staff will have their own unique username and private passwords to access school systems and 'Valley End' school emails. Governors have their own username and private passwords to access 'Valley End' school emails. Governors and members of staff are responsible for keeping their passwords private.

- We require all users to:
  - Use strong passwords for access into our system.
  - Change passwords every 45 days. Users are prompted to do this.

- Always keep their password private; users must not share it with others or leave it where others can find it.
- Not to login as another user at any time.

Managing the Safety of the School Website
- The school will ensure that information posted on our website meets the requirements as identified by the Department for Education (DfE) and OFSTED.
- The school will ensure that our website complies with guidelines for publications including: accessibility; data protection; respect for intellectual property rights; privacy policies and copyright.
- Staff, pupils' and governors' personal information will not be published on our website. The contact details on the website will be the school address, email and telephone number.
- The administrator account for the school website will be secured with an appropriately strong password.
- The school will post appropriate information about safeguarding, including online safety, on the school website for members of the community.

Managing Email
- Access to school email systems will always take place in accordance with data protection legislation and in line with this policy, and staff codes of conduct/Acceptable Use Policy.
  - The forwarding of any chain messages/emails is not permitted. Spam or junk mail will be blocked and reported to the email provider.
  - Any electronic communication which contains sensitive or personal information will only be sent using secure and encrypted email.
  - School email addresses and other official contact details will not be used for setting up personal social media accounts.
- Members of the school community will immediately tell the DSL if they receive offensive communication, and this will be recorded in the school safeguarding files/records.
- The use of personal email addresses by staff for any official school business is not permitted. All members of staff are provided with a specific school email address, to use for all official communication.

Social Media
- The expectations' regarding safe and responsible use of social media applies to all members of Valley End C of E Infant School community.
- The term social media may include, but is not limited to: blogs; wikis; social networking sites; forums; bulletin boards; online gaming; apps; video/photo sharing sites; chatrooms and instant messenger.
- All members of Valley End C of E Infant School community are expected, at all times, to engage in social media in a positive, safe and responsible manner,
- The use of social media during school hours for **personal** use **is not** permitted.
- Concerns regarding the online conduct of any member of Valley End C of E Infant School community on social media should be reported to the DSL and will be managed in accordance with the school's Anti-bullying, Allegations Against Staff, Behaviour and Safeguarding and Child protection policies.

Staff Personal Use of Social Media
- The safe and responsible use of social networking, social media and personal publishing sites will be discussed with all members of staff, governors and volunteers as part of induction and will be revisited and communicated via regular training opportunities for staff.
- Safe and professional behaviour will be outlined for all members of staff, governors and volunteers as part of the school's codes of conduct and acceptable use policies.

- All members of staff, governors and volunteers are advised that their online conduct on social media can have an impact on their role and reputation within school. Civil, legal or disciplinary action may be taken if they are found to bring the profession or institution into disrepute, or if something is felt to have undermined confidence in their professional abilities.
- All members of staff are advised to safeguard themselves and their privacy when using social media sites. Advice will be provided to staff via staff training and by sharing appropriate guidance and resources on a regular basis. This will include but is not limited to
  - Setting the privacy levels of their personal sites as strictly as they can.
  - Being aware of location sharing services.
  - Opting out of public listings on social networking sites.
  - Logging out of accounts after use.
  - Keeping passwords safe and confidential.
  - Ensuring staff do not represent their personal views as that of the school.
- Members of staff are encouraged not to identify themselves as employees of Valley End C of E Infant School on their personal social networking accounts. This is to prevent information on these sites from being linked with the school and also to safeguard the privacy of staff members and governors.
- All members of staff are encouraged to carefully consider the information, including text and images, they share and post online and to ensure that their social media use is compatible with their professional role and is in accordance with schools policies and the wider professional and legal framework.
  - Information and content that staff members have access to as part of their employment, including photos and personal information about pupils and their family members or colleagues will not be shared or discussed on social media sites.
- Members of staff will notify the DSL immediately if they consider that any content shared on social media sites conflicts with their role in the school.
- All members of staff are advised not to communicate with or add as 'friends' any current or past pupils or current or past pupils' family members via any personal social media sites, applications or profiles.
  - Any pre-existing relationships or exceptions that may compromise this will be discussed with Designated Safeguarding Lead and/or the Headteacher.
- Staff will not use personal social media accounts to make contact with pupils or parents, nor should any contact be accepted, except in circumstance whereby prior approval has been given by the Headteacher.

Any communication from pupils and parents received on personal social media accounts will be reported to the schools Designated Safeguarding Lead.

Official School Use of Social Media
- The official use of social media sites, by the school, only takes place with clear educational or community engagement objectives, with specific intended outcomes.
  - The official use of social media as a communication tool has been formally risk assessed and approved by the Headteacher.
  - The Headteacher, the Assistant Headteacher and the Administration Officer have access to account information and login details for the social media channels.
- Official school social media channels have been set up as distinct and dedicated social media sites or accounts for educational or engagement purposes only.
  - Staff use school provided email addresses to register for and manage any official school social media channels.
  - Official social media sites are suitably protected and, where possible, run and/or linked to/from the school website.

- Public communications on behalf of the school will, where appropriate and possible, be read and agreed by at least one other colleague.
- Parents, carers and pupils will be informed of any official social media use, along with expectations for safe use and action taken to safeguard the community.
- Parents and carers will be informed of any official social media use with pupils and written parental consent will be obtained, as required.

The school will ensure that any official social media use does not exclude members of the community who are unable or unwilling to use social media channels.

Staff expectations
- If members of staff are participating in online social media activity as part of their capacity as an employee of the school, they will:
  - Adhere to the school's Staff Code of Conduct and ICT Acceptable Use Policy.
  - Be professional at all times and aware that they are an ambassador for the school.
  - Disclose their official role and/or position, but make it clear that they do not necessarily speak on behalf of the school.
  - Be responsible, credible, fair and honest at all times and consider how the information being published could be perceived or shared.
  - Always act within the legal frameworks they would adhere to within the workplace, including: Libel, Defamation, Confidentiality, Copyright, Data protection and Equalities laws.
  - Ensure that they have appropriate written consent before posting images on the official social media channel.
  - Not disclose information, make commitments or engage in activities on behalf of the school unless they are authorised to do so.
  - Not engage with any direct or private messaging with current, or past, pupils, parents and carers.
- Inform the Designated Safeguarding/ Headteacher of any concerns, such as criticism, inappropriate content or contact from pupils.

Use of Personal Devices and Mobile Phones
- Valley End C of E Infant School recognises that personal communication through mobile technologies is an accepted part of everyday life for staff, governors, volunteers and parents/carers, but technologies need to be used safely and appropriately within school.
- Electronic devices of any kind that are brought onto site are the responsibility of the user at all times.
- All members of Valley End C of E Infant School community are advised to take steps to protect their mobile phones or devices from loss, theft or damage. The school accepts no responsibility for the loss, theft or damage of such items on school premises.
- All members of Valley End C of E Infant School community are advised to use passwords/pin numbers to ensure that unauthorised calls or actions cannot be made on their phones or devices; passwords and pin numbers should be kept confidential and mobile phones and personal devices should not be shared.
- The sending of abusive or inappropriate messages/ content via mobile phones or personal devices is forbidden by any member of the community and any breaches will be dealt with as part of the school's codes of conduct and acceptable use policies.
- All members of Valley End C of E Infant School community are advised to ensure that their mobile phones and personal devices do not contain any content which may be considered to be offensive, derogatory or would otherwise contravene the school Behaviour or Safeguarding and child protection policies.

- Staff will be advised to:
    - Keep mobile phones and personal devices in a safe and secure place during lesson time
    - Keep mobile phones and personal devices switched off or switched to 'silent' mode during lesson times.
    - Not use personal devices during teaching periods, unless written permission has been given by the Headteacher, such as in emergency circumstances.
    - Ensure that any content bought onto site via mobile phones and personal devices are compatible with their professional role and expectations.
- Members of staff are not permitted to use their own personal phones or devices for contacting pupils or parents and carers.
    - Any pre-existing relationships, which could undermine this, will be discussed with the Designated Safeguarding Lead.
- Staff and governors will not use personal devices, such as: mobile phones, tablets or cameras:
    - To take photos or videos of pupils and will only use school-provided equipment for this purpose.
    - Directly with pupils, and will only use work-provided equipment during lessons/educational activities.

Responding to Online Safety Incidents and Concerns
- All members of the school community will be made aware of the reporting procedure for online safety concerns, including: breaches of filtering, youth produced sexual imagery (sexting), cyberbullying and illegal content.
- All members of the community must respect confidentiality and the need to follow the official school procedures for reporting concerns.
    - Pupils, parents and staff will be informed of the school's complaints procedure and staff will be made aware of the whistleblowing procedure.
- The school requires staff, parents, carers and pupils to work in partnership to resolve online safety issues.
- After any investigations are completed, the school will debrief, identify lessons learnt and implement any policy or curriculum changes as required.
- If the school is unsure how to proceed with an incident or concern, the DSL will seek advice from the Surrey Safeguarding Children Partnership.
- Where there is suspicion that illegal activity has taken place, the school will contact the Surrey Safeguarding Children Partnership or Surrey Police using 101, or 999 if there is immediate danger or risk of harm.
- If an incident or concern needs to be passed beyond the school community (for example if other local schools are involved or the public may be at risk), the school will speak with Surrey Police and/or the Surrey Safeguarding Children Partnership first, to ensure that potential investigations are not compromised.

Concerns about Pupils Welfare
- The DSL will be informed of any online safety incidents involving safeguarding or child protection concerns.
    - The DSL will record these issues in line with the school's Safeguarding and child protection policy.
- The DSL will ensure that online safety concerns are escalated and reported to relevant agencies in line with the Surrey Safeguarding Children Partnership thresholds and procedures.
- The school will inform parents and carers of any incidents or concerns involving their child, as and when required.

Staff Misuse
- Any complaint about staff misuse will be referred to the DSL/Headteacher, according to the Management of Allegations and Concerns Safeguarding and child protection and Whistleblowing policies.
- Any complaint about the Headteacher's on-line misuse will be referred to the Chair of Governors according to the Management of Allegations and Concerns, Safeguarding and child protection and Whistleblowing policies.
- Any allegations regarding a member of staff's online conduct will be discussed with the LADO (Local Authority Designated Officer).

Youth Produced Sexual Imagery or "Sexting"
- Valley End C of E Infant School recognises youth produced sexual imagery (known as "sexting") as a safeguarding issue; therefore all concerns will be reported to and dealt with by the Designated Safeguarding Lead.
- The school will follow the advice as set out in the non-statutory UKCCIS guidance: 'Sexting in schools and colleges: responding to incidents and safeguarding young people' and KSCB guidance: "Responding to youth produced sexual imagery".
- Valley End C of E Infant School will ensure that all members of the community are made aware of the potential social, psychological and criminal consequences of 'sexting' by implementing preventative approaches, via a range of age and ability appropriate educational methods.
- The school will ensure that all members of the community are aware of sources of support regarding pupil produced sexual imagery.

Dealing with 'Sexting'
- If the school are made aware of an incident involving the creation or distribution of pupil produced sexual imagery, the school will:
    - Act in accordance with our Safeguarding and child protection policy and the relevant Surrey Safeguarding Child Partnership's procedures.
    - Immediately notify the Designated Safeguarding Lead.
    - Store the device securely.
        - If an indecent image has been taken or shared on the school network or devices, the school will take action to block access to all users and isolate the image.
    - Carry out a risk assessment which considers any vulnerability of pupil(s) involved; including carrying out relevant checks with other agencies.
    - Inform parents and carers, if appropriate, about the incident and how it is being managed.
    - Make a referral to Specialist Children's Services and/or the Police, as appropriate.
    - Provide the necessary safeguards and support for pupils, such as offering counselling or pastoral support.
    - Implement appropriate sanctions in accordance with the school's Behaviour policy, but taking care not to further traumatise victims where possible.
    - Consider the deletion of images in accordance with the UKCCIS: 'Sexting in schools and colleges: responding to incidents and safeguarding young people' guidance.
        - Images will only be deleted once the school has confirmed that other agencies do not need to be involved; and are sure that to do so would not place a child at risk or compromise an investigation.
    - Review the handling of any incidents to ensure that best practice was implemented; the leadership team will also review and update any management procedures, where necessary.

- The school will take action regarding pupil produced sexual imagery, regardless of whether the incident took place on/off school premises, using school or personal equipment.
- The school will not:
    - View any images suspected of being pupil produced sexual imagery, unless there is no other possible option, or there is a clear need or reason to do so.
        - In this case, the image will only be viewed by the Designated Safeguarding Lead and their justification for viewing the image will be clearly documented.
    - Send, share, save or make copies of content suspected to be an indecent image of children i.e. pupil produced sexual imagery and will not allow or request pupils to do so.

Online Child Sexual Abuse and Exploitation
- Valley End C of E Infant School will ensure that all members of the community are aware of online child sexual abuse, including: exploitation and grooming; the consequences; possible approaches which may be employed by offenders to target children and how to respond to concerns.
- Valley End C of E Infant School recognises online child sexual abuse as a safeguarding issue and, as such, all concerns will be reported to and dealt with by the Designated Safeguarding Lead.
- The school will implement preventative approaches for online child sexual abuse via a range of age and ability appropriate education for pupils, staff and parents/carers.
- The school will ensure that all members of the community are aware of the support available regarding online child sexual abuse, both locally and nationally.

Dealing with Online Child Sexual Abuse and Exploitation
- If the school are made aware of incident involving online sexual abuse of a child, the school will:
    - Act in accordance with the school's Safeguarding and child protection policy and the relevant Surrey Safeguarding Children Partnership's procedures.
    - Immediately notify the Designated Safeguarding Lead.
    - Store any devices involved securely.
    - Immediately inform Surrey police via 101 (or 999 if a child is at immediate risk)
    - Carry out a risk assessment which considers any vulnerabilities of pupil(s) involved (including carrying out relevant checks with other agencies).
    - Inform parents/carers about the incident and how it is being managed.
    - Make a referral to Specialist Children's Services (if required/ appropriate).
    - Provide the necessary safeguards and support for pupils, such as, offering counselling or pastoral support.
    - Review the handling of any incidents to ensure that best practice is implemented.
    - Review and update any management procedures, where necessary.
- The school will take action regarding online child sexual abuse, regardless of whether the incident took place on/off school premises, using school or personal equipment.
- If the school is unclear whether a criminal offence has been committed, the Designated Safeguarding Lead will obtain advice immediately through the Surrey Safeguarding Children Partnership and/or Surrey Police.
- If the school is made aware of intelligence or information which may relate to child sexual exploitation on or offline, it will be passed through to Surrey Police by the Designated Safeguarding Lead.
- If pupils at other schools are believed to have been targeted, the school will seek support from Surrey Safeguarding Children Partnership and/or Surrey Police first to ensure that potential investigations are not compromised.

11.3 Indecent Images of Children (IIOC)
- Valley End C of E Infant School will ensure that all members of the community are made aware of the possible consequences of accessing Indecent Images of Children (IIOC).
- The school will take action regarding IIOC on school equipment and/or personal equipment, even if access took place off site.
- The school will take action to prevent accidental access to IIOC by using an internet Service provider (ISP) which subscribes to the Internet Watch Foundation block list and by implementing appropriate filtering, firewalls and anti-spam software.
- If the school is unclear if a criminal offence has been committed, the Designated Safeguarding Lead will obtain advice immediately through Surrey Safeguarding Children Board and/or Surrey Police.
- If made aware of IIOC, the school will:
- Act in accordance with the schools child protection and safeguarding policy and the relevant Surrey Safeguarding Children Partnership procedures.
- Immediately notify the school Designated Safeguard Lead.
- Store any devices involved securely.
- Immediately inform appropriate organisations, such as the Internet Watch Foundation (IWF), Surrey police or the LADO.
- If made aware that a member of staff or a pupil has been inadvertently exposed to indecent images of children whilst using the internet, the school will:
  - Ensure that the Designated Safeguard Lead is informed.
  - Ensure that the URLs (webpage addresses) which contain the suspect images are reported to the Internet Watch Foundation via www.iwf.org.uk .
  - Ensure that any copies that exist of the image, for example in emails, are deleted.
  - Report concerns, as appropriate to parents and carers.
- If made aware that indecent images of children have been found on the school devices, the school will:
  - Ensure that the Designated Safeguard Lead is informed.
  - Ensure that the URLs (webpage addresses) which contain the suspect images are reported to the Internet Watch Foundation via www.iwf.org.uk .
  - Ensure that any copies that exist of the image, for example in emails, are deleted.
  - Inform the police via 101 (999 if there is an immediate risk of harm) and children's social services (as appropriate).
  - Only store copies of images (securely, where no one else has access to them and delete all other copies) at the request of the police only.
  - Report concerns, as appropriate to parents and carers.
- If made aware that a member of staff is in possession of indecent images of children on school devices, the school will:
  - Ensure that the DSL/Headteacher is informed.
  - Inform the Local Authority Designated Officer (LADO) and other relevant organisations in accordance with the school's Safeguarding and child protection, Managing of Allegations and Concerns and Whistleblowing policies.
  - Quarantine any devices until police advice has been sought.

Cyberbullying
- Cyberbullying, along with all other forms of bullying, will not be tolerated at Valley End C of E Infant School.
- Full details of how the school will respond to cyberbullying are set out in the Anti-bullying policy.

Online Hate

- Online hate content, directed towards or posted by, specific members of the community will not be tolerated at Valley End C of E Infant School and will be responded to in line with the school's Anti-bullying, Behaviour, Safeguarding and Child Protection and Whistleblowing policies.
- All members of the community will be advised to report online hate in accordance with relevant school policies and procedures.
- The Police will be contacted if a criminal offence is suspected.
- If the school is unclear on how to respond, or whether a criminal offence has been committed, the Designated Safeguarding Lead will obtain advice through the Surrey Safeguarding Children Partnership and/or Surrey Police.

Online Radicalisation and Extremism
- The school will take all reasonable precautions to ensure that children are safe from terrorist and extremist material when accessing the internet in school.
- If the school is concerned that a child or parent/carer may be at risk of radicalisation online, the Designated Safeguarding Lead will be informed immediately and action will be taken in line with the Safeguarding and Child Protection Policy.
- If the school is concerned that member of staff may be at risk of radicalisation online, the DSL/ Headteacher will be informed immediately and action will be taken in line with the Safeguarding and Child Protection and Management of Allegations and Concerns Policies.

Examination Policy

Contents

- The centre exams policy
- Qualifications
- Exam series and timetables
- Entries, entry details and late entries
- Exam Fees
- Equality Legislation
- Estimated grades
- Managing invigilators
- Candidates
- Internal assessments and appeals
- Results

The policy is next due for review on **November 2024**

Exam Responsibilities

The head of centre:
- Has overall responsibility for the school/college as an exams and advises on appeals and re-marks.
- Is responsible for reporting all suspected or actual incidents of malpractice – refer to the JCQ document *Suspected malpractice in examinations and assessments.*

Exam Officer:
- Manages the administration of internal exams
- Advises the senior leadership team, subject and class tutors, and other relevant support staff on annual exams timetables and procedures as set by the various awarding bodies
- Oversees the production and distribution, to all centre staff and candidates, of an annual calendar for all exams in which candidates will be involved and communicates regularly with staff concerning imminent deadlines and events
- Ensures that candidates and their parents are informed of and understand those aspects of the exams timetable that will affect them
- Checks with teaching staff that the necessary coursework and/or controlled assessments are completed on time and in accordance with JCQ guidelines
- Provides and confirms detailed data on estimated entries
- Maintains systems and processes to support the timely entry of candidates of their exams
- Receives, checks and stores securely all exams papers and completed scripts and ensures that scripts are dispatched as per the guidelines.
- Administers access arrangements and makes application for special consideration following the regulations in the JCQ publications *a guide to the special consideration process.*
- Identifies and manages exam timetables clashes
- Accounts for income and expenditures relating to all exam costs/charges
- Line mangers the senior exam invigilator in organising the recruitment, training and monitoring of a team of exams invigilators responsible for the conduct of exams
- Ensures candidates' coursework/ controlled assessment marks are submitted, and any other materials required by the appropriate awarding bodies correctly and on schedule
- Tracks, dispatches, and stores returned coursework/ controlled assessments
- Arranges for dissemination of exam results and certificates to candidates and forwards consultation with the SLT, any post results service requests.
- Ensures that any conflict of interest is considered when booking exams/tests to ensure there is no scope for conflicts to arise where a person is to administer, undertake or invigilate an exam/test at either a centre they are employed by, or for

Head of department/faculty/curriculum
- Guidance and pastoral oversight of candidates who are unsure about exams entries or amendments to entries
- Accurate completion of entry and all other mark sheets and adherence to deadlines as set by the exam officer.
- Accurate completion of coursework/ controlled assessment mark sheets and declaration sheets
- Decisions on post-results procedures.

Teachers are responsible for:
- Supplying information on entries, coursework and controlled assessments as required by the head of department and/or exams officer.

The Special education needs coordinator (SENCo)/ specialist teacher is responsible for:
- Identification and testing of candidates' requirements for access arrangements and notifying the exams officer in good time so that they are able to put in place exam day arrangements
- Process any necessary applications in order to gain approval (if required)
- Working with the exams officer to provide the access arrangements required by candidates in exam rooms.

Lead invigilator/ invigilators are responsible for:
- Assisting the exams officer in the efficient running of exams according to JCQ
- Collection of exam papers and other material from the exams office before the start of the exam of the exam
- Collection of all exam papers in the correct order at the end of the exam and ensuring their return to the exam office.

Candidates are responsible for:
- Confirmation and signing of entries
- Understanding coursework/ controlled assessment regulations and signing a declaration that authenticates the coursework as their own
- Ensuring they conduct themselves in all exams according to the JCQ regulations

Entry deadlines are circulated to heads of department/curriculum via email, briefing meetings
Head of department/curriculum will provide estimated entry information to the exams officer to meet JCQ and awarding body deadlines.

Entries and amendments made after an awarding organisation's deadline (i.e. late) require the authorisation, of Exam officer and Head of centre.
Functional skills re-sits or retakes
Re-sit decisions will be made by Head of Centre in consultation with Exam Officer

Exam Fees

Candidates or department will not be charged for changes of tier, withdrawals made by the proper procedures or alterations arising from administrative processes provided these are made within the time allowed by the awarding bodies.

The exams officer will publish the deadline for actions well in advance for each exams series.

Functional skills entry exams fees are paid by the centre, department/school

Late entry or amendments fees are paid by the centre, department/school

Fee reimbursements are not sought from candidates: if they fail to sit an exam

Qualifications offered

The qualifications offered at this centre are decided by the head of centre.

The types of qualifications offered are BTEC Vocational Studies, BTEC Construction, BTEC Hair & Beauty, BTEC Cooking, BTEC Land Based Studies, CSCS Cards.

The subjects offered for these qualifications in any academic year may be found in the centre's published prospectus or similar documents for that year.

Informing the exam officer of changes to a specification is the responsibility of the IV/ Head of Department

Decisions on whether a candidate should be entered for a particular subject will be taken by Head of department in consultation with the Head of Centre.

Exam Series

Internal exams (Mock or trial exams) and assessments are scheduled in a spreadsheet

Internal exams are not held under external exam conditions.

The Head of Department decides which exam series are used in the centre.

The centre does offer some assessment on an on-demand basis. If offered, on-demand assessments can be scheduled only in windows agreed between the Exam Officer and the Head of Department.

Exam timetables

Once confirmed, the exams officer will circulate the exam timetables for internal exams at a specified date before each series begins.

Entries, entry details and late entries

Candidates or parents/carers cannot request a subject entry, change of level or withdrawal.

The centre does not act as an exams centre for other organisations.

Re-sit fees are paid by the centre, department/school

Equality Legislation

All exam centre staff must ensure that they meet the requirements of any equality legislation.

The centre will comply with the legislation, including making reasonable adjustments to the service that they provide to candidates in accordance with requirements defined by the legislation, awarding bodies, and JCQ. This is the responsibility of the Head of Centre.

Access Arrangements

The SENCo/ Specialist teacher will inform subject teachers of candidates with special education needs and any special arrangements that individual candidates will need during the course and in any assessments/exams.

A candidate's access arrangements requirement is determined by the SENCo/ Head of Department

Ensuring there is appropriate evidence for a candidate's access arrangement is the responsibility of the teacher

Submitting completed access arrangement applications to the awarding bodies is the responsibility of the Exam Officer

Rooming for access arrangement candidates will be arranged by the Exam Officer. Invigilation and support for access arrangement candidates, as defined in the JCQ access arrangements regulations, will be organised by the Exam Officer

Contingency Planning
Contingency planning for exams administration is the responsibility of the Exam Officer

Contingency plans are available via email, briefing meetings and are in line with the guidance provided by OFqual, JCQ and awarding organisations.

Estimated grades
Teachers are responsible for submitting estimated grades to the exam officer when requested by the exam officer.

Managing invigilators
External staff will not be used to invigilate examinations

Recruitment of invigilators is the responsibility of the Head of Centre

Securing the necessary Discosure Barring Service (DBS) clearance for new invigiltors is the responsibility of Head of Centre

DBS fees for securing such clearance are paid by the centre.

Invigilators' rates of pay are set by the Head of Centre

Invigilators are recruited, timetabled, trained, and briefed by the Head of Centre and Exam Officer.

Malpractice
The head of centre in consultation with the exam officer is responsible for investigating suspected malpractice

Exam Days
The exam officer will book all exam rooms after liaison with other users and make the question papers, other exams stationery and materials available for the invigilator.

Site management staff is responsible for setting up the allocated rooms, and will be advised of requirements in advance.

The Exam officer will start and finish all exams in accordance with JCQ guidelines.

Subject staff may not be present at the start of the exam to assist with identification of candidates. Any staff present must be in accordance with the rules defined by JCQ concerning who is allowed in the exam room and what they can do.

In practical exams, subject teachers' availability will be in accordance with JCQ guidelines. Exam papers must not be read by subject teachers or removed from the exam room before the end of a session. Papers will be distributed to heads of department in accordance with JCQ's recommendations and no later than 48 hours after candidates have completed them.

After an exam, the exam officer will arrange for the safe dispatch of completed examination scripts to awarding bodies, working in conjunction with head of centre

Candidates
The exams officer will provide written information to candidates in advance of each exam series. A formal briefing session for candidates may be given by the Head of department.

The centre's published rules on acceptable dress and behaviour apply at all times. Candidates' personal belongings remain their own responsibility and the centre accepts no liability for their loss or damage.

In an exam room candidates must not have access to items other than those clearly allowed in the instructions on the question paper, the stationery list, or the specification for the subject. This is particularly true of mobile phones and other electronic communication or storage devise with text or digital facilities. Any precluded items must not be taken into an exam room.

Disruptive candidates are dealt with in accordance with JCQ guidelines. Candidates are expected to stay for the full exam time at the discretion of the exam officer

Note: candidates who leave an exam room must be accompanied by an appropriate member of staff at all times.

The Exam officer is responsible for handing late or absent candidates on exam day.

Clash candidates

the head of centre will be responsible as necessary for supervising escorts, identifying a secure venue and arranging overnight stays

Special consideration

Should a candidate be unable to attend an exam because of illness, suffer bereavement or other trauma, be ill or otherwise disadvantaged or disturbed during an exam, then it is the candidate's responsibility to alert the centre's invigilator to that effect.

The candidate must support any special consideration claim with appropriate evidence within 28 days of the exam.

The exam officer will make a special consideration application to the relevant awarding body within 14 days of the exam

Internal assessment

It is the duty of heads of department to ensure that all internal assessment is ready for dispatch at the correct time. The exam officer will assist by keeping a record of each dispatch, including the recipient details and the date and time sent.

Marks for all internally assessed work are provided to the exam office by the head of department. The exams officer will inform staff of the date when appeals against internal assessments must be made by. Any appeals will be dealt with in accordance with the centre's internal appeals procedure (IAP) document.

Enquires about results (EAR)

EARs may be requested by centre staff or the candidate following the release of results. A request for a re-mark or clerical check requires the written consent of the candidate, a request for a re-moderation of internally assessed work may be submitted without the consent of the group of candidates

The cost of EARs will be paid by the centre

All decisions whether to make an application for an EAR will be made by Head of centre.

If a candidate's request for an EAR is not supported, the candidate may appeal and the centre will respond by following the process in its Internal Appeals Procedure (IAP) document.

All processing of EARs will be the responsibility of the Head of centre, following the JCQ guidance

Access to Scripts (ATS)

After the release of results, candidates may ask subject staff to request the return of written exam papers within 14 days of the receipt of results.

Centre staff may also request scripts for investigation or for teaching purposes. For the latter, the consent of candidates must be obtained.

An EAR cannot be applied for once an original script has been returned
The cost of EARs will be paid by the centre
Processing of requests for ATS will be the responsibility of head of centre.

Head of Centre: Alex Stone
Exam Officer: Bryony McMillan
Date: 03/10/2023

Appendix A

	General Roles	Access Arrangements / Special Consideration roles	Invigilator/ invigilation / Malpractice roles
Possible role options for inclusion in policy (select as many required)	• Head of centre • Vice principal • Deputy head • Heads of faculty • Heads of subject • Head of department • Heads of curriculum • Head of key stage • Senior leadership team • Exams officer • SENCO • Subject teacher • Governors • Trustees • Candidates • Parent/carers • Other	• SENCo • ALS Manager • Doctor • Pastoral teacher • Educational psychologist • Specialist teacher • Exams officer • Other	• Exam officer • Centre administration • Support staff • Senior leaders • External staff • Agency employees • Head of centre • Senior leadership team • Senior invigilator • Invigilator • Other

Extremism Statement

Created: March 2019   Reviewed: Annually   To be reviewed again: Nov 2024

Circles Alt Ed is committed to providing a secure environment for students, where students feel safe and are kept safe.
All adults at the school recognise that safeguarding is everyone's responsibility, irrespective of the role they undertake.
Circles believe in and promote the values of democracy, the rule of law, individual liberty, mutual respect and tolerance for those with different faiths and beliefs. We teach and encourage pupils to respect one another and to respect and tolerate difference.

We are committed to tackling extremism and radicalisation and adhere to the Prevent strategy, where we will specifically:

- Respond to the ideological challenge of terrorism and the threat we face from those who promote it.
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support.
- Work with sectors and institutions where there are risks of radicalisation which we need to address.

We believe that education is a powerful tool to equip students with the knowledge, skills and critical thinking, to prepare them for life in a modern, multicultural and diverse British and Global society.

Although no formal curriculum is in place to cover such topics due to Circles only being a part time provision, we endeavour to embed values of Kindness and Compassions, Hope, and Connection and Belonging in everything we do.
All staff act with tolerance of, and respect of, the rights of others. Staff are required to ensure that any political views expressed are done so in a balanced way, and so reflect fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs.

The duty to prevent children and young people being radicalised is set out in the following documents.

- Counter Terrorism and Security Act (2015)
- Keeping Children Safe in Education (Sept 2021)
- Prevent Duty Guidance (2015)
- Working Together to Safeguard Children (July 2018)

First Aid Policy

Created: March 2016   Reviewed: Annually   To be reviewed again: Nov 2024

Rationale
Children and adults in our care need good quality first aid provision. Clear and agreed systems should ensure that all children are given the same care and understanding in our school.

Purpose
This policy;

1. Gives clear structures and guidelines to all staff regarding all areas of first aid

2. Clearly defines the responsibilities of all staff

3. Enables staff to see where their responsibilities end

4. Ensures good first aid cover is available in the school and on visits.

Guidelines
New staff are given access to this policy when they are appointed. As part of the induction process new staff are given details of the first aiders in school, are trained in accident reporting and shown where first aid supplies are stored. This policy is annually reviewed and updated.

Conclusion
The administration and organisation of fist aid provision is taken very seriously at Circles Alternative Education Ltd. There are annual procedures that check on the safety and systems that are in place in this policy. The school takes part in the annual Health and Safety checks by Essex County Council.

Guidelines
At Circles Alternative Education Ltd, we ensure that there is at least one emergency first-aid trained member of staff in school at all times (during the school day and extended school day). This is to ensure that all areas of the school have at least one competent person present; with sufficient 'spare' to cover off-site visits, part-time staff and as far as possible staff absences. For each break-time the school has nominated first aiders. When children are taking part in off-site visits, we ensure that a first aider accompanies all groups. Staff are expected to identify this member of staff when planning any visits. During activities outside of the school day (after school clubs), there is always a designated first-aider onsite.

Training
All staff are offered emergency first-aid training. New staff members are offered training as part of their induction process. The school keeps a register of who is first-aid trained and when their training is valid till. The headteachers are responsible for organising first-aid training. The headteacher is first aid trained.

Roles and Responsibilities

The main duties of a first aider in school are:

• To complete a training course approved by the Health and Safety Executive, as required.

• To give immediate help to casualties with common injuries and those arising from specific hazards at school

• When necessary, ensure that an ambulance or other professional medical help is called.

Appointed Persons

The headteachers are the appointed persons within the school to take charge when someone is injured or becomes ill and call the emergency services if required. In the absence of the headteacher the senior teachers will carry out this role.

First Aid Facilities

The 'team room' is the schools designated medical room. The school has six first-aid boxes. The main medical cabinets which includes an eye wash station can be found in the office. The school has two travelling first-aid containers used for off-site visits. These are kept in the office and on the minibuses.

Accident and Injury Reporting

All first-aid incidents should be recorded in the first-aid record book. Wherever possible staff should speak to the parent/carer concerned. When this is not possible a slip should be completed and sent home. Where a child has a serious injury or injury to the head, the staff member should inform the headteacher or senior teacher who will decide whether parents should be contacted immediately. All serious injuries should be reported to the headteacher or senior teacher. This is completed in the office.

Calling the emergency services

In the case of major accidents, it is the decision of the headteacher/senior teacher if the emergency services are to be called. If a member of staff is asked to call the emergency services, they must,

1. State what has happened
2. The child's name
3. The age of the child
4. Whether the casualty is breathing and/or unconscious
5. The location of Circles Alternative Education Ltd.

In the event of the emergency services being called, a member of the Admin staff OR another member of staff, should wait by the school gate and guide the emergency vehicle. If the casualty is a child, their parents should be contacted immediately and give all the information required. If the casualty is an adult, their next of kin should be called immediately. All contact numbers for children and staff are clearly located in the school office.

Staff Grievance Policy & Procedure

Created: March 2016   Reviewed: Annually   To be reviewed again: Nov 2024

SCOPE

The grievance procedure is intended as the tool by which a member of staff may formally have a grievance, regarding any condition of their employment, heard by the management of the Company. The aggrieved employee has the right to representation by a colleague.

In the event of a member of staff wishing to raise a grievance, it is preferable for the grievance to be satisfactorily resolved as close to the individual and their line manager as possible. It is understood however that this is not always possible and that a formal procedure is required to ensure the swift and fair resolution of matters which aggrieve employees.

Time scales have been fixed to ensure that grievances are dealt with quickly, however these may be extended if it is agreed upon by both parties.

This procedure is not intended to deal with Dismissal or disciplinary matters which are dealt with under the Disciplinary and Dismissal Policy and Procedure.

An employee who has a grievance, should raise the matter with his or her manager immediately via email. If the matter itself concerns the employees' immediate manager, then the grievance should be taken to their superior.

GRIEVANCE HEARING

If the manager is unable to resolve the matter at that time, the manager will then arrange a grievance hearing to be held within **2 working weeks** (i.e. the managers normal working days).

A Grievance Hearing will be held, chaired by the manager, during which the full details of the grievance will be discussed. At this meeting the employee has the right to a representative in the form of a colleague.

The manager will then carry out any relevant investigation, including gathering statements from colleagues involved, and respond to the employee.

The response will give a full written explanation of the mangers decision and who to appeal to if still aggrieved.

APPEAL

If the employee remains aggrieved, they should follow the appeals policy, and direct this towards a director. This appeal must be made in writing, enclosing a copy of the original grievance letter, to the director.

The Director will arrange to hear the appeal and respond formally with a full explanation **within 20 working days**.

Health and Safety Policy

Created: March 2016
Reviewed: Annually
To be reviewed again: Nov 2024

This is the Health and Safety Policy Statement of

Circles Alternative Education Ltd

Management recognises and accepts its responsibility to ensure, so far as is reasonably practicable, the health and safety of all its employees, contractors, visitors and those members of the public who may be affected by the centre's activities.

It is the centre's aim to promote, set and maintain the highest standards for health, safety and welfare matters. This will be achieved by:

- providing adequate control of the health and safety risks arising from the work activities;
- consulting with employees on matters affecting health and safety;
- providing and maintaining safe equipment;
- ensuring safe handling and use of substances;
- providing information, instruction and supervision for employees;
- ensuring all employees are competent to do their tasks;
- preventing accidents and cases of work-related ill health;
- maintaining safe and healthy working conditions;   and
- reviewing and revising this policy as necessary at regular intervals.
  Health and Safety at Work etc. Act 1974

Circles Ltd. will endeavour to eliminate any hazards which may result in personal injury, illness, fire, security losses, property damage or harm to the environment.

Signed: ....

Alex Stone & Brad Kaylor (on behalf of Circles Alternative Education Ltd.)

1. Responsibilities

The responsibility for health and safety rests with everyone, from senior management through to each individual member of staff. This section sets out the responsibilities under this policy.

1.1   Overall and final responsibility for health and safety within the centre is that of:

Alex Stone & Brad Kaylor

1.2   To ensure health and safety standards are maintained / improved, the following people are responsible for ensuring that all activities under their control are carried out in accordance with the centre's health and safety policy, standards and safe working procedures; and in compliance with statutory provisions:

Brad Kaylor

1.3   Employees have legal duties under the Health and Safety at Work etc. Act 1974. In particular, they must:

- co-operate with management on health and safety matters;

- take reasonable care for their own health and safety and that of others who may be affected by their acts or omissions at work;

- co-operate, so far as is necessary, to enable any duty or requirement imposed on the centre by or under any of the relevant statutory provisions, to be performed or complied with;

- not intentionally or recklessly interfere with or misuse anything provided in the interest of health, safety or welfare in pursuance of any of the relevant statutory provisions;

Failure to comply with these requirements may lead to both disciplinary action being taken by the centre and prosecution by the Health & Safety Executive (HSE).

2. Health & Safety Risks Arising From Our Work Activities

Under the <u>Management of Health and Safety at Work Regulations 1999</u>, the centre has a duty to assess risks to the health and safety of anyone who may be affected

by their work activities. It is the centre's policy to ensure that no-one is put at risk from any activities under its control.

2.1 Risk assessments will be undertaken by Brad Kaylor in consultation with NFU Mutual Risk Management Services Limited.

2.2 The findings of the risk assessments will be reported to all relevant members of staff.

2.3 Action required to remove / control risks will be approved by Brad Kaylor.

2.4 Brad Kaylor and Alex Stone will be responsible for ensuring the action required is implemented.

2.5 Alex Stone will check that the implemented actions have removed the hazards or reduced the risks to an acceptable level.

2.6 Assessments will be reviewed annually or when work activity changes, whichever is soonest.

3. Consultation with employees

Under the Health and Safety (Consultation with Employees) Regulations 1996 the centre has a duty to consult employees either directly or through elected representatives on matters relating to health and safety.

3.1 The centre's Employee Representatives to whom staff can address any safety related queries, are Brad Kaylor and Alex Stone.

4. Safe plant and equipment

Under the Provision and Use of Work Equipment Regulations 1998 and Lifting Operations and Lifting Equipment Regulations 1998, the centre has a duty to ensure that all plant and equipment that requires maintenance (including statutory testing) is identified and that the maintenance work is undertaken.

4.1 Matt Kinsella will be responsible for identifying all equipment / plant needing maintenance (e.g. portable electrical appliances, vehicles, etc.).

4.2 Brad Kaylor will be responsible for ensuring effective maintenance procedures are drawn up.

4.3 Matt Kinsella will be responsible for ensuring that all identified maintenance is implemented.

4.4 Any problems found with plant / equipment should be reported to Brad Kaylor or Alex Stone or Matt Kinsella.

5. Safe Handling & Use of Substances

Under the Control of Substances Hazardous to Health Regulations (COSHH) 2004, the centre has a duty to assess the risks from both hazardous substances that are used (e.g. chemicals, solvents, paints, oil, etc.) and hazardous substances generated from work activities (e.g. dust, fume, vapour, etc.).

5.1 Matt Kinsella will be responsible for identifying all substances that need a COSHH assessment, will be responsible for undertaking COSHH assessments, and will also be responsible for ensuring that all actions identified in the assessments are implemented.

5.2 Assessments will be reviewed annually or when the work activity changes, whichever is soonest.

6. Information, Instruction & Supervision

The Health and Safety (Information for Employees) Regulations 1989 require the centre to display a poster telling employees what they need to know about health and safety.

6.1 A copy of the HSE's Health and Safety Law poster is displayed on the notice board.

6.2 Health and safety advice is available from the HSE, telephone 0845 345 0055.

6.3 Supervision of trainees will be arranged / undertaken / monitored by Brad Kaylor, Alex Stone and Matt Kinsella.

7. Competency for Tasks & Training

The law requires an employer to provide appropriate information, instruction and training regarding health and safety at work. This is to enable employees to work safely for the benefit of themselves and others.

7.1 Induction training will be provided for all employees by Brad Kaylor and Alex Stone.

7.2 Job specific training will be provided by Alex Stone and Matt Kinsella, together with experienced workers.

7.3 The following tasks must only be carried out by specifically authorised employees, who will normally have successfully completed a special training course. This is because the tasks are either potentially hazardous or legislation demands authorised persons only:

- tractor driving;
- handling and using chemicals;
- animal handling;

All other employees are strictly forbidden from carrying out the above tasks unless supervised by a suitably qualified person.

7.4 Employees operating the centre's vehicles must hold the appropriate class of licence and be specifically authorised, for a particular vehicle, by management. All employees must have signed the vehicle agreement contract.

7.5 Training records are kept by Alex Stone and Matt Kinsella who will identify, arrange and monitor any necessary training.

If an employee does not understand any matter relevant to their health and safety at work, or consider that they have not received adequate information, instruction or training, they must report the matter to Management.

8. Accidents, First aid & Work-Related Ill health

The centre will ensure, so far as is reasonably practicable, that all accidents and dangerous occurrences are reported internally and, where appropriate, to the enforcing authority. In addition, all accidents and dangerous occurrences will be investigated and reasonable measures put in place to prevent recurrence.

8.1 All accidents, cases of work-related ill health and dangerous occurrences are to be reported to Brad Kaylor or Alex Stone or Matt Kinsella without delay. Details of the incident will be recorded in the accident book which is located in the Farm Managers Office. Brad Kaylor is responsible for periodically analysing the accident book for signs of trends.

8.2 Brad Kaylor and Alex Stone are responsible for undertaking investigations following accidents, dangerous occurrences and work related ill health / absence.

8.3 Brad Kaylor is responsible for acting on investigation findings to prevent a recurrence.

8.4   Brad Kaylor and Alex Stone are responsible for reporting notifiable accidents, diseases and dangerous occurrences to the enforcing authority, as required by the <u>Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 1995</u>.

8.5   First aid kits are located in the various locations throughout the centre. If a first aid kit is required in a certain area this is to be arranged by Wayne Bryan.

8.6   The appointed first aid persons are all Staff that have completed 'Emergency First aid training at work' (Please See CPD Chart Sugar Sync).

Wayne Bryan is responsible for ensuring that first aid boxes are regularly stocked with approved first aid material.

8.7   It is the centre's policy to do everything that is reasonably practicable to reduce the risk of work-related stress. If any member of staff feels that they are suffering from excessive pressure, anxiety or other symptoms of stress, they should speak, in strictest confidence, to management.

Help and support is available from **The Samaritans,** 08457 909090, (24 hours a day)

9.   Emergency Procedures – Fire & Evacuation

9.1   Brad Kaylor is responsible for ensuring the Fire Risk Assessment is undertaken and implemented.

9.2   Escape routes are regularly checked by Brad Kaylor,Alex Stone and Matt Kinsella.

9.3   Fire extinguishers are maintained and checked on an annual contract.

9.4   The emergency evacuation procedures will be tested every 6 months.

10. Areas of Risk

There are several situations that may present a risk to health and safety. The main areas of risk are listed below:

- falls from height;
- transport;
- contact with machinery or material being machined;
- struck by moving or falling objects;
- contact with electricity or an electrical discharge;
- slip, trip or fall on same level;

- exposure or contact with hot / harmful substance;
- fire and explosion;
- occupational health.

To help reduce the risk of injury or exposure, the centre has produced Safe Working Procedures for a variety of the hazardous tasks that are undertaken. All employees should read and follow the guidance detailed in these documents.

11. Monitoring & Reviewing

To ensure that the centre's commitment to managing health, safety and welfare in the workplace is actively pursued, Brad Kaylor will examine the implementation of this policy by performing regular safety audits and inspections of the premises and work activities. In addition, this policy, together with its associated arrangements, will be reviewed annually or when work activity changes, whichever is soonest.

If you are unsure about any issues raised in this policy, please inform management **IMMEDIATELY**. Do not take chances.

IF IN DOUBT - ASK !

Inducements, Gifts and Favours Register

Name of supplier and/or contact name	Gift / Benefit / Favour received	Employee Name	Date received / attended	Authorised signature	Date authorised

Please return to: Alex Stone or Brad Kaylor

Information Sharing Policy

Created: March 2015   Reviewed: Annually   To be reviewed again: Nov 2024

Safeguarding and Welfare Requirements: Providers must maintain records and obtain and share information to ensure the safe and efficient management of the setting, and to help ensure the needs of all children are met.

'*Practitioners need to understand their organisations position and commitment to information sharing. They need to have confidence in the continued support of their organisation where they have used their professional judgement and shared information professionally.*'

Information Sharing Guidance: Guidance for Practitioners and Managers

Policy Statement

At Circles Alternative Education Ltd, we recognise that parents have a right to know the information they share with us will be regarded as confidential, as well as to be informed about the circumstances when and the reasons why, we are obliged to share information.

We are obliged to share confidential information without authorisation from the person who provided it, or to whom it relates, if it is in the public interest. That is when:

• it is to prevent a crime from being committed or to intervene where one may have been, or to prevent harm to a child or adult; or • not sharing it could be worse that the outcome of having shared it. The decision should never be made as an individual, but with the back-up of the management team.

The three critical criteria are: • Where there is evidence that a child is suffering, or at risk of suffering, significant harm. • Where there is reasonable cause to believe that a child may be suffering, or is at risk of suffering significant harm. • To prevent significant harm arising to children and young people or adults, including the prevention, detection and prosecution of serious crime.

• Our procedure is based on the seven golden rules for information sharing as set out in Information Sharing: Guidance for Practitioners and Managers (DSCF 2008).

1. Remember that the Data Protection act is not a barrier to information sharing but provides a framework to ensure that personal information about living persons is shared appropriately. • Our policy and procedures on Information Sharing provide guidance to appropriate sharing of information with external agencies.

2. Be open and honest with the person (and/or their family where appropriate) from the outset and why, what, how and with whom information will, or could, be shared, and seek their agreement, unless it is unsafe or inappropriate to do so. In our nursery we ensure parents: • receive information about our Information Sharing Policy when starting their child in the nursery and that they sign our Registration Form to say that they understand the circumstances in which information may be shared without their consent. This will only be when it is a matter of safeguarding a child or vulnerable staff; • have information about our

Safeguarding and Children Protection Policy; and • have information about the other circumstances when information will be shared with external agencies, for example, with regard to any special needs the child may have or transition to school.

3. Seek advice if you are in doubt, without disclosing the identity of the person where possible. • Contact Essex Safeguarding Children Board / Social Care for advice where they have doubts or are unsure.

4. Share with consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in the judgement, that lack of consent can be overridden in the public interest. You will need to base your judgements on the facts of the case. • Guidelines for consent are part of this procedure.

5. Consider safety and well-being: Base you information sharing decisions on considerations of the safety and well-being of the person and others who may be affected by their actions. In our nursery we: • records concerns and discuss these with the nursery's designated person(s) for child protection matters; • record decisions made and the reasons why information will be shared and to whom; and • follow the procedures for reporting concerns and record keeping.

6. Necessary, proportionate, relevant, accurate, timely and secure. Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with the people who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely. • Our Safeguarding Children and Child Protection Policy and Children's Records Policy set out how and where information should be recorded and what information should be shared with another agency when making a referral.

7. Keep a record of your decision and the reasons for it – whether it is so share information or not. If you decide to share, then record what you have shared, with whom and for what purpose. • Where information is shared, the reasons for doing so are recorded in the child's file; where it is decided that information is not be to be shared that is recorded too. Consent Parents have a right to be informed that their consent to share information will be sought in most cases, as well as the kinds of circumstances when their consent may not be sought or their refusal to give consent may be overridden. We do this as follows: • Our policies and procedures set out responsibility regarding gaining consent to share information and when it may not be sought or overridden. • We may cover this verbally when the child starts or include this in our prospectus. • Parents sign our Registration Form at registration to say they understand this. • Parents are asked to give written consent to share information about any additional needs their child may have, or to pass on child development summaries to the next provider/school. • Copies are given to parents of the forms they sign.

We consider the following questions when we need to share: Is there legitimate purpose to sharing the information? - Does the information enable to person to be identified? - Is the information confidential? - If the information is confidential, do we have consent to share? - Is there a statutory duty or court order requiring us to share the information? - If consent is refused, or there are good reasons not to see consent, is there sufficient public interest for us to share information? - If the decision is to share, are we sharing the right information in the right way? - Have we properly recorded our decision? All of the undertakings above are

subject to the paramount commitment of the nursery, which is to the safety and well-being of the child.

Please see our Safeguarding Children and Child Protection Policy.

Legal framework: Data Protection Act (1998) | Human Rights Act (1998)

Lone Working Policy

Created: March 2016   Reviewed: Annually   To be reviewed again: Nov 2024

School Ethos

Circles Alt Ed is committed to ensuring that staff, volunteers and contractors enjoy a safe working environment. It is recognised that there are occasions when teaching, support, administrative, grounds or cleaning staff may be required, or choose, to work alone or in isolated situations. This, however, may introduce risks for a normally non-hazardous work activity.

Lone working

For the purposes of this policy, lone working will be defined as a situation where staff are engaged in work (either outdoors or indoors) where there are no other people who could reasonably be expected to come to their immediate aid in the event of an incident or emergency.

Within Circles Alt Ed, there are various work activities that may result in staff members working alone; for example:

1. Staff that are required to work alone for all or most of the time, such as cleaning staff working at night or early morning.
2. Staff staying on to finish urgent work after others have left, or those who regularly work late or start early, before anyone else gets into the building.
3. Staff who are key-holders or who are left to turn out the lights, set the alarm and lock up the premises after everyone else has gone home.
4. Peripatetic workers whose work involves travelling or home visits to service users.
5. Staff on home visits alone e.g. Parent Support Advisor

Risk Assessment

It is the responsibility of the Health and Safety Co-ordinator together with the Head Teacher to ensure that an annual Health and Safety and Risk Assessment is undertaken and that members of staff are aware of the content of this, as well as the risks of Lone Working. The risk assessment will take into account the type of tasks undertaken, the environment, health and safety instruction and training received in addition to the individual's medical history. Hazards identified will be evaluated by the Health and Safety Co-ordinator for the likelihood of the hazard causing harm. Measures will be introduced if the assessment shows that existing precautions are inadequate to eliminate or adequately control the hazard. The risk assessment will be subject to review to ensure it is relevant and current to the workings of the school.

Contractors will be given the opportunity by the Health and Safety Co-ordinator to complete a Lone Working Risk Assessment as necessary and receive the appropriate Health and Safety information.

Protocol

Staff should seek the permission of the Head Teacher to work alone in the building outside of normal school hours. The experience and training of staff and the activities to be undertaken will be taken into consideration before allowing lone working. Whenever possible it is recommended that staff work with a colleague and ensure that they are aware if they are to be in a lone working situation, for example if a colleague had previously been on site but had

Mission Statement

Circles Alternative Education strives to engage young people in learning through vocational team work and social development.

Ethos

Circles Alt Ed C.I.C Ltd is a community interest company committed to providing a happy, caring and safe learning environment for all, where they feel valued and are able to grow in confidence and independence.

We promote Happiness through a creative, exciting and practical curriculum, which generates a love of, and interest in, learning. Great value is placed on pupils' self-esteem which is developed through a well-motivated attitude to learning, a healthy lifestyle, good social skills, self-discipline and a positive self-image.

We promote the highest standards of achievement in all areas of the curriculum and help all pupils to fulfil their potential regardless of gender, race or ability. We foster respect for all by establishing good relations between the school, home and community. Pupils are taught respect for themselves, others and the environment.

We teach our students to take responsibility for their actions, belongings and school community. We encourage truth and honesty in all aspects of school life - relationships, work and the curriculum. We develop spirituality so that calm, quiet, reflective times are part of school life and the beauty of the environment is appreciated.

Created: March 2016   Reviewed: Annually   To be reviewed again: Nov 2024

Circles Alt Ed C.I.C Ltd

Team Structure

SLT

- Alex Stone – Director   DSL, CP & CSE Champion, I
- Brad Kaylor – Director   Deputy DSL, CP
- Matthew Kinsella - Farm Manager   Deputy DSL, CP

SLT Senior Leadership Team
DSL Designated Safeguarding Lead
CP Child Protection
CSE Child Sexual Exploitation

Admin / Secretarial / Operational Staff

- Bee McMillan   Operations Admin   Exams & Attendance Officer

- Justine Carr   Operations Admin   Quality Nominee / IV / Assessor
                                          (FS BTEC)

Delivery Staff

- Nicky Masters   Group Leader

- Kes Shearer   Group Leader   Assessor (VS)

- Chris Martin   Group Leader   Assessor (Trades)

- Fez Sackett   Group Leader

- Melissa Harris   Group Leader   Assessor (H&B)

- James Lister   Group Leader

- Georgia Stone   Head Chef

- John Ford   Group Leader

- Tegan Joyce   Group Leader   Assessor (VS)

- Bee McMillan   Group Leader   Assessor (VS)

- Hazel Rodda   Group Leader

- Ryan Morrant   Group Leader   Assessor (VS)

- Bex Smollett   Group Leader

Produced March 2016   *Review as required, if not November 2024*

Password Policy

Created: March 2016   Reviewed: Annually   To be reviewed again: Nov 2024

Overview

This policy is intended to establish guidelines for effectively creating, maintaining, and protecting passwords at Circles Alt Ed Ltd.

Scope

This policy shall apply to all employees, contractors, and affiliates of Circles Alt Ed Ltd, and shall govern acceptable password use on all systems that connect to Circles Alt Ed Ltd network or access or store Circles Alt Ed Ltd data.

Password Creation

1. All user and admin passwords must be at least [8] characters in length. Longer passwords and passphrases are strongly encouraged.
2. Where possible, password dictionaries should be utilized to prevent the use of common and easily cracked passwords.
3. Passwords must be completely unique, and not used for any other system, application, or personal account.
4. Default installation passwords must be changed immediately after installation is complete.

Password Aging

1. User passwords must be changed every 3 months. Previously used passwords may not be reused.
2. System-level passwords must be changed on a quarterly basis.

Password Protection

1. Passwords must not be shared with anyone (including coworkers and supervisors), and must not be revealed or sent electronically.
2. Passwords shall not be written down or physically stored anywhere in the office.
3. When configuring password "hints," do not hint at the format of your password (e.g., "zip + middle name")
4. User IDs and passwords must not be stored in an unencrypted format.
5. User IDs and passwords must not be scripted to enable automatic login.
6. "Remember Password" feature on websites and applications should not be used.
7. All mobile devices that connect to the company network must be secured with a password and/or biometric authentication and must be configured to lock after 3 minutes of inactivity.

Enforcement

It is the responsibility of the end user to ensure enforcement with the policies above.
If you believe your password may have been compromised,
please **immediately** report the incident to Alex Stone and change the password.

Promotion of Good Behaviour and Sanctions for Misbehaviour

Created: March 2016   Reviewed: Annually   To be reviewed again: Nov 2024

All members of the Circles community - pupils, staff, parents and apprentices are expected to contribute to the creation of a stimulating and caring environment where boys and girls are encouraged to realise their potential.

The Pupil's Code of Conduct

We have the **Right:**

~ to be able to study and learn effectively in both academic and co-curricular pursuits
~ to feel happy and safe in the circles environment
~ to be able to express our opinions, and to be listened to.

We should show **Respect:**

~ for fellow pupils, staff and visitors
~ for the circles environment and all wildlife
~ for other people's property and privacy.

We have **Responsibilities:**

~ to know and promote circles rules
~ to work hard and encourage/support others to do the same
~ to be punctual
~ to help others and to respect their rights
~ to behave responsibly when representing circles in the community
~ to be polite and co-operative.

We are each responsible for thinking through the implications of this Code of Conduct for ourselves. For example: **Helping others**: we should be prepared to prevent or report bullying.

Respect for others: we should conduct ourselves sensibly and appropriately at School, for example by considerate behaviour in corridors/stairs/stables/enclosures, and avoiding public displays of affection and behaviour likely to cause embarrassment or offence.

Respect for the Circles environment: we should keep it tidy, and free from litter and damage.

Ground Rules:
~ We have the right to learn in our sessions. We have the responsibility not to ridicule others for the way they learn and not to disturb the learning of other pupils.
~ We have the right to be treated with respect by everyone at Circles. We have the responsibility to respect all others and their property within the classroom.
~ We have the right to express relevant opinions and be heard. We have the responsibility to allow others to be heard.

Discipline & Sanctions

Pupils are expected to	Sanctions that may help encourage good behaviour	Staff are expected to
Be prompt and fully prepared for all aspects of circles and it's duties.	Up to five minutes of verbal encouragement and correction Further or repeated failure – pass on to 'Floating' staff member.	Take attendance register promptly at 9.30am registration and check up on absentees as soon as possible.
Behave well in sessions. This includes: Being absolutely quiet when told Keeping quiet while others are talking Not swear or spit Making a good effort with set work and co-operating in keeping the noise level to that required by the group leader	Unacceptable behaviour should be dealt with in the following order of increasing seriousness: Mild rebuke/encouragement Calm, authoritative order If appropriate, suggest a move to another area of the site and set an individual task Continued disobedience, if not too disruptive, may be left to the end of the session when the pupil must be left in no doubt of the unacceptability of the behaviour and a warning/incident report should be given. If the poor behaviour threatens the work of the remainder of the group, the pupil is warned that unless	Be prompt, fully prepared with the first activity and aim to have the group doing something quickly. Deal with trouble as soon as it appears. Have a variety of activities available if one does not appear to be working. **Not** to use the ultimate sanction of sending a pupil to a senior colleague lightly. This should be a rare occurrence and we will be expected to explain the approaches that were unsuccessful.

	there is an immediate improvement then (s)he will be sent to a senior member of staff. A failure to report would increase the severity of the offence still further. School/Centre will be informed as soon as possible.	
Make notes on their daily write up sheets and hand it in at the appointed time	Occasional lateness and the occasional failure to take part should be met with the very firm reminder that this put in place to improve progress/complete the qualification and that the latter will be hampered if this is not done. A second failure following upon the first leads to a report to school or centre. If there is still no improvement the group leader should ask Directors to arrange a meeting/for parents to come in.	Mark and return routine work by the next week's session Projects and coursework will usually require longer.
Behave responsibly and sensibly around circles at all times. This includes keeping hands and feet to oneself, voices and language under control, walking and putting litter in the proper bins.	Failure to curb unreasonably boisterous or dangerous behaviour will usually result in some form of constructive service such as litter collection. More serious sanctions may, however, be appropriate.	Challenge and stop such behaviour. Report such behaviour to Directors.
Treat each other, staff and visitors with courtesy and respect. Take no part in bullying. Report any bullying to a member of staff.	Bullying will be dealt with in accordance with the circles' anti-bullying policy.	Be constantly on the lookout for any form of bullying. Be conversant with the Circles policy on it. Follow up vigorously any suggestions of indications of its occurrence.

Provision Policy

Aims of the Provision

- To provide a secure and reliable small class setting where children can learn by re-experiencing nurturing from adults who actively work towards enabling their successful integration into their mainstream class.

- To help children learn to behave appropriately, use their curiosity constructively, improve self-esteem and develop confidence through close and trusting relationships with adults.

- To provide on-going assessment and support for children showing signs of emotional stress and behavioural difficulties with the aim of enabling the child to access the curriculum and participate fully in school life.

- To work in partnership with class teachers, outside agencies other settings and parents to develop and plan a consistent approach to be used both at school and at home.

Six Principles for Enhanced Provision

- Children's learning is understood developmentally

We respond to all our children not in terms of arbitrary expectations about 'attainment levels' but in terms of the children's developmental progress assessed through the Boxall Profile. The response to the individual child is 'as they are', underpinned by a non-judgemental and accepting attitude.

- The setting offers a safe base

The provision setting offers a balance of educational and domestic experiences aimed at supporting the development of the children's relationship with each other and with the staff. The setting is organised around a structured day with predictable routines. Great attention is paid to detail; the adults are reliable and consistent in their approach to the children. The provision makes an important link between emotional containment and cognitive learning.

- The setting is important for the development of self-esteem

The setting involves listening and responding, 'everything is verbalised' with an emphasis on the adults engaging with the children in reciprocal shared activities e.g. play / meals / reading /talking about events and feelings. Children respond to being valued and thought about as individuals, so in practice this involves noticing and praising small achievements; 'nothing is hurried'.

- Language is understood as a vital means of communication

Language is more than a skill to be learnt, it is the way of putting feelings into words. The children in the setting often 'act out' their feelings as they lack the vocabulary to 'name' how they feel. The informal opportunities for talking and sharing, e.g. welcoming the children into the group or having breakfast together are as important as the more formal lessons teaching language skills. Words are used instead of actions to express feelings and opportunities are created for extended conversations or encouraging imaginative play to understand the feelings of others.

- All behaviour is communication

This principle underlies the adult response to the children's often challenging or difficult behaviour. 'Given what I know about this child and their development what is this child trying to tell me?' Understanding what a child is communicating through behaviour helps staff to respond in a firm but non-punitive way by not being provoked or discouraged. If the child can sense that their feelings are understood this can help to diffuse difficult situations. The adult makes the link between the external / internal worlds of the child.

- Transitions are significant in the lives of children

The setting helps the child make the difficult transition from home to school. However, on a daily basis there are numerous transitions the child makes, e.g. between sessions and classes and between different adults. Changes in routine are invariably difficult for vulnerable children and need to be carefully managed with preparation and support.

Equal Opportunities (please refer to equal opportunities policy)
Teaching strategies and material should:
- ensure equal access to the curriculum for all
- ensure sensitive treatment of gender and ethnic and religious issues and avoid stereotyping.

Confidentiality
Whilst every effort is made to ensure that discussion with pupils and parents are confidential total confidentiality cannot be guaranteed as we are primarily concerned with the welfare of the pupils and are obliged to follow child protection procedures.

Staff Training
Staff needs will be identified, and appropriate training will be given either as in-service training or through courses given by outside agencies.

Health and Safety
Promote healthy lifestyles, choices and attitudes in all. To follow the school's rules and to follow the school's policies for behaviour, discipline, teaching and learning.

Created: March 2016   Reviewed: Annually   To be reviewed again: Nov 2024

Quality Assurance Policy

Created: March 2016
Reviewed: Annually
To be reviewed again: Nov 2024
By: Alex Stone

Purpose of the Policy

To ensure that internal verification is valid, reliable and covers all assessors and programme activity.

To ensure that the internal verification procedure is open, fair and free from bias.

To ensure that there is accurate and detailed recording of internal verification decisions.

In order to do this, the centre will ensure that:

• A lead internal verifier is accredited by Edexcel/VTCT/AQA/ASDAN
• Each lead internal verifier oversees effective internal verification systems within each principal subject area.
• Staff are briefed and trained in the requirements for current internal verification procedures.
• Effective internal verification roles are defined, maintained and supported
• Internal verification is promoted as a developmental process between staff
• Standardised internal verification documentation is provided and used
• All centre assessment instruments are verified as fit for purpose
• An annual internal verification schedule, linked to assessment plans, is in place
• An appropriately structured sample of assessment from all programmes, sites and teams is internally verified, to ensure centre programmes conform to national standards and standards verification requirements
• Secure records of all internal verification activity are maintained
• The outcome of internal verification is used to enhance future assessment practice.

Relationships & Behaviour Policy

Created: March 2016   Reviewed: Annually   To be reviewed again: Nov 2024

Circles is Trauma–Perceptive Trained:

Circles have undertaken the Essex approach to understanding behaviour and supporting emotional wellbeing known as Trauma Perceptive Practice (TPP). This Essex wide approach enables us to better understand behaviour and emotional wellbeing and support young people to reach their full potential.

Principles of support:

- A focus on nurture (relationships and trust building)
- A focus on structure (strong routines and boundaries)
- An environment which supports and promotes co-regulation
- An understanding by all of how our brains work and a desire to be curious about behaviour including our own.
- Access to a needs-led provision and targeted support
- Use of educational and protective consequences rather than 'punishments'
- A strong support network for staff.

Strategies and interventions used to promote behaviour at Circles

- Expectations of behaviour are discussed on induction.
- All staff are consistent when responding and applying consequences to difficult or unsafe behaviour.
- All staff have access to information about each pupil, both on file and on the Circles register and attendance system, and are expected to read and update it.
- Reviews are held regularly for all pupils. Parents and Carers attend alongside any other relevant agencies. Areas in need of attention and support are shared with all relevant staff.
- Engagement mentors support pupils with their behaviour and emotional issues, and liaise with outside agencies both inside and outside lessons.
- Individual counselling and/or mentoring is available for all pupils.
- All information on a pupil is recorded by all staff on the Circles register and attendance system.
- Any pupil who has an EHC plan is taught according to the plan. Annual reviews are arranged and attended.
- A log is kept of any incidents of bullying, racist or violent incidents and any actions taken and of reviews of the action. These are reported to SLT.

In addition, all staff act as positive role models, by setting a good example at all times.

Rewards

Circles believe in promoting discipline and an internal motivation in young people to be successful.

However, we do use rewards when pupils do particularly well in:

- Being positive; trying their best
- Being supportive of others
- Respecting others; respecting their learning environment

Good or improved attendance Examples of rewards:

- Positive comments by staff
- Showing good work/sharing compliments of behaviour to senior staff
- Sending home copies of work that has been praised
- Sharing successes on social media
- Positive contact with home
- Certificates
- Vouchers
- 'Free choice' of activity
- Trips

Challenging Behaviour:

At times, it is acknowledged that some pupils may display difficult or unsafe behaviours. In such circumstances, approaches will be in proportionate to the harm that could be caused and to the needs of the young person. It is important to acknowledge that it is the behaviour, not the pupil, which is being challenged.

All staff challenge low level poor behaviour by describing the behaviour they expect to see:

Examples:

"Xavier, we use polite language, thanks"
"Xavier, we walk in the corridors, thank you"
We use the pupils name to add a sense of significance and responsibility.
We use the term "we" to add a sense of belonging.

We describe the desired behaviour to ensure the pupil is clear on our expectations and on what we expect them to do.
We end in "thanks" or "thank you" as staff always treat pupils with respect.

Physical interventions and the use of force:

At Circles "physical force" will never be used to force compliance and will only be used as a last resort and when all other strategies have been tried or considered.

There are occasions when staff will have cause to make physical contact with pupils for a variety of reasons, for example:

- to comfort a pupil in distress (so long as this is appropriate to their age);
- to praise a pupil
- to gently direct a pupil
- for curricular reasons (for example in games such as tag etc.)
- in an emergency to avert danger to the pupil/pupils or staff
- in rare circumstances, when Restrictive Physical Intervention is warranted.

"Restrictive Physical Intervention" is the term used to describe interventions requiring the use of "reasonable physical force" to control or manage a child's behaviour.

Staff at Circles receive training on using Restrictive Physical Interventions by trained staff. Refresher training is delivered annually.

- The use of force can only be regarded as *reasonable* if the circumstances of an incident warrant it; i.e. it is absolutely *necessary*.
- The degree of force must be in *proportion* to the circumstances of the incident, age and understanding of the child and the seriousness of the consequences or harm it is intended to prevent.

Situations that may require a Restrictive Physical Intervention:

- To prevent a child from injuring themselves or others
- To prevent a child from committing a criminal offence
- To prevent or stop a child from causing serious damage to property *(including the child's own property)*

Restrictive Physical Interventions are only used as an act of care and control, **not** to force compliance. All staff are responsible for the safeguarding of our children and therefore all staff are authorised by the head teacher to use

physical force (which is deemed reasonable, proportional and necessary) to keep our pupils safe
We also take the view that staff should not be expected to put themselves in danger and that removing other children and themselves from risky situations may be the right thing to do.

All staff have Continual Professional Development in co-regulation and managing challenging situations, and the use of force.

All Restrictive Physical Interventions that take place at Circles are recorded.

All complaints or disputes which arise about the use of force by a member of staff will be dealt with according to our Child Protection and Safeguarding policy.

Bullying:

We promote respect for others, including respect for different ethnic, religious and cultural backgrounds as well as sexuality and gender.

Bullying is any behaviour which is perceived by the targeted individual or any other person, as intending to hurt, intimidate, frighten, harm or exclude.

Bullying is not tolerated.

Any reports of bullying are taken seriously and all incidents are recorded. Incidents are investigated with the aim that matters should be resolved as quickly as possible.

Circles follow all guidance within the Equality Act 2010: guidance - GOV.UK (www.gov.uk)

Prevention of bullying

We encourage a positive approach to the prevention of bullying through cross-curricular activities, particularly in our social sessions duing break times and afternoons.

We provide opportunities to:

- Encourage children to talk about their feelings:
- Promote understanding of friendship through co-operative work/play situations in and out of the classroom
- Maintain a consistent approach to unacceptable behaviour by all members of staff.

- Treat all children fairly and equally (which sometimes means treating them differently)
- Praise positive behaviour through the school's reward system.
- Teach children to know what is acceptable/unacceptable behaviour and why.

Incidents of bullying may be reported by:

- A parent/guardian of a child who is being bullied.
- A child who is being bullied.
- Other children not directly involved in the bullying.
- A member of staff.

Procedures to follow if an incident of suspected bullying is reported:

All claims of bullying will be taken seriously and investigated promptly.
If a suspected incident of bullying is reported to a member of staff, they will ensure that other key staff are informed.
The member of staff should speak to the child/children involved. This may be on an individual or group basis depending on the teacher's/member of staff's interpretation of the incident. The member of staff involved should try to ascertain accurate details by:
- Taking the incident seriously.
- Ensuring the situation is dealt with swiftly and sensitively.
- Listening to **both/all** sides of the reported incident.
- Reassuring the target.
- Making sure that all parties involved understand what behaviour/action is being disapproved of and why.
- Being seen to treat all parties fairly and with a consistent approach.
- Trying to decide on a positive course of action for all parties and for all parties to agree/understand the reasons behind the agreed action to prevent recurrence of unwanted incidents through the implementation of the "No- Blame" approach
- Informing the parents/carers
- Recording the details of the incident and actions
- Reporting data of incidents

Engagement Mentors may be used to work with the children involved and use restorative approaches to resolve the conflict.

All suspected incidents of bullying are reported to a senior manager.

If the reported incident is judged to be bullying then a copy of key details relating to the target(s) and perpetrator must go in the pupils' personal file (MIS). This report should include:

- who was involved (or alleged to be)
- where and when the event(s) happened

- what happened
- what action was taken
- how action was followed up

It must be remembered that both the perpetrator and the target(s) may need help too.

The organisation responds within ten days to any request from a parent to investigate incidents of bullying. In all cases the governing body notifies the Head teacher, and asks him/her to conduct an investigation into the case, and to report back to a representative of the organisation.

The role of pupils:

Pupils are encouraged to tell anybody they trust if they are being bullied, and if the bullying continues, they must keep on letting people know.

Pupils are invited to tell us their views about a range of school issues, including bullying, through pupil perceptions and pupil questionnaires.

Pupils are also encouraged to be positive role models for others within the school community.

The role of parents:

Parents have a responsibility to support the school's anti-bullying policy, actively encouraging their children to be a positive member of the school/community.

Any parents who suspect that their child may be the target of bullying or who believe that their child may be the perpetrator of bullying, should contact their child's class teacher immediately. All cases of suspected bullying will be thoroughly investigated.

If parents are not satisfied with the response from staff, they should contact the appropriate senior manager who will then carry out a further investigation into the incident.

Code of Conduct

To comply with Circles code of conduct for ICT:

I agree that:

1. I will not give out my own personal details such as mobile phone number, personal email address and so on.

2. Images of pupils and/or staff will only be taken, stored and used for professional purposes in line with Circles policy and with written consent of parent/carer or staff member.

3. I will not browse, download, upload or distribute any material that could be considered offensive, illegal or discriminatory.

4. I will comply with the ICT security software and not disclose any passwords.

Please Include:
Name & Address
Concerns
Name Concerns About

Safeguarding at Circles Alternative Education Ltd
South Hill Farm, Ingatestone Road
Stock, Essex
CM4 9PD

Safeguarding Advice

Guidance for adult visitors volunteering or working at Circles Alternative Education Ltd.

Circles Alternative Education Ltd
Strives to keep young people safe
and engaging in Education.

The welfare of our pupils is of the utmost importance to us.

If you have any concerns about a pupil please report to reception and ask to speak to Alex Stone, Brad Kaylor or Matt Kinsella.

If unavailable please write a brief description of your concerns, the pupils name and your contact details. Please leave this with reception staff in a sealed envelope marked 'Private & Confidential' for the attention of a designated safeguarding officer.
Keeping Everyone Safe
Adults visiting or working at Circles Alternative Education Ltd play an important part in the running & organisation of Circles

Whilst on site you may be approached by a child who would like to talk to you about something that is concerning them. You may notice something that concerns you about a child, an unexplained bruise or the physical condition the child is in. To protect you and the child please follow this guidance.

Disclosure of abuse or concern about a child's safety or well-bring. If you are approached by a child wanting to talk, you should listen positively and reassure the child.

Helping the child when abuse is disclosed:

If a child makes a disclosure to you, be prepared to listen and comfort.

Stay calm & controlled.

Do not make false promises e.g. that you will keep this a secret or that no one else need be involved.

Do not question a child, try to limit your involvement to listening.

Report any disclosure immediately to the designated safeguarding officer via the reception area.

Guidance for reporting Information;

You should record your concerns as soon as possible and any note should include the following;

The nature of the concern.

What is the evidence that led to your concern?

What the child said if a discussion took place.

What you did or said in your response.

Please follow this advice and keep yourself and our pupils safe.

Safeguarding Training
Alex Stone – Designated Safeguarding Trained.
Brad Kaylor – Designated Safeguarding Trained.
Matt Kinsella – Designated Safeguarding Trained.
All other staff are Level 2 Safeguarding trained.

Contact Us

Please Include:
Name & Address
Concerns
Name Concerns About
Telephone
Email Address

01277 280 396

info@circlesalted.co.uk

www.circlesfarm.co.uk

Safeguarding Policy
Circles Alt Ed Ltd

Circles Farm, South Hill Farm, Ingatestone Road, Stock CM4 9PD

Circles Basildon, The Old Boiler House, Malyons Place Basildon SS13 1PS

Circles Woodland, East End Lane, East Bergholt, CO7 6XS

Phone 01277 280396

Monitoring and Review

This Policy will be monitored regularly and reviewed in response to any changes in legislation or incidents occurring.

Adopted: November 2022
Review Due: November 2024

Keeping Children Safe in Education – (KCSIE) , 2023 states that:

'Schools and their staff form part of the wider safeguarding system for children. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals should make sure their approach is childcentred. This means that they should consider, at all times, what is in the best interests of the child. (Keeping Children Safe in Education – DfE, 2023)'

This applies to Circles as an alternative provider. Its important that both Circles and the referring school/agency/etc safeguarding policy align and practices are in place for communicating any issues;

'The governing body or proprietor should therefore seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place for the provider to liaise with the school or college on these matters where appropriate. (Keeping Children Safe in Education – DfE, 2023)'

Contents

DfE Statutory Guidance
This policy should also be read in conjunction with DfE statutory guidance, including:

- Keeping Children Safe In Education - Sept 23
- Working Together to Safeguard Children – July 2018 (with Dec 2020 Update)
- DfE Teaching Online Safety 2019

Other providers policies including:
- Online safety policy
- Staff Code of Conduct
- Staff Acceptable Use Agreement

A full list of statutory guidance can be found at:
https://www.gov.uk/government/collections/statutory-guidance-schools#safeguarding-children-and-young-people

1. Safeguarding Students and vulnerable adults

This Safeguarding Policy is for all Circles staff, parents, volunteers and the wider provision community. It forms part of the safeguarding arrangements for our provision and should be read along with the Staff Code of Conduct, Behaviour Policy, Attendance Policy and Online Safety Policy. All staff are given a copy of Part One and Annex A of the statutory guidance.

Circles is committed to safeguarding children and to create a culture of vigilance on site. Adults at Circles take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. Ultimately, all systems, processes and policies at Circles operate with the best interests of the child at their heart. This policy should also be read in conjunction with other policies listed above.

Safeguarding and promoting the welfare of children is defined in the latest edition of Keeping Children Safe in Education as:

Protecting children from maltreatment
Preventing impairment of children's mental and physical health or development
Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
Taking action to enable all children to have the best outcomes

For the purposes of this policy children includes everyone under the age of 18

1.1. Aims

1.1.1. To have in place procedures to ensure that we meet our responsibilities for safeguarding Students and vulnerable adults from abuse.

1.1.2. To have in place procedures to ensure that staff are protected against allegations of abuse.

1.1.3. To support the child's or vulnerable adult's development in ways that will foster security, confidence and independence.

1.2. Policy

1.2.1. The safety and protection of Students and vulnerable adults is of paramount importance to every person in the organisation. We have in place procedures as taken from the government guidance document 'Safeguarding Children and Safer Recruitment' to ensure their safety.

1.2.2. We are aware that certain personnel are in a unique position to notice injuries, marks or bruises when Students and vulnerable adults are undertaking certain activities, which might indicate that individual has been abused. We believe that we must investigate all injuries for the safety and protection of the students and vulnerable adults in our care.

1.2.3. It is acknowledged that a child can be abused, harmed or neglected in a family, institution or community setting or online by someone known to them, or less commonly, by a stranger, this includes someone in a

position of trust such as a teacher or other professional.

1.2.4. Safeguarding and the promotion of a child's welfare covers all aspects of the child's life and Circles Alt Ed is committed to ensuring that all its actions in respect for a child are compatible with this aim. Circles Alt Ed are aware that early identification of concerns and the use of Early Help to develop a multi-agency plan for the child can reduce the risk of subsequent abuse.

1.2.5. As part of our responsibilities for adopting child protection guidelines through procedures and a code of conduct for staff and volunteers Circles Alt Ed aim to:

a. Provide a systematic means of monitoring children known or thought to be at risk of harm.

b. Support pupils who have suffered abuse in accordance with their agreed Child Protection Plan.

c. Emphasise the need for good levels of communication between all members of staff and inter-agency working.

d. Carefully follow the procedures for recruitment and selection of staff and volunteers, ensuring that all adults within our Circles Alt Ed who have access to children have been checked as to their suitability.

e. Set out a structured procedure within the Circles Alt Ed community in cases of suspected abuse.

f. Share information about child protection and good practice with children, parents and carers, staff and volunteers.

g. Develop and promote effective working relationships with other agencies, especially the Police and Social Care. Sharing information about concerns with agencies who need to know, and involving parents and children appropriately.

h. Ensure all staff are aware of the Circles Alt Ed's code of conduct which includes low-level concerns, allegations against staff and whistleblowing.

i. Provide effective management for staff and volunteers through support, supervision and training.

1.2.6. We have in place procedures to ensure that we meet our responsibilities for safeguarding Students and vulnerable adults from abuse.

1.2.7. We have in place procedures to ensure that all staff are protected against allegations of abuse.

1.2.8. This policy and procedures should be read in conjunction with policies listed above.

1.2.9. This policy and the following procedures apply to all paid staff, volunteers and stakeholders working with or in Circles Alt Ed

1.3. **Procedure**

1.3.1. The following procedures outline the action to be taken if it is suspected that a child may be being abused, harmed or neglected. There are four

categories of abuse:

    a.   Physical Abuse
    b.   Emotional Abuse
    c.   Sexual Abuse
    d.   Neglect

1.3.2.   Appendix 2 also lists further types of abuse.

1.3.3.   All new members of staff, supply staff and volunteers, as part of the induction process, will be made aware of the following:

    a.   Safeguarding and Child Protection Policy, which includes child-on-child abuse,
    b.   Staff code of conduct and acceptable use policy
    c.   Behaviour policy, which includes measures to prevent bullying, including cyber bullying, prejudice based and discriminatory bullying
    d.   Procedures for managing children missing in education

1.3.4.   All members of staff will read the latest version of Keeping Children Safe in Education part 1. Senior Leadership will support all staff in understanding this key document and implementing it in their practice.

1.3.5.   All concerns must be reported to the Safeguarding team and discussed immediately. A SLT will decide the appropriate action in consultation with the SMT.

1.3.6.   All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and / or they may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the SLT if they have concerns about a child.

1.3.7.   It is important that staff determine how best to build a trusted relationship with children and young people which helps to facilitate communication.

1.3.8.   The conduct of staff when in a 1:1 situation with a child should be managed in a way that would not lead any reasonable person to question their motives or intentions.

1.3.9.   All staff must ensure that their behaviour and actions do not place children or themselves at risk of harm or of allegations of harm to children.

1.3.10.   All staff must be aware of the 'Whistleblowing and Managing Allegations Policy' and how to access it.

1.3.11.   In the event that there are concerns about a child the Designated Safeguarding Lead will consult with the appropriate department of the Local Authority to inform their decision-making process with regard to

the presenting safeguarding concerns.

1.3.12. Recording information - all concerns, discussions and decisions made, and the reasons for those decisions will be recorded in writing. This will also help if / when responding to any complaints about the way a case has been handled. Notes must be taken which record:

    a.   The date
    b.   Time
    c.   Place
    d.   Nature of the concern
    e.   All facts
    f.   Observed injuries and bruises
    g.   Note the actual words of the child and not your opinion
    h.   Sign the notes and hand to the Child Protection Officer

1.3.13. After a child has disclosed abuse, the Designated Lead should seek advice on whether or not it is safe for a child to return home to potentially abusive situation. The Designated Lead should take immediate action to contact the Local Authority (including Children's Social Care and Police) to discuss putting safety measures into effect.

1.3.14. All Parents/ carers are made aware of the possibilities of staff members actions with regard to child protection procedures except where it is deemed that the child may be put at more risk, in the case of an on-going police investigation or under the advice of the Local Authority Child Protection Team.

1.3.15. All parents, as part of the child induction process, will be made aware of the Safeguarding and Child Protection Policy.

1.3.16. Support will be provided for staff who may feel distressed from being involved with a case of abuse. These staff may be offered supervision.

1.4. **Responsibilities**

1.4.1. The Proprietors, via the Site managers will:

    a.   ensure that the Safeguarding policy and other related procedures are in place and up to date
    b.   appoint a senior member of staff to act as the designated child protection officer (Designated Safeguarding Lead – SLT)
    c.   nominate the Chief Executive to liaise with the child protection officer
    d.   have in place safer recruitment procedures
    e.   ensure that DBS checks are undertaken for everyone working with children
    f.   undertake regular appropriate training about the ways of safeguarding children. This training should equip them with the knowledge to provide strategic challenge to test the safeguarding policies and procedures in place are effective and support a robust whole provision approach to safeguarding
    g.   ensure that safeguarding and online safety is taught across the curriculum

h.	be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including Public Sector Equality) and their local multi-agency safeguarding arrangements
i.	review the policy annually and make appropriate amendments

1.4.2. The SMT will:

a.	implement the policy
b.	monitor the policy
c.	ensure the policies and procedures adopted (particularly those concerning referrals and cases of suspected abuse and neglect), are understood, and followed by all staff
d.	report annually to the Trustees through the Chief Executive on the effectiveness of the policy

1.4.3. The Designated Safeguarding Lead (SLT)/Child Protection Officer will:

a.	investigate and deal with all cases of suspected or actual problems associated with child protection
b.	keep up to date will all new guidance on safeguarding children
c.	keep all personnel up to date with any changes to procedures
d.	organise appropriate training for personnel
e.	ensure that all staff have awareness of and access to the latest copy of the London Child Protection procedures, Part A
f.	liaise with the SMT
g.	annually review the policy with the SMT
h.	ensure that full and accurate chronological records are kept confidentially and are separate from the student records.
i.	ensure that an indication of further record-keeping is marked on student records
j.	be aware of the designated contact and procedure for child protection in each local area of operation
k.	take lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact these issues might be having on children's attendance, engagement and achievement.
l.	liaise with the Local Authority the mental health support team, where safeguarding concerns are linked to mental health.
m.	ensure that any child who is subject to a child protection plan who is absent without explanation is referred to Social Care.
n.	ensure that where any child currently who is subject to a Child Protection Plan leaves, relevant information is transferred to the new provision within 5 days or in the first 5 days of a new term by secure transit and that the child's social worker is informed.
o.	The SLT/CPO is **Alex Stone** and the deputies are **Brad Kaylor, Matt Kinsella, Ryan Morrant, Paul Sackett.**

1.4.4. Staff must be:

a.	aware of this policy and procedures
b.	aware of the names of the designated CP Officers

c.   trained in identifying signs of harm and abuse
d.   know how to report any suspected case of harm or abuse
e.   kept up to date with changes in procedures
f.   prepared to attend a Strategy Meeting
g.   prepared to attend a Child Protection Case Conference
h.   aim to continually monitor and review their practice and ensure they follow the guidance contained in this document.
i.   self-report if their conduct or behaviour falls short of these guiding principles

1.5.   Additional Safeguarding Responsibilities:

1.5.1.   Keeping in touch with children including children not currently attending

a.   Contact details for parents and carers, and additional emergency contact numbers should be kept up to date. There is a recognition that there may be changes in detail about family circumstances over this time. Circles will do everything possible to update contact and welfare information for children and their families.
b.   If children are at home, first day calling will be in place and children working at home should have reporting routes for raising concerns, including worries about being online.
c.   Circles will have regular contact arrangements with families and children when they are learning at home agreed with the referring school/agency/la/etc.

1.5.2.   Reporting concerns about children (face to face or via phone, video or similar)

a.   All staff, on site or working from home must understand how to raise a concern. This should be immediate reporting to the SLT / Team using existing Circles processes. Staff could (face to face or digitally)
b.   Talk to a SLT/Team member
c.   Follow up with an email to SLT

1.5.3.   Learning online

a.   Circles will continue to provide learning opportunities. This will be a blend of activities to undertake at home, online activities and live virtual opportunities.
b.   There will be protocols for participation, for staff and for the children at home. Circles staff should be aware that if they observe anything or concern, or if a disclosure is made in a virtual environment, the usual procedures apply and the concern will be taken straight to the SLT.

1.6.   Confidentiality

1.6.1.   Confidentiality is a very difficult issue but all personnel have a professional responsibility to share information with other professionals who are investigating a case.

1.6.2.   A child, when confiding information to a member of staff, must be made aware that for the child's own sake this information cannot be kept secret and will only be shared with people that need to know, who will decide what to do next.

1.6.3.   All child protection records are regarded as confidential and will be kept in a secure place.

1.6.4.   We work hard to establish excellent relations with all our parents. Parents are aware that we have a responsibility for the welfare of all our pupils and that we have a duty to involve Social Services if we have any concerns about a child.

1.6.5.   Parents will be informed of our actions except where it is deemed that the child may be put at more risk, in the case of an on-going police investigation or under the advice of the Local Authority Child Protection Team.

1.6.6.   The Child Protection Officer will attend all Child Protection Case Conferences if appropriate.

1.6.7.   The Child Protection Officer will attend all Core Group meetings once a child has been placed on the Child Protection Register, if it is felt to be appropriate

1.7.   **Training**

1.7.1.   Whilst not exhaustive, we have identified the following staff training needs:

a.   Child Protection Course as part of induction to the organisation

b.   CPD for Designated Safeguarding Lead(s)/Child Protection Officers including SLT update training (now every two years, from 2021)

c.   Positive handling, safe intervention and de-escalation

d.   Safer recruitment training for staff involved in the recruitment process

e.   All staff will receive Keeping Children Safe in Education (KCSIE) update training every year.

1.8.   **Channel and Prevent**

1.8.1.   We are committed to tackling extremism and radicalisation and adhere to the Prevent strategy, where we will specifically;

a.   Respond to the ideological challenge of terrorism and the threat we face from those who promote it.

b.   Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support.

1.8.2.   A referral will be made to the Channel programme if there is a concern about any person who may be at risk of radicalisation, whether it be a family member, friend, school leader, colleague or from any contact of Circles.

1.8.3.   For the further details please refer to the septate policy within our Extremism Statement.

1.9. Supporting Children

1.9.1. We recognise that a child who is abused or witnesses violence may find it difficult to develop and maintain a sense of self-worth. We recognise that a child in these circumstances may feel helpless and humiliated. We recognise that a child may feel self-blame.

1.9.2. We recognise that the organisation may provide the only stability in the lives of children who have been abused or who are at risk of harm.

1.9.3. We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

1.9.4. Some children's circumstances mean they are more vulnerable to abuse and/or less able to easily access services. These children often require a high degree or awareness and co-operation between professionals in different agencies, both in recognising and identifying their needs and in acting to meet those needs.

1.9.5. Circles will support all pupils by:

   a. Encouraging self-esteem and self-assertiveness whilst not condoning aggression or bullying.
   b. Promoting a caring, safe and positive environment within the organisation.
   c. Educating pupils on how to keep themselves safe, including on-line through teaching and learning opportunities as part of a rich and balanced curriculum. This may include covering relevant issues through Relationships Education and Relationships and Sex Education (RSE)
   d. Liaising and working together with all other support services and those agencies involved in the safeguarding of children
   e. Notifying Social Care as soon as there is a significant concern.
   f. Providing continuing support to a pupil about whom there have been concerns who leaves the organisation by ensuring that appropriate information is forwarded under confidential cover to the pupil's new place of education.

1.10. Early Help

1.10.1. At Circles Alt Ed we also liaise with a wide variety of outside agencies, many of which are able to see students weekly. We undertake to take part in discussions to agree the level of assessment and support to be commissioned and delivered according to the local threshold document.

1.10.2. Examples of the wider agencies we liaise with include; multi-agency team/s, Child and Adolescent Mental Health Services (CAMHs), our local Police Community Support Officers (PCSO's), the Police, Local Authority MASH, Integrated Care Systems and other services.

1.10.3. We encourage families, students and parents to work with these partner agencies also. The provision of early help services should form part of a continuum of help and support to respond to the different

levels of need of individual children and families.

1.10.4. Children who may require early help
Staff and volunteers working within Circles Alt Ed should be alert to the potential need for early help for children. Staff and volunteers should consider following the procedures identified for initiating early help for a child who:
a.   is disabled and has specific additional needs
b.   has special educational needs
c.   is a young carer
d.   is showing signs of engaging in anti-social or criminal behaviour
e.   is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health, domestic violence
f.   has returned home to their family from care; and/or
g.   is showing early signs of abuse and/or neglect.

1.10.5. All initial contacts where staff or volunteers wish to make a request for general advice, information or a service for a child who may be a child with additional or complex needs should be made by contacting the Designated Safeguarding Lead who will make a referral to the Local Authority where appropriate, using the Common Assessment Framework (CAF).

1.11. Private Fostering

1.11.1. A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

1.11.2. A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

1.11.3. Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

1.11.4. Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or are involved in trafficking, child sexual exploitation or modern-day slavery.

1.11.5. We have a mandatory duty to report to the local authority where we are aware or suspect that a child is subject to a private fostering arrangement. Although Circles Alt Ed has a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the academy. However, it should be clear to the academy who has parental responsibility.

1.11.6. Circles Alt Ed staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The academy itself has a duty to inform the local authority of the private fostering arrangements.

1.11.7. On admission to Circles Alt Ed, we will take steps to verify the relationship of the adults to the child who is being registered.

1.12. **Female Genital Mutilation**

1.12.1. Female genital mutilation (FGM) comprises all procedures (not operations) that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons and is a form of child abuse.

1.12.2. We aim to work sensitively with community groups where this maybe a cultural belief and practice to educate and inform however we believe the welfare of the child is paramount and will act to safeguard and promote our students welfare, acting in the interest of the rights of the girl / young woman, as stated in the UN Convention on the Rights of the Child (1989).

1.12.3. UK communities that are most at risk of FGM include Kenyans, Somalis, Sudanese, Sierra Leoneans, Egyptians, Nigerians and Eritreans. However women from non- African communities that are at risk of FGM include Yemeni, Kurdish, Indonesian and Pakistani women.

1.12.4. Regardless of a students ethnicity, any concerns around FGM should be raised immediately to the DSL and not dismissed as unlikely.

1.12.5. FGM training has been undertaken by the designated and deputy safeguarding leads and training disseminated to all staff at the front line dealing with the children.

1.12.6. Female students are at particular risk of FGM during school summer holidays. This is the time when families may take their children abroad for the procedure. However other times of potential vulnerability include; extensions to school holiday times, children missing from education or where a child suddenly leaves the school with no follow on arrangements offered.

1.12.7. Many girls may not be aware that they may be at risk of undergoing FGM and that we need to be vigilant to indicators of risk and report concerns immediately. Particular areas to be aware of are;
   a. Talk of ceremonies to celebrate the young person becoming a woman.
   b. Changes in patterns of behaviour if a child is taken out of the country.
   c. Undisclosed health issues where the child is experiencing discomfort in sitting, going to the toilet etc.
   d. The child may talk or have anxieties about forthcoming holidays to their country of origin.
   e. Parent/Guardian requests permission for authorised absence for overseas travel or you are aware that absence is required for vaccinations.

1.12.8. If a woman has already undergone FGM, and it comes to the attention of any professional, consideration needs to be given to any Child Protection implications e.g. for younger siblings, extended family members and a referral made to Social Care or the Police if appropriate.

1.12.9. All concerns around FGM will be shared immediately with the referring school/agency/LA.

1.13. **Managing Child Protection Cases**

1.13.1.   Children potentially at greater risk of harm (Tier 3 - Child in Need and Tier 4 - Child Protection) may need a social worker due to safeguarding or welfare needs.

1.13.2.   Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

1.13.3.   Where children need a social worker, this will inform decisions about safeguarding (e.g. responding to unauthorised absence or missing education where there are known safeguarding risks) and promoting welfare (e.g. considering the provision of pastoral and/or academic support, alongside action by statutory services).

1.13.4.   We will establish with the social care team any additional reporting requirements.

   a.   Management of children subject to Child Protection investigation or subject to a Child Protection Plan

   b.   The Designated Safeguarding Lead and team will contribute to the child protection investigation and attend or contribute to the Strategy meetings.

   c.   The Designated Safeguarding Lead or deputy will attend the Initial Child Protection Conference to share any relevant information and provide a written report for the conference.

   d.   If the child is placed on the Child Protection Plan, the Designated Safeguarding Lead or deputy is responsible for ensuring that the school participates appropriately in the Child Protection Plan and attends all Core Group Meetings and Child Protection Conferences.

   e.   Information will be shared with staff on a "need to know" basis but key personnel working with child should have sufficient information to support them in their work with that child.

   f.   If a child with a Child Protection Plan has an unexplained absence, the Designated Safeguarding Lead will inform the Social Worker.

1.14.   **Bullying**

1.14.1.   Our policy on bullying is set out in a separate policy and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. A copy of the policy can be provided on request.

1.14.2.   Bullying and abuse can be motivated by perceived differences e.g. on the grounds of race, religion, gender, sexual orientation, disability or other difference. We acknowledge that repeated incidents or a single serious incident may lead to consideration under child protection procedures.

1.15. Child on Child Abuse

1.15.1. Children can abuse other children. This is generally referred to as child on child abuse.

1.15.2. This can present in many forms and methods, including
  a. Both inside and outside of school/college.
  b. Online.
  c. It is most likely to include, but may not be limited to: bullying (including cyberbullying, prejudice-based and discriminatory bullying)
  d. Abuse in intimate personal relationships between children/young people
  e. Physical abuse.
  f. Sexual violence, such as rape, assault by penetration and sexual assault, sexual harassment, non-consensual sharing of nude and semi-nude images and/or videos, causing someone to engage in sexual activity without consent.
  g. Initiation/hazing type violence and rituals.

1.15.3. Child on child abuse will often signal other safeguarding areas and should be reported to the DSL for consideration.

1.15.4. Signs of Child on Child abuse can be;
  a. Absents from school, or disengagement from school activities.
  b. Physical injuries.
  c. Mental or emotional health issues.
  d. Lack of self esteem / becoming withdraw.
  e. Lack of sleep.
  f. Alcohol or substance misuse.
  g. Changes in behaviour.
  h. Inappropriate behaviours for age.
  i. Harmful towards others.

1.15.5. All children can be victim of child on child abuse, often students not considered vulnerable can be more susceptible to Child on child abuse as there is less adults/professionals monitoring their interactions.

1.16. Upskirting

1.16.1. Up-skirting is a form of sexual assault and often committed as child on child abuse.

1.16.2. Up-skirting became a specific criminal offense under the Voyeurism Act 2019 when it became law in April 2019 in England and Wales.

1.16.3. The Voyeurism Act outlaws upskirting where the purpose is to obtain sexual gratification, or to cause humiliation, distress or alarm. This includes instances where culprits say images were just taken 'for a laugh' or when paparazzi are caught taking intrusive images.

1.16.4. Upskirting is a harmful and humiliating form of abuse and often has a devastating impact on all aspects of the victim's life. Victims' experiences include a fundamental breach of their autonomy, trust, sexual integrity and privacy.

1.16.5. Upskirting involving children can also make the issue Child sexual abuse and so needs.

1.16.6. Staff should not attempt to verify the images where suspected up skirting has taken place but should confiscate the device and report to DSL, who will report to the police.

1.17. Allegations against staff

1.17.1. We understand that a child may make an allegation against a member of staff.
If such an allegation is made (no matter how small), the member of staff receiving the allegation or having the concern will immediately inform their senior member of staff.
On all such occasions the Child Protection officer will discuss the content of the allegation with Local Authority Designated Officer (LADO).

1.17.2. Where a low-level concern is shared the Principal will be the ultimate decision maker and if there is any doubt as whether the information shared reaches the harm threshold will consult with the Local Authority Designated Officer (LADO).

1.17.3. Low-level concerns which are shared about supply staff and contractors will be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.
If the allegation made to a member of staff concerns the senior member of staff, the designated member of staff will immediately inform the Deputy Chief Executive or Chief Executive who will consult with the Local Authority Designated Officer (LADO).

1.17.4. As an organisation we follow the relevant Local Authoritys Child Protection Procedures for dealing with allegations against staff.

1.17.5. Circles will refer all cases to the DBS where it is believes a person has caused harm or poses a future risk of harm to vulnerable groups, including children.

1.18. Whistle blowing

1.18.1. We recognise that children cannot be expected to raise concerns in an environment where staff fails to do so.

1.18.2. All staff are made aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues.

1.18.3. Further information is available in our separate policy on whistle blowing, which can be provided on request.

1.19. Information Sharing

1.19.1. Circles Alt Ed follows the DfE "Information Sharing – advice for practitioners providing safeguarding services to children, young people, parent and carers" guidance and procedures.

1.19.2. The Designated Safeguarding Lead or staff generally will disclose information about a child or to other members of staff on a need-to-know basis only.

1.19.3. All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and follow the Circles Alt Ed Information Sharing procedures.

2. Safer Recruitment

2.1. **Aims**

2.1.1. To ensure the practice of safe recruitment of personnel and volunteers.

2.1.2. To have in place a specific and strict procedure of recruitment in order to give maximum level of safety and reassurance of ability to the staff and Students and vulnerable adults when offering employment

2.2. **Safer Recruitment Policy**

2.2.1. We are committed to safeguarding and promoting the welfare of all children and we believe we have a duty to ensure safe recruitment of personnel and volunteer helpers to the organisation.

2.2.2. We wish to appoint the most suitable person for each vacant position regardless of age, marital status, sex, race, religion or belief, sexual orientation or disability. We intend deter, identify and reject applicants who are unsuitable to work with children.

2.2.3. We believe our recruitment and selection process is systematic, efficient, effective and equal. All applicants must declare spent and unspent convictions, cautions and bind-overs, including those regarded as spent and have an Enhanced Criminal Records Disclosure as all posts are exempt from the Rehabilitation of Offenders Act 1974.

2.2.4. Circles will follow the guidance set out in:

a. Keeping Children Safe in Education (latest addition)
b. Local Safeguarding Partnership procedures

2.3. **Safer Recruitment Procedure**

When a post becomes vacant or is created then the following procedure takes place:

2.3.1. **Job advertisement**

a. All posts will be advertised internally and externally (including agencies) in order to attract as wide a field of candidates as possible.

b. All advertisements for posts will state that the organisation is committed to safeguarding children and young people and all post holders are subject to a satisfactory enhanced Disclosure and Barring Services (DBS) disclosure.

2.3.2. **Job Information Pack**

a. All agency applicants will be asked to supply a CV

b. All shortlisted agency applicants and any direct applicants will be provided with an application form, job description and person specification, and copies of the Safeguarding and

Safe Recruitment Policies.

2.3.3. **Short-Listing and References**

    a. Applicants will be short-listed for the post if they suit the job description and person specification.

    b. Immediately after short-listing, references will be requested for those candidates short-listed.

    c. All referees will be asked if the candidate is suitable to work with children, has any disciplinary procedures relating to the safety and welfare of children, or any details of allegations/concerns/bad behaviour relating to the safety and welfare of children.

    d. All references will be checked for consistent information.

    e. The candidate will be asked to clarify any highlighted discrepancies.

2.3.4. **The Interview**

    a. All candidates will be asked to bring identity proof with them as required for a DBS Check

    b. All applicants will undergo a face-to-face interview where questions pertaining to child protection will be asked.

    c. All interviews will be conducted with a minimum of 2 people, one of which will have attended safer recruitment training. Where possible, three people will form the interview panel.

    d. All candidates will be assessed for their suitability to the post and their capability to safeguard and protect the welfare of children and young people.

2.3.5. **Pre - Employment Checks for the Successful Candidate**

Before taking up the post the following checks will be undertaken on the successful candidate:

    a. References (minimum of 2, one of which should be recent employer)
    b. Photo proof of identity
    c. DBS Enhance Disclosure
    d. Prohibition from teaching and prohibition of management (where applicable)
    e. Proof of a right to work in the UK

2.3.6. **Induction**

The induction programme for all newly appointed personnel will

include all organisational policies dealing with the safeguarding of children and young people and they will receive copies of the DFE guidance on Safe Working Practice.

2.3.7.   We will keep a single central record of recruitment and record checks of:

a.   all staff
b.   all volunteers
c.   all work experience providers (where appropriate)
d.   trustees
e.   regular contractors

2.4.   Safer Recruitment Responsibilities

2.4.1.   The proprietors have:

a.   the responsibility of ensuring that the safe recruitment process complies with DfE guidance and legal requirements
b.   delegated certain powers and responsibilities to the Chief Executive to oversee compliance with DfE guidance and legal requirements
c.   responsibility for the effective implementation, monitoring and evaluation of this policy

2.4.2.   Site Managers will:

a.   promote the safeguarding and welfare of children
b.   ensure the organisation operates safe recruitment procedures
c.   ensure all appropriate pre-employment checks are completed
d.   ensure contractors and agencies comply with this policy
e.   ensure that relevant staff attend safer recruitment training
f.   monitor and evaluate the effectiveness of this policy

3.   DBS Disclosure Checks

3.1.   Aims

3.1.1.   To have in place clear procedures for DBS Disclosure checks for all personnel, volunteers and new appointments in order to ensure the safety and welfare of children and young people.

3.2.   DBS Disclosure Checks Policy

3.2.1.   We have in place clear procedures for DBS Disclosure checks for all personnel, volunteers and new appointments in order to ensure the safety and welfare of children and young people.

3.2.2.   We believe the safety and welfare of children and young people is paramount and we are fully committed to the procedures and arrangements of the Criminal Records Bureau and Independent Safeguarding Authority.

3.2.3.   We understand that this policy complies with the current range of policies for 'Safeguarding Children and Safer Recruitment in Education', the School Staffing (England) the Education (Restriction

of Employment), the Data Protection Act and the DBS code of Practice, also the ISA Vetting and Barring Scheme requirements.

3.2.4. We acknowledge the immense importance of the DBS in providing access to Disclosure checks for personnel, volunteer helpers and for new appointments.

3.2.5. Enhanced disclosures will be applied to the following categories:

a. All staff
b. Volunteers at our training centre
c. Work Experience Providers for placements which run over 15 days, or who are sole traders
d. Contractors
e. Trustees

3.2.6. DBS disclosures will not be applied to the following as it is felt that they will have very little, if any, contact with children, they will be escorted whilst on our premises or school premises, or that they will work under the supervision of a member of staff:

a. Pupils on work experience
b. Work Experience providers for placements 15 days or under
c. Occasional event volunteers
d. Contractors who are on site when children are not present

3.2.7. In compliance with the Education (Restriction of Employment) we will ensure that no new employee will commence their appointment without the completion of a DBS check.

3.2.8. We will consider any person with a criminal record equally with others applying for any vacant post, or volunteering opportunity, unless their DBS disclosure check indicates that they present a risk to children.

3.3. DBS Disclosure Checks Responsibilities

3.3.1. The Proprietors has:

a. delegated powers and responsibilities to the Chief Executive Officer to ensure DBS disclosures are in place
b. nominated the Chief Executive Officer to report back to the Proprietors
c. responsibility for the effective implementation, monitoring and evaluation of this policy

3.3.2. The SMT will:

a. implement this policy
b. ensure all personnel and volunteers are aware of it
c. monitor and evaluate the effectiveness of this policy

3.4. Security of Information

3.4.1. In compliance with the DBS Code of Practice and the Data Protection Act all Disclosure information and records of all

personnel will be safely handled, securely stored, retained and disposed of in a secure manner.

3.4.2. We have in place the Single Central Record, which records the receipt of all satisfactory DBS Disclosures.

4. **Restraint of Students and vulnerable adults**

4.1. Aims

4.1.1. To make centre personnel aware that they can use reasonable force to restrain a pupil only in extreme circumstances.

4.2. Policy

4.2.1. We acknowledge that Section 93 of the Education and Inspections Act 2006 allows staff to use reasonable force to restrain a student from doing, or continuing to do, any of the following:

a. committing any offence (or, for a student under the age of criminal responsibility, what would be an offence for an older student)

b. causing personal injury to, or damage to the property of, any person (including the student him/herself); or

c. prejudicing the maintenance of good order and discipline or among any Students and vulnerable adults receiving education at the provision, whether during a teaching session or otherwise.

4.2.2. We understand that there is no legal definition when reasonable force can be used. 'That will always depend on the precise circumstances of individual circumstances of individual cases.

4.2.3. To be judged lawful, the force used would need to be in proportion to the consequences it is intended to prevent.

4.2.4. The degree of force used should be the minimum needed to achieve the desired result. Use of force could not be justified to prevent trivial misbehaviour'. (Department for Education– The Use of Force to Control or Restrain Pupils)

4.3. **Restraint of Students and vulnerable adults Procedure**

4.3.1. We have the following in place in order to reduce the likelihood of any member of staff using force:

a. A calm, orderly and supportive climate.
b. Strong and effective relationships between Students and vulnerable adults and staff.
c. An effective staff development programme that develops the skills of positive behaviour management.
d. Identifying when an incident is going to happen.
e. Using effective strategies to manage all incidents that occur.

f. Informing a disruptive student that force may be used before using it.

g. Ensuring that no student is locked in a room as part of managing behaviour.

4.3.2. All staff whose job involves supervising Students and vulnerable adults may use force to restrain a student only in extreme circumstances and only after training has been given.

4.3.3. All staff will receive training in student restraint.

4.4. **Deciding whether to use force**

4.4.1. We believe that the use of force and what force to use must always depend on the circumstances of each incident.

4.4.2. We acknowledge that when faced with an incident there is very little time for staff to think before making a quick but effective decision.

4.4.3. Staff must be aware of and consider the following:

a. Assessing the seriousness of the incident that if force is not used then it could result in injury, damage or disorder.

b. After considering alternatives for dealing with the situation, force is the only justifiable way of achieving a positive result.

c. Assessing the number of risks connected with using force compared with using other strategies.

4.4.4. Types of Incidents

Staff will have to make decisions when dealing with any of the following incidents:

a. **Fighting** - Students and vulnerable adults fighting.

b. **Attack** - a student attacks an adult or another student.

c. **Damage to property** – a student deliberately damages property or is about to.

d. **Injury or damage** – a student causes or is about to cause injury or damage.

e. **Absconding** – when a student tries to leave the site which could put his/her own safety at risk, the safety of others or the damage to property.

f. **Defying an instruction** – when a student persistently refuses to leave a classroom.

g. **Disruption of lessons** – when a student's behaviour seriously disrupts a lesson.

h. **Disrupting an event** – when a student's behaviour seriously disrupts an event.

4.4.5. When faced with an incident and before force is used, staff must:

a. act in a calm and measured manner.

b. show no anger or frustration.

c. tell the student to stop misbehaving or restraint will be used but will stop when the student behaves.

4.4.6.   Staff may use the following types of force:

    a.   **passive physical contact** by standing between Students and vulnerable adults or by blocking a student's path

    b.   **active physical contact** by using restrictive holds, leading a student by the arm or hand or ushering a student away by placing a hand in the centre of the back.

4.4.7.   Staff must make every effort not to harm a student or restrain a student that could be interpreted as sexually inappropriate conduct.

4.4.8.   Risk assessments are in place for individual Students and vulnerable adults

4.4.9.   Staff will be trained in the techniques of restraint when they join the company, and this training will be repeated at least every three years.

4.4.10.   Records will be kept of all incidents and parents will be informed by telephone and then by letter.

4.5.   **Post-incident support**

4.5.1.   After an incident has occurred the following procedure will take place:

    a.   First aid if necessary
    b.   Medical help if necessary
    c.   Emotional support to student/vulnerable adult
    d.   Emotional support to staff
    e.   Recording of the incident on the database.
    f.   Discussions with parents

4.5.2.   All complaints and allegations will be dealt with by using the procedures as stated in the Complaints Policy.

5.   **Supervision of Students and vulnerable adults**

5.1.   Aims

5.1.1.   To outline the safeguarding procedures in order to ensure full and appropriate supervision of all pupils throughout the day.

5.2.   Policy

5.2.1.   We have a legal duty of care to all our students and vulnerable adults and the responsibility to ensure that we have in place safeguarding procedures for supervising students and vulnerable adults throughout the school day in order to ensure their health, safety,

welfare and good conduct.

5.2.2.   We are aware that our responsibility of supervising students and vulnerable adults begins when they arrive on site. Therefore, we will ensure that all parents are informed of the time that provision starts, and that students and vulnerable adults should at least 10 minutes before the start time.

5.2.3.   We believe we have a duty of care to all staff and adult volunteers. Therefore, we strongly advise that they should avoid supervising any student alone, at all times.

5.2.4.   If a one-to-one situation is unavoidable then staff should take the necessary precautions beforehand to ensure that the situation is managed in a way that would not lead any reasonable person to question their motives or intentions.

5.3.   Responsibilities

5.3.1.   The proprietors have:

a.   a legal duty of care for all pupils and to provide adequate supervision of Students and vulnerable adults while on Circles sites
b.   delegated powers and responsibilities to the Site managers to ensure that high standards of student behaviour and discipline are maintained throughout the Circles day whether it is on or off site.
c.   responsibility for the effective implementation, monitoring and evaluation of this policy

5.3.2.   Site Managers will:

a.   be responsible for the internal organisation, management and control of the site.
b.   ensure the maintenance of good order and discipline at all times during the day when Students and vulnerable adults are present on Circles premises or on educational visits
c.   ensure all staff are aware and comply with this policy
d.   ensure that all staff are aware of their supervisory roles and responsibilities with Students and vulnerable adults during the day
e.   organise appropriate training for staff
f.   monitor the effectiveness of this policy

5.3.3.   Staff will:

a.   be aware of and comply with this policy
b.   maintain good order and discipline among all Students and vulnerable adults safeguarding their health and safety when they are authorised to be on site and during educational visits
c.   ensure that no class of Students and vulnerable adults should be left unsupervised
d.   ensure they take the necessary precautions before undertaking any one-to-one supervision

e.   record and report any incident or accident that could be considered a breach of supervision

5.3.4.   Parents are asked to ensure that:

a.   their children arrive at least 10 minutes before provision starts
b.   they report their child's absence because of illness or for any other reason

5.4.   Supervision of breaks

5.4.1.   Staff will:

a.   be on duty 15 minutes prior to the start of the day
b.   ensure that all students and vulnerable adults enter the site and go to their sessions where their tutor and support staff will supervise them

5.4.2.   Supervision at Break Times

The SMT will:

a.   ensure duty rotas are in place so that there is adequate supervision
b.   ensure procedures and duties are clearly understood by all involved with student supervision
c.   ensure duty tutors begin supervision promptly
d.   act as line manager at break times when tutors and support staff are on duty
e.   ensure good lines of communication are in place to ensure the overall safety of the students and vulnerable adults at these times
f.   ensure procedures for dealing with accidents are in place
g.   ensure all accidents are recorded in the appropriate accident book
h.   ensure parents are notified of any accident, especially head injuries
i.   ensure staff are trained in emergency first aid
j.   ensure permission is obtained from parents for Students and vulnerable adults leaving during lunch breaks

5.4.3.   Supervision during off-site visits

a.   The party leader will make all appropriate arrangements for supervision as outlined in the 'Trips' policy

6. Student or vulnerable adult gone missing on or off site

6.1.   Aims

6.1.1.   To ensure that security procedures are in place to deal with the unlikely event of a missing student / vulnerable adult.

6.2.   Policy

6.2.1. We believe it is essential to have in place exceptional security systems to prevent young people going missing from Circles, or when they are on an educational visit.

6.3. Procedure

6.3.1. In the event that a student has gone missing in the centre:

a. Inform the SMT
b. Search the premises
c. Check the CCTV footage
d. Search the immediate area surrounding the site
e. Contact the student's or vulnerable adult's parents /carers
f. If the student is still not found, then contact the police giving full details of the child / vulnerable adult
g. Inform the school/LA
h. When the student / vulnerable adult is found, review security procedures

6.3.2. When the student / vulnerable adult is found security procedures will be fully reviewed

6.3.3. All appropriate personnel must be trained in how to deal with a student / vulnerable adult going missing

6.4. Responsibilities

6.4.1. The proprietors have:

a. appointed a manager to put into practice security measures
b. delegated powers and responsibilities to the Chief Executive to oversee all security measures
c. responsibility for the effective implementation, monitoring and evaluation of this policy

6.4.2. The SMT will:

a. ensure that security measures are in place and are effective
b. ensure that all staff are aware of security procedures and the roles of staff
c. notify parents of security procedures and the procedures for dealing with a missing student
d. monitor and evaluate the effectiveness of this policy
e. monitor security procedures
f. undertake/coordinate security risk assessments
g. consider all suggested ideas from staff, parents, Students and vulnerable adults and visitors for improvement
h. inform parents of new and improved security measures

6.4.3. All staff will:

a. be aware of and abide by this policy
b. undertake appropriate training in security procedures
c. inform and remind Students and vulnerable adults of security procedures such as the reporting of unidentified visitors

   d. remind Students and vulnerable adults that they should not leave the premises or wander off while on an educational visit

  6.4.4. Students and vulnerable adults must be aware of and abide by all security measures that are in place.

  6.4.5. Parents must:

   a. ensure they provide correct and updated contact details
   b. be aware of security procedures especially at the beginning and end of the day

6.5. Reducing the Risk of a Missing Student / vulnerable adult

  6.5.1. All security procedures must be reviewed annually by the SMT. Everyday staff must be aware of the following:

   a. entrances and exits are secure
   b. windows are secure
   c. challenging and dealing with unauthorised people on the sites
   d. outside lighting is switched on
   e. security of valuables and personal possessions
   f. visitors and contractors wearing identification badges
   g. staff carrying radios

7. Vulnerable Students and vulnerable adults

7.1. Aims

  7.1.1. To ensure that all staff are aware of their responsibilities for safeguarding and promoting the welfare of Students and vulnerable adults.

  7.1.2. To have in place clear structured procedures to identify and report suspected cases of child abuse.

  7.1.3. To provide support and guidance for pupils identified as being vulnerable.

7.2. Policy

  7.2.1. We fully recognise our responsibilities for safeguarding and promoting the welfare of all Students and vulnerable adults by ensuring that all staff are able to identify and report possible cases of abuse and vulnerable children.

  7.2.2. We consider children / adults to be vulnerable if they are:

   a. Looked After Children (LAC)
   b. Bullied/cyber bullied
   c. Students and vulnerable adults who go missing from home/site
   d. Suffering from neglect, physical abuse, sexual abuse or emotional abuse
   e. Suffering from bereavement
   f. Refugees/asylum seekers

g. Experiencing drugs or alcohol abuse
h. Students and vulnerable adults with a disability
i. Excluded from Circles

7.2.3. We believe we have worked hard to create and maintain an ethos in which we provide support and guidance so that Students and vulnerable adults feel secure and confident enough to talk if they are experiencing difficulties. Students and vulnerable adults understand that we are prepared to listen to them as we value their viewpoints.

7.2.4. We ensure that all Circles staff receive regular training in safeguarding techniques so that we are able to recognise the signs and symptoms of suspected child abuse and that they are aware of the procedures of reporting such cases.

7.2.5. We have in place an effective system for monitoring those children identified as being vulnerable and excellent lines of communication with external support agencies.

7.2.6. We ensure that all staff are aware of their responsibilities for safeguarding and promoting the welfare of Students and vulnerable adults.

7.2.7. We have in place clear structured procedures to identify, and report suspected cases of child abuse.

7.2.8. We provide support and guidance for pupils identified as being vulnerable.

7.3. Vulnerable Students and vulnerable adults Responsibilities

7.3.1. The proprietors has:

a. appointed a member of staff to be the Coordinator for Safeguarding Children
b. nominated the Chief Executive Officer to visit the centres regularly and to liaise with the SLT; report back to the Proprietors; be familiar with local Area Safeguarding Committee procedures and LEA procedures

7.3.2. The Chief Executive will:

a. ensure the implementation of this policy
b. ensure that the recruitment policy is safe and effective
c. ensure that all Circles personnel and volunteers have undertaken DBS checks
d. monitor the effectiveness of this policy

7.3.3. The SLT will:

a. be fully conversant in safeguarding procedures
b. ensure all personnel are aware of their responsibilities
c. ensure that all personnel are aware of the system of reporting suspected child abuse
d. report cases of suspected child abuse to social services

e. liaise with social services and other agencies
f. organise in-house training for personnel
g. attend training in order to keep up to date with new developments and resources
h. ensure all relevant and current documentation is up to date
i. review and monitor the effectiveness of this policy

8. Visitors & Contractors

8.1. Aims

To ensure that the premises are safe and that visitors to the site / centre come to no harm.

8.2. Policy

8.2.1. We have a statutory duty under the Health and Safety at Work Act 1974, the Management of Health and Safety at Work Regulations 1999, the Disability Discrimination Act 1995 and a common law duty to ensure that, so far as reasonably practicable, that the premises are safe and that visitors to site come to no harm.

8.2.2. We require all visitors such as parents/carers, education officials, LA officials, contractors and others to report to the main office upon entering the premises. They will be welcomed in a cordial confidential, efficient and purposeful manner. Visitors will be asked to state the purpose of their visit, and to confirm their status by producing verifiable documentation.

8.2.3. When working on the premises, contractors have a duty to ensure the health and safety of everyone in the centre who may be affected by their work activities. Also, they have to cooperate with our health and safety policies and procedures.

8.2.4. We have a legal responsibility under the Management of Health and Safety at Work Regulations 1999 to ensure that all contractors when working on the premises act in a responsible and proper manner.

8.3. Responsibilities

8.3.1. The Proprietors has appointed a member of staff to be the Coordinator for Health and Safety and nominated the Chief Executive to liaise with the coordinator and to report back to the Proprietors

8.3.2. The Chief Executive will:

a. ensure the health and safety of all visitors to the centre by undertaking a Risk Assessment of the premises
b. ensure that all contractors when working on the premises cooperate with our health and safety policies and procedures

    c.   ensure that all contractors act in a responsible and proper manner

    d.   come to an agreement regarding how the contractor can work on site during the school day

    e.   issue the code of conduct to contactors when quotations or tenders are invited

    f.   gain agreement from the contractor to comply with the code as part of the condition of offer of work

    g.   highlight the code during any pre-start meeting

    h.   check to ensure that this working agreement is fulfilled

    i.   monitor and review this policy

8.3.3.   Staff will:

    a.   take reasonable care of their own health and safety

    b.   take reasonable care of the health and safety of Students and vulnerable adults, visitors and contractors

    c.   be aware of the working agreement between Circles Alt Ed and any contractor undertaking work on site

8.3.4.   Visitors will:

    a.   report to reception upon entering the premises

    b.   confirm their status by producing verifiable documentation

    c.   enter their details in the visitors book

    d.   wear a visitors badge

    e.   abide by the visitors code of conduct

    f.   be familiar with the procedure of evacuating the school building in the event of an emergency

    g.   sign out when leaving site

8.3.5.   Contractors will

    a.   comply with all health and safety policies and procedures when working on the premises

    b.   act in a responsible and proper manner

    c.   come to a working agreement regarding how they can work on the premises during the day while Students and vulnerable adults are on site

    d.   avoid contact with Students and vulnerable adults

    e.   never be in contact with Students and vulnerable adults without supervision

    f.   stay within the agreed work area and access routes

    g.   obtain permission if you need to go outside the agreed work area or access routes

    h.   keep staff informed of where you are and what you are doing

    i.   not use profane or inappropriate language

    j.   not bring inappropriate printed material onto the site

    k.   dress appropriately – shirts to be worn at all times

    l.   observe the code at all times

    m.   not take photographs whilst on site without prior consent

n.   remember that your actions, no matter how well intentioned, could be misinterpreted

9.   Student / Client Illness

9.1.   Aims

9.1.1.   To have in place procedures to deal with all Students and vulnerable adults who become ill on site.

9.1.2.   A Covid-19 Risk Assessment is in place, available to all staff and updated when needed.

9.2.   Policy

9.2.1.   We are committed to safeguarding and promoting the welfare of Students and vulnerable adults and we expect everyone connected with this company to share this commitment.

9.2.2.   We have a duty to ensure the health and wellbeing of all Students and vulnerable adults in order for them to be successful learners in a learning environment that is clean, healthy and safe for everyone. Therefore, it is our responsibility to deal with all Students and vulnerable adults who become sick in a kind and caring manner.

9.2.3.   We believe that if a student is displaying signs of illness then a parent/carer has a duty not to send their child to school. Likewise, staff have a duty to assess the condition of any student who is thought to be unwell and to contact the parent/carer requesting the child should be taken home.

9.2.4.   We are aware that all children are subject to coughs and colds at sometime and these should not prevent them from attending. We do ask parents/carers not to send their children to school if they are showing signs of vomiting, diarrhoea, any type of rash, conjunctivitis, flu, chicken-pox, mumps, measles or high temperature.

9.2.5.   We recognise the importance of working closely with parents/carers and we believe we have good lines of communication in place. But in order to ensure the health and well being of all Students and vulnerable adults, everyone must be aware of their role and responsibilities when a student is displaying signs of illness.

9.2.6.   We believe it is only correct for a student suffering from an infectious or contagious disease to be excluded from the provision until they are fully recovered. We have a duty of care for all Students and vulnerable adults and personnel and, therefore, we request parents to consult with their GP before their child returns to the provision and if need be we will seek advice from the Local Health Authority.

9.3.   Responsibilities

9.3.1.   The Proprietors has:

a.   delegated powers and responsibilities to the Chief Executive to put into place procedures to ensure sick Students and vulnerable adults are identified and are cared for appropriately

b.   responsibility for the effective implementation, monitoring and evaluation of this policy

9.3.2.   The Chief Executive will:

a.   protect the health and safety of Students and vulnerable adults and personnel at all times

b.   ensure procedures are in place and effectively implemented to deal with Students and vulnerable adults taken ill at the Circles

c.   ensure staff and parents are aware of this policy

d.   organise first aid training for staff

e.   ensure that Students and vulnerable adults records and emergency contact numbers are kept up to date

f.   monitor the effectiveness of this policy

9.3.3.   First Aid Trained Personnel will:

a.   ensure compliance with this policy

b.   receive training in first aid at their induction and will attend periodic training to renew their first aid qualification

c.   assess the condition of any student thought to be unwell, in a kind and caring manner

9.3.4.   Staff will:

a.   notify the student's school or carer of any child taken ill

b.   immediately contact the student's parents/carers of their concerns about the child's health

c.   ensure the comfort of an ill student by staying with them while awaiting the parents to arrive

d.   seek immediate medical advice if a student is in danger

e.   call for an ambulance if needed

f.   arrange for the parent/carer or school representative to escort a student to hospital

g.   ensure records are kept of all Students and vulnerable adults taken ill and sent home while at Circles

9.3.5.   Parents/carers must:

a.   be aware of this policy

b.   comply with this policy

c.   notify the nominated key worker of any changes to their contact details

d.   co-operate with the school by keeping their child at home if they are unwell or showing any signs of vomiting, diarrhoea, any type of rash, conjunctivitis, flu, chicken-pox, mumps, measles or high temperature

e.   consult with their GP if their child is suffering from one of the communicable diseases

f.   inform the school if their child is not their normal self when attending school, but is not showing any signs of illness

10. Administering Medicines

10.1. Aims

10.1.1. To outline the procedures for administering prescribed medicines to Students and vulnerable adults.

10.2. Policy

10.2.1. We acknowledge that under the standard terms and conditions of employment there is no legal duty for staff to administer or to supervise a child taking medication.

10.2.2. Administration of medicines by any member of staff is undertaken purely on a voluntary basis and individual decisions will be respected. However, appropriate training will be provided before any member of the personnel who has volunteered and accepted this role to be familiar with all administration of medication procedures.

10.2.3. Medicines will only be administered that have been prescribed by a doctor, or some other authorised person and where it would be detrimental to a student's health if the medicine were not administered during the day. Non-prescription medicines will not be administered by staff, but parents/carers can make arrangements at lunchtime to administer the medication to their child.

10.3. Responsibilities

10.3.1. The Proprietors has:

    a. appointed a member of staff to be the Coordinator for Health and Safety
    b. nominated the CEO to liaise with the coordinator and to report back to the Proprietors
    c. a responsibility for the effective implementation, monitoring and evaluation of this policy

10.3.2. The SMT will:

    a. ensure the administration of prescribed medicines by putting into practice effective strategies and examples of good practice
    b. inform parents of the policy during enrolment

10.3.3. Members of staff who have volunteered to administer or supervise the taking of medication will:

    a. undertake appropriate training
    b. be up to date with the Individual Health Care Plans for those pupils with specific medical needs or emergency medication such as asthma inhalers or epi-pens

10.3.4. Parents/carers must provide:

    a. written permission for administration of medicines
    b. sufficient medical information on their child's medical condition
    c. the medication in its original container
    d. sufficient medicine for the dosage to be given during the day

10.4. Administration of Prescribed Medicines

10.4.1. Members of staff who have volunteered to administer or supervise the taking of medication will:

    a. be aware of Individual Health Care Plans and of symptoms which may require emergency action
    b. read and check parental consent before administering or supervising the taking of medicines
    c. check that the medication belongs to the named student
    d. check that the medication is within the expiry date
    e. inform the parent if the medication has reached its expiry date
    f. confirm the dosage/frequency on each occasion and consult the medicine record form to prevent double dosage
    g. record on the medication record all relevant details of when medication was given
    h. return medications to the secure cabinet for storage
    i. always take appropriate hygiene precautions
    j. record when a pupil refuses to take medication
    k. immediately inform the parent/carer of this refusal

10.5. Medication Records

10.5.1. The following information must be supplied by the parent/carer:

    a.   Name and date of birth of the child
    b.   Name and contact details of the parent/carer
    c.   Name and contact details of GP
    d.   Name of medicines
    e.   Details of prescribed dosage
    f.   Date and time of last dosage given
    g.   Consent given by parent/carer for staff to administer medication
    h.   Expiry date of medication
    i.   Storage details

10.6. Administering Medicines Security

10.6.1. All medications will be kept in a secure place and accessible only to the designated persons

10.7. Administering Medicines Educational Visits

10.7.1. On educational visits a designated person will also attend in order to administer medications

10.8. Administering Medicines Sporting Activities

10.8.1. We will ensure that pupils have immediate access to asthma inhalers during sporting activities during the day

11. Online Safety

11.1. Introduction and overview

The purpose of this policy is to:

11.1.1. Set out the key principles expected of all members of Circles Alt Ed with respect to the use of IT-based technologies.

11.1.2. Safeguard and protect the children and staff.

11.1.3. Assist Circles Alt Ed staff working with children to work safely and responsibly with the Internet and other IT and communication technologies and to monitor their own standards and practice.

11.1.4. Set clear expectations of behaviour and/or codes of practice relevant to responsible use of the Internet for educational, personal or recreational use for the whole Circles Alt Ed community.

11.1.5. Have clear structures to deal with online abuse such as online bullying noting that these need to be cross referenced with other Circles Alt Ed policies.

11.1.6. Ensure that all members of the Circles Alt Ed community are aware that unlawful or unsafe behaviour is unacceptable and that, where appropriate, disciplinary or legal action will be taken.

11.1.7. Minimise the risk of misplaced or malicious allegations made against adults who work with students.

11.2. **Main area of risk**

The main areas of risk for our Circles Alt Ed community can be summarised as follows:

11.2.1. Content

   a. Exposure to inappropriate content
   b. Lifestyle websites promoting harmful behaviours
   c. Hate content
   d. Content validation: how to check authenticity and accuracy of online content

11.2.2. Contact

   a. Grooming (sexual exploitation, radicalisation etc.)
   b. Online bullying in all forms
   c. Social or commercial identity theft, including passwords

11.2.3. Conduct

   a. Aggressive behaviours (bullying)
   b. Privacy issues, including disclosure of personal information
   c. Digital footprint and online reputation
   d. Health and well-being (amount of time spent online, gambling, body image)
   e. Sexting
   f. Copyright (little care or consideration for intellectual property and ownership)

11.2.4. Commerce

   a. risks such as online gambling, inappropriate advertising, phishing and or financial scams.

11.3. **Scope**

11.3.1. This policy applies to all members of Circles Alt Ed (including staff, students/pupils, volunteers, parents/carers, visitors, community users) who have access to and are users of Circles Alt Ed IT systems, both in and out of Circles Alt Ed

11.4. **Roles and responsibilities**

11.4.1. The Proprietors (Proprietor), through the Chief Executive will:

   a. Ensure that the online safety policy and other related procedures are in place and up to date

b. To lead a safeguarding culture ensuring that online safety is fully integrated into safeguarding as a whole
c. Nominate the Chief Executive to liaise with the Safeguarding Officer
d. Consider the age range and number of children, how often they access the IT system and the proportionality of costs verses safeguarding risks

11.4.2. The SMT will:

a. Implement the policy
b. Monitor the policy with the Safeguarding lead
c. Report annually on the effectiveness of the policy
d. To ensure Trustees are regularly updated on the nature and effectiveness of the Circles Alt Ed's arrangements for online safety
e. Ensure suitable 'risk assessments' are undertaken so the curriculum meets needs of pupils, including risk of children being radicalised
f. Ensure Circles Alt Ed uses appropriate IT systems and services
g. Be responsible for ensuring that all staff receive suitable training to carry out their safeguarding and online safety roles
h. Ensure that there is a system in place to monitor and support staff who carry out internal online safety procedures, e.g. network manager
i. Take overall responsibility for online safety provision
j. Ensure staff, parents and carers are kept up to date and given advice on preparing for any online challenges and hoaxes and how to get support following the guidance at [Harmful Online challenges and online hoaxes](). This link is provided to parents in the student handbook and available on the website.

11.4.3. The SLT/Child Protection Officer Will:

a. Be adequately trained in off-line and online safeguarding, in-line with statutory guidance and relevant Local Safeguarding Children Proprietors (LSCB) guidance
b. Lead a 'safeguarding' culture, ensuring that online safety is fully integrated with whole Circles Alt Ed safeguarding.
c. Be aware of procedures to be followed in the event of a serious online safety incident
d. Promote an awareness and commitment to online safety throughout the Circles Alt Ed community
e. Take day to day responsibility for online safety issues and a leading role in establishing and reviewing the Circles Alt Ed's online safety policy/documents
f. Ensure that online safety education is embedded within the curriculum
g. Liaise with Circles Alt Ed technical staff where appropriate
h. To communicate regularly with SMT and the designated online safety Governor/committee to discuss current issues, review incident logs and filtering/change control logs
i. To ensure that all staff are aware of the procedures that need to be followed in the event of an online safety incident
j. To ensure that online safety incidents are logged as a safeguarding incident

k.   Facilitate training and advice for all staff

l.   Oversee any pupil surveys / pupil feedback on online safety issues

m.   Support Circles Alt Ed in encouraging parents and the wider community to become engaged in online safety activities

n.   Liaise with the Local Authority and relevant agencies

o.   Is regularly updated in online safety issues and legislation, and be aware of the potential for serious child protection concerns

11.4.4.   The Vice Principal (Teaching and Learning) will:

a.   Oversee the delivery of the online safety element of the Computing curriculum

11.4.5.   The Network Manager / technician will:

a.   report online safety related issues that come to their attention, to the Safeguarding officer

b.   manage Circles Alt Ed's computer systems, ensuring Circles Alt Ed's password policy is strictly adhered to

c.   ensure systems are in place for misuse detection and malicious attack (e.g. keeping virus protection up to date)

d.   ensure access controls/encryption exist to protect personal and sensitive information held on Circles Alt Ed owned devices

e.   ensure Circles Alt Ed's policy on web filtering is applied and updated on a regular basis

f.   ensure that they keep up to date with the Circles Alt Ed online safety policy and technical information in order to effectively carry out their online safety role and to inform and update others as relevant

g.   ensure that the use of Circles Alt Ed technology and online platforms are regularly monitored and that any misuse/attempted misuse is reported to the online safety co-ordinator/Safeguarding Lead

h.   ensure appropriate backup procedures and disaster recovery plans are in place

i.   keep up-to-date documentation of the Circles Alt Ed's online security and technical procedures

j.   regularly review the effectiveness of appropriate monitoring and filtering systems used

11.4.6.   Teaching staff will:

a.   Embed online safety in the curriculum

b.   Supervise and guide pupils carefully when engaged in learning activities involving online technology (including, extra-curricular and extended Circles Alt Ed activities if relevant)

c.   Ensure that pupils are fully aware of research skills and are fully aware of legal issues relating to electronic content such as copyright laws

11.4.7.   All staff, volunteers and contractors will:

a.   Report any suspected misuse or problem to the online safety coordinator

b. Maintain an awareness of current online safety issues and guidance e.g. through CPD

c. Model safe, responsible and professional behaviours in their own use of technology

d. Be aware that technology is a significant component in many safeguarding and wellbeing issues.

11.5. Communication

11.5.1. The policy will be communicated to staff/pupils/community in the following ways:

a. Policy to be part of Circles Alt Ed induction pack for new staff
b. Regular updates and training on online safety for all staff
c. Acceptable use agreements signed by staff, volunteers, students and parents / carers as part of the induction process

11.6. Handling Incidents

11.6.1. Circles Alt Ed will take all reasonable precautions to ensure online safety

11.6.2. Staff and pupils are given information about infringements in use and possible sanctions.

11.6.3. The Safeguarding Lead acts as first point of contact for any incident

11.6.4. Any suspected online risk or infringement is reported to Safeguarding Lead that day

11.6.5. Any concern about staff misuse is always referred directly to the CEO, unless the concern is about the CEO in which case the compliant is referred to the Chair of Trustees and the LADO (Local Authority's Designated Officer)

11.6.6. Any suspected phishing and or financial scams, will be reported to the Anti-Phishing Working Group (https://apwg.org/).

11.7. Education and Curriculum

11.7.1. Circles Alt Ed:

a. Has a clear, progressive online safety education programme as part of the Computing curriculum/PSHE and other curriculum areas as relevant. This covers a range of skills and behaviours appropriate to their age and experience

b. Plans online use carefully to ensure that it is age-appropriate and supports the learning objectives for specific curriculum areas

c. Will remind students about their responsibilities through the Student and Parent Handbook

d. Ensures staff are aware of their responsibility to model safe and responsible behaviour in their own use of technology, e.g. use of passwords, logging-off, use of content, research skills, copyright

e. Ensures that staff and pupils understand issues around plagiarism; how to check copyright and also know that they must respect and acknowledge copyright/intellectual property rights

f.   Ensure pupils only use Circles Alt Ed-approved systems and publish within appropriately secure / age-appropriate environments.

g.   DfE 'Teaching Online Safety in school' outlines how the curriculum will support children to learn about risk and responsibility.

h.   Online safety concerns will be taken to the SLT in the same way as any other form of harm, or risk of harm.

11.7.2.   Circles will help pupils stay safe online by helping them to recognise, through the curriculum and through support offered to them, that:

a.   Some online content tries to make people believe something false is true and/or mislead (misinformation and disinformation)

b.   Companies use techniques to persuade people to buy something

c.   Some games and social media companies use techniques to try to keep users online longer (persuasive/sticky design)

d.   There are grooming risks online, such as grooming into criminal activities.

11.7.3.   Circles will help pupils recognise acceptable and unacceptable behaviours by:

a.   looking at why people behave differently online, for example how anonymity (you do not know me) and invisibility (you cannot see me) affect what people do

b.   looking at how online emotions can be intensified resulting in mob mentality

c.   teaching techniques (relevant on and offline) to defuse or calm arguments, for example a disagreement with friends, and disengage from unwanted contact or content online

d.   considering unacceptable online behaviours often passed off as so-called social norms or just banter. For example, negative language that can be used, and in some cases is often expected, as part of online gaming and the acceptance of misogynistic, homophobic and racist language that should never be tolerated online or offline

11.7.4.   Circles will help pupils identify and manage risk by:

a.   discussing the ways in which someone may put themselves at risk online

b.   discussing risks posed by another person's online behaviour

c.   discussing when risk taking can be positive and negative

d.   discussing "online reputation" and the positive and negative aspects of an online digital footprint. This could include longer-term considerations, i.e how past online behaviours could impact on their future, when applying for a place at university or a job for example

e.   discussing the risks vs the benefits of sharing information online and how to make a judgement about when and how to share and who to share with

f.   asking questions such as what might happen if I post something online? Who will see it? Who might they send it to?

11.8. Staff training

11.8.1. Circles Alt Ed:

a. Makes regular training available to staff on online safety issues
b. Provides, as part of the induction process, all new staff [including those on university/college placement and work experience] with information and guidance on the Online Safety Policy and the Circles Alt Ed's Acceptable Use Agreements.

11.9. Parent awareness

11.9.1. Circles Alt Ed:

a. Provides induction for parents which includes online safety
b. Ensures parents and carers are aware of what their children are being asked to do online, including the sites they will be asked to access and who they will be interacting with online

11.10. Expected conduct and Incident management

11.10.1. All users:

a. Are responsible for using the Circles Alt Ed IT and communication systems in accordance with the relevant Acceptable Use Agreements
b. Understand the significance of misuse or access to inappropriate materials and are aware of the consequences
c. Understand it is essential to reporting abuse, misuse or access to inappropriate materials and know how to do so
d. Understand the importance of adopting good online safety practice when using digital technologies in and out of Circles Alt Ed
e. Know and understand Circles Alt Ed policies on the use of mobile and hand held devices including cameras

11.10.2. Staff, volunteers and contractors

a. Know to be vigilant in the supervision of children at all times, as far as is reasonable, and uses common-sense strategies in learning resource areas where older pupils have more flexible access
b. Know to take professional, reasonable precautions when working with pupils, previewing websites before use; using age-appropriate (pupil friendly) search engines where more open Internet searching is required with younger pupils

11.10.3. Parents/Carers:

a. Should provide consent for students to use the Internet, as well as other technologies, as part of the Parent Consent form
b. Should know and understand what Circles Alt Ed's 'rules of appropriate use for the whole Circles Alt Ed community' are and what sanctions result from misuse.

11.11. Incident Management

11.11.1. There is strict monitoring and application of the online safety policy and a differentiated and appropriate range of sanctions

11.11.2. All members of Circles Alt Ed are encouraged to be vigilant in reporting issues, in the confidence that issues will be dealt with quickly and sensitively, through Circles Alt Ed's escalation processes

11.11.3. Support is actively sought from other agencies as needed (i.e. the local authority, LGfL, UK Safer Internet Centre helpline, CEOP, Prevent Officer, Police, IWF) in dealing with online safety issues

11.11.4. Monitoring and reporting of online safety incidents takes place and contribute to developments in policy and practice in online safety within Circles Alt Ed

11.11.5. Parents/carers are specifically informed of online safety incidents involving young people for whom they are responsible

11.11.6. The Police will be contacted if one of our staff or pupils receives online communication that we consider is particularly disturbing or breaks the law

11.11.7. We will immediately refer any suspected illegal material to the appropriate authorities

11.12. CCTV

11.12.1. We have CCTV in Circles Alt Ed as part of our site surveillance for staff and student safety.

11.12.2. The use of CCTV is clearly signposted in Circles Alt Ed.

11.12.3. We will not reveal any recordings without appropriate permission.

11.13. Digital images and video

11.13.1. We gain parental/carer permission for use of digital photographs or video involving their child as part of the Circles Alt Ed agreement form when their daughter/son joins Circles Alt Ed (or annually)

11.13.2. We do not identify pupils in online photographic materials or include the full names of pupils in the credits of any published Circles Alt Ed produced video materials/DVDs

11.13.3. Staff sign the Circles Alt Ed's Acceptable Use Policy and this includes a clause on the use of mobile phones/personal equipment for taking pictures of student's detailed within the Staff Code of Conduct

11.13.4. If specific student photos (not group photos) are used on the Circles Alt Ed web site, in the prospectus or in other high profile publications the Circles Alt Ed will obtain individual parental or student permission for its long term, high profile use

11.13.5. Circles Alt Ed blocks/filter access to social networking sites unless there is a specific approved educational purpose

11.13.6. Students are taught about how images can be manipulated in their online safety education programme and also taught to consider how to publish for a wide range of audiences which might include governors, parents or younger children as part of their computing scheme of work

11.13.7. Students are advised to be very careful about placing any personal photos on any 'social' online network space. They are taught to understand the need to maintain privacy settings so as not to make public, personal information.

11.13.8. Students are taught that they should not post images or videos of others without their permission. We teach them about the risks associated with providing information with images (including the name of the file), that reveals the identity of others and their location. We teach them about the need to keep their data secure and what to do if they are subject to bullying or abuse

11.13.9. Upskirting and sexualised images will be dealt with inline with 'Keeping Children Safe in Education' guidance and reported to the police. Devices with suspected explicit images on will be held within the safe and handed over to the police. Staff **will not** view the devices to confirm the images exist.

11.14. Remote Education

11.14.1. Circles Alt Ed communicates with parents and students on staying safe whilst participating in remote education (see Annex 5 for Parent/Carer communication).

11.14.2. Remote education will be provided in a number of formats:

   a.   Paper based student workbooks posted out on a regular basis and collected for marking once completed
   b.   E- workbooks published on our secure learning platform using Microsoft Office 365
   c.   Live lessons using Microsoft Teams.

11.14.3. We do not believe these formats pose additional safeguarding risks and can actually bring many benefits, including improved engagement. Circles Alt Ed ensures the following points are adhered to when broadcasting live lessons:

   a.   use neutral or plain backgrounds
   b.   ensure appropriate privacy settings are in place
   c.   ensure staff understand and know how to set up and apply controls relating to pupil and student interactions, including microphones and cameras
   d.   set up lessons with password protection and ensure passwords are kept securely and not shared
   e.   ensure all staff, pupils, students, parents and carers have a clear understanding of expectations around behaviour and participation

Safer Recruitment Policy Statement

Created: March 2016   Reviewed: Annually   To be reviewed again: Nov 2024

The safer recruitment of staff in schools/alternative provisions is the first step to safeguarding and promoting the welfare of children in education.

Circles Alt Ed is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. Circles Alt Ed is also committed to providing a supportive and flexible working environment to all its members of staff.

We recognises that, in order to achieve these aims, it is of fundamental importance to attract, recruit and retain staff of the highest calibre who share this commitment. It is recognised that this can only be achieved through sound procedures, good interagency co-operation and the recruitment and retention of competent, motivated employees who are suited to, and fulfilled in the roles they undertake.

Circles Alt Ed recognises the value of, and seeks to achieve a diverse workforce, which includes people from different backgrounds, with different skills and abilities. We are committed to ensuring that the recruitment and selection of all who work within the school is conducted in a manner that is systematic, efficient, effective and promotes equality of opportunity.

Circles Alt Ed will uphold its obligations under law and national collective agreements to not discriminate against applicants for employment on the grounds of age, sex, sexual orientation, marital status, disability, race, colour, nationality, ethnic origin, religion or creed.

The aims of Circles Alt Ed's recruitment policy are:
- to ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position;
- to ensure compliance with all relevant legislation, recommendations and guidance including the statutory guidance published by the Department for Education (DFE), Keeping Children Safe in Education (2016) (KCSIE) ('The Guidance') and any advice published by the Disclosure and Barring Service (DBS);
- to ensure that the School meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre- employment checks.

All positions within Circles Alt Ed are exempt from the Rehabilitation of Offenders Act 1974 and therefore all applicants will be required to declare spent and unspent convictions, cautions and bind-overs, including those regarded as spent and have an Enhanced Disclosure & Barring Service Check.

SEN Policy

Created: March 2019   Reviewed: Annually   To be reviewed again: Nov 2024

Definition of SEN (Special Educational Needs)

Students have Special Educational Needs (SEN) if they have a learning difficulty that calls for additional educational provision above that which maintained mainstream schools are able to provide within their budget or expertise.

Students have a learning difficulty if they:

I.   Have a significantly greater difficulty in learning than the majority of pupils of the same age.
II. Have physical or mental impairment that has a substantial and long term adverse effect on their ability to carry out day-to-day activities.
III. Are under compulsory school age and fall within the definition of either/both of the above or would do so if special educational provision was not made for them.

The majority of students attending Circles have special educational needs, some have a formal EHCP in place, some have EHCP processing, and some do not meet the threshold for an EHCP but still present with a need that mainstream has struggled to meet in part.

Aims of this policy

- To ensure entitlement and access to a range of vocational qualifications that allow students to increase their knowledge, build a foundation to go on to further study/apprenticeships/employment, and above all boost their self-esteem.
- To encourage leaners of all abilities to take control of their vocational development.
- To allow all Circles students to develop a range of skills outside of the formal vocational qualifications that enable them to be able to lead a fulfilled life embedded within their communities.
- To ensure that the range of qualification and teaching strategies in place meet the varied range of needs presented by our young people.
- To highlight access requirements, and to make suggestions to further places of study about reasonable changes to learning.

Suitability of Placement

A student referral to Circles establishes a partnership between the referring school/agency/LA and Circles for the delivery of vocational alternative education. As part of this process it is key that information is shared both ways around any specific SEN needs of the student so that the placement can be tailored to achieve the best outcomes.

Students are grouped predominantly via interests while at Circles, where a student needs additional 1:1 support they will still form part of a group where ever possible as social interaction is a fundamental part of the Circles Day.

EHCP Review meetings

Circles will endeavour to attend virtually and/or physically any EHCP review meetings, where possible these meetings should be schedules outside of the school day as all Circles staff are student facing. Where meeting are unable to be attended a report will be provided.

Differentiation

The underlying ethos of Circles is that the traditional school system is not suited to everyone, regardless of SEN need. All Circles courses are designed with extensive differentiation techniques in mind.

The concept of SEN means that it is an ever evolving science, where appropriate Circles looks to utilise new concepts of engagement where ever possible.

November 2023	Current	Benefit	Development
SOCIAL	• Students' Social Moral Spiritual & Cultural is developed in hair & beauty in a number of ways. We believe that in educating our students to think about the impact of their hair & beauty activities are making on people, society and hair & beauty sector. Students are expected to grow and develop a sense of social responsibility, mutual respect and care for each other through our teaching of behaviour self-regulation. We expect students to influence the behaviour of others around them by encouraging a confidence to challenge each other when standards fall below our collective expectations. • Mutual respect is gathered through the process of peer evaluation of each other's work and standards. We empower students to take criticism positively and to articulate their views in a respectful and sensitive way. We support this through the celebration of human imperfection as a motivator to learn and succeed. • We support students search for Meaning and Purpose through encouraging creativity in hair and beauty activities. Students draw upon a variety of sources for inspiration. Many of these are natural but true creativity comes from the freedom to explore within more open ended projects	**Aid in development of identity/belonging/ ownership.** **Promote social interaction.** **Different social settings** **Learning how to get along with people that you wouldn't always choose to.** **Understanding peoples different needs**	**Guiding learners to be supportive to one another** **Supporting and encouraging creativity in hair & beauty** **Supporting learners to take responsibility and mutual respect for each other**

MORAL	- In hair and beauty we seek to develop a sense of moral conscience by encouraging students to work with each other and groups of students they wouldn't ordinary choose to work with. This develops a reflection of the real world of work, when the students will have to work with a diverse range of people; this also shows students a clear understanding of how their treatment of other people reflects on themselves and other members of their team. - Each student is encouraged to develop a moral conscience and responsibility to work, and must work professionally with each client, along with following health & safety working practices at all times. Students are also encouraged to reflect on the products they are using and the impact these have on the environment.	**Respect for self, each other, elders, any living thing.** **Equal chances for all.** **Care for the environment**	**Focus more upon praise rather than discipline.** **Raise awareness on what products and waste can harm the environment** **Encourage health & safety responsibility**

SMSC Policy Social Moral Spiritual Cultural

SPIRITUAL	• Spiritual development in hair and beauty appears in many forms. The schemes of work develop a sense of encouragement, surrounding learning about themselves and the world around them. This is evident when we learn how different cultures design hair & make up • The use of imagination and creativity is highly developed as students are given the freedom to investigate a range of different skills and techniques within hair and beauty, but importantly given time to reflect upon these skills in order to develop them further.	**Willingness to reflect and see different peoples perspectives / feelings.** **Gain a sense of enjoyment and indulge imagination.** **Accepting life/death, understanding right/wrong.**		**Encourage more discussion during group work and social leisure time.** **Encourage imagination and research into cultures within hair & beauty**
CULTURAL	• The hair and beauty industry is a multi cultural industry offering services to a vast range of clients from all different cultures and religions. Within this subject we investigate how styles and techniques have evolved from different cultures, both present day and historically. The students are encouraged to respect cultural diversity and develop skills for a range of cultural events.	**Understanding different viewpoints, beliefs, morals, diets, habits and so on.**		**Ensure learners are aware of different Cultures and equal opportunities.**

Social Media Policy

Created: March 2016   Reviewed: Annually   To be reviewed again: Nov 2024

Circles Alt Ed recognises that many staff, parents, carers and pupils use the internet for personal purposes and that they may participate in social networking on social media websites such as Facebook, Snapchat, Instagram, Redditt, Twitter, Youtube, etc. In addition, staff, governors, parents and carers may set up personal weblogs or "blogs" on the internet. Whilst staff, governors, parents and carers are free to use the internet in this way, they must ensure that they do not breach the law or disclose Circles Alt Ed's confidential information, breach copyright, defame the school, its staff, governors, parents, carers and pupils.

They must not disclose personal data or information about any individual that could breach the Data Protection Act 1998 or Circles Alt Ed E-Safety policy. They should keep completely confidential, any information regarding the children, their families or other staff which is learned through the school. The purpose of this policy is to outline the responsibilities of staff, governors, parents and carers setting up personal websites and blogs and using social networking websites. This policy relates to material posted on public areas and those restricted to certain individuals.

SOCIAL MEDIA DEFINITION
Social media technologies take on many different forms including magazines, Internet forums (messageboards), weblogs (blogs), microblogging (Twitter, Reddit), social networks (Facebook, Myspace, etc), podcasts, photographs or pictures, video and virtual game worlds (Moshi Monsters, Club Penguin, etc).

WEBSITES AND BLOGS
The following guidelines apply: • Staff, parents and carers must not disclose any information that is confidential to the school or any third party that has disclosed information to the school. • Staff, governors, parents and carers should not link any personal websites, social networking sites etc to the school's website. • Staff, governors, parents and carers must not use the school website, internet systems, e-mail addresses or intranet for their weblog and staff must not write their weblog in employer time. • If a member of staff, governor, parent or carer is asked to contribute to an official weblog connected to the school, then special rules will apply and they will be told in detail how to operate and what to write. • Circles Alt Ed will not tolerate criticisms through social media websites and blogs. If a member of staff feels aggrieved then they must follow the procedures outlined in the Complaints and Whistleblowing Policy.

SOCIAL NETWORKING SITES
The school respects a member of staff's right to a private life. However; the school must also ensure that confidentiality and its reputation are protected. The school expects all staff, governors, parents and carers to: • Ensure that they do not conduct themselves in a way that is detrimental to the school. • Take care not to allow their interaction on these websites to damage working relationships between members of staff and clients of the school.

IMPORTANT CONSIDERATIONS

When writing a weblog and placing information on social networking sites, staff, governors, parents and carers should follow these guidelines: • Do not include any information that breaches copyright and should link to other material rather than cutting and pasting it • Do not defame (libel) anyone. A member of staff, governor, parent or carer who makes a defamatory statement that is published on the internet may be legally liable for any damage to the reputation of the individual concerned • Include personal information about an individual without his/her consent, otherwise they risk breaching the Data Protection Act 1998, which is a criminal offence • Include material that is abusive, defamatory, sexist, racist or that could be interpreted as harassment or bullying • Bring Circles Alt Ed into disrepute • Staff should only access social media sites in their own time • Staff should not comment on any posts made by others relating to the school • Staff should not share or discuss matters relating to the school • It is not advisable to invite parents/carers to become your friends on social networking sites. There may be a conflict of interest and security and privacy issues, but where relationships are already established, staff should proceed with caution, being fully aware of the social media guidelines and the teacher's code of conduct • Staff should not accept friend requests from Circles Alt Ed pupils under any circumstances • Staff should use the privacy settings available • Staff should not share personal conversations. • Staff should behave respectfully and should not engage in topics that may be considered objectionable or inflammatory such as politics or religion.

CYBER BULLYING

Circles Alt Ed is committed to ensuring that all of its staff, parents/carers and pupils are treated with dignity and respect. Bullying and harassment of any kind will not be tolerated. Cyber-bullying methods could include text messages, emails, phone calls, instant messenger services, circulating photos or video clips or by posting comments on web sites, blogs or in chat rooms. Personal blogs that refer to colleagues without their consent is also unacceptable. Staff, governors, parents and carers who cyber-bully could 3 also face criminal prosecution under various laws, including the Malicious Communications Act 1988.

PERSONAL USE OF THE INTERNET

Circles Alt Ed does not allow personal use of the internet during session times. DISCIPLINARY ACTION If necessary, action will be taken against any member of staff, governor, parent or carer who is found to have breached this Policy. Staff should also refer to the Disciplinary Policy.

SECURITY AND IDENTITY THEFT

Staff, governors, parents and carers should be aware that social networking websites are a public forum, particularly if they are part of a 'network'. Staff, governors, parents and carers should not assume that their entries on any website will remain private. Staff, governors, parents and carers must also be security conscious and should take steps to protect themselves from identity theft, for example by restricting the amount of personal information that they give out. Social networking websites allow people to post detailed personal information such as date of birth, place of birth and, for example, favourite football team which can form the basis of security questions and passwords. Review date: May 2018

Staff Development Policy and Procedures

Created: March 2016   Reviewed: Annually   To be reviewed again: Nov 2024

MISSION STATEMENT

Circles is committed to encouraging, supporting and delivering training and development for all staff throughout Circles to aid each department and the organisation as a whole to meet its objectives thereby assisting its centres to remain competitive and highly effective.

POLICY

1. Policy Statement

Only development that is deemed to be entirely work-related and which will be to the benefit of the department or organisation will be supported.

2. Staffing

Staff Development lies with Brad Kaylor or Alex Stone. Contactable by phone or email.

3. Explanation of staff development

Staff training and development is a means to ensure an organisation's workforce is adequately equipped with the knowledge, skills and competencies to perform well in their current work-role and for the future to assist the organisation, in this case Circles, in achieving its objectives. This may be achieved in a number of ways e.g. attending events, coaching, mentoring, shadowing, one-to-one work. It is important that access to development is fair, equitable and must be to the benefit of the department and the organisation.

4. Aims

The Staff Development function aims to provide comprehensive advice, guidance and development opportunities for all Circles staff in order to support the organisation in the attainment of its objectives.

5. Objectives

To support staff affected by restructuring.
To communicate training and development opportunities in paper and electronic formats.
To review the School's current induction process

6. Responsibilities for staff development

The SLT is centrally responsible for providing advice, guidance and opportunities for staff, based on information received. It is also responsible for evaluating all centrally funded events to ensure they are cost-effective and to the benefit of the organisation. The SLT will fully administer all events.

Managers are responsible for identifying development needs and encouraging their staff to participate in development activity at probation, review or during other activities. Managers must agree any activity and sign request forms allowing this to proceed and agreeing the time away from work. On completion of the event, it is expected that managers will facilitate the dissemination of the new learning in the workplace, as appropriate, either through the individual or in the context of a team learning event.

Individuals are responsible for identifying and suggesting learning opportunities to their managers based on their current job descriptions and career aspirations. A 'Request for Development' form must be expressed by the individual. It is the individual's responsibility to ensure that this is followed up on and implemented.
Individuals will be expected to behave appropriately at any learning event and to fill-in an evaluation form on completion that may be subsequently forwarded to their line manager for information.

PROCEDURES
7. Entitlement
Circles recognises that all staff whether full-time, part-time or fixed-term are entitled
to access development opportunities.

All staff at the Circles, whether full-time, part-time, fixed-term or temporary are entitled to
access the induction programme.

Access to development is at the line manager's discretion and the discretion of the Diectors who will
aim to ensure equality of opportunity throughout the whole department. Where the development
requires funding over £500, agreement must be sought only from the Directors.

Development activity will be monitored by the Directors - aiming to ensure fairness and equity of
treatment under the policy.

8. Requesting Staff Development
All requests for staff development, including IT training, must be received in writing.
a supporting management signature.

Verbal requests cannot be accepted as formal requests.

Any requests received without an authorising signatory will be returned to the applicant.

Development events can be requested for individuals, teams and departments where it is
deemed appropriate.

9. Staff Absence Requiring Cover
Where attendance of an individual at an event will require staff cover, Directors
are encouraged to speak to all staff to try and find cover of the staff member whilst away from work.

Directors will not be able to provide any additional resources for staff cover.

10. Charging for Staff Development Activity
If departments have no budget for staff development, staff will be able to
access central funds at no cost where there is a perceived benefit to the department and
the organisation although this will be in a timely manner alongside the Centre's every day running..

11. Cancellation of events
Failure to attend an event or where a staff member has to withdraw or cancel their place
(either internal or external) leading to a cost for Circles, will be investigated by the
Directors and a charge will be incurred by their department, unless there are exceptional
circumstances.

12.Circles courses
Please see the Fee Remission policy, available from Brad or Alex.

13. Appeals
Where an application for development is not successful, an individual may appeal to the
Directors.

14. Funding for External Courses
All requests for short external courses must be made in writing with full supporting
documentation. Full costs must be included on this form and if the request is successful,
only these costs will be paid. Any additional costs will have to be met by the individual or
the department. As per contract of employment, costs may be recouped by Circles if a staff member
leaves within two years. Staff are required to select local venues wherever possible.

Directors will arrange all course bookings, but all travel & accommodation requests, must be arranged
by the individual.

Staff are requested to travel by the cheapest methods wherever possible. Only travel over and above
that usually paid to travel to work will be funded.

15. Funding for Accredited Courses
All requests for Supported Study for accredited courses must be submitted in writing.

Staff are advised that only external accredited courses that are deemed to be work-
related, and which will enhance the individual's performance to the benefit of the
Department and Circles will be considered for funding.

Managers are required to monitor progression of their staff undertaking accredited
courses. Where staff are struggling in their course, managers should approach the staff
to discuss the need for further assistance.

Staff are encouraged to explore at least three different providers of the course they wish
to pursue, before requesting funding. These possibilities should be discussed with the
line manager or the Directors, who will be able to advise on the most appropriate course of study.

Staff are discouraged from pursuing a course involving full or part day-release. However,
where no other provider can be sourced, release will be dependent on the Directors agreement. In
this instance, Director's are encouraged to speak to staff about the feasibility of offering a flexible-
working arrangement and issues relating to the cover of the staff member whilst away from work.

Funding offered to individual staff for supported study will be 100%.

Directors will arrange all course bookings, but all travel & accommodation requests, must be arranged
by the individual.

All approved requests for accredited courses will be confirmed in writing and subject to
the following conditions. All applicants, other than in exceptional circumstances, will have completed
their probationary period before applying for financial assistance for an accredited course.

The funding received will be in the form of a loan which will have to be repaid to
Circles in the event of the individual leaving within a two year period following
the completion of the course. Repayments will be calculated on a pro-rata basis.

100% repayment will be expected if an individual leaves within 6 months of
completing the course, 75% within one year of completion, 50% within 18 months
of completion and 25% within the two year period. The terms of the loan cease
after this two year period.

Circles may not be able to fund any repeat parts of a course following failure to complete. In this
instance, a written statement will be required from the individual or manager. Circles will fund travel
and, where appropriate, accommodation for a course.

However, all costs must have been included on application. Once funding has
been agreed at a set cost, additional funding will not be possible.

Circles will not pay for membership of professional bodies or pay for any books or additional
resources required for a course.

Funding for a course will only be agreed on an annual basis. Funding for a second or subsequent
year of a course will depend on the funds available for staff development within Circles at that time
and an acceptable level of progress in the first year.

16. Study & Examination Leave

Staff who are sitting examinations following completion of a work-related course that has
been funded by Circles are entitled to take one day's paid leave for each day they sit
an examination. In addition, staff may take one day's paid study leave for each examination.

ll study and examination leave is granted in addition to annual leave entitlement, but
must be agreed by the Directors.

Staff who apply for study or examination leave for a course which is not Circles funded
will not be eligible for study leave and must use their annual leave.

17. Payment of Membership Fees

The Directors will not pay any membership fees for staff wishing to join professional associations.

18. Conference Attendance

Where a department has a budget for conferences or staff development, will be unable to offer
funding. Academic conferences in the staff member's relevant field of expertise will not be funded
by staff development as funding exists within each Faculty for this activity. Only conferences directly
related to duties and responsibilities expected to be performed by an individual can be funded.

Where a department has no conference budget, requests may be made to Directors, subject to
availability of funds.

A maximum of two places per conference may be funded by staff development. Any other places will have to be funded by departments.

19. Recommendations

It is suggested that one person in each department, probably a manager, acts as a training and development representative. This person should meet with the Directors to discuss developments against plans and receive advice and guidance on how best to proceed.

Staff Student Conduct Policy

Created: March 2016   Reviewed: Annually   To be reviewed again: Nov 2024

1.0   Introduction

1.1   This policy sets out clear guidance on the standards of behaviour expected from all staff at Circles Alternative Education Ltd. The principles underlying the guidance aim to encourage staff to achieve the highest possible standards of conduct and minimise the risk of inappropriate conduct occurring.

1.2   Circles Alternative Education Ltd staff are in a unique position of trust and influence as role models for pupils/students. Therefore, staff must adhere to behaviour that sets a good example to all pupils/students within Circles Alternative Education Ltd sites.

1.3   Staff also have an individual responsibility to maintain their reputation and the reputation of the Circles Alternative Education Ltd, both inside and outside working hours and work setting.

1.4   This policy applies to all staff and volunteers in the Circles Alternative Education Ltd regardless of their position, role or responsibility. References to 'staff' throughout the policy relate to all of the following groups:

    1.4.1   All members of staff including teaching and support staff

    1.4.2   Volunteers, including governors

    1.4.3   Casual workers

    1.4.4   Temporary and supply staff, either from agencies or engaged directly

    1.4.5   Student placements, including those undertaking initial teacher training and apprentices.

1.5   Circles Alternative Education Ltd requires that all staff have read and agree to comply with this policy.

1.6   Breach or failure to observe this policy will result in action being taken under the Circles Alternative Education Ltd disciplinary procedures including, but not limited to, dismissal.

1.7   This code of conduct is not an exhaustive list of acceptable and unacceptable standards of behaviour. In situations where guidance does not exist in this policy staff are expected to exercise their professional judgement and act in the best interests of the pupils/students and Circles Alternative Education Ltd.

2.0 Professional Behaviour and Conduct

2.1 Staff are expected to demonstrate the highest possible standards of personal and professional conduct and behaviour and consistently act with honesty and integrity. Circles Alternative Education Ltd expects staff to treat each other, pupils/students, parents and the wider community with dignity and respect at all times.

2.2 Staff must act in accordance with their duty of care to pupils and ensure that the safety and welfare of pupils are accorded the highest priority.

2.3 Staff should show fairness in their treatment of children and avoid behaviours such as embarrassing or humiliating pupils/students, making jokes at the expense of pupils/students, discriminating against or favouring pupils/students and sarcasm.

2.4 Staff must have regard for the mission statement, ethos and values of Circles Alternative Education Ltd and must not do or say anything which may bring the Circles Alternative Education Ltd or governing body into disrepute. Care should be taken by staff to avoid any conflict of interest between activities undertaken outside Circles Alternative Education Ltd and responsibilities within Circles Alternative Education Ltd. Staff should act in accordance with Circles Alternative Education Ltd's policies and procedures at all times.

3.0 Dress and Appearance

3.1 Circles Alternative Education Ltd recognise that dress and appearance are matters of personal choice and self-expression. However, all staff must dress in a manner that is appropriate to a professional role and that promotes a professional image.

3.2 Staff should dress in a manner that is not offensive, revealing or sexually provocative and in a manner that is absent from political or contentious slogans.

3.3 Staff should dress safely and appropriately for the tasks they undertake.

3.4 Tattoos and body art should be covered while staff are in Circles Alternative Education Ltd. Discreet earrings are acceptable but all other body piercings should be removed while on Circles Alternative Education Ltd premises.

4.0 Smoking, alcohol and other substances

4.1 Circles Alternative Education ltd operates non-smoking sites. Staff must not smoke on Circles Alternative Education Ltd premises or outside Circles Alternative Education Ltd gates. Any member of staff wishing to smoke must leave the Circles Alternative Education Ltd grounds.

4.2 Staff must not smoke whilst working with or supervising pupils offsite.

4.3 Staff must not consume or be under the influence of alcohol, illicit drugs or other illegal substances on or near Circles Alternative Education Ltd premises.

4.4 Staff must refrain from the consumption of alcohol and other substances at Circles Alternative Education Ltd/student events (i.e. Leaving Proms, residential visits) both

within the Circles Alternative Education Ltd premises and outside the Circles Alternative Education Ltd setting.

5.0 Relationships with Pupils/Students

5.1 Staff must maintain professional boundaries with pupils/students appropriate to their position and must always consider whether their actions are warranted, proportionate, safe and applied equitably. Staff should act in an open and transparent way that would not lead any reasonable person to question their actions or intent. Staff should think carefully about their conduct so that misinterpretations are minimised.

5.2 Staff must not establish or seek to establish social contact with pupils for the purpose of securing a friendship or to pursue or strengthen a relationship. If a young person seeks to establish social contact you should exercise your professional judgement in making a response and be aware that such social contact could be misconstrued.

5.3 Staff must not develop personal or sexual relationships with pupils/students and should not engage in any sexual activity with a pupil/student. Sexual activity does not just involve physical contact including penetrative and non-penetrative acts.

5.4 Working Together to Safeguard Children[1] defines *s*exual abuse as ... 'forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

5.5 Staff should be mindful of section 16 of The Sexual Offences Act 2003[2].

5.6 Staff must not make sexual remarks to a pupil/student, discuss their own sexual relationships with, or in the presence of, pupils/students or discuss a pupil's sexual relationships in an inappropriate setting or context.

5.7 Contact with pupils/students should be through Circles Alternative Education Ltd's authorised mechanisms [*liaison with Directors and referring school*]. Personal phone numbers, email addresses or communication routes via all social media platforms should not be used and staff should not share their home address with pupils/students. If contacted via an inappropriate route the member of staff must inform the Headteacher/Director immediately.

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[1]https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419595/Working_Together_to_Safeguard_Children.pdf

[2] Section 16 of The Sexual Offences Act 2003 provides that it is an offence for a person aged 18 or over (e.g. teacher, youth worker) to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual. A situation where a person is in a position of trust could arise where the child is in full-time education and the person looks after children under 18 in the same establishment as the child, even if s/he does not teach the child.

5.8   Circles Alternative Education Ltd staff must not accept friend invitations or become friends with any pupil/student of Circles Alternative Education Ltd on any social media platform. Staff should also refrain from following the Twitter or other similar social media accounts of pupils/students or their parents. Staff must read the Circles Alternative Education Ltd's e-safety policy carefully and follow all advice and guidance contained within it.

6.0   Infatuations

6.1   It is not unusual for pupils or, sometimes, their parents to develop infatuations towards members of staff. All such situations must be responded to sensitively to maintain the dignity of those concerned.

6.2   Staff should also be aware that such circumstances carry a high risk of words or actions being misinterpreted and for allegations to be made against staff. Any indications of an infatuation towards yourself or another member of staff must be reported to your line manager.

7.0   Gifts/Hospitality

7.1   Staff need to take care that they do not accept any gift/offer of hospitality that might be construed as a bribe by others, or lead the giver to expect preferential treatment. However, there may be occasions where pupils/students or parents wish to give a small token of appreciation to staff, for example at religious festivities or at the end of the year.

7.2   It is unacceptable to receive gifts on a regular basis or to suggest to pupils/students that gifts are appropriate or desired. Money must not be accepted as a gift. If you are unsure whether to accept a gift you should consult your line manager.

7.3   Staff must not accept significant gifts [a sum to be assessed by the Circles Alternative Education Ltd] or hospitality from pupils, parents, carers, actual or potential contractors or outside suppliers. All such gifts/offers of hospitality should be reported to your line manager and recorded.

7.4   Personal gifts must not be given by staff to pupils/students and any reward to pupils/students should be in accordance with Circles Alternative Education Ltd's behaviour policy, recorded and not based on favouritism.

8.0   Physical Contact with Pupils

8.1   There are occasions when it is entirely appropriate and proper for staff to have physical contact with pupils, but it is crucial that they only do so in ways appropriate to their professional role. A 'no touch' approach is impractical for most staff and may in

some circumstances be inappropriate. When physical contact is made with pupils it should be in response to their needs at that time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background.

8.2   Where feasible, staff should seek the child's permission before initiating contact. Staff should listen, observe and take note of the child's reaction or feelings and, so far as is possible, use a level of contact which is acceptable to the child for the minimum time necessary.

8.3   It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one child in one set of circumstances may be inappropriate in another, or with a different child. Staff should therefore, use their professional judgement at all times.

8.4   Staff should be aware that even well intentioned physical contact may be misconstrued by the child, an observer or by anyone to whom this action is described. Staff should never touch a child in a way which may be considered indecent. Always be prepared to explain actions and accept that all physical contact be open to scrutiny. Staff must not engage in rough play, tickling or fun fights with pupils/students.

8.5   Extra caution should be exercised where a child is known to have suffered previous abuse or neglect. Such experiences may sometimes make a child exceptionally needy and demanding of physical contact and staff should respond sensitively by deterring the child through helping them to understand the importance of personal boundaries.

8.6   Staff supervising PE and games or providing musical tuition should demonstrate the use of a particular piece of equipment/instrument on another member of staff if possible. However, they may be required to initiate physical contact with pupils/students to support a child to perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or to assist them with an exercise. Contact under these circumstances should be done with the pupil/student's agreement, for the minimum time necessary and in an open environment. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the pupil/student.

8.7   Physical contact must never be secretive, for the gratification of the adult or represent a misuse of authority.

8.8   If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be reported to your line manager, recorded and, if appropriate, a copy placed on the child's file.

8.9   Staff should refer to Circles Alternative Education Ltd's Physical Intervention/Positive Handling training/policies.

9.0   Child in distress

9.1   There may be occasions when a pupil/student is in distress and in need of comfort as a reassurance. This may include age appropriate physical contact. Staff should

remain self-aware at all times in order that their contact is not threatening, intrusive or subject to misinterpretation.

9.2 Such incidents should always be recorded and shared with your line manager. If you have a particular concern about the need to provide this type of care and reassurance you should seek further advice from your line manager.

10.0 Showers and changing

10.0 Pupils/students are entitled to respect and privacy whilst they are changing or showering after PE/games or swimming. However, there needs to be an appropriate level of supervision in order to safeguard young people, meet health and safety requirements and to ensure that bullying does not take place. The supervision should be appropriate to the needs and age of the pupils/students and sensitive to the potential for embarrassment.

10.1 Staff should be vigilant about their own behaviour and announce their intention of entering a changing room. Staff must not change or shower in the same place as children.

11.0 One to one situations

11.1 Staff working individually with pupils/students should be aware of the potential vulnerability of pupils/students and staff in such situations. Staff should manage these situations with regard to the safety of the pupil/student and to themselves.

11.2 Individual work with pupils should not be undertaken in isolated areas or rooms where there is no external viewing panel. Where it is necessary to close doors for reasons of confidentiality a colleague should be made aware of this and asked to remain vigilant.

12.0 Transporting pupils

12.1 In certain circumstances it may be appropriate for staff to transport pupils/students offsite, for example sports fixtures, swimming lessons or other out of Circles Alternative Education Ltd activities. A designated member of staff should be appointed to plan and provide oversight of all transport arrangements and to respond to any difficulties that may arise.

12.2 Staff should ensure that the transport arrangements and the vehicle meet all legal requirements. Staff should ensure that the driver has the appropriate license for the vehicle, that the vehicle is roadworthy, has a valid MOT certificate and is appropriately insured and that the maximum capacity is not exceeded.

12.3 Staff should ensure that the driver is not distracted while the vehicle is in motion for any reason other than an emergency and should also ensure all passengers are wearing correctly fastened seatbelts. Staff should never transport pupils/students while under the influence of alcohol or drugs.

12.4   Prior to transporting pupils offsite consent must be obtained from pupil/students' parent/guardian and staff should be aware that the safety and welfare of the pupils/students is their responsibility until this is safely passed back to their parent/carer.

13.0   E-Safety

13.1   Staff should follow Circles Alternative Education Ltd's E-Safety policy for staff and the Acceptable Use Policy at all times and have regard for Circles Alternative Education Ltd's E-Safety policy for pupils.

13.2   Staff must not engage in inappropriate use of social network sites which may bring themselves, the Circles Alternative Education Ltd or the Circles Alternative Education Ltd community into disrepute. Staff should adopt the highest security settings on any personal profiles they have.

13.3   Staff should remain mindful of their digital footprint and exercise caution in all their use of social media or any other web based presence they have. This includes written content, videos or photographs and views expressed either directly or by 'liking' certain pages or posts or following certain individuals or groups. Staff should exercise care when using dating websites where staff could encounter students.

13.4   Staff must not make contact with pupils, must not accept or initiate friend requests nor follow pupils/students accounts on any social media platform. Staff must not communicate with pupils/students via social media, websites, instant messenger accounts or text message. The only acceptable method of contact is via the use of Circles Alternative Education Ltd email accounts or telephone equipment.

13.5   Staff should not make contact with pupils' family members, accept or initiate friend requests or follow pupils' family member's account on any social media platform.

13.6   However, Circles Alternative Education Ltd acknowledges that staff who are also parents may wish to make contact with other parents, who are friends, over social media. Staff must exercise caution and professional judgement in these circumstances and should not have any contact with pupils' family members via social media if that contact is likely to constitute a conflict of interest or call into question their objectivity.

13.7   Mobile phones and personally-owned devices may not be used during lessons or formal Circles Alternative Education Ltd time. They should be switched off (or silent) at all times. The Bluetooth functionality of a mobile phone should be switched off at all times and may not be used to send images or files to other mobile phones. Mobile

phones and personal devices are not permitted to be used in certain areas within the Circles Alternative Education Ltd site such as changing rooms and toilets.

13.8   Mobile phones and personally-owned mobile devices brought in to Circles Alternative Education Ltd are the responsibility of the device owner. Circles Alternative Education Ltd accepts no responsibility for the loss, theft or damage of personally-owned mobile phones or mobile devices.

14.0   Photography, video and images of children

14.1   Many Circles Alternative Education Ltd activities involve recording images as part of the curriculum, extra Circles Alternative Education Ltd activities, publicity or to celebrate an achievement. In accordance with The Data Protection Act 1998 the image of a pupil/student is personal data. Therefore, it is a requirement under the Act for consent to be obtained from the parent/guardian of a pupil/student for any images made. It is also important to take into account the wishes of the pupil/student, remembering that some pupils/students do not wish to have their photograph taken or be filmed.

14.2   Using images for publicity purposes will require the age-appropriate consent of the individual concerned and their parent/guardian. Images should not be displayed on websites, in publications or in a public place without their consent. Staff should also be clear about the purpose of the activity and what will happen to the photographs/images/video footage when the lesson or activity is concluded.

14.3   Photographs/stills or video footage of pupils/students should only be taken using Circles Alternative Education Ltd equipment for purposes authorised by the Circles Alternative Education Ltd and should be stored securely and only on Circles Alternative Education Ltd equipment.

14.4   Staff should ensure that a member of the Senior Leadership Team is aware of the proposed use of photographic/video equipment and that this is recorded in lesson plans. All photographs/stills and video footage should be available for scrutiny and staff should be able to justify all images/video footage made.

14.5   Staff should remain aware of the potential for images of pupils/students to be misused to create indecent images of children and/or for grooming purposes. Therefore, careful consideration should be given to how activities which are being filmed or photographed are organised and undertaken. Particular care should be given when filming or photographing young or vulnerable pupils/students who may be unable to question how or why the activities are taking place. Staff should also be mindful that pupils/students who have been abused through the use of video or photography may feel threatened by its use in a teaching environment.

15.0 Confidentiality

15.1 Members of staff may have access to confidential information about pupils/students, their parents/carers or their siblings. Staff must not reveal such information except to those colleagues who have a professional role in relation to the pupil/student on a need to know basis.

15.2 Staff should never use confidential or personal information about a pupil/student or her/his family for their own, or others' advantage (including that of partners, friends, relatives or other organisations). Information must never be used to intimidate, humiliate, or embarrass the pupil/student.

15.3 All staff are likely at some point to witness actions which need to be confidential. For example, where a pupil/student is bullied by another pupil/student, this needs to be reported and dealt with in accordance with the appropriate Circles Alternative Education Ltd procedure. It must not be discussed outside the Circles Alternative Education Ltd, including with the pupil/student's parent or carer, nor with colleagues in the Circles Alternative Education Ltd except by a senior member of staff with the appropriate authority to deal with the matter.

15.4 Staff have a statutory obligation to share with Circles Alternative Education Ltd's Designated Safeguarding Lead or Deputy Designated Safeguarding Lead any information which gives rise to concern about the welfare or safety of a pupil/student or that might suggest a pupil/student is in need or at risk of significant harm. Staff should pass on information without delay in accordance with Circles Alternative Education Ltd's safeguarding policy and procedures and this should be recorded. Staff must never promise a pupil/student that they will not act on or pass on any information that they are told by the pupil/student.

15.5 Staff should refer to the Department of Education's document Information sharing: advice for practitioners providing safeguarding services[3] for further guidance on information sharing. If you are in any doubt about whether to share you should seek guidance from a member of the senior leadership team.

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[3]https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419628/Information_sharing_advice_safeguarding_practitioners.pdf

15.6   Any media or legal enquiries should be passed to the senior leadership team and only approved staff and Governors should communicate to the media about the Circles Alternative Education Ltd.

16.0   Whistleblowing

16.1   Whistleblowing is the mechanism by which staff can voice their concerns, without fear of repercussion.

16.2   All Circles Alternative Education Ltd staff have a duty to report any behaviour by a colleague which raises concern. Staff should refer to Circles Alternative Education Ltd's whistleblowing policy for further guidance. This is particularly important where the welfare of pupils/students may be at risk.

17.0   Compliance

17.1   All staff must complete the PPP form to confirm they have read, understood and agree to comply with this policy. This form should be signed and dated and a copy retained on the member of staff's file. Available in the office or Employees resources of server.

PPP Form

Confirmation of compliance

I hereby confirm that I have read, understood and agree to comply with Circles Alternative Education Ltd's staff behaviour policy.

Name …………………………………………..

Position/Post Held……………………….

Signed ……………………………………..   Date ………………………………

Once completed, signed and dated, please return this form to your line Manager / Director.

Circles Alt Ed Supervision Policy

General Statement
Circles Alt Ed believe that the School should provide a caring, positive, safe and stimulating environment, which promotes the social, physical and moral development of all pupils. During the school day, teachers act 'in loco parentis', and are responsible for exercising a standard of care that would be expected by a caring and prudent parent. It is our policy to ensure that a balance exists between the meticulous supervision of children every moment that they are at school and the desirable object of encouraging independence.

Aims
Circles Alt Ed is committed to ensuring pupils are safe and appropriately supervised at all times, both in school and during off-site visits. The school is committed to ensuring that:

☐ Pupil supervision and security always forms part of the risk assessment for any activity or visit.
☐ Supervision of pupils takes into account the age, maturity, needs and numbers of pupils, as well as the location and type of activities in which they are engaged.
☐ Staff ratios for supervision are within regulatory guidelines at all times, whether pupils are involved in school activities on the school premises or attending educational visits offsite.
☐ Appropriate staff duty rotas are in place which demonstrate levels of staff supervision which are satisfactory in terms of numbers and staff competence in view of the pupils and the situation.
☐ Mandatory staffing ratios for EYFS provision and after school care are enforced. While the policy aims are the same across the whole school, the detailed procedures are adjusted to suit the age, number, and any special needs of the pupils concerned, and the nature and location of the different activities in which they are engaged (on-site, off-site matches, offsite visits).

This policy is applicable to all young people including those in EYFS. The school seeks to implement this policy through adherence to the procedures set out in the rest of this document. This document is available on our website and on request from the school office and should be read in conjunction with the following documents: Risk Assessment, Off-site Visits, Missing Child, (including uncollected pupils), Behaviour, Discipline & Sanctions, Anti-bullying.

When supervising pupils in their care staff:
☐ Follow the Health & Safety Policy and the medical (First Aid) Policy and procedures ☐ Have a high awareness of pupil well-being
☐ Ensure the environment and any equipment being used is safe
☐ Are vigilant and active and ensure equal access, opportunity and inclusion for all pupils ☐ Intervene when necessary to avoid incidents
☐ Have high expectations for behaviour with regard to the relevant policies on behaviour and anti-bullying
☐ Ensure pupils follow the school values
☐ Ensure pupils are where they should be at all times
☐ Report any concerns or incidents to the SLT

Created Sept 2011   Adapted May 2020   Renewal Due Sept 2024

Acceptable Use of Technology Policy

Created: March 2016   Reviewed: Annually   To be reviewed again: Nov 2024

Introduction

Circles Alt Ed Ltd. provides ICT equipment, and in some cases, access to email and the Internet, to learners during the course of their learning experience with us. Office employees use ICT in their day-to-day jobs, and tutors and trustees use CIRCLES ALT ED LTD. equipment. Email is regularly used for communication purposes between paid and voluntary staff, and in some of our classes. The Internet is also used by paid and voluntary staff, and in some of our classes.
All those who have been granted the right to use the company's equipment to use the Internet and email services are required to abide by this policy.

Acceptable Use

Use of email and the Internet by employees, trustees, volunteers, and learners (whilst in the classroom) of CIRCLES ALT ED LTD. is permitted and encouraged where such use supports the goals and objectives of CIRCLES ALT ED LTD..
However, CIRCLES ALT ED LTD. has a policy for the use of Internet and email whereby employees, trustees, volunteers and learners must ensure that they:
• Comply with current legislation
• Use email and the Internet in an acceptable way
• Do not create unnecessary risk to CIRCLES ALT ED LTD. by their misuse of the Internet.
Unacceptable Use

The following behaviour is considered unacceptable:

• Use of CIRCLES ALT ED LTD. communications systems to set up personal businesses or send chain letters
• Forwarding of CIRCLES ALT ED LTD. confidential messages to external locations
• Searching for, distributing, disseminating or storing images, text or materials that might be
considered indecent, pornographic, obscene or illegal
• Searching for, distributing, disseminating or storing images, text or materials that might be
considered discriminatory, offensive or abusive, in that the context is a personal attack, sexist or racist, or might be considered as harassment
• Accessing copyrighted information in a way that violates the copyright

• Breaking into CIRCLES ALT ED LTD.'s or another organisation's system or unauthorised use of a password/mailbox
• Broadcasting unsolicited personal views on social, political, religious or other non-business related matters
• Transmitting unsolicited commercial or advertising material
• Undertaking deliberate activities that waste staff effort or networked resources
• Introducing any form of computer virus or malware into the corporate network
• Office staff spending an excessive amount of time on personal emails or on the Internet.
• Take pictures, videos or recordings of other people in the class, unless authorised by the tutor and learners.
• Take pictures, videos or recordings of other learners' work, unless authorised by the tutor and Learners.

Monitoring

CIRCLES ALT ED LTD. accepts that the use of email and the Internet is a valuable business tool. However, misuse of this facility can have a negative impact upon employees, volunteers, trustees and learners, and on the reputation of CIRCLES ALT ED LTD..
CIRCLES ALT ED LTD.'s Internet resources and equipment are provided for business purposes. Therefore, CIRCLES ALT ED LTD. maintains the right to examine any systems and inspect any data recorded in those systems.
In order to ensure compliance with this policy, CIRCLES ALT ED LTD. also reserves the right to use monitoring software in order to check upon the use and content of emails, or use of the Internet. Such monitoring is for legitimate purposes only and will be undertaken in accordance with a procedure agreed with anyone involved.

Action

Where it is believed that an employee has failed to comply with this policy, they will face the company's disciplinary procedure. If the employee is found to have breached the policy, they will face a disciplinary penalty ranging from a verbal warning to dismissal. The actual penalty applied will depend on factors such as the seriousness of the breach and the employee's disciplinary record.
Where it is believed that a trustee, volunteer, tutor or learner has failed to comply with this policy, there will be a full investigation, and appropriate action will be taken. The Manager will deal this with in the first instance.

The Law

Various Acts may be relevant to the misuse of Internet and email. Here are some of them – this is not an exhaustive list:

The Equality Act 2010 covers harassment, on the basis of age, disability, gender reassignment, race, religion or belief, sex and sexual orientation.
The Data Protection Act 1998 – the Act regulates the use of "personal data".
The Copyright, Designs and Patents Act 1988 - the current UK copyright law. It gives the creators of literary, dramatic, musical and artistic works the right to control the ways in which their material may be used. Failure to comply with the law could lead to prosecution.

Tobacco, Nicotine and Inhaled Products Policy

This policy is in reference to legal but often age restricted products, Illegal substances are covered under a separate policy.

Created: Sept 2021   Reviewed: Annually   To be reviewed again: Nov 2024

Circles actively discourages all staff, visitors, contractors, students from the use of any tobacco, nicotine or inhaled recreational product such as vapes regardless of nicotine content.

Aims

- To protect and promote the health of staff, visitors, contractors and students.

- To inform staff, referring agencies, parents and students of their responsibilities in respect of this policy.

- To support stakeholders who wish to stop smoking.

- To promote a culture of a smoke free organisation.

- To make referring agencies, parents and carers aware of how young people with a nicotine addiction will the supported.

All stakeholders including students, wherever and whenever taught are covered by this policy, whether on site, working off site, or during an offsite trip.

This policy covers:

- All Tobacco based products.

- All legally smoked products.

- Nicotine products.

- E-cigarettes and vapes.

- Any device that enables the user to recreationally inhale legal substances regardless of nicotine content.

Policy Principles

It is generally considered that all Circles sites are Smoke and Vape free zones.

- Staff are expected to lead by example and promote a smoke and vape free site at all times during the student day. Staff and contractors that wish use a product covered by this policy must do so in non-work time, i.e. before or after work. Where staff feel unable to wait until the end of the student day, they may at the discretion of their manager, and with the dynamic service needs in mind, take an unpaid break where they must leave the Circles site and not be visible to any stakeholder.

- Once a year this policy will be discussed with staff and other interested parties and updated to reflect shifting issues.

- Circles supports and encourages staff who want to stop or control their smoking/vaping to seek help from the NHS stop smoking service (www.gosmokefree.co.uk) or established services such as ASH - Action on Smoking and Health (www.ash.org.uk) for support. Reasonable paid time off to attend group and/or individual sessions for smokers who want to stop will be proved where possible.

- Staff breach this policy will be disciplined according to company procedures.

- Contractors who breach this policy will be asked to leave site and reported to their company/main contractor.

- Visitors who break this policy will be asked to leave site.

Student Specific Principles

- Students are expected to be none smokers/vapers, at no time should the concept of smoking or vaping be normalized or accepted.

- Circles underlying policy is of discouragement and disapproval of the use of any smoked or vaped product.

- Circles does however acknowledge that a number of students have addiction issues with nicotine based products and takes a pragmatic approach to dealing with the day to day issue, and the longer term process of education and encouragement to overcome such issues.

- Restricted areas can be made available for students identified by referral, with limited and supervised access to smoked/vaped products where such an addiction is present that refusal would likely lead to absconding and/or risky behaviour.
  - Such instances should be individual and not a group setting.
  - Supportive discouragement around smoking/vaping offered.
  - Not be used or seen as a 'smoking break'.

- Students should be encouraged to seek/accept support around giving up smoking/vaping with collaborative referrals to outside agencies by the referring partner.

- Parents will play a vital role in any referral, as generally the organisations can only provide support if the young person is willing to engage as cannot be forced.

- The process of encouraging a young person to stop smoking/vaping is on the most part supportive education around the issue with enragement to make better health choices. A blanket ban is unlikely to affect long term change.

- Students that are receiving help to stop smoking and following a planned nicotine plan, gum, patches, etc will be allowed reasonable changes to their normal day to facilitate such a plan.

Today is the best day to give up smoking!
not next Monday/week/month/year/etc

Nappy Changing, Toileting and Continence Policy and Procedure

Created: March 2019   Reviewed: Annually   To be reviewed again: Nov 2024

Children present in many different ways with regards to their toileting independence as they begin to attend part of full time school.

- Fully toilet trained across all settings
- Fully toilet trained but regress for a little while in response to the stress and excitement of starting school
- Be fully toilet trained at home but prone to accidents in new settings
- Be on the point of being toilet trained but require reminders and encouragement.
- Not toilet trained at all but likely to respond quickly to a well structured toilet training programme.
- Be fully toilet trained but have disabilities or learning difficulties.
- Have delayed onset of full toilet training in line with with other development delays but ewill master these skills during the first few weeks
- Have AEN/SEN that makes it unlikely that they will be toilet trained in the immediate future.

Admitting children who have continence problems into Foundation Stage and Key Stage 1 provision can present a challenge to schools. The purpose of this policy and guidelines is to identify best practice to achieve the full inclusion of such children.

Child Protection

The normal process for assisting with personal care, such as changing a nappy should not raise child protection concerns. There are no regulations that state that a second member of staff must be available to supervise the nappy changing process to ensure that abuse does not take place. DBS checks are rigorous and are carried out to ensure the safety of children with staff employed at our school.

Section 18 in the governement guidance 'Safe Practice in Education' states that:
'Staff should ensure that another appropriate adult is in the vicinity and is aware of the task to be undertaken.'

It is reccomended that the adult who is going to change the child informs the teacher/ another member of classroom staff if in the nursery, that they are going to do this. There is no written legal requirement that two adults have to be present and schools will make this judgement in conjunction with the child and their family.

Location of changing

Whenever possible it is reccomended that:
1. Mobile children are changed standing up
2. If this is not possible the next best alternative is to change a child on a mat on a suitable surface. Children in Year 1 and above should only be changed either on a changing bed or in a toilet cubicle standing up. Staff should consider the childs preference for changing and the outcome of any risk assessments.

Resources

Changing time can be a positive learning time and an opportunity to promote independence and self worth. Church Lane Primary School ensures there is:
- Hot running water
- Paper towels
- Aprons and Gloves
- Nappy Bags
- Cleaning equipment
- Bin

    Parents need to ensure they supply spare clothes, wipes and nappies.

Working with Parents/carers

At Church Lane Primary Nursery we will work with parents when attending to changing routines. If a child has any disability or medical needs that may affect their personal care routine, an Individual Educational Plan (IEP)/Health Care Plan will be drawn up in agreement with parents/carers.

Parents will be asked when their child first starts whether or not their child has any special words/actions/particular needs during their nappy changing procedure. Any significant observations made during a nappy changing procedure will be notified to the parents at the end of the session (i.e. badly soiled nappy/strong urine etc.)

Protection for Staff

Changing procedures and toileting routines will be carried out by the child's Key Person/Teacher or Teaching Assistant, protection being afforded to the single member of staff in the following ways:

If a situation occurs that causes staff embarrassment or concern, a second member of staff should be called if necessary and the incident reported to the Manager and recorded.

Where staff are concerned about a child's actions or comments whilst carrying out the personal care procedure, this should be recorded and discussed with the Manager immediately.

Risk Assessments will be carried out for Toileting and Nappy Changing procedures.

Staff will be trained in the area of Intimate/Personal care for children with specific needs and procedure for safe moving and handling.

Home/School management agreement

Parents/carers

- Agree to change the child at the latest possible time before coming to school
- Provide spare nappies, wet wipes and a change of clothes
- Understand and agree procedures to be followed during changing at school
- Agree to inform school should the child have any marks/rash
- Agree how often the child should be routinely changed if the child is in school for the day and who will do the changing
- Agree to review the arrangements, in discussion with the school, should this be necessary agreeing to encourage the childs participation in toileting procedures wherever possible.

The School setting:
- Agree to change the child should they soil themselves or become wet
- Agree how often the child should be routinely changed if the child is in school for the full day and who would be changing them.
- Agree a minimum number of changes
- Agree to report to the Headteacher or the Designated safeguarding Lead should the child be distressed or if mark/ rashes are seen.
- Agree to review arrangements, in discussion with parents/carers should this be neccesary
- Agree to encourage the childs participation in toileting procedures wherever possible discussing and taking the appropriate action to respect the cultural practices of the family.

Asking or telling parents to come and change their child (unless the parents have expressed a preference for this) or wanting an older sibling to change their brother/sister is likely to be a direct contravention of the DDA, as is leaving a child soiled, which could be considered as a form of abuse since it places the child at risk of significant harm. The process for the management of a childs personal care needs may need to be further clarified through a personal care plan. For example, should a child with complex continence needs be admitted, the childs medical practitioners will need to be closely invoved and a separate, individual toilet management plan may be required.

Procedure for changing a Nappy/Soiled or Wet Pants (as followed by staff)

- Consider where to change the child
- Wash your hands
- Gather all the necessary items needed before each nappy change, for example, nappy, wipes, nappy sack, cream if necessary (each child should have their own named cream and written permission obtained from the parent).
- Put on gloves and apron. A new set of gloves and disposable apron is used for each nappy change.
- Place the child on a nappy changing mat if required.
- Remove the child's clothing to access the nappy/soiled or Wet Pants. Remove them and place them inside the nappy sack.
- If the child's clothes are soiled, you should bag them separately and send them home. You should not rinse them hand.
- Using the wipes, clean the child from front to back and place the used wipes in the nappy sack. Tie the nappy sack and put it in a pedal operated bin.
- Put on a clean nappy and apply cream if necessary (see above).
- Take off the gloves and apron and place them in a pedal operated bin.
- Dress the child.
- Help the child to wash their hands if necessary using liquid soap, warm water and paper towels.
- Wash your hands using liquid soap, warm water and paper towels.
- Take the child back to the room.
- Return to the nappy changing area and using anti bacterial spray and paper towels clean the changing mat, surrounding area and underneath the mat before leaving to dry and then wash and dry your hands.

Toilet Training

Children that are toilet training will be encouraged to sit on the toilet during their nappy changing period. At this time, staff will talk to the children and provide positive praise and reinforce what the child is doing. Stickers may be offered if approved by the parent to reinforce the positive behaviour to the child. A potty may be provided by the parent for their child to use in the setting if they would prefer to.

Children will not be hurried in these daily routines to support them in confidently becoming toilet trained and maintaining a positive experience.
We understand that some children display anxiety at becoming toilet trained and will work slowly and sympathetically alongside them whilst updating parents of their progress at the end of each session.

Appendix 1

Intimate Care Policy:

Introduction

We are committed to ensuring that all staff responsible for the intimate care of children will undertake their duties in a professional manner at all times. We recognise that there is a need to treat all children with respect and dignity when intimate care is given. No child should be attended to in a way that causes distress, embarrassment or discomfort. Children's dignity will be preserved and a high level of privacy, choice and control will be provided to them. Staff that provide intimate care to children have a high awareness of child protection issues. Staff will work in partnership with parents/carers to provide continuity of care.

Definition

Intimate care is any care which involves washing, touching or carrying out an invasive procedure to intimate personal areas. In most cases such care will involve procedures to do with personal hygiene and the cleaning of associated equipment as part of the staff member's duty of care. In the case of specific procedures only the staff suitably trained and assessed as competent should undertake the procedure (e.g. the administration of rectal diazepam).

Our Approach to Best Practice

The management of all children with intimate care needs will be carefully planned. The child who requires care will be treated with respect at all times; the child's welfare and dignity is of paramount importance. Staff who provide intimate care are trained to do so (including Child Protection and Moving and Handling) and are fully aware of best practice. Suitable equipment and facilities will be provided to assist children who need special arrangements following assessment from physiotherapist/ occupational therapist.

Staff will be supported to adapt their practice in relation to the needs of individual children taking into account developmental changes such as the onset of puberty or menstruation. Wherever possible staff involved in intimate care will not be involved in the delivery of sex education to the children in their care as an extra safeguard to both staff and children involved. The child will be supported to achieve the highest level of autonomy that is possible given their age and abilities. Staff will encourage each child to do as much for him/ herself as they are able. Individual intimate care plans will be drawn up for children as appropriate to suit the circumstances of the child. Each child's right to privacy will be respected. Careful consideration will be given to each child's situation to determine how many staff members will need to be present when the child is toileted.

Intimate care arrangements will be discussed with parents/carers on a regular basis and recorded on the child's personal care plan. The needs and wishes of children and parents will be taken into account wherever possible within the constraints of staffing and equal opportunities legislation.

The Protection of Children

Child Protection Procedures and Multi-Agency Protection procedures will be adhered to. If any member of staff has concerns about physical changes to a child's presentation, e.g. marks, bruises, soreness etc. s/he will immediately report concerns to the appropriate designated person for child protection.

If a child becomes distressed or unhappy about being cared for by a particular member of staff, the matter will be looked into and outcomes recorded. Parents/carers will be contacted at the earliest opportunity as part of the process in order to reach a resolution; staffing schedules will be altered until the issue(s) are resolved.

Appendix 2 for Reception and above

Intimate Care Consent

Child's name

Date of birth

Male/ female

Parent/ Carer's name

Address

I understand that:

I give permission to the school to provide appropriate intimate care support to my child e.g. changing soiled clothing, washing and toileting. I will advise the Head Teacher of any medical complaint my child may have which affects issues of intimate care

Signed _____

Relationship to Child _____

Date _____

Training and Continuing Professional Development Policy

Reviewed: Sept 2022

Next review: Sept 2024

Principles

We believe that effective training and CPD contributes significantly to Circles general improvement. An investment in the staff has a positive effect on their motivation and effectiveness and helps to create a climate for learning which affects both staff and students within Circles.

In particular we believe that training and CPD is most effective when it is;
- Owned by staff.
- Relevant and within context.
- Builds on existing knowledge and expertise.
- Feeds from the principles of circles overall training programme.
- Is part of a series of linked training opportunities.
- Provides access to external expertise.

Circles believes that training and CPD practice leads to the following impacts;
- Improve student learning.
- Boost staff confidence.
- Improves teaching through updated and enhanced practises.
- Improves staff morale.
- Promote positive ethos and culture within Circles.
- Has a significant impact on general improvement within Circles.

Values and Entitlements

All staff should take ownership and give a high priority to professional appraisal. All staff contribute as part of a team to the success of Circles and have a right of access to CPD. Therefore all staff have an entitlement to equality of access to high quality training and CPD.
Staff are encouraged to road map their own CPD opportunities, with training in both direct and indirect areas encouraged.

Training to all Circles staff will be linked and integrated to a cohesive strategy of improvement. Whatever possible cross site training is encouraged as a method of sharing best practise.

Monitoring and Evaluation

Staff are expected to maintain a record of their own training and CPD to be shared with the training and CPD coordinator, who in turn updates a manage is the central training database.

Whistleblowing Policy

Reviewed: Sept 2023

Next review: Sept 2024

Introduction

Often it can be the employee who is the first to realise that there may be something wrong within their setting. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or employer; or they may fear harassment, victimisation or other reprisals. In these circumstances, it may be easier to ignore the concern rather than report what may be just a suspicion of malpractice.

Circles is committed to the highest possible standards of service provision and to full accountability for those services. In line with that commitment employees are encouraged to come forward and voice any concerns they may have about any area within Circles or its stakeholders. It is recognised that certain cases will have to proceed on a confidential basis.
This policy document makes it clear that employees can do so without fear of reprisals and is intended to encourage and enable them to raise serious concerns within Circles rather than overlooking a problem or "blowing the whistle" outside.

The policy applies to all employees and those contractors working for Circles or on Circles sites, for example, builders, drivers or visitors. It also covers suppliers and those providing services under a contract.

Public Interest Disclosure Act 1998

This act protects workers who 'blow the whistle' about wrongdoing. It makes;
- Provision about the kind of disclosures which may be protected.
- The circumstances in which the disclosures are protected.
- The persons who may be protected.

The provisions introduced by the act protect most workers from being subjected to a detriment by their employer. Detriment may take a number of forms, such as denial of promotion, facilities or training opportunities, which the employer would otherwise have offered. Employees may make a claim for unfair dismissal if they are dismissed for making a protected disclosure.

Aims and Scope

This policy aims to;

- Provide routes for staff to raise concerns and receive feedback on any action taken.
- Allow staff to take the matter further if they are dissatisfied with the school's response to the concerns expressed.
- Reassure staff that they will be protected from possible reprisals or victimisation.
- Report any concern that you may have regarding a suspicion of malpractice or wrongdoing in any aspect of the school provision, or the conduct of staff within school, or others acting on behalf of the School, can and should be reported under this policy. Employees are expected to report malpractice and wrongdoing, and may be liable to disciplinary action if they knowingly and deliberately do not disclose information relating to

malpractice or wrongdoing in any aspect of the school's provision or the conduct of staff or others acting on behalf of the School.

What is Malpractice or Wrongdoing?

Malpractice and wrongdoing may be about something that;

- Is unlawful; or
- Against the School's or LA's policies; or
- Is not in accordance with established standards of practice; or
- Amounts to improper conduct by an employee.

The overriding concern should be that it would be in the public interest for the malpractice to be corrected and, if appropriate, sanctions to be applied.

The following are examples of issues, which could be raised under this policy. It is not intended to be an exhaustive list and there may be other matters which could be dealt with under this policy:

- Any unlawful act or omission, whether criminal or a breach of civil law.
- Maladministation, as defined by the Local Government Ombudsman.
- Breach of any statutory code of practice.
- Breach of, or failure to implement or comply with and Circles policy.
- Failure to comply with appropriate professional standards or other established standards of practice.
- Corruption or fraud.
- Actions which are likely to cause physical danger to any person, or give rise to risk of significant damage to property.
- Failure to take reasonable steps to report and rectify any situation which is likely to give rise to a significant avoidable cost, or loss of income, to Circles or its stakeholders or would otherwise seriously prejudice Circles.
- Abuse of power, or the use of the school's powers and authority for any unauthorised or ulterior purpose.
- Unfair discrimination in the School's employment or provision.
- Dangerous procedures risking health and safety.
- Abuse of clients.
- Damage to the environment.
- Other unethical conduct.

Safeguards

Harassment or Victimisation, Circles recognise that the decision to report a concern can be a difficult one to take, not least because of the fear of reprisal from those responsible for the malpractice or from the organisation as a whole. Circles will not tolerate any such harassment or victimisation and will take appropriate action in order to protect staff who raise a concern in good faith. In addition, staff are protected in law by the Public Interest Disclosure Act, which gives employees protection from detriment and dismissal where they have made a protected disclosure, providing the legal requirements of the Act are satisfied.

This does not necessarily mean that if staff are already the subject of disciplinary procedures that those procedures will be halted as a result of a concern being raised under this policy.

Confidentiality

It will be easier to follow up and to verify complaints if complainants are prepared to give their names. However, wherever possible the Circles will protect those who do not want their names to be disclosed. It must be appreciated that any investigative process may reveal the source of the information and a statement from complainants may be required as part of the evidence.

Anonymous Allegations

Concerns expressed anonymously are much less powerful, but they will be treated with caution and considered at the discretion of the directors. In exercising this discretion the factors to be taken into account would include:
- The seriousness of the issues raised.
- The credibility of the concern.
- The likelihood of obtaining the necessary information and confirmation of the allegation.

Deliberately False or Malicious Allegations

Circles will view very seriously any deliberately false or malicious allegation it receives, and will regard the making of such allegations by any employee as a serious disciplinary offence which could result in dismissal.

If an allegation is made in good faith, but it is not confirmed by the investigation, no action will be taken against the complainant.

Circles will try to ensure that the negative impact of either a malicious or unfounded allegation about any employee is minimised. However, it must be acknowledged that it may not be possible to prevent all of the repercussions potentially involved.

How is a Concern Raised

If wrongdoing in the workplace is suspected;
- Do not approach or accuse the individuals directly.
- Do not try to investigate the matter.
- Do not convey such suspicions to anyone other than those with the proper authority.

As a first step, raise the concerns with your immediate line manager or supervisor. However, the most appropriate person to contact will depend on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. For example, if you believe that a site manager is involved in the matter of concern, or the normal channels of communication are inappropriate for some reason, you should approach a Director.

Although concerns may be raised verbally, they are better put in writing. It should set out the background and history of the concern giving relevant names, dates and places where possible, and the reason why the situation is of concern.

The earlier a concern is expressed, the easier it is to take appropriate action.

Although complainants are not expected to prove the truth of allegations made it will be necessary for them to demonstrate to the person contacted that there are sufficient grounds for concern.

How Circles Will Respond

The action taken by Circles will depend on the nature of the concern.
Where appropriate, the matters raised may;

- Be investigated by management, internal audit, or through the disciplinary process.
- Be referred to the Police.
- Be referred to the external Auditor.
- Form the subject of an independent enquiry.

In order to protect individuals and the organisation, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations, which fall within the scope of specific procedures (for example child protection or capability issues), will normally be referred for consideration under these procedures.

Some concerns may be resolved by agreed action without the need for investigation.

Within 10 working days of a concern being raised under this procedure the Officer considering the issues will write to the complainant:
- Acknowledging that the concern has been received.
- Indicating how it is proposed to deal with the matter.
- Giving an estimate (so far as is reasonably practicable) of how long it will take to provide a final response.
- Advising whether any initial enquiries have been made.
- Advising whether further investigations will take place and if not, why not

The amount of contact between the complainant and the Officer considering the issues will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of information provided. If necessary, further information will be sought from the complainant.

Where any meeting is arranged the complainant has the right to be accompanied by a colleague who is not involved in the area of work to which the concern relates.

Circles will take appropriate steps to minimise any difficulties the complainant may experience as a result of raising a concern. For example if the complainant may be required to give evidence in criminal or disciplinary proceedings support will be offered.

Circles accepts that the complainant needs to be assured that the matter has been properly addressed. Therefore, subject to any legal constraints, as much information as possible will be provided about the outcomes of any investigation.

How Can The Matter Be Pursued Further?

This policy is intended to provide employees and other persons with an avenue to raise concerns within Circles and it is hoped that this will be the option taken in the first instance.
Circles hopes this will be sufficient, but if not, and it is felt necessary to take the matter outside the School, then depending upon the nature of the issue involved, the following are possible contact points:
- The referring school/agency/LA.
- Relevant professional bodies or regulatory organisations.
- The Police.
- The local Citizens Advice Bureau.
- An independent legal adviser within the meaning of the Public Interest Disclosure Act 1998.
- Regulatory body designated for the purpose of the Public Interest Disclosure Act 1998

If the matter is taken outside of Circles, confidential information must not be disclosed. In addition, to secure the protections afforded by the Public Disclosure Act, the disclosure must be protected within the meaning of the Act and comply within a set of specific conditions which vary according to whom the disclosure is made.