



The Foundation Policy Book

The Positive Impact Group

Effective Date

June 2026

Review Date

June 2027



Table of Contents

<u>Safeguarding and Child Protection Policy</u>	2
<u>Online Safety (E-Safety) Policy</u>	52
<u>Low-Level Concerns Policy</u>	59
<u>Safer Recruitment Policy</u>	65
<u>Alcohol Policy</u>	81
<u>Anti-Bullying Policy</u>	85
<u>Bullying Policy</u>	89
<u>SEND Policy</u>	91
<u>Administrations of Medicines Policy</u>	98
<u>Positive Relationships and Behaviour Policy</u>	108
<u>Attendance Policy</u>	117
<u>Primary Academy Curriculum Policy</u>	122
<u>Secondary and Post-16 Curriculum Policy</u>	126
<u>Equality Objectives Policy</u>	132
<u>Intimate Care Policy</u>	136
<u>Admission and Induction Policy</u>	140
<u>Transporting Pupils Policy</u>	143
<u>Wellbeing Policy</u>	149

Safeguarding and Child Protection Policy

Introduction

The Positive Impact Primary Academy recognises and takes seriously its responsibility to safeguard and promote the welfare of children. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are committed to working together with other agencies to ensure adequate arrangements are in place to identify, assess, and support those children who are suffering harm. We recognise that all adults within the Positive Impact Group have a full and active part to play in protecting and safeguarding the children in our care, and that the pupils' welfare is our paramount concern.

Safeguarding and Child Protection Key Personnel	
Director	James Armson james.armson@positive-impactuk.com
Head of Primary, Designated Safeguarding Lead and SENDCo	Amelia Goodhew amelia.goodhew@positive-impactuk.com
Deputy Designated Safeguarding Lead and LAC Teacher	Gemma Lish gemma.lish@positive-impactuk.com
Local Authority Designated Officer (LADO)	lado@warwickshire.gov.uk 01926745376
Local Authority Children's Services (Family Connect)	triagehub@warwickshire.gov.uk 01926414144
Prevent Officer at Warwickshire County Council	geoffthomas@warwickshire.gov.uk
Warwickshire Safeguarding Children Partnership	wscp@warwickshire.gov.uk 01926746982

Policy Aims

- To provide all staff with the necessary information and standards to enable them to meet their safeguarding and child protection responsibilities.
- To effectively apply consistent good practice through training, auditing, and development.
- To demonstrate the Positive Impact Primary Academy's commitment with regard to safeguarding and child protection to pupils, parents, and other partners.
- To contribute to The Positive Impact Primary Academy's safeguarding portfolio.

We will therefore ensure the following arrangements are in place to safeguard and promote the welfare of children:

- **Prevention**

We will create an ethos and culture where all students feel secure and able to build trusted relationships with staff. Children will be encouraged to talk and feel confident that they will be listened to. Staff and volunteers will be trained regularly to understand their responsibilities to recognise and report safeguarding or child protection concerns. This includes maintaining professional curiosity and understanding that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected and/or may not recognise their experiences as harmful. Students are taught about safeguarding, including online, through various teaching and learning opportunities as part of a broad and balanced curriculum.

- **Protection**

We will ensure that each member of staff, governor and other visitors involved in regulated activity with students has undergone a thorough safer recruitment process and is sufficiently trained and supported to respond appropriately and sensitively to safeguarding and child protection concerns.

- **Support**

We will provide structured systems of support for all students and appoint appropriately qualified and experienced staff (DSLs and DDSLs) to provide advice, training and support around safeguarding concerns.

- **Working with Parents and External Agencies**

We will work closely with parents to ensure appropriate communications and actions are undertaken. We will develop and maintain links with relevant external agencies in all matters relating to safeguarding and child protection. All schools assess the risks and issues in the wider community as part of the safeguarding curriculum.

- **Commitment**

We expect everyone to share this commitment, creating a culture of vigilance.

Positive Impact Primary Academy commits to acting in accordance with Keeping Children Safe in Education. This policy does not aim to replicate the guidance in full. Therefore, the policy should be read in conjunction with at least Part One and Annex B of Keeping Children Safe in Education (2025).

Whilst the policy primarily focuses on the safeguarding of children, it also references the action to be taken if any member of the school community becomes concerned about the safety or welfare of an adult at risk, aged 18 or over.

The Positive Impact Academy Recognises That

- The safety and welfare of a student is always of paramount consideration, and we will work together with parents, carers and other agencies to safeguard and promote the welfare of the child.
- All children, regardless of age, special needs or disability, racial or cultural heritage, religious belief, gender or sexual orientation, have the right to be protected from ill treatment and neglect and to experience a good standard of care.
- All children have the right to be heard, and that the wishes and feelings of the child should be sought and influence the decision-making.
- All incidents and allegations of suspicious or poor practice or abuse will be taken seriously, listened to and responded to appropriately. This includes allegations raised through the whistleblowing procedures.
- There is a consistent understanding of acceptable behaviour of young people towards other young people and staff within the school.
- Safeguarding is everyone's responsibility.

Positive Impact Primary Academy Expects

- Everyone should be alert to signs of abuse, neglect and exploitation and to follow procedures to ensure that children receive effective support and protection.
- Everyone knows to whom they should report any concerns or suspicions.
- Everyone is committed to creating a culture of safety that minimises the opportunity for any kind of abuse (including all forms of child-on-child abuse) through training, education and robust response procedures.
- We have procedures (of which all staff and visitors are aware) for handling suspected abuse of students, including procedures to be followed if a member of staff is accused of abuse or suspected of abuse.
- A Designated Safeguarding Lead (DSL) and any Deputy Designated Safeguarding Leads (DDSLs) have responsibility for coordinating action within the setting and liaising with other agencies. They must develop expertise and skills to be the most appropriate person to advise on the response to safeguarding concerns.

We commit to working in partnership with the Warwickshire County Council Safeguarding Partnership (WS) and will follow their guidance and implement their systems and protocols for referring families for early help and reporting child protection concerns. The school is committed to developing effective working practice with locality support networks and agencies. DSLs will ensure that all staff and governors are aware of issues and systems for reporting and will provide local safeguarding updates, as signposted by Warwickshire Safeguarding and partners.

This policy is applicable to all on- and off-site activities undertaken by pupils whilst they are in the responsibility of the setting; Positive Impact Primary Academy is committed to anti-discriminatory practice and recognises children's diverse circumstances. Some children are at an increased risk of abuse, and additional barriers can exist for some children to recognise or disclose abuse. We ensure that all children have the same protection, regardless of any barriers they may face.

Legislation and Statutory Guidance

Statutory Guidance

- Keeping Children Safe in Education (KCSiE) (2025)
- Working Together to Safeguard Children (2023)
- Multi-agency statutory guidance on female genital mutilation (2020)

- Early Years Foundation Stage (2025)
- Teachers' Standards July (2021)

Legislation

- The Children Act 1989 and The Children Act (2004)
- Section 5B (11) of the Female Genital Mutilation Act (2003), as inserted by section 74 of the Serious Crime Act (2015)
- The Rehabilitation of Offenders Act (1974)
- Safeguarding Vulnerable Groups Act (2006)
- Counterterrorism and Security Act (2015) (and the Prevent Duty guidance)
- The Education Act (2002)
- Education (Independent Academy Standards) (England) Regulations (2014)
- The Academy Staffing (England) Regulations (2009)
- Part 1 of the schedule to the Non-Maintained Special Academies (England) Regulations (2015)
- The Equality Act (2010)
- The Childcare (Disqualification) Regulations 2009 (and 2018 amendment)
- The Childcare (Act 2006)
- Public Sector Equality Duty (2012)
- Care Act (2014)
- Mental Capacity Act (2005)

The school has regard to the following guidance and reviews relating to safeguarding:

- [Working Together to Safeguard Children DfE \(December 2023\)](#)
- [Keeping Children Safe in Education DfE \(2025\)](#)
- [Working Together to Improve School Attendance, DfE \(August 2024\)](#)
- [Guidance for Safer Working Practices for Adults Who Work with Children and Young People in Education Settings \(Feb 2022\)](#)
- [What To Do If You're Worried a Child is Being Abused DfE \(March 2015\)](#)
- [Information Sharing: Advice for Practitioners Providing Safeguarding Services DfE \(May 2024\)](#)
- [The Prevent Duty: Departmental Advice for Schools and Childcare Providers DfE \(September 2023\)](#)
- [The Prevent Duty: Safeguarding Learners Vulnerable to Radicalisation \(Updated March 2024\)](#)
- [Mandatory Reporting of Female Genital Mutilation: Procedural Information Home Office \(January 2020\)](#)

- [Multi-Agency Practice Principles for Responding to Child Exploitation and Extra-Familial Harm](#)
- [Child Sexual Exploitation: Guide for Practitioners DfE \(February 2017\)](#)
- [Teaching Online Safety in School DfE \(January 2023\)](#)
- [Mental Health and Behaviour in Schools DfE \(November 2018\)](#)
- [Data Protection: Toolkit for Schools DfE \(Updated June 2025\)](#)
- [Promoting the Education of Children with a Social Worker and Children in Kinship Care \(Updated July 2025 to include Virtual School\)](#)
- [Preventing Youth Violence and Gang Involvement](#)
- [Criminal Exploitation of Children and Vulnerable Adults: County Lines](#)
- [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education \(Updated 2025\)](#)
- [Domestic Abuse Act 2021 Statutory Guidance \(Home Office April 2023\)](#)

Guidance from Warwickshire Safeguarding:

- www.safeguardingwarwickshire.co.uk
- [Early Help](#)
- [Families First for Children – Child Friendly Warwickshire](#)

Safeguarding Information for All Staff

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child.

Safeguarding and promoting the welfare of children is defined in KCSiE (2025) as:

- providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment, whether that is within or outside the home, including online;
- 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;

- 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, the term 'safeguarding' refers to everything our setting does to keep children safe and promote their welfare, including, but not limited to:

- Supporting students' health, safety and well-being, including their mental health.
- Meeting the needs of children with special educational needs and/or disabilities.
- Meeting the needs of children with medical conditions.
- Providing first aid.
- Providing educational visits.
- Ensuring intimate care and emotional wellbeing needs are met.
- Maintaining a focus on online safety and associated issues.
- Ensuring appropriate arrangements are in place to ensure school security, taking into account the local context.
- Keeping children safe from risks, harm, exploitation and radicalisation.
- Ensuring effective child protection procedures are in place and understood.
- Working with partner services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help/support when additional needs of children are identified and contributing to interagency plans to provide additional support to children subject to Child in Need or Child Protection plans.

Child Protection is defined as the activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online. Effective safeguarding means practitioners should understand and be sensitive to factors, including economic and social circumstances and ethnicity, which can impact children and families' lives.

'Staff' refers to all those working for or on behalf of the school, full time or part time, in either a paid or voluntary capacity.

'Child' refers to all young people who have not yet reached their 18th birthday. All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.

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

Roles and Responsibilities

The Director, James Armson, has overall responsibility for the internal strategic management of a whole school approach to safeguarding and the policy within the Positive Impact Group's settings.

The Designated Safeguarding Leads and the Deputy Designated Persons have undertaken the appropriate training required by this role. The names of the Designated Safeguarding Leads and other members of staff responsible for Child Protection will be clearly advertised in the school, with a statement explaining the school's role in referring and monitoring cases of suspected abuse.

Child protection concerns or allegations against adults working in the school are referred to the Local Authority Designated Officer for advice. Contact details are listed at the beginning of this document. Where there are low-level concerns about staff conduct, these will be addressed using procedures in the staff code of conduct. Any member of staff found not suitable to work with children will be notified to the Disclosure and Barring Service (DBS) for consideration for barring, following resignation, dismissal, or when they cease to use their service as a result of a substantiated allegation, in the case of a volunteer. Please refer to our DBS Policy for further guidance on this area. The Local Authority Children's Services contact details are listed at the beginning of this document.

The Prevent Duty Partner details are listed at the beginning of this document. Please see the section of this policy relating to radicalisation for more information on this.

Parents/carers are made aware of this policy and their entitlement to have a copy of it via the website.

A Local Safeguarding Children Board/Local Safeguarding Partnership (LSCB/LSP) brings together organisations responsible for Safeguarding and agrees on how they will cooperate with one another to safeguard and promote the welfare of children. The main responsibilities of the LSCB/LSP are to coordinate and quality assure the safeguarding children activities of member agencies.

The Designated Safeguarding Lead (DSL) and Deputy Designated Person (DDP)

The Designated Safeguarding Lead holds ultimate responsibility for Child Protection and Safeguarding in the setting and:

- Act as a source of support and expertise on matters relating to safeguarding and child protection to ensure that other members of staff can carry out their safeguarding duties.
- Provide oversight, support and challenge to DDSLs.
- Act as a point of contact with the safeguarding partners and engage fully with requests for information (e.g., Section 175 audit).
- Be aware of and up to date with the latest national and local guidance and requirements, ensuring this is shared with all key personnel.
- Advice on the response to safeguarding concerns, ensuring that all safeguarding concerns raised by staff are properly assessed, categorised, actioned and resolved, and ensuring that decisions and rationales are clearly recorded.
- liaise with the Local Authority and work with other agencies in line with 'Working Together to Safeguard Children' (2023).
- Be aware of the requirement for children to have an Appropriate Adult and follow the procedures outlined in Searching, Screening, and Confiscation 2022.
- Identify if children may benefit from Early Support.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.
- Make referrals to the Channel programme where there is a radicalisation concern and/or support staff who make a referral to Channel.
- Support the head with regard to their responsibilities under the Prevent duty and provide advice and support on protecting children from radicalisation.
- Refer cases to the police where a crime may have been committed, with reference to When to call the police NPCC; be available during school hours for staff to discuss any safeguarding concerns. In the event that they are not available, a deputy will be made available.
- Undertake training to equip them with the skills to carry out the role and update this every two years.
- Maintain a forensic understanding of safeguarding data, including data relating to child-on-child abuse.

-
- Ensure all staff who work directly with children have read and understood Part 1 and Annex B of KCSiE (2025).
 - Ensure all staff who do not work directly with children have read either Part 1 or Annex A (as appropriate) of KCSiE (2025).
 - Update their knowledge and skills regularly and keep up with any developments relevant to their role.
 - Provide staff in the school with the knowledge, skills and support required to safeguard children.
 - Ensure that all school staff and those working with the school receive initial training and appropriate regular update training via whole staff training or bulletins on safeguarding, including how to recognise the signs and symptoms of abuse. This includes provision of training on how to report a safeguarding concern through the IRIS Adapt.
 - Ensure that all staff can demonstrate an understanding of child abuse, neglect and exploitation and their main indicators, including for children in care (looked after children). Staff can also demonstrate an understanding of wider safeguarding issues (details in Annex B of KCSiE) and the additional vulnerabilities of children with special educational needs and disabilities or those who identify as gender questioning.
 - Take responsibility for the accurate and timely recording of safeguarding and child protection concerns, and take overall responsibility for safeguarding and child protection files.
 - Take responsibility for the transfer of safeguarding files when a child leaves their school, adhering to KCSiE's five school day transfer limit.
 - Monitor school mobility, and in particular take responsibility for ensuring that those children removed from the school are removed in adherence with LA guidance, ensuring that all reasonable steps are taken to ensure that the child is safe.
 - Attend or ensure an appropriate representative attends multi-agency safeguarding or child protection meetings.
 - Ensure that parents and carers are informed of the safeguarding procedures by a statement in the school's prospectus, access to the policy and procedures on the school website and reminders via newsletters.
 - Work closely with other relevant education professionals (e.g., SENCo, Virtual Schools Head) to ensure children with additional vulnerabilities are safeguarded (including engagement to facilitate Para 199 of KCSiE 2025, allowing the virtual head to promote educational achievement of children in kinship care).

- Help to promote educational outcomes of children who have experienced or are experiencing safeguarding or child protection issues by sharing relevant information with teachers and the school's leadership team.
- Promote a 'culture of safeguarding', in which every member of the school community acts in the best interests of the child.
- Meet regularly with relevant staff to share information about emerging trends and ensure that the safeguarding curriculum is meeting the needs of students.
- Meet regularly with the Director to ensure that safe recruitment practices are in place and effective, including checking that the School's Single Central Record is maintained in line with statutory guidance.

In the absence of the DSL, the Deputy Designated Person will carry out the role as outlined above.

If, at any point, there is a risk of immediate serious harm to a child, a referral should be made to Family Connect immediately. Anyone can make a referral.

The DSL will undergo updated child protection training at least every 2 years, with regular refresher training to keep updated with the national and local initiatives.

Good Practice Guidelines for All Staff

All staff play a particularly important role because they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.

All staff:

- have a responsibility to provide a safe environment, where children can learn.
- will be made aware of and should be clear on the school's policy and procedures with regard to safeguarding and child-on-child abuse, and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.
- will complete mandatory training provided by the school so that they know and understand: how to identify indicators of neglect, harm and abuse and the behaviours associated with these risks; what to do if a child discloses information which is a safeguarding concern (including FGM); what safeguarding systems are

in place within the school, including the use of IRIS for recording concerns, decisions, actions, and outcomes.

- must be aware of who the DSLs and DDSs in the safeguarding team are.
- are responsible for ensuring that they have read and understood key policies such as the Safeguarding and Child Protection Policy, the Code of Conduct Policy, the Behaviour Policy, and how to respond to children who are absent from education, particularly on repeat occasions and/or prolonged periods. Staff should also be aware of the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies). Staff must also regularly familiarise themselves with the key information contained in Annex B of KCSIE 2025 in conjunction with this policy.
- should be prepared to make referrals to the Family Connect if they are concerned that a child is suffering, or likely to suffer, significant harm and understand the role that they may be expected to play in social care assessments.
- will be encouraged to contribute to the development of safeguarding policy and practice.

All staff who work directly with children will be provided with a copy of, and must read, Part 1 and Annex B of KCSIE annually and will receive ongoing training to maintain knowledge and skills, including safeguarding roles and responsibilities. Staff who do not work directly with children will be provided with a copy of Part 1 of KCSIE (2025) and must read this document. In either case, all members of staff must sign a declaration confirming they have done this.

Please also refer to The Positive Impact Academy's Code of Conduct for all staff and volunteers.

Abuse of Trust

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

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

Impact Primary Academy staff and a pupil under 18 may be a criminal offence, even if that pupil is over the age of consent.

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

Definitions and Guidance

Different Forms of Abuse

To ensure that our children are protected from harm, we need to understand what types of behaviour constitute abuse. Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical, as well as the impact of witnessing ill treatment on others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or by another child or children.

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

- **Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in, a child.
- **Emotional abuse** is the persistent emotional maltreatment of a child, such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate or valued only for meeting the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, causing children to frequently feel frightened or in danger, or the exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

- **Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative and non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.
- **Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing or shelter, including exclusion from home or abandonment; failing to protect a child from physical and emotional harm or danger; failure to ensure adequate supervision, including the use of inadequate caretakers; or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Child-on-Child Sexual Violence and Sexual Harassment

The Positive Impact Primary Academy recognises that children are capable of abusing their peers, and that this abuse can include: bullying (including cyberbullying); physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence, such as rape, assault by penetration and sexual assault; sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse; up-skirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; sexting (also known as youth produced sexual imagery); initiation/hazing type violence and rituals. The values, ethos and behaviour

policies provide the platform for staff and students to clearly recognise that abuse is abuse and it will never be tolerated or diminished in significance. It should be recognised that there is a gendered nature to child-on-child abuse, i.e. that it is more likely that girls will be victims and boys perpetrators. Schools should recognise the impact of sexual violence and the fact that children/young people can, and sometimes do, abuse their peers in this way.

As an alternative education provider:

- We will not tolerate instances of child-on-child abuse and will not pass it off as “banter”, “just having a laugh” or “part of growing up”.
- We will follow both national and local guidance and policies to support any children/young people subject to child-on-child abuse, including sexting (also known as youth-produced sexual imagery) and gang violence.
- We will follow the guidance on managing reports of child-on-child sexual violence and sexual harassment in schools.
- We will always record episodes of ‘up-skirting’.
- We will monitor, act, analyse and report on this and all forms of child-on-child abuse (prejudice & bullying).

While bullying between children is not a separate category of abuse, neglect or exploitation, it is a very serious issue that can cause considerable anxiety and distress. All incidents of bullying should be reported and will be managed through our anti-bullying procedures. If the bullying is particularly serious, or the anti-bullying procedures are deemed ineffective, the Head/DSL will consider implementing child protection procedures.

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

Child-on-Child Sexual Violence and Sexual Harassment

Sexual violence reports from children are important. A culture of vigilance, of being proactive and a zero-tolerance approach ensures that children are confident to report concerns. Victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children rather than criminalise them. Staff must inform the DSL (or Deputy) as soon as practically possible if the DSL (or Deputy) is not involved in the initial report. The DSL (or Deputy) will manage the report in line with current guidance in KCSIE. When taking down details of any harassment, the staff member devotes their full attention to the child and listens to what they are saying. All children are reassured, supported and taken seriously; they are never made to feel ashamed. When making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note-taking. Nevertheless, it is essential that a written record is made.

Confidentiality

The victim may ask the school not to tell anyone about the sexual violence or sexual harassment. Staff taking a report should never promise confidentiality. The DSL (or a DDSL) should consider the following:

- Parents or carers should normally be informed unless this would put the victim at greater risk.
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to the local authority children's social care.
- Sexual assaults are crimes. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains.

If a referral to local authority children's social care and/or a report to the police is made against the victim's wishes, this should be handled extremely carefully, the reasons should be explained to the victim and appropriate specialist support should be offered.

Additional information on confidentiality and information sharing is available at Safeguarding Practitioners Information Sharing Advice and NSPCC: Information sharing and confidentiality for practitioners.

Risk Assessments

A report of sexual violence or sexual harassment should include the time and location of the incident. Subsequent risk assessments will include any actions required to make the location safer. It is also important to understand intra-familial harms and identify any necessary support for siblings following incidents of sexual violence or sexual harassment.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

CSE involves exploitative situations, contexts and relationships where young people receive something as a result of engaging in sexual activities. Sexual exploitation can take many forms. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim, which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, manipulation, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying, including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse and may not see themselves as a victim and may resent interference. However, this should not influence whether or not a referral is made. Some of the following signs may be indicators of CSE: children appear with unexplained gifts, who may have an older boyfriend or girlfriend, who misuse drugs and alcohol, who are absent for periods of time or suffer changes in their emotional well-being.

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual

activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc., without a plausible explanation;
- gang-association and/or isolation from peers/social networks;
- exclusion or unexplained absences from school, college or work;
- leaving home/care without explanation and persistently absent or returning late;
- excessive receipt of texts/phone calls;
- returning home under the influence of drugs/alcohol;
- inappropriate sexualised behaviour for age/sexually transmitted infections;
- evidence of/suspicious of physical or sexual assault;
- relationships with controlling or significantly older individuals or groups;
- multiple callers (unknown adults or peers);
- frequenting areas known for sex work;
- concerning the use of the internet or other social media;
- increasing secretiveness around behaviours; and
- self-harm or significant changes in emotional well-being.

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues:

- Having a prior experience of neglect, physical and/or sexual abuse;
- lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example);
- recent bereavement or loss;
- social isolation or social difficulties;
- absence of a safe environment to explore sexuality;
- economic vulnerability;
- homelessness or insecure accommodation status;
- connections with other children and young people who are being sexually exploited;
- family members or other connections involved in adult sex work;
- having a physical or learning disability;
- being in care (particularly those in residential care and those with interrupted care histories); and

- sexual identity.

CCE is where an individual or a group takes advantage of power to coerce, manipulate or deceive a child or young person into committing a criminal act. CCE of children/young persons can involve force/enticement-based methods of compliance, which can involve threats of violence or actual violence and may include:

- Travelling outside of the area they live in on public transport: the county lines.
- Committing crimes on behalf of or requested by others because friends/family are being threatened with violence to settle debts or fabricated debts.
- Being forced to commit crimes so they can be part of a gang.
- Being encouraged or manipulated to commit crimes by social media.
- Receiving food, money, or status in return for storing weapons or drugs.
- Participating in 'cuckooing', a form of crime in which drug dealers take over the home of a vulnerable person in order to use it as a base for drug dealing.

Some of the following signs may be indicators of CCE:

- Wearing new clothes, having money, mobile phones, etc., without a reasonable excuse;
- gang association or isolation from friends, different friends/social network;
- exclusion or periods of absence from school;
- going missing from home/care without explanations;
- receiving lots of texts or calls. The abuse can be perpetrated by individuals or groups, males or females, and children or adults.

The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

Female Genital Mutilation (FGM)

All staff need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk, but if there are two or more indicators present, this could signal a risk to the child or young person. It should be noted

that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

For more information on the warning signs in relation to FGM, please visit the government advice link:

<https://www.gov.uk/government/publications/female-genital-mutilation-guidelines>

There is a statutory duty upon teachers to report to the police where they discover that FGM appears to have been carried out on a girl under 18. Section 5B of the Female Genital Mutilation Act 2003 places a statutory duty upon teachers, along with regulated health and social care professionals in England and Wales, to report to the police where they suspect that FGM appears to have been carried out on a girl under the age of 18.

In addition to FGM, the African practice of “ironing” a girl’s chest with a hot stone to delay breast formation is spreading in the UK. This is a practice whereby mothers, aunties or grandmothers use a hot stone to massage across the breast repeatedly in order to “break the tissue” and slow its growth. The perpetrators, usually mothers, consider it a traditional measure which protects girls from unwanted male attention, sexual harassment and rape. Medical experts and victims regard it as child abuse, which could lead to physical and psychological scars, infections, inability to breastfeed, deformities and breast cancer.

Mental Health

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation and school has an important role to play in supporting the mental health and well-being of our pupils.

Whilst only appropriately trained professionals should attempt to make a diagnosis of a mental health problem, staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse, neglect or exploitation, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children’s experiences can impact their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the Safeguarding policy and speaking to the DSL or a Deputy.

Additional information, advice and guidance have been published by the DFE, Public Health England and NSPCC.

Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism.

From 1 July 2015, all schools are subject to section 26 of the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism. This duty is known as the Prevent duty. The statutory Prevent guidance summarises the requirements on schools in terms of four general themes: risk assessment, working in partnership, staff training and IT policies.

It is possible to prevent vulnerable people from being radicalised during this process. However, there is no single way of identifying those individuals who are vulnerable. Radicalisation can occur in many different ways, including specific background factors or specific influences such as family and friends. Social media and the internet are also major factors in the radicalisation of young people. Risk Assessment requires a general understanding of the risks affecting children and young people in the community and how to identify individual children who may be at risk of radicalisation.

As with other safeguarding risks, staff should be alert to changes in behaviour which could indicate that children may be in need of support or protection. Staff should use their professional judgement and act proportionately, which may include making a referral to the Channel programme.

Channel is a programme which focuses on providing support at an early stage to those who are identified as being vulnerable to being drawn into terrorism. An individual's engagement with the programme is entirely voluntary at all stages. Following a referral to Channel, an assessment will be made to the extent to which identified individuals are vulnerable to being drawn into terrorism, and, where considered appropriate and necessary consent is obtained, arrangements will be made for support to be provided to those individuals.

For more information on this guidance, please visit the government advice link below:
<https://www.gov.uk/government/publications/channelguidanceceple>

Absent from Education

We recognise that full attendance at school is important to the well-being of all our pupils and enables them to access the opportunities made available to them at school. Attendance is monitored closely as patterns of absence are sometimes a cause for concern. Absence may be linked to overlapping issues, and contextual safeguarding should be reinforced.

A child absent from education is a potential indicator of abuse, neglect or exploitation. Where a child has been absent from school with no explanation for 2 days, a home visit should be made to ensure the child's wellbeing. The DSL will monitor unauthorised absence, particularly where children are absent on repeated occasions. Where a pupil has 10 consecutive school days of unexplained absence and all reasonable steps* have been taken by the school to establish their whereabouts without success, the school should make an immediate referral to your local Councils Children Missing Education (CME) Service. Home visits will be conducted when appropriate.

Reasonable steps may include:

- Telephone calls to all known contacts
- Letters home, including recorded delivery
- Contact with other schools where siblings may be registered
- Possible home visits, where safe to do so
- Enquiries to friends, neighbours, etc. through school contacts
- Enquiries with any other Service known to be involved with the pupil/family
- All contacts and outcomes are to be recorded in the pupil's file

Illegal Drugs

When there is evidence or reasonable cause to believe that a young person is using illegal drugs, appropriate action and support will be taken.

Further enquiries and/or further action will be taken when the school receives reliable information about drug and alcohol abuse by a child's parents/carers.

Youth Produced Sexual Imagery (Sexting)

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal.

Youth-produced sexual imagery refers to both images and videos where:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.
- Consensual and non-consensual taking and sharing nude photographs of under-18s is a criminal offence.
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.
- All incidents of this nature should be treated as a safeguarding concern and in line with the UKCCIS guidance 'Sexting in schools and colleges: responding to incidents and safeguarding young people'.
- Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child are child sexual abuse and should be responded to accordingly.

If a member of staff becomes aware of an incident involving youth-produced sexual imagery, they should follow the child protection procedures and refer to the DSL as soon as possible. The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view, copy or print the youth-produced sexual imagery.

The DSL should hold an initial review meeting with appropriate school staff and subsequent interviews with the children involved (if appropriate). Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm. At any point in the process if

there is concern that a young person has been harmed or is at risk of harm, a referral should be made to Children's Social Care or the Police as appropriate.

Early information sharing is vital. Immediate referral at the initial review stage should be made to Children's Social Care/Police if:

- The incident involves an adult.
- There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent. For example, owing to special education needs.
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent.
- The imagery involves sexual acts.
- The imagery involves anyone aged 12 or under.
- There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example, the child is presenting as suicidal or self-harming.

If none of the above applies, then the DSL will use their professional judgement to assess the risk to pupils involved and may decide, with input from the Director, to respond to the incident without escalation to Children's Social Care or the police.

In applying judgment, the DSL will consider if:

- There is a significant age difference between the sender/receiver.
- There is any coercion or encouragement beyond the sender/receiver.
- The imagery was shared and received with the knowledge of the child in the imagery.
- The child is more vulnerable than usual, i.e. at risk.
- There is a significant impact on the children involved.
- The image is of a severe or extreme nature.
- The child involved understands consent.
- The situation is isolated, or if the image has been more widely distributed.
- There are other circumstances relating to either the sender or recipient that may cause for concern, i.e. difficult home circumstances.
- The children have been involved in incidents relating to youth-produced imagery before.

If any of these circumstances are present, the situation will be escalated according to our child protection procedures, including reporting to the police or children's social care. Otherwise, the situation will be managed within the school.

The DSL will record all incidents of youth-produced sexual imagery, including both the actions taken, actions not taken, reasons for doing so and the resolution in line with safeguarding recording procedures. Youth refers to anyone under the age of 18.

Online Safety

Our pupils increasingly use electronic equipment on a daily basis to access the internet and share content and images via social media sites such as Facebook, Twitter, Instagram and Snapchat. Schools have appropriate filtering and monitoring on all school devices and school networks. All staff will undertake training to understand the process of the filtering and monitoring system.

Unfortunately, some adults and other children use these technologies to harm children. The harm might range from sending hurtful or abusive texts or emails to grooming and enticing children to engage in sexual behaviour such as webcam photography or face-to-face meetings. Pupils may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders.

Where pupils are learning remotely, staff will encourage parents to provide their child/ren with age-appropriate supervision and have the necessary parental controls in place on all devices. Parents/carers should be informed about who the child is likely to be interacting with online and which sites they will be asked to access. Remote teaching includes both recorded and live direct teaching time.

Schools are aware that the balance needs to be struck between 'overblocking' sites and hence limiting access to needed information, and the safeguarding of children from unsafe information. The Director ensures that appropriate filters and monitoring systems are in place and that staff review their effectiveness. The School has an online safety policy which explains how we try to keep pupils safe online in school and at home, and how we respond to online safety incidents. Staff take online training to combat cyberbullying and internet safety. The school has appropriate filters and monitoring systems in place, however the school is aware that "over-blocking" does not lead to

unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

Pupils are taught about online safety throughout the curriculum and all staff receive online safety training, which is regularly updated. Risk Assessments are carried out annually alongside the policy review.

Forced Marriage

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

Forced marriage is an appalling and indefensible practice and is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June 2014, forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.

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

Staff should never attempt to intervene directly at the school or through a third party. Contact should be made with social care or the Forced Marriage Unit 200 7008 0151.

Honour-Based Abuse

Honour-based abuse (HBA) can be described as a collection of practices which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such abuse, including violence, can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code. Honour-based abuse might be committed against people who:

- Become involved with a boyfriend or girlfriend from a different culture or religion.
- Want to get out of an arranged marriage.

- Want to get out of a forced marriage.
- Wear clothes or take part in activities that might not be considered traditional within a particular culture.

It is a violation of human rights and may be a form of domestic and/or sexual abuse. There is no, and cannot be, honour or justification for abusing the human rights of others.

Private Fostering Arrangements

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or 18 if the child is disabled. Children looked after by the local authority, or who are placed in residential schools, children's homes or hospitals, are not considered to be privately fostered.

Private fostering occurs in all cultures, including British culture, and children may be privately fostered at any age. The school recognises that most privately fostered children remain safe and well, but is aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country.

By law, a parent, private foster carer or other person involved in making a private fostering arrangement must notify children's services as soon as possible. However, when a member of staff becomes aware that a pupil may be in a private fostering arrangement, they will raise this with the DSL, and the DSL will notify their local authority Children's Social Care of the circumstances.

Children with Family Members in Prison

Children with a parent or family member in prison are at risk of poverty, stigma, bullying, isolation and poor mental health. Performance at school may drop, and they may have to take on extra responsibilities at home, including becoming young carers in some situations. The school is aware of which children have a parent or family member in prison, maintaining confidentiality where necessary.

Gangs, Organised Crime and County Lines

A gang is typically a noticeable group of individuals that spends time in public and engages in criminal activity and violence. The group may also be territorial or in conflict with other gangs. Young people involved in gangs have an increased risk of experiencing violence and other types of abuse. Gang crime and serious youth violence are also often synonymous with knife crime and Child Criminal Exploitation (CCE).

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”.

Exploitation is an integral part of the county lines offending model, with children and vulnerable adults exploited to move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap victims (and their families) if they attempt to leave the county lines network.

Teachers have the power to search pupils without consent for ‘prohibited items’ such as knives and weapons, alcohol, illegal drugs, tobacco, and any item that staff reasonably suspect has been, or is likely to be, used to commit an offence, cause personal injury or damage to property. Parents should be informed, and a witness should be present.

Anyone worried about a student involved in, or at risk from, gangs can call the NSPCC on 0808 800 5000.

Up Skirting

Up Skirting is now a criminal offence. This typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

Serious Violence

Signs of serious violence may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

Children and the Court System

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children.

Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- (a) physical or sexual abuse;
- (b) violent or threatening behaviour;
- (c) controlling or coercive behaviour;
- (d) economic abuse (adverse effect on the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- (e) psychological, emotional or other abuse.

People are 'personally connected' when they are, or have been, married to each other or civil partners, or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse, and they are related to the abusive person.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background, and domestic abuse can take place inside or outside of the home.

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

Operation Encompass alerts when sent to the school are immediately acted upon. Details are gathered by relevant staff and recorded. Patterns are monitored, and discussions are had with social care when relevant.

'Harm can include ill treatment that is not physical, as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.'

Safeguarding and Child Protection Procedures

Creating a culture of safeguarding within school requires all staff to adopt an approach where they are professionally curious, regarding any concerns about children and that they maintain an attitude that 'it could happen here'.

Indicators of Abuse and What You Might See

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser

has threatened further violence or trauma. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons, it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the DSL. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people, which facilitate communication.

Remember, it is your responsibility to report your concerns. It is not your responsibility to investigate or decide whether a child has been abused. A child who is being abused and/or neglected may:

- have bruises
- bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with regard to their own or others' safety
- self-harm
- frequently miss school or arrive late
- show signs of not wanting to go home
- display a change in behaviour, like from quiet to aggressive, or happy to withdrawn
- challenge authority
- become disinterested in their school work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about, drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age

Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges, of which staff need to be aware. Disability and special educational needs and disabilities may be more prone to being persistently absent from education, being involved in 'honour-based' abuse, having a parent in prison or being

involved in county lines. Additional barriers can exist when recognising abuse, neglect and exploitation in this group of children. These can include:

- Assumptions that indicators of possible abuse, such as behaviour, mood and injury, relate to the child's disability without further exploration.
- Being more prone to peer group isolation than other children.
- The potential for children with SEND to be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in overcoming these barriers.
- The duty to make reasonable adjustments for disabled children and young people.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed. It is very important that you report your concerns.

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of this environment. All staff, but especially the DSL (and Deputies), will consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms, and children can be vulnerable to multiple harms, including, but not limited to, sexual exploitation, criminal exploitation, and serious youth violence.

Recognising and Responding to Abuse

If a member of staff, parent or member of the public is concerned about the safety or welfare of a child, they should report it to the DSL as soon as possible. If the DSL is not available, it should be reported to the deputy safeguarding lead/s immediately. If, in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care, Family Connect.

Although any member of staff can make a referral to children's social care, Family Connect, where possible, there should be a conversation with the DSL. All staff must follow the procedures set out below in the event of a safeguarding issue.

All staff will be alert to indicators of abuse, including child-on-child, online abuse, and exploitation, and will report any of the following to the Designated Safeguarding Lead immediately:

- any concern or suspicion that a child has sustained an injury outside what is reasonably attributable to normal play;
- any concerning behaviours exhibited by children that may indicate that they have been harmed or are at risk of harm, including unusual changes in mood or behaviour, concerning use of language and/or concerning drawings or stories;
- any significant changes in attendance or punctuality;
- any significant changes in a child's presentation;
- any indicators that a child may be experiencing child-on-child abuse;
- any concerns relating to people who may pose a risk of harm to a child; and/or
- any disclosures of abuse that children have made.

More information about our approach to child-on-child abuse (including sexual violence and sexual harassment) can be found in specific safeguarding issues, please see Part One, Part Five and Annex B of KCSIE 2025.

Responding to a Disclosure

When responding to a disclosure from a child, staff will:

- listen to what is being said without displaying shock, disbelief or other emotion;
- accept what is being said;
- allow the child to talk freely;
- reassure the child, but not make promises which might not be possible to keep;
- never promise a child that they will not tell anyone, it may not be in their best interest;
- reassure them that what has happened is not their fault;
- stress that it was the right thing to tell;
- listen, only asking questions when necessary to clarify, do not investigate;
- not criticise the alleged perpetrator;
- explain what has to be done next and who has to be told;
- not ask students to write a written record of their disclosure;
- reassure the victim they are being taken seriously and they will be supported and kept safe. A victim should never be given the impression they are creating a problem by reporting abuse (including sexual violence and sexual harassment), nor should a victim ever be made to feel ashamed for making a report.

Reporting and Recording a Concern

All staff and volunteers receive guidance on the procedures to report safeguarding concerns upon induction and receive regular updates. All concerns should be reported in writing, using IRIS. Records should be created as soon as possible, on the same day and during working hours. Staff should never wait until the next day to complete a safeguarding concern report.

All staff and volunteers will:

- Make a written record, informing the child that you are doing so.
- Pass the information to the DSL and DDSL without delay, either in person (for immediate, priority cases) or through the use of IRIS (for lower-level concerns), depending on the nature of the concern. All reports to the DSL must be followed up in writing through IRIS.

The DSL/DDSL will then:

- Keep a confidential record of all comments, actions, and observations. These records will be filed, kept securely, and access will be restricted to only staff authorised by the DSL or Head.
- Seek to discuss any concerns about a student with their parents. This must be handled sensitively and the DSL or the DDSL will contact the parent in the event of a concern, suspicion or disclosure. However, if the DSL or the DDSL believes that notifying parents could significantly increase the risk to the child or exacerbate the problem, advice will first be sought from Family Connect.
- If the DSL or the DDSL believes that “a child is experiencing or may have already experienced abuse or neglect” or “is at risk of suffering significant harm” either now or in the future, then the school will comply with the procedures of the Local Safeguarding Partnership.

Concerns About Significant Harm or Imminent Danger

Any member of staff who suspects or has evidence of child abuse or is concerned that a child may be at risk of imminent danger must notify the DSL or a DDSL immediately and in

person. A referral must be made if a child may be suffering or at risk of suffering harm. Whilst the DSL or a DDSL should ideally make the referral, anyone can make a referral to children's social care, Family Connect. If anyone other than the DSL makes a referral to children's social care or to the police, they should inform the DSL as soon as possible.

Concerns Below the Threshold for Significant Harm and No Imminent Danger

Staff should log concerns on IRIS at the earliest opportunity, providing sufficient information and context for the DSL/DDSL to assess the information. The DSL will decide on the most appropriate course of action and whether the concerns should be referred to Family Connect, using the threshold guidance Spectrum of Support, published by the local safeguarding partnership. If it is decided to make a referral to children's social care, the parent will be informed, unless to do so would place the child at further risk or undermine the collection of evidence.

All concerns, discussions and decisions will be recorded in writing. The DSL will provide guidance on the appropriate action. Options will include:

- Managing any support for the child internally via the school's own pastoral support processes.
- An Early Support Pathway Assessment.
- A referral for statutory services where the child is, or might be, in need, suffering or likely to suffer significant harm.

5.10 Early Help/ Early Support and Vulnerable Children (Note: This process is known nationally as Early Help, but in Warwickshire is referred to as Early Support)

All staff should be prepared to identify children who may benefit from early support. Early Support means providing support as soon as a problem emerges at any point in a child's life. If early support is appropriate, the DSL or DDSL will generally lead on liaising with other agencies and setting up an interagency assessment as appropriate. Staff may be required to support, in some cases, acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse. Timelines of interventions will be monitored and reviewed.

All staff will be made aware of the Early Support process and understand their role in identifying emerging problems, sharing information with other professionals to support early identification and assessment of a child's needs. It is important for children to receive the right help at the right time to address risks and prevent issues from escalating. This also includes staff monitoring the situation and feeding back to the DSL or DDSL any ongoing/escalating concerns so that consideration can be given to a referral to children's social care if the child's situation does not appear to be improving. We recognise that any child can be the victim of abuse and may benefit from early help. However, we will be particularly vigilant to the potential need for early help if a child:

- Is disabled or has certain health conditions and has specific additional needs.
- Has special educational needs, whether or not they have a statutory Education, Health and Care Plan (EHCP).
- Has a mental health need.
- Is a young carer.
- Is showing signs of being drawn into antisocial or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Is frequently missing/goes missing from care or from home or care.
- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- Is at risk of modern slavery, trafficking, sexual or criminal exploitation.
- Is at risk of being radicalised or exploited.
- Has a parent or carer in custody, or is affected by parental offending.
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- Is misusing drugs or alcohol themselves.
- Has returned home to their family from care.
- Is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage.
- Is a privately fostered child.

The DSL will maintain a list of students who the school has identified to be at potential risk, including those with a social worker, and ensure that relevant staff are aware and that these students are monitored closely and supported to achieve the best possible outcomes. This will include children in care (looked after children, or previously looked after children), or those who have special educational needs or disabilities.

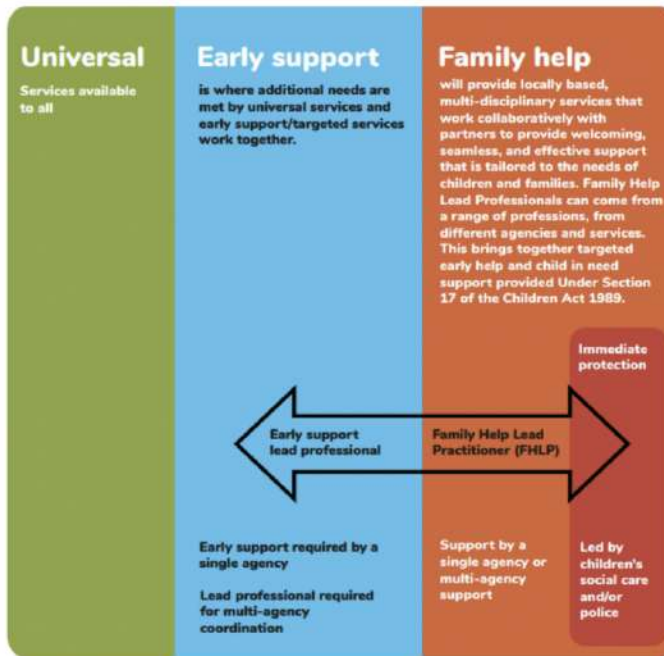
5.11 Referrals

If it is appropriate to refer the case to the local authority children's social care or the police, the DSL will make the referral or support you to do so. If you make a referral directly, you must tell the DSL as soon as possible. Children's social care assessments should consider where children are being harmed in contexts outside the home, so the school will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm. The school will be guided by Family Connect as to the appropriate outcome, e.g., complete an Early Help Pathway Assessment or refer to a relevant specialist agency. All Child Protection records, including referrals, will be maintained in a confidential file at the school. The protocols as outlined in the Data Protection Policy must be followed.

The local authority will decide within 1 working day of a referral about what course of action to take and will inform the referrer of the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded. If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves. All escalations must be recorded on IRIS. The DSL should refer all cases of suspected abuse or neglect to the Family Connect, police (cases where a crime may have been committed) and to the Channel programme where there is a radicalisation concern. Consent will be required before support can be delivered to any individual through the Channel programme. Contact details for the Family Connect can be found in Section 1 of this policy.

5.12 Trigger Points and Escalation

In the event of serious incidents, the Director should be informed.



Language we may use to describe need

- Universal
- Thriving
- Community based
- Low level
- Emerging needs
- Primary prevention
- Universal Plus
- Inclusion
- Getting advice
- Secondary prevention
- Additional need
- Early help
- Early support
- Getting help
- Targeted
- Multiple needs
- Family Help
- Complex
- Child in need
- Getting more help
- Statutory
- Specialist
- Acute
- Child protection

Responses to need

Universal

Children and young people are supported by their family and universal services to meet all of their needs. Some examples may include services provided routinely and available to all children and families by schools, nurseries, health providers – including 0-19 Healthy Child Programme, GP, acute trusts, and voluntary and community organisations.

Early Support

Consider initiating an Early Support Assessment plan or requesting a consultation with an Early Support Officer. Both families and professionals (with family consent) can request Early Support advice. Families can also access this support by asking a community professional for assistance.

Family Connect

Family Connect is a team of multi-disciplinary workers who have received training to coach and empower workers in responding to concerns about a child's welfare. Their goal is to provide the right support to children and families from the outset. By discussing concerns and solutions with professionals, we can collaborate more effectively and ensure families receive the appropriate support.

Supporting Children: Opportunities to Teach Safeguarding

The Positive Impact Primary Academy will ensure that children are taught about safeguarding, including online safety. This will be considered as part of providing a planned, broad and balanced curriculum. This will include covering relevant issues for school through Relationships Education (for all primary pupils) and Relationships and Sex Education (for all secondary pupils), and Health Education (for all pupils in state-funded schools). The DSL will ensure that the curriculum covers all the information a child needs to keep themselves safe, related to age and stage of development.

Schools are required to provide a coordinated approach to early help. We recognise that providing early help and early information sharing are more effective in promoting the welfare of children than reacting later. Early Support means providing support as soon as a problem emerges, at any point in a child's life, and we are particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs, whether or not they have a statutory Education, Health and Care plan;
- has a mental health need;
- is a young carer;
- is showing signs of being drawn into antisocial or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from education, home or care;
- has experienced multiple suspensions, is at risk of being permanently excluded;
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a parent or carer in custody, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing alcohol and other drugs themselves;
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child.

When a child requires support from more than one agency (e.g. education, health, housing, police), the school will follow local procedures, e.g. by completing an Early Support Assessment (ESA) and identifying what help the child/ family require, to prevent their needs escalating to a point where intervention via a statutory assessment under the Children Act 1989 is needed.

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

Our setting will support all children by:

- Encouraging the development of self-esteem and resilience in every aspect of school life, including through the planned curriculum.
- Promoting a caring, safe and positive environment within the school by vigilance and explicitly promoting children's welfare.
- Ensure that all children know there is an adult in the school whom they can approach if they are worried or in difficulty.
- Include regular consultation with children, e.g. through safety questionnaires, participation in anti-bullying week, asking children to report whether they have had happy/sad playtimes.
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children.
- Notifying Children's Services as soon as there is a significant concern.
- Ensuring that a named teacher is designated for Looked After Children (LAC) and that an up-to-date list of children is regularly reviewed and updated.
- Providing continuing support to a child (about whom there have been concerns) who leaves the school, by ensuring that such concerns and school medical records are forwarded under confidential cover to the Head at the pupil's new school as a matter of urgency.
- Listening to a child's wishes and feelings and understanding their lived experience.

Children Potentially at Greater Risk of Harm

Children Who Need a Social Worker (Child in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect or exploitation 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.

Local authorities should share the fact that a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children. Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Vulnerable children and those who need a social worker are at risk of poorer educational outcomes, and the school will recognise this by ensuring relevant educational support is provided. The Virtual Head Teacher within the Local Authority also has oversight of attendance, attainment and progress of looked-after children and children in need.

Findings from the Children in Need review, 'Improving the educational outcomes of Children in Need of help and protection', contain further information; the conclusion of the review, 'Help, protection, education', sets out the action the Government is taking to support this.

Children Who Are LGBTQ+

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded when children who are LGBT lack a trusted adult with whom they can be open. It is

therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

Supporting Staff

We recognise that staff who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting. We will support such staff by providing regular sessions to talk through their anxieties and to seek further support.

Concerns About a Colleague, Including Supply Staff and Volunteers

The Positive Impact Group creates a culture where all concerns about adults are shared, recorded and dealt with. Our Low-Level Concerns Policy describes how we deal with concerns that do reach the threshold for safeguarding. This approach promotes a culture of safety and transparency for all.

Staff who are concerned about the conduct of a colleague (including supply staff and volunteers) towards a child are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation, and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount. All concerns of poor practice or concerns about a child's welfare brought about by the behaviour of colleagues should be reported to the Head. Complaints about a Head should be reported to the Director.

Concerns About the Safeguarding Practices Within the School or Have a Complaint

Staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime. Appropriate whistleblowing procedures are in place to raise such a concern with the school's management team. Please refer to the Whistleblowing Policy for full details.

Our complaints procedure will be followed where a child or parent raises a concern about poor practice towards a child that initially does not reach the threshold for child protection action. Complaints from staff are dealt with under the school's grievance procedures.

Allegations Made Against Staff, Including Supply Staff, Volunteers and Contractors

All staff, including supply staff, volunteers and contractors, should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in the presence of other adults.

We understand that a pupil or parent may make an allegation against a member of staff. If such an allegation is made, the member of staff receiving the allegation will immediately inform the Director or the most senior teacher if the Director is not available.

If the allegation meets any of the following criteria, it should be reported by the Director to the Local Authority Designated Officer as soon as possible on that day:

- Staff have behaved in a way that has harmed a child, or may have harmed a child.
- Staff have possibly committed a criminal offence against or related to a child.
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children.
- Staff have behaved or may have behaved towards a child or children in a way that indicates s/he is unsuitable to work with children.

Any member of staff who believes with reasonable cause that allegations about staff are not being referred to the Local Authority Designated Officer or handled appropriately may refer the matter directly to the Local Authority Designated Officer.

Under no circumstances will we send a child home, pending such an investigation, unless this advice is given exceptionally, as a result of a consultation with the Local Authority Designated Officer.

Suspension of the member of staff against whom an allegation has been made needs careful consideration, and the Director will consult in making this decision.

If an allegation is made directly to the police, they will coordinate with the Local Authority Designated Officer. The Local Authority Designated Officer will then discuss the allegation with the Director and, where necessary, obtain further details of the allegation. The Director should not investigate the allegation at this stage. The discussion should also consider whether there is evidence/information that establishes that the allegation is false or unfounded.

If the allegation is not definitively false and there is cause to suspect that a child is suffering or is likely to suffer significant harm, the Local Authority Designated Officer will immediately refer to Children's Social Care and request a strategy discussion with the Head.

If there is no cause to suspect that significant harm is an issue, but a criminal offence might have been committed, the Local Authority Designated Officer will immediately inform the police and convene a similar discussion to decide whether a police investigation is needed. That discussion will also involve other agencies involved with the child.

After this initial consideration, if it is decided that the allegation does not involve a possible criminal offence, it will be for the school to deal with it. In such cases, the Director will decide if a Disciplinary process is required and, if so, will handle the matter in line with the current disciplinary policy. In a case in which Children's Social Care has undertaken enquiries, the Head should take account of any relevant information obtained in the course of those enquiries when considering disciplinary action.

The Local Authority Designated Officer will continue to liaise with the school to monitor the progress of the case and provide advice and support.

If a criminal investigation is required, the police will aim to complete their enquiries as quickly as possible, consistent with a fair and thorough investigation and will keep the progress of the case under review.

If the police and/or Criminal Prosecution Service (CPS) decide not to charge the individual with an offence, or decide to administer a caution, or a Court acquits the person, the police aim to pass all information they have which may be relevant to a disciplinary case to the school as quickly as possible after the decision. The school will then consider the matter in line with the current disciplinary policy.

The outcome of the investigation of the allegation should be recorded as malicious, unfounded, false, unsubstantiated or substantiated.

If the person is convicted of an offence, the police will inform the employer straight away so that appropriate disciplinary action can be taken.

Referral to the DBS will be made at the conclusion of the disciplinary process, where the threshold for referral is met. See also:

<https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs>

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

Allegations Against Pupils

In most instances, the conduct of pupils towards each other will be covered by the Behaviour Policy. However, some serious allegations may raise safeguarding concerns, including physical abuse, child-on-child abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely to be considered a safeguarding allegation if the allegation:

- is made against an older pupil and refers to their behaviour towards a younger or more vulnerable pupil.
- is of a serious nature, possibly including a criminal offence.
- raises risk factors for other pupils in the school.
- indicates that other pupils may have been affected by this student.
- indicates that young people outside the school may be affected by this student.
- is made by a staff member against a pupil.

Examples of safeguarding issues against a pupil could include:

- violence, particularly pre-planned
- forcing others to use drugs or alcohol
- blackmail or extortion
- threats and intimidation
- indecent exposure, indecent touching or serious sexual assaults
- forcing others to watch pornography or take part in sexting

- encouraging others to attend inappropriate parties
- photographing or videoing other children performing indecent acts

When an allegation is made by a pupil, staff will need to consider if the complaint raises a safeguarding concern. If there is a safeguarding concern, the Head/DSL should be informed immediately.

A factual record should be made of the allegation, but no attempt at this stage should be made to investigate the circumstances.

The DSL will contact social care to discuss the case and will follow up on the outcomes of the discussion. The DSL will make a record of the concern, the discussion and any outcome and keep a copy in the files of both pupils' files.

A risk assessment must be made to ensure that the pupils are kept safe and separated if necessary. A supervision plan should be put in place to ensure pupil safety.

If the allegation indicates a potential criminal offence has taken place, the police should be contacted at the earliest opportunity, and both sets of parents informed.

It may be appropriate to exclude the pupil being complained about for a period of time according to the Behaviour Policy.

Where neither Children's Social Care nor the police decide to investigate the complaint, a thorough school investigation should take place, with a risk assessment prepared and a supervision plan implemented, if required.

Confidentiality

All matters relating to child protection are confidential. The Head/DSL will disclose any information about a child to other members of staff on a need-to-know basis only.

All staff must be aware that they have a professional responsibility to share information with other agencies such as Social Care, Local Authority, Channel, etc., in order to safeguard children.

All staff must be aware that they cannot promise a child to keep secrets that might compromise the child's safety or wellbeing, or that of another.

The Positive Impact Group always undertakes to share our intention to refer a child to Social Care with their parents unless to do so could put the child at greater risk of harm, or impede a criminal investigation.

All confidentiality will take into account the requirements to notify agencies of safeguarding concerns under the Children Act 1989, Working Together to Safeguard Children and the Prevent Duty.

The Data Protection Act 2018. DPA and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

Physical Intervention

We acknowledge that staff must only ever use physical intervention as a last resort, when a child is endangering him/herself or others, and that at all times it must be the minimal force necessary to prevent injury to another person. Such events should be recorded and signed by a witness.

We understand that physical intervention of a nature that causes injury or distress to a child may be considered under child protection or disciplinary procedures.

We recognise that touch is appropriate in the context of working with children, and all staff have been given training and guidance to ensure they are clear about their professional boundaries.

It is up to the DSL to ensure that every staff member in the school, who may be called upon to use physical intervention, has been appropriately trained to deal with any potential scenarios that may arise.

Staff Training

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

Governors and Trustees will receive training during their induction. All staff will receive training that is updated annually with refreshers throughout the year. All members of staff:

- are provided with child protection awareness information at induction so that they know who to discuss a concern with.
- are trained in and receive regular updates in e-safety and reporting concerns.
- have child protection awareness training every year, to maintain their understanding of the signs and indicators of abuse.
- know how to respond to a pupil who discloses abuse and the procedure to be followed in appropriately sharing a concern of possible abuse or disclosure of abuse.
- are expected to have read at least Section One of Keeping Children Safe in Education 2025.
- will have been notified of the details of the Local Safeguarding Children Board/LSP and Prevent partners.
- have an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

Safer Recruitment

The Positive Impact Group endeavours to ensure that we do our utmost to employ 'safe' staff by following the guidance in Keeping Children Safe in Education 2025. Please refer to the Safer Recruitment Policy for further information.

The Designated Persons who are involved in recruitment will be trained in complete Safer Recruitment Training.

Use of Mobile Phones and Cameras

Where appropriate, the Positive Impact Group may provide a work mobile for staff to use to record images and videos, as well as make professional calls. At no time should a staff member's personal camera or personal mobile phone be used to record children. Staff mobile phones should not be used unless being used for Health & Safety reasons, and should be locked away when in a classroom.

All recorded images should only be downloaded onto our school-based system, and should be deleted once printed.

Parental consent will be sought for the use of photographs or videos in school and outside of school, such as on school trips and for promotional reasons. If images are used with consent, only first names or anonymised titles will be used.

Our policy on E-safety outlines the expectations of pupils regarding mobile phones and cameras.

Parents may bring mobile phones into the setting but may only take photographs of their own child/ren, during events such as plays, concerts or sporting events for personal use. Parents should be reminded that the publication of such images might be unlawful.

We are vigilant to ensure the appropriate use of social media.

Extended School and Off-site Arrangements

Where extended school activities are provided, this policy will still apply, for example, school lettings. The provider will provide a copy of their own safeguarding and child protection policy as part of contractual arrangements. When our children attend off-site activities, we will check that effective child protection arrangements are in place.

Site Security

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

Record Keeping

The DSL will maintain child protection records and ensure they:

- Have details of at least two emergency contacts on every child's file.

- Keep a clear and comprehensive summary of the concern about children, even when there is no need to refer to the matter.
- Keep details of how the concern was followed up and resolved.
- Keep a note of any action taken, decisions reached and the outcome.
- Keep records in meticulous chronological order.
- Keep all records in secure and locked locations.
- Send all relevant records to the receiving school, college or education establishment when a pupil moves and that safe receipt is confirmed.

Child protection records will be maintained independently from the pupil's school files, and the school file will be 'tagged' to indicate that separate information is held.

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

Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If a request is received, please refer to the Head/Head of School, who will advise them to submit a Freedom of Information request for consideration. The Data Protection Act does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.

This policy is reviewed annually.

Overall responsibility lies with the Director, who liaises with the Senior Leadership Team to ensure a robust and sustainable model of Leadership.

Signed by Director



James Armson

Online Safety (E-Safety) Policy

Principles

This policy has been written for The Positive Impact Primary Academy, in line with local and national guidance. This policy should be read in conjunction with the Safeguarding and Child Protection Policy, the Anti-bullying Policy and the Curriculum Policy.

At The Positive Impact Group, we recognise both the significant benefits and potential risks associated with using the Internet and digital technologies. This policy outlines clear procedures to ensure that our pupils use these tools safely, responsibly, and with discernment. We believe that the ability to navigate the Internet safely is an essential life skill. Our aim is to empower pupils to understand existing risks, make informed choices, and confidently manage future challenges in a rapidly evolving digital world.

We also acknowledge that adults, both in their personal and professional lives, can be vulnerable to online threats, such as cyberbullying, phishing, or reputational harm. This policy emphasises the importance of training and promoting best practices among staff to ensure safer and more effective use of technology. In addition, we are aware of broader safety concerns related to technology use, including screen overexposure, privacy issues, and the impact of social media. These concerns are addressed through ongoing education, support, and practical guidance for both pupils and staff.

As new opportunities and risks emerge daily in the digital landscape, this policy will be reviewed regularly to remain current and effective. Our goal is to equip our pupils with the knowledge, skills, and confidence to use technology positively and safely.

E-Safety Coordinator for The Positive Impact Group

David Strong

Director of Operations

david.strong@positive-impactuk.com

Teaching and Learning

As we move towards a more digital curriculum, we will actively promote the use of 'real-world' technologies to enhance and support learning.

Why Internet Use is Important

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

Internet Use Will Enhance Learning

- The Positive Impact Primary Academy's internet access has been designed expressly for pupil use and includes filtering appropriate to the age of pupils.
- Pupils will be taught the differences between acceptable and unacceptable Internet use and given clear objectives for Internet use.
- The setting is vigilant in its supervision of pupils' use at all times, as far as is reasonable, and uses strategies in learning resource areas where older pupils have more flexible access.
- In the event of pupils trying to make inappropriate use of the internet, particularly using search engines, this is captured and reported in real time. Senior staff will follow these up with pupils, notify their families and keep an incident record on the pupil's file for future reference as required.
- Pupils will be educated in the effective use of the internet in research, including the skills of knowledge location, retrieval and evaluation throughout the curriculum.

Pupils Will Be Taught How to Evaluate Internet Content

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

Good Practice

- Teaching staff will update and check websites before accessing them with the children to ensure that the content is appropriate. The curriculum is planned in

context for internet use to match pupils' ability, using child-friendly search engines where more open Internet searching is required, e.g. Yahoo for kids or Ask for kids.

- Families provide consent for pupils to use the internet, as well as other ICT technologies.
- The setting makes clear that all users know and understand what the 'rules of appropriate use' are and what sanctions result from misuse, through staff meetings and the curriculum plans.
- A record is kept of any cyberbullying or inappropriate behaviour in line with the school behaviour management system. Parents/carers are informed of significant or repeated inappropriate behaviours.
- The setting ensures the Designated Safeguarding Lead Professional has appropriate training in E-Safety.
- The setting provides advice and information on reporting offensive materials, abuse/bullying etc and makes this available for pupils, staff and parents.
- E-Safety advice for pupils, staff and parents is provided annually.
- The setting ensures that when copying materials from the web, staff and pupils understand issues around plagiarism, how to check copyright and also know that they must observe and respect copyright / intellectual property rights.
- The setting ensures that staff and pupils understand the issues around aspects of the commercial use of the internet in an age-appropriate way. This may include risks in pop-ups, buying online, online gaming or gambling.
- The setting makes training on the E-Safety education available to staff.
- The setting provides advice, guidance and training for parents, including information leaflets; in school newsletters; on the website.

Managing Internet Access

Information System Security

- The Positive Impact Primary Academy's ICT systems capacity and security are reviewed regularly
- Virus protection is updated regularly

Email

- Pupils may only use approved school e-mail accounts on the school system.
- E-mails sent to an external organisation should be written carefully and authorised before sending, in the same way as a letter written on school-headed paper.
- The forwarding of chain letters is not permitted.

Published Content and Website

- The contact details on the website are the school address, e-mail and telephone number. Staff, pupils' or governors' personal information will not be published.
- The Director's nominee will take overall editorial responsibility and ensure that content is accurate, appropriate, up to date and aligned to statutory requirements.

Publishing Pupils' Images and Work

- Photographs that include pupils will not refer to the pupil by name. Digital images/video of pupils stored in a teacher's documents or shared images folder on the network are deleted at the end of the year, unless specifically required for a key school publication or assessment information.
- Images of children and staff are not to be taken on or away from the setting premises by parents or visitors, unless prior permission is explicitly sought and given by the school or at scheduled school events.
- Pupils are not identified by their full name in online photographic materials or in the credits of any published video materials.
- Parental agreement is obtained through the specific confirmation of a consent form signed at the point of admission, before pupils' images are published on the website or other publications.

Social Networking and Personal Publishing

- The setting blocks and filters access to social networking sites or newsgroups unless there is a specific, approved educational purpose.
- Pupils are advised to be very careful about placing any personal photos on any social online network. They are taught to understand the need to maintain privacy settings so as not to make public personal information.
- Newsgroups will be blocked unless a specific use is approved.
- Pupils are advised never to give out personal details of any kind which may identify them or their location.
- Pupils and parents are advised that the use of some social network spaces, for example, Facebook, Instagram, TikTok, Snapchat, WhatsApp, outside school is inappropriate for primary-aged pupils and that some of these sites have minimum age requirements.
- Pupils are taught that they should not post images or videos of others without their permission. They are taught about the risks associated with providing information with images (including the name of the file) that reveals the identity of others and their location, such as house number, street name or school. They are taught the

need to keep their data secure and what to do if they are subject to bullying or abuse.

Managing Filtering

- The setting will work with relevant providers (in this case Warwickshire LA) to ensure systems which protect pupils are regularly reviewed and improved.
- If staff or pupils discover an unsuitable site, it must be reported to the E-Safety Leader.
- The school will immediately refer any material we suspect is illegal to the appropriate authorities, e.g., the police and the local authority.
- Senior staff will ensure that regular checks are made to ensure that the filtering methods selected are appropriate, effective and reasonable.

Managing Emerging Technologies

- Emerging technologies will be examined for educational benefit, and a risk assessment will be carried out before use in school is allowed.
- Mobile phones will not be used during lessons or formal school time. The sending of abusive or inappropriate text messages is forbidden.

Protecting Personal Data

- Personal data will be recorded, processed, transferred and made available according to GDPR requirements.

Policy Decisions

Authorising Internet Access

- The setting reserves the right to withdraw internet access from a pupil or member of staff in the event of misuse or infringement of policy.

Assessing Risks

- The setting will take all reasonable precautions to ensure that users access only appropriate material. However, due to the international scale and linked nature of internet content, it is not possible to guarantee that unsuitable material will never appear on a school computer. The school can't accept liability for the material accessed or any consequences of Internet access.

- The setting will audit ICT provision annually to establish whether the E-Safety policy is adequate and whether its implementation is effective.

Handling E-Safety Complaints

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

GDPR Compliance

The aim of GDPR legislation is to return control to individuals by allowing them to request deletion or disclosure of their data. As an educational setting, we have a responsibility to provide evidence of our data storage activities. In terms of E-Safety, the implications of this are as follows:

- The setting must annually ensure that its digitally held (and paper-based) storage of personal data is logged and that a list of the software used across the school (including teacher-selected APPs) is GDPR compliant.
- Staff need to check what data is being extracted by all online tools / APPs used and that this is in line with GDPR requirements.
- The setting must have a lawful basis for processing personal data.
- Parents must complete a data use consent form each year.
- The setting must have a privacy policy on the website, which must be distributed to all staff.
- There should be clear procedures in place to find, delete and disclose relevant data as required. Warwickshire IT services provide a help desk service for schools regarding the legal and timely deletion of data.
- The setting must appoint a Data Protection Officer (David Strong).

Communications Policy

Introducing the E-Safety Policy to Pupils

- E-safety rules are displayed in work areas and are discussed with the pupils on a regular basis.
- Pupils are informed that network and internet use will be monitored.

- Pupils are not allowed to use mobile phones in The Positive Impact Primary Academy. Upon entering the site, children's mobile phones must be turned off and handed into the pupil's Education Mentor. They will be stored safely in the staff office and returned to the children at the end of the day.
- The use of a smartwatch is also not permitted.

Staff and the E-Safety Policy

- The E-Safety Policy is distributed to all staff and is included in child protection training sessions.
- Internet usage is able to be monitored and can be traced to the individual user.
- Discretion and professional conduct are essential.

Enlisting Parents' Support

- Parents/carers' attention will be drawn to the setting's E-Safety Policy in a variety of ways, including newsletters, open evening events and on the website.

This policy is reviewed annually.

Overall responsibility lies with the Director, who liaises with the Senior Leadership Team to ensure a robust and sustainable model of Leadership.

Signed by Director



James Armson

Low-Level Concerns Policy

Introduction

The Positive Impact Group recognises and takes seriously its responsibility to safeguard and promote the welfare of children. We endeavour to provide a safe and welcoming environment where children are respected and valued. We recognise that all adults within the Positive Impact Group have a full and active part to play in protecting and safeguarding the children in our care, and that the pupil's welfare is our paramount concern.

This policy is based on concerns that do not meet the harm threshold in part 4 of Keeping Children Safe in Education 2025. This applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold. Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definitions and Terminology

The term 'Low-Level' concern is any concern, no matter how small, that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority.

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Taking photographs of children with their mobile phones
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate, sexualised, intimidating or offensive language

Sharing Low-Level Concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately. We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.
- Having clear policies and procedures.
- Empowering staff to share any low-level concerns.
- Empowering staff to self-refer.
- Addressing unprofessional behaviour and supporting the individual to correct it at its earliest stage.
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised.
- Helping to identify any areas of weakness in the setting's safeguarding system.

Reporting a Low-Level Concern

- Low-level concerns about a member of staff should be reported to the Director as per the setting's Child Protection procedures.
- Low-level concerns about supply staff, contractors and local authority visiting staff will also be reported to their employers.
- Staff should use the school's Low-Level Concerns Reporting Form (see Appendix 1).

Responding to Low-Level Concerns

If the concern is raised via a third party, the Director will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously.
- To the individual involved and any witnesses.

The Director will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff Code of Conduct. This includes, but is not limited to:

- Allegations that meet the harm threshold will be referred to the LADO for advice.
- Low-level concerns that the setting may need further guidance on will be referred to the LADO for advice.
- Low-level concerns that the setting feels it can deal with internally will be dealt with via the setting's usual child protection investigation process.
- The setting will engage with its HR provider where it is necessary to undertake further investigation and/or deal with the concern under relevant processes.

Record Keeping

All low-level concerns will be recorded in writing.

In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with GDPR.
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.
- Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold, we will refer it to the Local Authority Designated Officer (LADO).

- Retained at least until the individual leaves employment at the school.

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

Reviewing a Low-Level Concern

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Where a pattern of such behaviour is identified, the Director will decide on a course of action, which may include:

- Disciplinary investigation and/or proceedings
- Management Advice, including recommendations for training
- Referral to the LADO (where a pattern of behaviour moves from a concern to meeting the harm threshold).

If the concern relates to volunteers or any other concerns arise, the setting can contact the LADO for further advice.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to LADO and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.

Appendix 1

Low Level Concerns Form		
Please use this form to share any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt', that an adult may have acted in a way that: • is inconsistent with The Positive Impact Group staff code of conduct, including inappropriate conduct outside of work, and • does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO. You should provide a concise record, including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible, of any such concern and relevant incident(s) (and please use a separate sheet if necessary). The record should be signed, timed and dated and returned to the Director.		
Name of Staff Member:	Team/Role:	Date:
Details of Concern:		
Name:	Signed:	Date:

This policy is reviewed annually.

Overall responsibility lies with the Director, who liaises with the Senior Leadership Team to ensure a robust and sustainable model of Leadership.

Signed by Director



James Armson

Safer Recruitment Policy

Introduction

The safe recruitment of staff in education is the first step to safeguarding and promoting the welfare of children in education. The Positive Impact Group is committed to safeguarding and promoting the welfare of all pupils in its care. As an employer, The Positive Impact Group expects all staff and volunteers to share this commitment.

Aims and Objectives

The aims of the Safer Recruitment policy are to help deter, reject, or identify people who might abuse pupils or are otherwise unsuited to working with them by having appropriate procedures for appointing staff.

The aims of The Positive Impact Group's recruitment policy are as follows:

- To ensure that the best possible staff are recruited based on their merits, abilities, and suitability for the position.
- To ensure that all job applicants are considered equally and consistently.
- To ensure that no job applicant is treated unfairly on any grounds, including race, colour, nationality, ethnic or national origin, religion or religious belief, sex, or sexual orientation, marital or civil partner status, disability, or age.
- To ensure compliance with all relevant legislation, recommendations and guidance, including the statutory guidance published by the Department for Education (DfE), Keeping Children Safe in Education - September 2025 (KCSIE), the Prevent Duty Guidance for England and Wales 2015 (the Prevent Duty Guidance) and any guidance or code of practice published by the Disclosure and Barring Service (DBS).
- To ensure that The Positive Impact Academy meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.

Employees involved in the recruitment and selection of staff are responsible for familiarising themselves with and complying with the provisions of this policy.

The Positive Impact Group has a principle of open competition in its approach to recruitment and will seek to recruit the best applicant for the job. The recruitment and selection process should ensure the identification of the person best suited to the job at The Positive Impact Group based on the applicant's abilities, qualifications, experience, and merit as measured against the job description and person specification.

The recruitment and selection of staff will be conducted in a professional, timely and responsive manner and in compliance with current employment legislation, and relevant safeguarding legislation and statutory guidance (including KCSIE 2025 and Prevent Duty Guidance).

If a member of staff involved in the recruitment process has a close personal or familial relationship with an applicant, they must declare it as soon as they are aware of the individual's application and avoid any involvement in the recruitment and selection decision-making process.

The Positive Impact Group aims to operate this procedure consistently and thoroughly while obtaining, collating, analysing, and evaluating information from and about applicants applying for job vacancies at The Positive Impact Group.

Roles and Responsibilities

It is the responsibility of the Director, Director of Operations and other SLT involved in recruitment to:

- Ensure that The Positive Impact Group operates safe recruitment procedures and makes sure all appropriate checks are carried out on all staff and volunteers who work at The Positive Impact Academy.
- Monitor contractors' and agencies' compliance with this document.
- Promote the welfare of children and young people at every stage of the procedure.

Definition of Regulated Activity and Frequency

Any position undertaken at, or on behalf of The Positive Impact Group will amount to "regulated activity" if it is carried out:

- Frequently, meaning once a week or more

- Overnight, meaning between 2.00 am and 6.00 am
- Satisfies the "period condition", meaning four times or more in a 30-day period
- Provides the opportunity for contact with children

Roles which are carried out on an unpaid/voluntary basis will only amount to regulated activity if, in addition to the above, they are carried out on an unsupervised basis.

The Positive Impact Academy is not permitted to check the Children's Barred List unless an individual will be engaging in "regulated activity". The Positive Impact Group is required to carry out an enhanced DBS check for all staff, supply staff and governors who will be engaging in regulated activity. However, The Positive Impact Group can also carry out an enhanced DBS check on a person who would be carrying out regulated activity, but for the fact that they do not carry out their duties frequently enough, i.e., roles which would amount to regulated activity if carried out more frequently.

Recruitment and Selection Procedure

Advertising

To ensure equality of opportunity, The Positive Impact Group will advertise all vacant posts to encourage as wide a field of applicants as possible; normally, this entails an external advertisement.

Any advertisement will make clear The Positive Impact Group's commitment to safeguarding and promoting the welfare of children.

All documentation relating to applicants will be treated confidentially in accordance with the Data Protection Act (DPA).

Application Forms

The Positive Impact Academy uses its own application form, and all applicants for employment will be required to complete an application form containing questions about their academic and full employment history and their suitability for the role (in addition, all applicants are required to account for any gaps or discrepancies in employment history). Incomplete application forms will not be shortlisted.

The application form will include the applicant's declaration regarding convictions and working with children, and will make it clear that the post is exempt from the provisions of the Rehabilitation of Offenders Act 1974. CVs will not be accepted.

It is unlawful for The Positive Impact Academy to employ anyone who is barred from working with children. It is a criminal offence for any person who is barred from working with children to apply for a position at The Positive Impact Academy. All applicants will be made aware that providing false information is an offence and could result in the application being rejected or summary dismissal if the applicant has been selected, and referral to the police and/or the DBS.

Job Descriptions and Person Specifications

A job description is a key document in the recruitment process and must be finalised prior to taking any other steps in the recruitment process. It will clearly and accurately set out the duties and responsibilities of the job role.

The person specification is of equal importance and informs the selection decision. It details the skills, experience, abilities, and expertise that are required to do the job. The person specification will include a specific reference to suitability to work with children in a boarding environment.

References

References for shortlisted applicants will be sent immediately after shortlisting. The only exception is where an applicant has indicated on their application form that they do not wish their current employer to be contacted at that stage. In such cases, this reference will be taken up immediately after the interview.

All offers of employment will be subject to the receipt of a minimum of two references, which are considered satisfactory by The Positive Impact Group. One of the references must be from the applicant's current or most recent employer. If the current / most recent employment does/did not involve work with children, then the second reference should be from the employer with whom the applicant most recently worked with children. The referee should not be a relative. References will always be sought and obtained directly from the referee, and their purpose is to provide objective information to support appointment decisions.

All referees will be asked whether they believe the applicant is suitable for the job for which they have applied and whether they have any reason to believe that the applicant is

unsuitable to work with children. Referees will also be asked to confirm that the applicant has not been radicalised so that they do not support terrorism or any form of "extremism".

Please note that no questions will be asked about health or medical fitness prior to any offer of employment being made. Any discrepancies or anomalies will be followed up. Direct contact by phone will be undertaken with each referee to verify the reference. The Positive Impact Group does not accept open references, testimonials, or references from relatives.

Interviews

There will be a face-to-face interview wherever possible, and a minimum of two interviewers will see the applicants for the vacant position. The interview process will explore the applicant's ability to carry out the job description and meet the person specification. It will enable the panel to explore any anomalies or gaps that have been identified to satisfy themselves that the chosen applicant can meet the safeguarding criteria (in line with Safer Recruitment Training).

Any information regarding past disciplinary action or allegations, cautions or convictions will be discussed and considered in the circumstances of the individual case during the interview process, if it has not been disclosed on the application form.

At least one member of any interviewing panel will have undertaken Safer Recruitment Training or refresher training as applicable.

All applicants who are invited to an interview will be required to bring evidence of their identity, address, and qualifications. The original document will only be accepted, and photocopies will be taken. Unsuccessful applicant documents will be destroyed six months after the recruitment programme.

Offer of Appointment and New Employee Process

In accordance with the recommendations set out in KCSIE and the requirements of the Education (Independent School Standards) Regulations 2014, The Positive Impact Group carries out several pre-employment checks in respect of all prospective employees.

If it is decided to make an offer of employment following the formal interview, any such offer will be conditional on the following:

-
- The agreement of a mutually acceptable start date and the signing of a contract incorporating The Positive Impact Group's standard terms and conditions of employment
 - Verification of the applicant's identity (where that has not previously been verified)
 - The receipt of two references (one of which must be from the applicant's most recent employer), which The Positive Impact Academy considers to be satisfactory
 - For positions which involve "teaching work"

The Positive Impact Group being satisfied that the applicant is not, and has never been, the subject of a sanction, restriction or prohibition issued by the Teaching Regulation Agency (formerly National College for Teaching and Leadership), or any predecessor or successor body, or by a regulator of the teaching profession in any other European Economic Area country which prevents the applicant working at The Positive Impact Group or which, in The Positive Impact Academy's opinion, renders the applicant unsuitable to work at The Positive Impact Group; and The Positive Impact Group being satisfied that the applicant is not, and has never been, the subject of any proceedings before a professional conduct panel or equivalent body in the UK or any other country for any reason which prevents the applicant working at The Positive Impact Group or which, in The Positive Impact Group's opinion, renders the applicant unsuitable to work at The Positive Impact Group.

- Where the position amounts to "regulated activity", the receipt of an enhanced disclosure from the DBS, which The Positive Impact Group considers to be satisfactory
- Where the position amounts to "regulated activity", confirmation that the applicant is not named on the Children's Barred List*
- Confirmation that the applicant is not subject to a direction under section 142 of the Education Act 2002, which prohibits, disqualifies, or restricts them from providing education at a school, taking part in the management of an independent school or working in a position which involves regular contact with children
- Confirmation that the applicant is not subject to a direction under section 128 of the Education and Skills Act 2008, which prohibits, disqualifies, or restricts them from being involved in the management of an independent school
- Verification of the applicant's medical fitness for the role
- Verification of the applicant's right to work in the UK
- Any further checks which are necessary because the applicant has lived or worked outside of the UK; and

- Verification of professional qualifications, which The Positive Impact Group deems a requirement for the post, or which the applicant otherwise cites in support of their application (where they have not been previously verified).

The Positive Impact Group is not permitted to check the Children's Barred List unless an individual will be engaging in "regulated activity". The Positive Impact Group is required to carry out an enhanced DBS check for all staff and supply staff who will be engaging in regulated activity. However, The Positive Impact Group can also carry out an enhanced DBS check on a person who would be carrying out regulated activity, but for the fact that they do not carry out their duties frequently enough, i.e., roles which would amount to regulated activity if carried out more frequently.

Whether a position amounts to "regulated activity" must therefore be considered by The Positive Impact Group to decide which checks are appropriate. It is, however, likely that in nearly all cases, The Positive Impact Group will be able to carry out an enhanced DBS check and a Children's Barred List check.

A personal file checklist will be used to track and audit paperwork obtained in accordance with Safer Recruitment Training. The checklist will be retained in personal files.

The Rehabilitation of Offenders Act 1974

The Rehabilitation of Offenders Act 1974 does not apply to positions which involve working with or having access to pupils. Therefore, any convictions and cautions that would normally be considered 'SPENT' must be declared when applying for any position at The Positive Impact Academy.

DBS (Disclosure and Barring Service) Certificate

The Positive Impact Group applies for an enhanced disclosure from the DBS and a check of the Children's Barred List (now known as an Enhanced Check for Regulated Activity) in respect of all positions at The Positive Impact Group which amount to "regulated activity" as defined in the Safeguarding Vulnerable Groups Act 2006 (as amended). The purpose of carrying out an Enhanced Check for Regulated Activity is to identify whether an applicant is barred from working with children by inclusion on the Children's Barred List and to obtain other relevant suitability information.

It is The Positive Impact Group's policy that the DBS disclosure must be obtained before the commencement of employment of any new employee.

It is The Positive Impact Group's policy to re-check employees' DBS Certificates every three years, and in addition, any employee who takes leave for more than three months (i.e., maternity leave, career break, etc.) must be re-checked before they return to work.

Members of staff at The Positive Impact Group are aware of their obligation to inform the Bursar or the HR Department of any cautions or convictions that arise between these checks taking place.

DBS checks will still be requested for applicants with recent periods of overseas residence and those with little or no previous UK residence.

Portability of DBS Certificates Checks

Staff may wish to join the DBS Update Service if they are likely to require another check in the future. Applicants may sign up for the Service for a fee of £13 per annum, which is payable by the applicant.

This allows for portability of a Certificate across employers. The Positive Impact Group will:

- Obtain consent from the applicant to carry out an update search.
- Confirm the Certificate matches the individual's identity.
- Examine the original certificate to ensure that it is for the appropriate workforce and level of check, i.e., enhanced certificate/enhanced including barred list information.

The Update check would identify and advise whether there has been any change to the information recorded since the initial Certificate was issued. Applicants will be able to see a full list of those organisations that have carried out a status check on their account.

Dealing with Convictions

The Positive Impact Group operates a formal procedure if a DBS Certificate is returned with details of convictions. Consideration will be given to the Rehabilitation of Offenders Act 1974 and:

- The nature, seriousness, and relevance of the offence.
- How long ago the offence occurred.
- One-off or history of offences.
- Changes in circumstances,
- Decriminalisation and remorse.

A formal meeting will take place face-to-face to establish the facts with the Director and the Director of Operations. A decision will be made following this meeting. If relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or obtained through a disclosure check, the Director will evaluate all the risk factors above before a position is offered or confirmed.

If an applicant wishes to dispute any information contained in a disclosure, they may do so by contacting the DBS. In cases where the applicant would otherwise be offered a position were it not for the disputed information, The Positive Impact Group may, where practicable and at its discretion, defer a final decision about the appointment until the applicant has had a reasonable opportunity to challenge the disclosure information.

Secretary of State Prohibition Orders (Teaching and Management Roles)

In all cases where an applicant is to undertake a teaching role of any kind, a Prohibition Order check will be made using the Employer Access Online Service. It is anticipated that this will be performed at the offer stage. A person who is prohibited from teaching must not be appointed to work as a teacher in such a setting.

Prohibition orders are made by the Secretary of State following consideration by a professional conduct panel convened by the National College for Teaching and Leadership (NCTL). Pending such consideration, the Secretary of State may issue an interim prohibition order if it is in the public interest to do so. Section 128 direction 39

prohibits or restricts a person from taking part in the management of an independent school.

A person who is prohibited is unable to participate in any management of an independent school, serve as a governor on any governing body in an independent school, or hold a management position that retains or has been delegated any management responsibilities. A check for a section 128 direction will be carried out using the Teacher Services' system. Where the person will be engaging in a regulated activity, a DBS barred list check will also identify any section 128 direction.

Proof of Identity, Right to Work in the UK and Verification of Qualifications or Professional Status

All applicants invited to attend an interview at The Positive Impact Group will be required to bring their identification documentation, such as a passport, birth certificate, driving licence, etc. with them as proof of identity/eligibility to work in the UK in accordance with those set out in the Immigration, Asylum and Nationality Act 2006 and DBS identity checking guidelines. The Positive Impact Group does not discriminate on the grounds of age.

Where an applicant claims to have changed their name by deed poll or any other means (e.g., marriage, adoption, statutory declaration), they will be required to provide documentary evidence of the change.

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

Medical Fitness

The Positive Impact Group is legally required to verify the medical fitness of anyone to be appointed to a post at The Positive Impact Group, after an offer of employment has been made, but before the appointment can be confirmed.

All applicants are requested to complete a medical questionnaire, and where appropriate, a doctor's medical report may be required. This information will be reviewed against the

Job Description and the Person Specification for the role, together with details of any other physical or mental requirements of the role.

The Positive Impact Group is aware of its duties under the Equality Act 2010. No job offer will be withdrawn without first consulting with the applicant, obtaining medical evidence and considering reasonable adjustments.

Overseas Checks

The Positive Impact Group, in accordance with the UK Visas and Immigration (UKVI), will, if applicable, sponsor new foreign nationals (see Certificate of Sponsorship section).

In addition, applicants who have lived/travelled abroad for more than 3 months will need to obtain a criminal records check from the relevant country. The applicant will not be permitted to commence work until the overseas information has been received and is considered satisfactory by The Positive Impact Academy.

Certificates of Sponsorship (CoS)

If an appointed applicant is a national of a non-EEA country, a CoS may be required. Before any offer of employment is made, the Interviewing Managers should consult with the Director to establish whether The Positive Impact Group has any unallocated Sponsorship Certificates.

Criteria for issuing a CoS are:

- The job is in a “designated shortage” occupation, or
- It passes the Resident Labour Market Test (RLMT)
- The job is at NQF6 Level or above
- Minimum salary levels as stated by the UKVI are met.

Only the Director will be able to issue a CoS. In addition to the CoS, the applicant must apply for entry clearance/leave to remain through the UK Visas and Immigration (UKVI) and comply with the UKVI requirements.

The process can take up to three months, and staff cannot, under any circumstances, be employed until permission is given.

Detailed advice on the above is available from the Director.

Induction Programme

All new employees will be given an induction programme which will clearly identify The Positive Impact Group policies and procedures, including the Child Protection Policy, the Code of Conduct, and KCSIE, and make clear the expectations which will govern how staff carry out their roles and responsibilities.

Single Centralised Register of Members of Staff

In addition to the various staff records kept on site and on individual personnel files, a single centralised record of recruitment and vetting checks is kept in accordance with the Education (Independent School Standards) Regulations 2014 requirements. This is kept up-to-date and retained by the Human Resources Office in Kingsland House. The Single Centralised

The register will contain details of the following:

- All employees who are employed to work at The Positive Impact Group.
- All employees who are employed as supply staff to The Positive Impact Group, whether employed directly or through an agency.
- All others who have been chosen by The Positive Impact Group to work in regular contact with children.

This will cover volunteers, Governors, peripatetic staff, and people brought into The Positive Impact Academy to provide additional teaching or instruction for pupils but who are not staff members, e.g., sports coaches, etc.

A designated Governor will be responsible for auditing the Single Centralised Register and reporting his/her findings to the full Governing Body during the Summer Term meeting.

Record Retention/Data Protection

The Positive Impact Group is legally required to undertake the above pre-employment checks. Therefore, if an applicant is successful in their application, The Positive Impact Group will retain any relevant information provided as part of the application process. This will include copies of documents used to verify identity, right to work in the UK, medical fitness and qualifications. Medical information may be used to help The Positive Impact Academy to discharge its obligations as an employer, e.g., so that The Positive Impact Academy may consider reasonable adjustments if an employee suffers from a disability or to assist with any other workplace issue.

This documentation will be retained by The Positive Impact Group for the duration of the successful applicant's employment with The Positive Impact Group. All information retained on employees is kept centrally in the Human Resources Office in a locked and secure cabinet.

The same policy applies to any suitability information obtained about volunteers involved with The Positive Impact Group activities.

The Positive Impact Group will retain all interview notes on all unsuccessful applicants for a period of 6 months, after which time the notes will be confidentially destroyed (i.e., shredded). The 6-month retention period is in accordance with the General Data Protection Regulations (GDPR).

Ongoing Employment

The Positive Impact Group recognises that safer recruitment and selection is not just about the start of employment but should be part of a larger policy framework for all staff. The Positive Impact Group will therefore provide ongoing training and support for all staff, as identified through the Annual Review/appraisal procedure.

Leaving Employment at The Positive Impact Group

Despite the best efforts to recruit safely, there will be occasions when allegations of serious misconduct or abuse against children and young people are raised. This policy is primarily concerned with the promotion of safer recruitment and details the pre-employment checks that will be undertaken prior to employment being confirmed.

Whilst these are pre-employment checks, The Positive Impact Group also has a legal duty to make a referral to the DBS in circumstances where an individual:

- Has applied for a position at The Positive Impact Group despite being barred from working with children; or
- Has been removed by The Positive Impact Group from working in a regulated activity (whether paid or unpaid), or has resigned prior to being removed, because they have harmed, or pose a risk of harm to, a child.

If the individual referred to the DBS is a teacher, The Positive Impact Group may also decide to make a referral to the Teaching Regulation Agency.

Contractors and Agency Staff

Contractors engaged by The Positive Impact Group must complete the same checks for their employees that The Positive Impact Group is required to complete for its staff. The Positive Impact Group requires confirmation that these checks have been completed before employees of the Contractor can commence work at The Positive Impact Group.

Agencies that supply staff to The Positive Impact Group must also complete the pre-employment checks, which The Positive Impact Academy would otherwise complete for its staff. Again, The Positive Impact Group requires confirmation that these checks have been completed before an individual can commence work at The Positive Impact Group.

The Positive Impact Group will independently verify the identity of staff supplied by contractors or an agency and will require the provision of the original DBS certificate before contractors or agency staff can commence work at The Positive Impact Group.

Visiting Speakers (and Prevent Duty)

The Prevent Duty Guidance requires The Positive Impact Group to have clear protocols for ensuring that any visiting speakers, whether invited by staff or by pupils, are suitable and appropriately supervised.

The Positive Impact Group is not permitted to obtain a DBS disclosure or Children's Barred List information on any visiting speaker who does not engage in regulated activity

at The Positive Impact Group or perform any other regular duties for or on behalf of The Positive Impact Group.

All visiting speakers will be subject to The Positive Impact Group's usual visitors' signing-in protocol. This will include signing in and out.

The Positive Impact Group will also obtain such formal or informal background information about a visiting speaker as is reasonable in the circumstances to decide whether to invite and/or permit a speaker to attend The Positive Impact Group. In doing so, The Positive Impact Group will always have regard to the [Visitors and Security Policy], the Prevent Duty Guidance and the definition of "extremism" set out in KCSIE, which states:

"'Extremism' is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas. Terrorist groups very often draw on extremist ideas developed by extremist organisations."

In fulfilling its Prevent Duty obligations, The Positive Impact Group does not discriminate on the grounds of race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age.

Volunteers

The Positive Impact Group will request an enhanced DBS disclosure and Children's Barred List information on all volunteers undertaking regulated activity with pupils at or on behalf of The Positive Impact Group (the definition of regulated activity set out above will be applied to all volunteers). Under no circumstances will The Positive Impact Group permit an unchecked volunteer to have unsupervised contact with pupils.

It is The Positive Impact Group's policy that a new DBS certificate is required for volunteers who will engage in regulated activity but who have not been involved in any activities with The Positive Impact Group for three consecutive months or more. Those volunteers who are likely to be involved in activities with The Positive Impact Group on a regular basis may be required to sign up to the DBS update service, as this permits The Positive Impact Group to obtain up-to-date criminal records information without delay prior to each new activity in which a volunteer participates.

In addition, The Positive Impact Group will seek to obtain such further suitability information about a volunteer as it considers appropriate in the circumstances. This may include (but is not limited to) the following:

- Formal or informal information provided by staff, parents, and other volunteers.
- Character references from the volunteer's place of work or any other relevant source; and
- An informal safer recruitment interview.

This policy is reviewed annually.

Overall responsibility lies with the Director, who liaises with the Senior Leadership Team to ensure a robust and sustainable model of Leadership.

Signed by Director

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

James Armson

Alcohol Policy

Introduction

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

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

Aims of the Policy

This policy aims to:

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

Health and Safety

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

In the workplace, alcohol abuse can take two different forms:

- Occasional inappropriate drinking.

- Consistently inappropriate drinking.

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

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

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

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

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

Restrictions on Drinking Alcohol at Work

- Alcohol must not be consumed in any situation where, as a consequence, the safety of the individual, colleagues or visitors is put at risk.
- Alcohol must not be consumed in excess [or in sufficient quantities to impinge on the exercise of any individual's duties] when on Company business outside normal working hours, for example, when involved in functions or in providing hospitality.
- Employees are not obliged to work with anyone they consider to be incapable through the consumption of alcohol and should immediately report the matter to James Armson/David Strong.

- Employees who are incapable of working through the consumption of alcohol should be immediately removed from duty, and the matter reported to James Armson/David Strong.
- Employees will be held to be contributory negligence in the event that whilst on Company business, they cause an accident or damage to anyone or anything, and that the incident occurred due to the Employee's consumption of alcohol.
Disciplinary Action: Employees who are unfit or otherwise incapable of work through the consumption of alcohol will be liable for disciplinary action, may be found guilty of gross misconduct, and may face summary dismissal.

Procedure

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

to make provision for any further treatment, and the employee in question may face summary dismissal.

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

This policy is reviewed annually.

Overall responsibility lies with the Director, who liaises with the Senior Leadership Team to ensure a robust and sustainable model of Leadership.

Signed by Director



James Armson

Anti-Bullying Policy

Principles

- Pupils have the right to learn free from intimidation and fear.
- The needs of the victim are paramount.
- The school will not tolerate bullying.
- Bullied pupils will be listened to.
- Reported incidents will be taken seriously and investigated

Defining Bullying

Bullying is defined as the repetitive, intentional harming of one person or group by another person or group, where the relationship involves an imbalance of power.

Bullying is, therefore:

- Deliberately hurtful
- Repeated, with multiple incidents occurring over a prolonged period of time
- Difficult to defend against
- Perpetrated by individuals and/or groups
- Unintentional at times

Types of Bullying	Definition
Emotional	Being unfriendly, excluding, and tormenting
Physical	Hitting, kicking, pushing, taking another's belongings, or any use of violence
Prejudice-based and discriminatory, including: racial, faith-based, gendered (sexist), homophobic/biphobic, transphobic, disability-based	Taunts, gestures, graffiti or physical abuse focused on a particular characteristic (e.g. gender, race, sexuality)

Sexual	Explicit sexual remarks, display of sexual material, sexual gestures, unwanted physical attention, comments about sexual reputation or performance, or inappropriate touching
Direct or indirect verbal	Name-calling, sarcasm, spreading rumours, teasing
Cyberbullying	Bullying that takes place online, such as through social networking sites, messaging apps or gaming sites

Preventing Bullying

Our PSHE programme uses a range of opportunities to educate pupils about our anti bullying ethos:

- Circle times
- PSHE lessons
- Targeted groups
- Friendship groups
- Anti-bullying ambassadors
- Sessions with the pastoral team

Roles and Responsibilities

Staff will:

- Develop pupils' self-esteem, self-respect and respect for others.
- Demonstrate high standards of personal and social behaviours.
- Discuss bullying with classes, groups and individuals in an age-appropriate manner.
- Be alert to the signs of distress and other possible signs of bullying.
- Listen to children.
- Report suspected cases of bullying.
- Follow up any issues raised by parents.

- Deal with observed incidents promptly and effectively.

Pupils will:

- Learn to understand that bullying is extremely serious and unacceptable.
- Refrain from bullying, even if there is strong peer pressure.
- Intervene to protect other pupils unless it is unsafe to do so.
- Report bullying to a member of staff.
- Not suffer in silence and have the courage to speak out.
- Have opportunities to speak to adults and to know who to speak to and how to get to speak to them.

Parents should:

- Watch for signs of distress.
- Advise their child/children to report bullying.
- Advise not to retaliate violently.
- Be sympathetic and supportive.
- Understand that bullying consists of a number of incidents occurring over a close period of time, not a singular incident.
- Inform the school if they suspect that bullying is occurring.
- Cooperate with the school's Preventive Measures.

Dealing with Incidents of Bullying

Positive Impact Academy will not tolerate bullying of any kind. Incidents of unkindness are recorded by members of staff and stored within pupils' weekly reviews. Where an incident occurs which requires staff intervention, details of this incident will be written in the format of an Incident Report, which will be shared with the referrer school and parents. This includes the location, time, lesson, type and names of any instigators, victims and/or witnesses involved. Education Mentors and our SLT will then closely monitor these incidents.

If a case of bullying is suspected (there are multiple recorded instances of unkindness by a child/group of children towards another child), Education Mentors will contact the parents/guardians of all involved to discuss the concern and possible strategies to resolve it.

This will then be monitored and reviewed by the team, usually for a period of two weeks. If the bullying concerns continue, this will then be referred to SLT, who will arrange a formal meeting with parents to highlight the severity of the situation and discuss further strategies and/or consequences that may be put in place if this continues. If, for any reason, a parent or student is unhappy about the way in which a bullying complaint has been responded to, they should contact the Director, who will investigate through:

- Clear written reports, including investigations, are essential.
- Records are kept to show incidents and behaviour patterns over time.
- Logs are kept and updated to show the nature of the bullying and any trends.
- Feedback from pupils and parents is valued and informs practices.
- Contact with relevant professionals is embedded.

This policy is reviewed annually.

Overall responsibility lies with the Director, who liaises with the Senior Leadership Team to ensure a robust and sustainable model of Leadership.

Signed by Director



James Armson

Bullying Policy

Introduction

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

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

student concerned. However, we will not break the rules of confidentiality by discussing the cases of other students.

10. If appropriate, external agencies will be involved to support the person being bullied or to offer corrective counselling to the person who is carrying out the bullying.
11. Tutors should review student behaviour following the incident. It may be appropriate to speak to the whole team about lessons that have been learned.
12. It may be appropriate for the Director to speak to the entire team about a particular incident.
13. The Positive Impact Foundation has now decided to keep a log of bullying incidents in order to detect patterns of behaviour. Any member of staff who deals with an incident of bullying will be required to record the incident in the logbook held by the DSL.
14. The Positive Impact Foundation DSL speaks to all students and parents about the subject when they join The Positive Impact Foundation. If appropriate, he provides a point of contact for students who wish to report an incident of bullying to someone who is not their tutor.
15. Bullying is reviewed on an ongoing basis by the Director.

This policy is reviewed annually.

Overall responsibility lies with the Director, who liaises with the Senior Leadership Team to ensure a robust and sustainable model of Leadership.

Signed by Director



James Armson

SEND Policy

Special Educational Needs Co-ordinator

Amelia Goodhew, Special Educational Needs (SEND) at The Positive Impact Foundation, recognises that every member of the The Positive Impact Foundation community is special and has individual learning and wellbeing needs. We value the abilities and achievements of all our pupils, and we are committed to providing the best possible learning environment for each pupil. The SEND policy and practices are based on the needs of the individual student, national legislation, and Local Authority (LA) guidance. The Positive Impact Foundation will seek to implement the objectives of this policy.

Our SEND Objectives

The SEND objectives at The Positive Impact Foundation are in line with the current Code of Practice and include:

- Ensuring all pupils have access to a broad and balanced curriculum.
- Providing a differentiated curriculum appropriate to each individual's needs and abilities.
- Identifying pupils requiring SEND provision at the earliest opportunity in their school career and informing parents promptly.
- Ensuring SEND pupils take part as fully as possible in all aspects of their school life.
- Providing parents with regular information regarding pupils' academic progress and attainment.
- Involving pupils in decisions affecting their future SEND provision, where practicable.

We recognise that some pupils may have existing SEND on entry and others may experience SEND at some point in their school career. We also recognise that SEND can be temporary and can be present at different times. Our staff are committed to the principles of this policy. By implementing this policy and working collaboratively, we believe pupils with SEND will be helped in managing their difficulties. This policy was created with input from pupils, parents, staff and relevant outside agencies. The final

policy was issued by the Director and will be implemented in conjunction with our existing behaviour, equal opportunities, equality and complaints policies.

What Is SEND?

A pupil has special educational needs if they require specific educational provision to be made. Difficulties may include:

- Pupils experiencing significant difficulty in learning in comparison with peers.
- Having a disability which prevents the pupil from accessing educational facilities.
- Pupils experiencing emotional difficulties which prevent them from engaging on a social or academic level.

Particular care will be taken in identifying SEND where lack of progress may be attributed to any of the following:

- English as an Additional Language (EAL).
- Absences due to long-term illness/hospitalisation.
- Frequent geographical relocation.

The Positive Impact Foundation and its partners believe that the admissions criteria should not discriminate against pupils with SEND, ensuring they are treated as fairly as all other applicants for admission.

Stages in the process of identifying and meeting special educational needs:

A pupil who is perceived by any member of staff as having SEND is reported to the SENCO with appropriate evidence, who will then investigate. The initial responsibility of care lies with tutors unless the pupil is identified as being in need of intervention, in which case the SENCO becomes responsible for coordinating SEND for that pupil. Early identification of pupils with SEND is a priority. The identification of all educational needs will be met through considering the following:

- **Information from Outside School**
 - Parents
 - Previous school
 - Specialists, e.g. Education Psychologist
 - Information provided through extracurricular activities

- **Information From Within School Utilising the Tutor's Knowledge-Based Upon**
 - Observations
 - Internal tests
 - Written work
 - Oral work
 - Extracurricular activities
- **Information From Within School Based On the Pupil's Performance**
 - Public examinations
 - Standardised tests
- **Additional Relevant Information**
 - Self-identification
 - The pupil's identification by other pupils.

In some instances, diagnostic testing may be required. Once identified, priority will be given to liaising with parents and tutors regarding the pupil's SEND requirements, and a plan of provision will be agreed upon.

What Our Expectations Are

Parents/pupils are expected to support The Positive Impact Foundation, wherever possible, in addressing their child's/own SEND. We believe a strong partnership with parents is essential in effectively addressing pupils' SEND and enabling them to achieve their potential. SEND pupils will be encouraged to participate in the decision-making processes affecting them. We will also provide, on request, details of the local parent partnership to ensure parents receive comprehensive, neutral and appropriate advice.

Our SEND policy recognises and reinforces the need for teaching that is fully inclusive. The Positive Impact Foundation will ensure appropriate provision is made for all pupils with SEND. We have adopted a whole business approach whereby pupils with SEND are, as far as is practicable, fully integrated into education. The SEND Code of Practice makes it clear that all teachers of pupils with SEND are expected to differentiate appropriately for different levels of need.

The Role of the SENCO

The SENCO works within The Positive Impact Foundation and with outside agencies, and is responsible for overseeing the administration of SEND provision and supporting staff to meet pupils' needs. Contact details are available via The Positive Impact Foundation website and at the front of this policy. Every effort will be made to prioritise needs and to provide necessary provision, based on relevant evidence.

The SENCO is supported in her role by:

- The Director
- Senior Leadership
- The DSL's
- All teaching staff

In School Provision

The aim of the SENCO (and that of support staff) is to support pupils and to enable subject specialists to teach their subject to all pupils. On admission, we commit to continuity of support for pupils with existing SEND.

To ensure that all staff are aware of current pupil needs, the SENCO publishes a monthly SEND register on The Positive Impact Foundation's Google Drive. Any examination Access Arrangements are also recorded within both registers (a pupil being in receipt of Extra Time or needing to use a Laptop, for example).

On the SEND register, levels of provision now fall into two categories – SEND Support (instead of the previous sub-categories of School Action/School Action Plus) and EHC Plans (Educational Health Care Plans) instead of Statements of SEND provision.

SEND Support

A pupil is deemed to be in receipt of SEND Support if they are unable to access the curriculum despite strategies attempted at Wave 1 of intervention, and they are on either Wave 2 or Wave 3. Support may come from internal resources and external agencies working together. Levels of provision fall into three categories:

Wave 1

Pupils who are recorded as being Wave 1 may have a diagnosis of Dyslexia or ADHD but require no extra intervention, just high-quality, inclusive teaching.

Wave 2

Pupils who are recorded as being Wave 2 receive internal 1:1 intervention.

Wave 3

Pupils who are recorded as being Wave 3 receive specialist external 1:1 intervention.

EHC Plan

In the event of a pupil having an EHC Plan, The Positive Impact Foundation will work with all relevant agencies to ensure appropriate recommendations are duly met (in line with the recently published SEND Code of Practice – June 2014).

Strategies for SEND

The Positive Impact Foundation staff use a variety of strategies to support pupils in the widest SEND sector. The main methods of provision include:

- Inclusive education with tutor support through a differentiated curriculum.
- 1:1 support.
- Opportunities for pre-teaching.

We offer targeted pupil updates to parents through regular progress reports. We provide teaching guidelines on general SEND issues, and SEND also forms part of our current staff in-house development, whereby best practice is regularly shared.

We support pupils individually as necessary for specific reasons, on agreed programmes, working closely with the following external agencies:

- Local Authority (LA)
- Educational Psychologist (EP)
- Specialist Teacher Services (STS)

-
- Medical professionals
 - Speech and Language Therapists (SaLT)
 - Children, Adolescent Mental Health Service (CAMHS)
 - Educating Children Out of School (ECOS)
 - Educational Social Worker (ESW)
 - Connexions advisors
 - Relevant charities and organisations

We apply for special access arrangements to support pupils in examinations when necessary, where academic evidence supports this need. The SENCO regularly meets with The Positive Impact Foundation's Director to ensure that the access arrangements held are current and valid.

The progress of SEND pupils will be monitored by considering observational evidence, formative and summative assessment. This information will be shared as necessary and reviewed regularly.

Evaluating Our SEND Policy

Through the evaluation of this policy, we will consider the views of:

- Pupils
- Parents
- Teachers
- Governors
- External professionals

Pupil progress will provide evidence for the success of the SEND policy. This will be analysed through consideration of pupils' meetings, the targets set within our review and evidence gathered through dialogue with pupils.

We consider the SEND policy document to be important and, in conjunction with WCC, will review it annually. The outcomes of the review will ensure the policy is current and that it continues to inform the Director.

This policy is reviewed annually.

Overall responsibility lies with the Director, who liaises with the Senior Leadership Team to ensure a robust and sustainable model of Leadership.

Signed by Director



James Armson



Administration of Medicines Policy

Introduction

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

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

The Role of Parents/Carers

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

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

Prescription Medication

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

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

In all cases, it is necessary to check:

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

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

Long-Term Medical Needs

It is important for The Positive Impact Primary Academy to have sufficient information regarding the medical condition of any pupil with long-term medical needs. The Local Authority will draw up a health care plan for such pupils, involving the parents and the relevant health professionals. Appropriate training will be arranged for the administration of any specialist medication (e.g., adrenaline via an EpiPen, Buccal midazolam, insulin, etc.) Staff will only administer such medicines if they have been trained to do so.

Controlled Drugs

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

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

Non-Prescription Medication

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

If non-prescription medication is to be administered, then the parent/carer must complete an Administration of Medicine Consent form (Appendix 1), and the same procedure will be followed as for prescription medication. The medicine must be provided in its original container, with dosage information on it. The parents' instructions will be checked against the dosage information, and this will not be exceeded.

Administering Medicines

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

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

Emergency Inhalers

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

Refusing Medication

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

Off-Site Visits

It is good practice for schools to encourage pupils with medical needs to participate in off-site visits. All staff supervising visits should be aware of any medical needs and relevant emergency procedures, and all staff will have access to individual risk assessments. A member of staff who is trained to administer any specific medication will

accompany the pupil and ensure that the appropriate medication is taken on the visit. Inhalers must be taken for all children who suffer from asthma.

Travel Sickness

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

Disposal of Medicines

The SENDCO will check all medicines kept at The Positive Impact Primary Academy each term, to ensure that they have not exceeded their expiry date. Parents/carers will be notified of any that need to be replaced. Parents/carers are responsible for ensuring that date-expired medicines are returned to a pharmacy for safe disposal. If parents do not collect all medicines, they should be taken to a local pharmacy for safe disposal. Sharps boxes should always be used for the disposal of needles. There is a sharps box in the staff office, if any child requires regular injections (e.g., Insulin).

This policy is reviewed annually.

Overall responsibility lies with the Director, who liaises with the Senior Leadership Team to ensure a robust and sustainable model of Leadership.

Signed by Director



James Armson

Appendix 1 — Administration of Medication Permission and Record

Name of child: _____

Date: _____

Details of illness: _____

Medicine: _____

Times and dosage of medicine: _____

Relevant side effects to be observed if any: _____

Medicine to be administered from: _____ to: _____

Parent/Carer:

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

I understand that I must supply The Positive Impact Academy with the prescribed medicine in the original container dispensed and properly labelled by the pharmacist.

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

Signature: _____ Relationship to child: _____

Appendix 2 — Administration of Medication Continuation Sheet

Sheet no. _____

Name of child: _____

Class: _____

Date: _____

Name	Time Given	Dose Given	Member of Staff	Intials

Appendix 3 — Example Consent Form for Off-Site Visit

Parental consent for trip to

Date of visit:

I agree to _____ taking part in the visit and am happy for them to participate on the activities described.

Medical

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

Please list below: _____

Is your child allergic to any medication? YES/NO

Please list below: _____

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

Contact Numbers:

Mobile: _____ Home: _____

Home address: _____

Name of family doctor: _____ Telephone no: _____

Address: _____ 9

Alternative emergency contact:

Name: _____ Telephone no: _____ Address: _____

Signed (Parent/Carer): _____ Date: _____

Prescribed Medicines:

Name of Medicine	Times To Be Taken	Dosage	Route

Signed (Parent/Carer): _____ Date: _____

Appendix 4 — Consent Form: Use of Emergency Salbutamol Inhaler

Child showing symptoms of asthma/having asthma attack

1. I can confirm that my child has been diagnosed with asthma/has been prescribed an inhaler [delete as appropriate].
2. My child has a working, in-date inhaler, clearly labelled with their name, which they keep at The Positive Impact Academy.
3. In the event of my child displaying symptoms of asthma, and if their inhaler is not available or is unusable, I consent for my child to receive salbutamol from an emergency inhaler held by The Positive Impact Primary Academy for such emergencies.

Name (print): _____

Child's name: _____

Class: _____

Work: _____ Home: _____

Home address: _____

Signed (Parent/Carer): _____ Date: _____

Positive Relationship and Behaviour Policy

Introduction

At Positive Impact Primary Academy, we believe that the adult-child/young person relationship is vital when developing the child/young person's social and emotional skills, which are essential for life and learning. We strive to demonstrate a relational approach to support social and emotional development and behaviour based on the following six principles:

- We understand that behaviour communicates unmet needs, and we can separate the child/young person from their behaviour.
- We understand that each developmental stage has a range of typical behaviours, which provide opportunities for adults to role-model and explicitly teach appropriate behaviours.
- We provide containment, predictability and routine to build a sense of safety in the emotional and physical environment.
- We encourage children/young people at our setting to become accountable for their actions and realise the impact they may have on themselves and others, promoting a solution-focused approach to changing future behaviours.
- We keep in mind that we are the adults and the children/young people are still growing, learning and developing.
- We seek to restore relationships and change behaviours rather than punish the actions a child/young person may have taken. Although this does not exclude the use of sanctions, we seek the most appropriate way of supporting children/young people to develop robust stress-regulation systems and therefore the skills of self-control, empathy and emotional management.

Policy Aims

This policy aims to:

- Share the approach the school takes to promote good behaviour and relationships, ensuring that children and young people are in a calm, safe and supportive environment.
- Share how the school community is committed to promoting and supporting positive behaviour and relationships across the school.
- Provide guidance to staff in their role of supporting positive behaviour and relationships.
- Provide information on what support and training opportunities are on offer for staff, parents and carers.

Whole-School Approach

We ensure that our school has a culture, ethos and practice that strengthens relational approaches and inclusion, recognising the importance of psychological safety. Our school implements Thrive, a trauma-informed whole-school approach to improving the mental health and wellbeing of children and young people.

Our school embeds Thrive into our curriculum, where children and young people are taught to:

- Develop their stress-regulation system.
- Recognise and verbalise a range of feelings and emotions.
- Build their emotional resilience so they can effectively manage stress.
- Keep themselves safe.
- Develop healthy coping strategies and regulation skills.

All staff are committed to supporting and promoting positive behaviour and healthy relationships. All staff will:

- Take the time to recognise and record positive behaviours and attitudes and reward success.
- Try to catch children and young people doing the right thing and enhance this.
- Engage in establishing the non-negotiable and negotiable rules at the start of the academic year, and revisiting these regularly and at least half-termly.
- Focus on the values, rights and responsibilities of the school when establishing boundaries with children and young people.
- Remind children and young people that their actions impact on others and that they have a responsibility to safeguard others' rights.

- Seek both resolution and learning when dealing with incidents.
- Consider how our actions and words help and give children/young people time and space to resolve the situation.
- Keep in mind that children and young people benefit from a clear structure (containment) within which to learn.
- Use sanctions only as a form of appropriate, proportionate and positive intervention.
- Keep in mind that any sanction used is to resolve rather than escalate a situation while preserving the dignity of all involved.
- Keep in mind that sanctions must be applied compassionately in a fair and consistent way.
- Be supported closely by the SENDCo regarding any pupils with additional needs, to ensure pupils' behaviour is appropriately supported.

Alongside the above, we also use the stance of PACE and the communication skills of the Vital Relational Functions (VRFs) to support children and young people.

PACE is the acronym used by psychologist Dan Hughes to describe the optimal adult stance when working with children to reduce stress, enhance connection, promote safety and engender the learning of new social and emotional skills. PACE stands for:

- **Playfulness**
Sensitive and appropriate playfulness helps the child feel safe and promotes positivity.
- **Acceptance**
Unconditionally accepting the child makes them feel safe, secure and loved.
- **Curiosity**
Genuine and non-judgemental interest in the child helps them become aware of their inner life.
- **Empathy**
Demonstrating compassion for the child and their feelings supports the child's sense of self-worth.

The VRFs represent the key techniques that we consciously apply in relationship. The VRFs include:

- **Attunement**
Matching the energy of the child with non-verbal, prosodic, energetic and behavioural communication.
- **Validation**
Acknowledging the validity of the child's feelings and experiences.
- **Containment**
Predictability, routine and experiencing safety and security, both relationally and environmentally.
- **Regulation**
Transforms what was too much to bear alone into an experience that can be tolerated together.

Special Educational Needs and Disabilities (SEND)

We recognise the important role of positive relationships with our children who have SEND. Our staff have an instrumental knowledge of the children and their needs. Our Positive Relationships Policy is tailored around the needs of our children, as we recognise that our approach must be adapted to each child.

Our relationships with our families are fundamental, and we pride ourselves on the level of support that we offer. Often, our families can also have additional needs, and we endeavour to make reasonable adaptations to make them feel comfortable and ensure their needs are also met.

Due to rising special educational needs, school refusers are a priority in the holistic care that we provide. We work closely with families to ensure that children are making academic progress while meeting SEMH milestones.

Positive Rewards

To promote intrinsic motivation, rewards will be given for the process of learning (behaviours for learning) rather than the output of an activity, which may promote extrinsic motivation.

Our classroom awards and certificates are designed to recognise children/young people doing the right thing, including:

- Students earn 'Stars' daily, which students can then choose an item out of the reward box every Friday, depending on how many stars they have earned that week.
- 'Caught being kind' postcards
- THRIVE Postcards
- Phone calls home
- Certificates of Recognition, based on our POSITIVE values:
 - Persevere
 - Optimistic
 - Safe
 - Inclusive
 - Teamwork
 - Inspire
 - Valued
 - Empathetic

Sanctions and Consequences

When an incident occurs, we understand that this will cause a rupture in relationships and we seek to repair this rupture. We describe the behaviour as 'distressed' rather than 'challenging', because we understand that the behaviour is communicating a level of need within the child/young person.

At Positive Impact Primary Academy, our sanctions are designed to support children/young people to be accountable for their actions, encouraging them to develop skills to change their behaviour rather than to punish the actions taken by the child. For example:

- Help to rectify something they have done, for example, help to tidy up the mess they have made, turn the chairs back up if they have been tipped over, etc.
- Use sanctions to help the pupil and others learn from mistakes and recognise how they can improve behaviour.
- Hold restorative sessions between students following an incident, encouraging both accountability and empathy.

- Use the Thrive assessment tool to help gain a better understanding of the child or young person's social and emotional needs.
- Hold Thrive one-to-one or group sessions to help promote positive behaviour and develop regulation techniques

Partnership with Parents and Carers

At Positive Impact Primary Academy, we work as a team to support the children/young people in our setting as they grow and develop socially and emotionally. We actively promote a partnership with parents/carers and other agencies, where appropriate.

We believe that clear and open communication is key to ensuring that we all work together as a team to meet the needs of the child/young person. We make sure parents/carers are supported to understand and help children/young people to be accountable for their actions. We encourage rejoicing in the positives and developing skills to change unacceptable behaviour rather than to punish the actions taken by the child.

Our school is committed to supporting parents, carers and families with their child or young person's behaviour. We aim to do this by:

- Communicating with parents, to update parents and carers with messages and news, throughout the week.
- Encouraging parents and carers to inform the school if they have any concerns regarding their, or another child's behaviour.
- Discussing any behaviour concerns we have with parents and carers.
- Keeping parents and carers well-informed regarding where they can seek support through the school website, social media pages, posters in the main entrance, letters home, etc.
- Providing Thrive home action plans so that parents and carers can support their child/young person at home.
- Holding regular review meetings with parents and carers, school and professionals.
- Holding drop-in sessions each term.
- Hosting parent/carer coffee mornings

Supporting Staff

At Positive Impact Primary Academy, we provide high-quality training and ongoing continual professional development for staff in relation to behaviour and relationships to support the school's implementation of the Thrive Approach, which helps with children and young people's social, emotional and mental health.

All staff will be given training so that they:

- Understand what children/young people's mental health needs are.
- Understand how to promote good mental health and wellbeing.
- Know how to recognise warning signs of poor mental health.
- Have a clear process and know what to do if they identify a child or young person in need of support.
- Understand the impact of SEND upon young people's social and emotional development.

Staff are provided with a range of ongoing support when supporting children and young people with their mental health and wellbeing. This includes the following:

- Access to Thrive-Online for all colleagues, which enables all staff to profile classes and groups, ensuring that pupils' social and emotional skills are on track.
- 'Introduction to Thrive' training module for all colleagues, which includes an overview of the Thrive Approach, basic theory and how to use Thrive-Online to profile a class or group.
- Regular social media updates to provide support and guidance for staff.
- Training and tailored support delivered and provided by our SENDCo.

Some key staff will receive additional training to provide them with the skills and knowledge to support children, young people, families and staff with their mental health and wellbeing:

- Thrive Licensed Practitioner training
- Mental Health Lead training (DfE quality assured)

We recognise that dealing with a child demonstrating distressed behaviour can be upsetting, therefore at our school we ensure support for staff is available if they have had to support a child or young person who is dysregulated.

Roles and Responsibilities

All staff in school are responsible for:

- promoting positive behaviour
- role-modelling positive behaviour and relationships
- supporting children and young people who may be displaying distressed behaviours

There are key adults who have the responsibility for overseeing and managing behaviour within the school:

Name	Role	Contact Details
Amelia Goodhew	Head, SENDCo and DSL (Senior Leadership Team)	amelia.goodhew@positive-impactuk.com 07857668332
Gemma Lish	Deputy DSL and Licensed THRIVE Practitioner	gemma.lish@positive-impactuk.com 07857668292
Daisy Jones	Education Mentor and Licensed THRIVE Practitioner	daisy.jones@positive-impactuk.com

Our setting may use other professionals to draw upon their expertise, make referrals or carry out further assessments. This list of professionals may include the following:

- Educational Psychologists
- Child and Adolescent Mental Health Services
- Speech and Language Therapists
- Doctor/GP
- Family Connect

This policy is reviewed annually.

Overall responsibility lies with the Director, who liaises with the Senior Leadership Team to ensure a robust and sustainable model of Leadership.

Signed by Director



James Armson

Attendance Policy

Principles

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

Regular and punctual attendance provides the means for children to take advantage of all educational opportunities. It ensures continuity, promotes responsibility and a purpose which can be carried into adult life. The purpose of this policy is to clearly state what our expectations are and that attendance and punctuality can only be achieved when home and school work together.

Aims & Objectives

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

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

- Establish a pattern of monitoring attendance and ensure consistency in recognising achievement and dealing with difficulties.
- Recognise the key role of all staff in promoting good attendance

Promoting Attendance

Excellent attendance is promoted through the consistent messages delivered throughout our curriculum, school newsletters, pupil rewards, posters, letters home, 15 parent information sessions, parent consultations and school reports. Attendance is everyone's responsibility, and we use every opportunity to communicate this.

Rationale: The Legal Framework

It is the responsibility of parents to ensure that their children attend regularly.

- Regular attendance is an essential prerequisite of effective schooling.
- The law requires that all children aged 5 to 16 years of age are required to attend full-time education unless an alternative provision is agreed for them.

Positive Impact Academy will support parents to improve attendance where it is of concern.

Register Procedure

It is the responsibility of the Head of Academy to log the attendance of each student on The Positive Impact Academy IRIS Portal. All students who fall within the cohort will have their attendance logged on IRIS. Students from other Local Authorities all have their attendance monitored by The Positive Impact Academy's online register. Attendance figures are shared with professionals working with the child, including the referring school.

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

Responsibility of Parents/Carers

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

It is the parent/carer's responsibility:

- To ensure that their children are ready for their pickup time.
- To notify The Positive Impact Academy on the first day of absence as soon as possible. Parents can report an absence by emailing their child's education mentor or telephoning the Head of Academy.
- To provide medical evidence, where possible, on the child's return.
- To ensure that, as far as possible, medical appointments are arranged for outside The Positive Impact Academy hours. Where this is not possible, parents are expected to provide evidence of the appointment in advance, and the child should attend The Positive Impact Academy before/after the appointment.
- To liaise with The Positive Impact Academy as soon as possible regarding any specific issues that might cause absence or lateness, e.g., a sick parent/carer. 16

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

Illness and Medical Absences

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

Absence for Holidays

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

If there are exceptional circumstances, parents/carers must complete a leave of absence request form in advance of the trip (ideally at least 4 weeks prior). These requests will be

considered on a case-by-case basis by the Director and Head of Academy, and they will use their discretion whilst applying government recommendations.

It is the parent/carer's responsibility:

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

If parents/carers decide to take a holiday without the Director's authorisation, the child's absences will be marked as unauthorised. Fixed Penalty Notices will be issued by the Education Welfare Service for unauthorised holiday absence during term time.

Absence for Other Reasons

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

It is the parent/carer's responsibility to inform the office, in writing, of the need for leave in circumstances which are known in advance.

Unexplained Absence

When a child is repeatedly absent, and no satisfactory reason is given, the parent/carers will be investigated and may be liable for prosecution and/or a fine from the Local Authority. Local Education Authorities and Police are able to issue penalty notices for unauthorised absence from school and will do so in accordance with the local authority code of conduct relating to the issuing of penalty notices. Failure to pay the Penalty Notice may result in a prosecution under Section 444 of the Education Act 1996 for failing to ensure a pupil's attendance at school.

Regular monitoring is carried out by The Positive Impact Academy. Children who have repeated unauthorised absences, holidays or otherwise, will be contacted and may be invited to an attendance meeting to discuss absences and any appropriate support.

Children Missing in Education

If a child is absent (unexplained) for at least 5 consecutive days, a home visit will be carried out. If the pupil has not returned to school for 10 continuous days and The Positive Impact Academy has undertaken reasonable enquiries (see below) to locate the child, The Positive Impact Academy School will complete a CME referral. CME will then likely signpost to any other relevant teams/agencies, and The Positive Impact Academy will continue to follow attendance procedures if absence continues.

First 1-20 school days of absence and whereabouts are unknown

Reasonable enquiries to be taken by the school:

- Daily telephone calls to all known contacts whilst the child is absent.
- Recorded delivery letters to the home.
- Contact with other schools where siblings are registered.
- Frequent home visits where safe to do so and, calling card left if no answer.
- Enquiries with any other agencies/services known to have involvement with the family.
- Recording all actions undertaken by way of a chronology

This policy is reviewed annually.

Overall responsibility lies with the Director, who liaises with the Senior Leadership Team to ensure a robust and sustainable model of Leadership.

Signed by Director



James Armson

Primary Academy Curriculum Policy

Principles

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

At Positive Impact Primary Academy, we believe every child deserves to feel seen, heard, and supported. We are a nurturing alternative provision setting dedicated to providing a safe, inclusive, and engaging environment for primary-aged children and young people with Special Educational Needs and Disabilities (SEND) and those at risk of permanent exclusion. Our approach is centred on building trust, restoring confidence, and re-engaging pupils in learning through personalised support, creative curriculum pathways, and strong therapeutic relationships. We work closely with families, schools, and professionals to ensure each child receives the right guidance, care, and encouragement to thrive, both in and out of the classroom.

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

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

The Curriculum

The curriculum, whilst paying due regard to achieving high academic standards, is broad, exciting, and challenging. The curriculum embraces the five outcomes set out in Every Child Matters:

- Stay Safe
- Be Healthy
- Enjoy and Achieve
- Achieve Economic Wellbeing
- Make a Positive Contribution

Our curriculum has been developed to increase children's knowledge and their ability to use the acquired knowledge, understanding as they grow, develop and become more aware of the world around them. We aim to foster positive attitudes both in and out of the Positive Impact Primary Academy. Our curriculum is carefully planned and structured to ensure that learning is continuous and that the students make good progress in their learning. We ensure that the knowledge and skills gained are used across the whole curriculum and not simply in isolation, and that meaningful links are made between subjects. The curriculum will engage the young person's interest, encourage, and motivate them to want to learn. It will be exciting and offer young people first-hand experience to reinforce their learning and to underpin their growing knowledge, skills, understanding and attitudes. It will open their eyes to the wider world and educate them in acceptable behaviours and community cohesion.

We offer both short-term and long-term placements for primary-aged children with SEND and those at risk of permanent exclusion. Our flexible and child-centred approach allows us to meet a wide range of needs while supporting successful transitions, whether back into mainstream education, into specialist provision, or as part of an ongoing placement with us. Our morning sessions focus on a broad and balanced academic curriculum, carefully adapted to meet each child's learning style and ability. With small class sizes, targeted teaching, and a supportive environment, we help children re-engage with their education and build confidence across their core subjects and SEMH development. Our afternoon sessions offer a rich nurture-based curriculum, designed to support emotional development, social skills, self-regulation, and wellbeing. Through play-based learning, therapeutic activities, and creative expression, we help children feel safe, build trust, and develop the tools they need to succeed.

As a whole-setting approach, THRIVE is embedded throughout everything we do. Every child has their own personalised THRIVE Action Plan, which is woven into their daily timetable to support emotional growth, build resilience, and promote positive behaviour. Our staff are trained in THRIVE and use its principles to guide interactions, planning, and interventions. Our goal is to provide a safe and structured environment where children can flourish academically, socially, and emotionally at a pace that's right for them.

Reporting on Attainment

All learning and work completed by our pupils at The Positive Impact Primary Academy is monitored and evaluated. A written report is made available to parents annually in the summer term for long-term placements or at the end of short-term placements. Additionally, weekly and termly reviews are completed by our Education Mentors, in collaboration with all staff. Termly reviews will also be shared with parents and professionals. Parents and professionals will also be invited to placement review meetings regularly, in line with the wishes of the referring school.

Target Setting

At the Positive Impact Primary Academy, pupils are set next-step learning targets through education mentors, marking, reviews, feedback and our use of assessment for learning. Curricular and personal targets are also set termly, and agreed upon with referring schools and all professionals, whilst ensuring that communication with parents and carers is highly prioritised and considered.

Roles and Responsibilities

The Head of Academy takes overall responsibility for the curriculum. Education Mentors will monitor their pupils' progress to ensure that the curriculum is implemented consistently and effectively in line with the agreed policies. Consultation relating to the curriculum is facilitated from parents and carers through questionnaires, from children through pupil voice and from staff through regular meetings.

Inclusion — Provision For All Children

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

Extra-Curricular Activities

The Positive Impact Primary Academy offers a wide range of extra-curricular activities, within our pupils' timetables, which are used both for educational purposes and as a reward for outstanding effort and behaviour.

This policy is reviewed annually.

Overall responsibility lies with the Director, who liaises with the Senior Leadership Team to ensure a robust and sustainable model of Leadership.

Signed by Director



James Armson

Secondary and Post-16 Academy Curriculum Policy

Principles

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

School Mission Statement

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

The Aims of the Positive Impact Academy

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

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

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

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

The Curriculum

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

Common Values and Purpose

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

The curriculum embraces the five outcomes set out in Every Child Matters – Stay Safe, Be Healthy, Enjoy and Achieve, Achieve Economic Well-Being and Make a Positive Contribution. The curriculum is used to increase children's knowledge, for example, key concepts in Mathematics and English. Also, the ability to use the acquired knowledge, understanding as they grow and develop and become more aware of the world around them and fostering positive attitudes both in and out of the Positive Impact Academy.

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

The curriculum will engage the young person's interest, encourage, and motivate them to want to learn. It will be exciting and offer young people first-hand experience to reinforce their learning and to underpin their growing knowledge, skills, understanding and

attitudes. It will open their eyes to the wider world and educate them in acceptable behaviours and community cohesion.

Equal Opportunities

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

Broad Guidelines

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

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

Core subjects delivered at every level are:

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

Reporting on Attainment

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

Target Setting

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

Roles and Responsibilities

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

Inclusion — Provision For All Children

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

Relationship Education

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

Spiritual, Moral, Social and Cultural Opportunities

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

Self-Esteem and Self-Worth

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

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

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

Extra-Curricular Activities

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

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

This policy is reviewed annually.

Overall responsibility lies with the Director, who liaises with the Senior Leadership Team to ensure a robust and sustainable model of Leadership.

Signed by Director



James Armson

Equality Objectives Policy

Principles

Nuneaton and Bedworth District has the highest levels of deprivation within Warwickshire, and the Lower Level Super-Output Area (LSOA) within which The Positive Impact Primary Academy is located is within the top 10 most deprived LSOAs nationally. This means that there is a high level of economic need within the area around the school. Ethnic groups are represented within the setting, and there is similarly wide-ranging representation from a number of different faiths.

Our setting aims to create an environment where individuals feel confident and at ease by:

- Being respectful
- Always treating other members of the school community fairly
- Developing an understanding of diversity and the benefits it can have
- Adopting an inclusive attitude
- Adopting an inclusive curriculum
- Encouraging compassion and open-mindedness

Legislation and Guidance

- The Positive Impact Group has obligations under the Public Sector Equality Duty (PSED) (as set out in the Equality Act 2010) to have due regard to the need to: Eliminate discrimination, harassment, victimisation and other conduct that is prohibited by the Equality Act 2010.
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it.
- Foster good relations across all characteristics between people who share a protected characteristic and people who do not share it.

The protected characteristics within the Equality Act 2010 are: Sex; Race; Disability; Religion or belief; Sexual orientation; Gender reassignment; Pregnancy or maternity.

Roles and Responsibilities

The Head will:

- Promote knowledge and understanding of the equality objectives among staff and pupils.
- Monitor success in achieving the objectives.

All school staff:

- Are expected to have regard to this document and to work to achieve the objectives.

Eliminating Discrimination, Harassment and Victimisation

We will not discriminate against, harass or victimise any pupil, prospective pupil, member of staff or any other member of the school community because of any protected characteristic. We will not tolerate any prejudice-related discrimination, whether direct or indirect, and will treat any such incidents with the utmost seriousness.

All within the Positive Impact Group will challenge any type of discriminatory and/or bullying behaviour. We will explore concepts and issues relating to identity and equality throughout our curriculum and co-curricular activities.

New staff receive training on the Equality Act as part of their induction, and all staff receive refresher training every year.

Advancing Equality of Opportunity

Our setting aims to advance equality of opportunity by:

- Removing or minimising the disadvantages suffered by people who are connected to a particular characteristic they have.

- Taking steps to meet the particular needs of people who have a particular characteristic.
- Encouraging people who have a particular characteristic to participate fully in any activities.

We will therefore:

- Collate and regularly analyse information (e.g. safeguarding, behaviour, attendance and attainment data) related to specific groups within the school community to identify any trends or patterns, and ensure that appropriate steps are taken to address any issues identified.

Fostering Good Relations

The Positive Impact Primary Academy instils in its pupils the importance of making a positive impact in the world by showing empathy, respect and compassion to all. It is an intrinsic part of the education we provide our children, using the POSITIVE values to underpin the activities of the setting. We believe that our pupils should be exposed to ideas and concepts that may challenge their understanding, to help ensure that pupils learn to become more accepting and inclusive of others. This challenge will be delivered in a way that prevents discrimination, instead promoting inclusive attitudes.

The Positive Impact Primary Academy recognises the importance of the use of language and high-quality resources in setting a tone and culture within the school. We ensure that staff, children and resources:

- Use appropriate and accurate language referring to particular groups or individuals.
- Do not consciously offend, transmit or reinforce negative stereotypes.
- Use their words to lift others up, not pull each other down.
- Reflect the reality of an ethnically and culturally diverse society and challenge negative stereotypes.
- Provide balance to discussions.
- Are accessible

Equality Considerations in Decision-Making

The Positive Impact Group ensures it has due regard to equality considerations whenever significant decisions are made.

The setting always considers the impact of significant decisions on particular groups. For example, when a school trip or activity is being planned, the school considers whether the trip:

- Cuts across any religious holidays
- Is accessible to pupils with disabilities
- Has equivalent facilities for boys and girls

Equality Objectives

1. Increase understanding of the Equality Act amongst staff and instil an awareness of the impact of their actions in relation to meeting our equality aims.
2. Undertake an analysis of attainment data and trends with regard to race, gender and disability by July.
3. Adopt and implement an anti-racism approach.

This policy is reviewed annually.

Overall responsibility lies with the Director, who liaises with the Senior Leadership Team to ensure a robust and sustainable model of Leadership.

Signed by Director



James Armson

Intimate Care Policy

Introduction

The Positive Impact Academy is committed to safeguarding and promoting the welfare of children and young people and expects all staff, volunteers and visitors to share this commitment. Intimate care is any care which involves washing, touching or carrying out an invasive procedure (such as cleaning up a child after they have soiled themselves) to intimate personal areas. In most cases, such care will involve cleaning for hygiene purposes, as part of a staff member's duty of care. In the case of a specific procedure, only a person suitably trained and assessed as competent should undertake the procedure. The issue of intimate care is a sensitive one and requires staff to be respectful of the child's needs. The child's dignity should always be preserved with a high level of privacy, choice and control. There will always be a high awareness of child protection issues. Staff behaviour must be open to scrutiny, and staff must work in partnership with parents/carers to provide continuity of care to children/young people wherever possible. The following policy is a model based on best practice.

Aims of this Policy

This policy sets out the procedures for dealing with toileting and personal/intimate care tasks with the utmost professionalism, dignity and respect for the child and the maintenance of the highest health and safety standards possible. The aim is to safeguard children, parents, staff and the school by providing a consistent approach within a framework which recognises the rights and responsibilities of everyone involved.

Approach to Best Practice

The Positive Impact Academy is committed to ensuring that all staff responsible for the intimate care of children will undertake their duties in a professional manner at all times. Any child with intimate care needs 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 can. This may mean, for example, giving the child responsibility for washing and dressing themselves. Individual intimate care plans will be drawn up for particular 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 carers might need to be present when a child is toileted.
- Where possible, one child will be catered for by one adult unless there is a sound reason for having more adults present. If this is the case, the reasons should be clearly documented.
- Wherever possible, the same child will not be cared for by the same adult on a regular basis; ideally, there will be a rota of carers known to the child who will take turns in providing care.
- Intimate care arrangements will be discussed with parents on a regular basis and recorded on the child's care plan.
- The needs and wishes of children and parents will be taken into account wherever possible within the constraints of staffing.

The Protection of Children

The Positive Impact Academy's Safeguarding and Child Protection Policy and procedures will be adhered to. All children will be taught personal safety skills carefully matched to their level of development and understanding. If a staff member has any concerns about a child's physical changes (bruises, marks, etc.), they will immediately report concerns.

If a child becomes distressed or unhappy regarding being cared for by a particular member of staff, the matter will be looked into, parents will be consulted, and outcomes will be recorded. Staffing schedules will need to be altered until the issue is resolved, as the child's needs remain paramount. If a child makes allegations against a member of staff, necessary procedures will be followed. See Safeguarding Policy for further information.

All adults carrying out intimate care or toileting tasks will be employees of the school and enhanced DBS checks will be in place to ensure the safety of the children. Students on work placement, voluntary staff or other parents working at the school will not be permitted to attend to toileting or intimate care tasks.

Children Wearing Nappies

Any child wearing nappies will have an intimate care plan which must be signed by the parent/carer. This plan will outline who is responsible in the setting for changing the child, and where and when this will be carried out. This agreement allows the setting and parents to be aware of all issues surrounding the task from the outset.

Health & Safety Guidance

Staff should always wear an apron and disposable gloves when dealing with a child who is soiled or when changing a nappy. Any soiled waste should be placed in a polythene waste disposal bag and sealed. The bag should then be placed in a bin (with a liner) specifically designed for such waste. This bin should be collected on a weekly basis as part of the usual refuse. It is not classed as clinical waste.

In reference to any requests from the parents for the use of medical ointments/creams, these should be prescribed by the GP and clearly labelled with the child's name. These should not be shared between other children and should be stored in a locked storage facility in line with the Administration of Medicine Policy.

Special Educational Needs and Disability (SEND)

Children with SEND have the same rights to privacy and safety when receiving intimate care. Additional vulnerabilities (any physical disability or learning difficulty) must be considered when drawing up care plans for individual children. Regardless of age and ability, the views and emotional responses of children with SEND should be actively sought when drawing up or reviewing a care plan.

Physical Contact

All staff engaged in the care and education of children and young people need to exercise caution in the use of physical contact. Staff must be aware that even well-intentioned contact might be misconstrued by the child or an observer. Staff must always be prepared to justify actions and accept that all physical contact is open to scrutiny. The expectation is that when staff make physical contact with children, it will be:

- For the least amount of time necessary (limited touch)
- Appropriate, given their age, stage of development and background

- In response to the pupil's needs at the time

Arrangements must be understood and agreed by all concerned, justified in terms of the child's needs and consistently applied and open to scrutiny. Where possible, consultation with colleagues should take place where any deviation from arrangements is anticipated. Any deviation from the agreed plan must be documented and reported.

This policy is reviewed annually.

Overall responsibility lies with the Director, who liaises with the Senior Leadership Team to ensure a robust and sustainable model of Leadership.

Signed by Director



James Armson

Admission and Induction Policy

Policy Statement

At Positive Impact Primary Academy, we strive to ensure that every child feels welcome. It is essential to have a smooth transition from one establishment to another, in order to ensure that children who arrive new to our setting feel confident, happy and secure in their new surroundings.

Policy Aims

- To provide children and young people with a secure and happy start to their education placement at Positive Impact Primary Academy, while causing minimal disruption to existing pupils.
- To involve parents and carers in the life of Positive Impact Primary Academy and to begin a partnership that will be long-lasting.
- To ensure teaching staff receive the information pertinent to each individual pupil.

Procedure

1. When approached by a Referrer School or the Warwickshire Education Entitlement Team regarding capacity for an education placement, initial contact with the referrer school will be made by Head of Primary/SENDCo, Amelia Goodhew - amelia.goodhew@positive-impactuk.com. To begin the referral process, we must receive a Learner Information Form (LIF) from the school and any supporting documentation, such as an Education, Health and Care Plan (EHCP).
2. If The Positive Impact Primary Academy has capacity, an observation of the pupil at their named school will be arranged between the Head of Primary/SENDCo, to ensure we can meet the needs based upon the observation and supporting documentation provided by the referrer school.
3. If deemed that The Positive Impact Primary Academy can meet need and has capacity, a site visit will be arranged for the referrer school, parent/carers and pupil. A tour of the setting will be provided by a member of staff as well as an introduction to members of the team.

4. Depending on the needs of the pupil and referrer school, The Positive Impact Primary Academy will then timetable each young person individually for our morning academic cohort, or afternoon nurture cohort.
5. Parents/Carers will be provided with a transition pack, including transition resources and consent forms.
6. New pupils can be provided with multiple site visits, taster sessions in the class they are joining. In some cases, an extended transition is offered.
7. SEND Transport is to be arranged and applied for by the referrer school or Education Entitlement Team.

Delivering Induction

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

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

Accordingly, the following principles underlie the approach to induction:

- That there is consistency of approach across the whole The Positive Impact Primary Academy provision, to ensure that all learners are aware of universal policies, whilst still addressing any course-specific issues.
- Induction takes place before learning starts, and directly informs the planning of all subsequent learning opportunities.
- Induction will be appropriate and proportionate to the nature of the learning taking place, whilst still ensuring that all relevant information is shared.
- Those delivering induction will understand the purpose and remit of the approach and be properly supported to deliver it effectively.

This policy is reviewed annually.

Overall responsibility lies with the Director, who liaises with the Senior Leadership Team to ensure a robust and sustainable model of Leadership.

Signed by Director



James Armson

Transporting Pupils Policy

Introduction

The Positive Impact Academy recognises and takes seriously its responsibility to safeguard and promote the welfare of children. We endeavour to provide a safe and welcoming environment where children are respected and valued. We recognise that all adults within the Positive Impact Group have a full and active part to play in protecting and safeguarding the children in our care, and that the pupils' welfare is our paramount concern.

The issue of transporting children/young people in cars, particularly in members of staff's own cars, is one which causes concern to some staff. It is, however, a necessary part of the work that some staff carry out. These guidelines aim to give advice to those staff who undertake this task to keep themselves and the pupils they are transporting safe.

Principles

The guiding principle should be that transporting children/young people in staff cars should be the exception to the rule, rather than the norm, unless it is an accepted part of a member of staff's role and included in their job description. Any journeys undertaken should always be planned and necessary.

In certain circumstances, children/young people may need to be transported in an emergency where management cannot be contacted to approve this. It is anticipated that these by the nature of them being emergencies would be very rare.

This guidance, however, still needs to be followed to ensure the safety of staff and young people. Services should therefore put plans in place for such situations that will allow workers to carry out such transport functions with delegated management approval to ensure we act in the best interests of the child/young person.

In situations that have not been planned for or where a section has not agreed on its procedures, staff will act in the best interest of young people. If this means they must be transported in a car, then, as long as the worker is acting in accordance with their job role,

is following this guidance and associated risk assessment and is not breaking any road traffic legislation, then they will be covered by the local authority for this action.

Drivers and Their Vehicles

Drivers are responsible for their own vehicle's roadworthiness and appropriateness for the task to be undertaken, and their fitness to drive. Managers are responsible for monitoring and verifying this. All staff who drive as part of their role and their managers must be fully familiar with the Council's Management of Occupational Road Risk Policy and Guidelines and ensure that these are complied with.

Key features of this document include that drivers must ensure that they:

- Have an appropriate, valid driving license
- Are insured for the journey (Business Use)
- Have a valid MOT certificate
- Have a valid Excise licence (TAX)
- Have checked that the vehicle is in a roadworthy condition
- Are not excessively tired, fatigued or under the influence of alcohol or drugs
- Meet minimum eyesight standards for driving. If they need to wear glasses or contact lenses to meet minimum standards, these must always be worn
- Have no medical condition, including the taking of medication or infirmity, that may affect their ability to drive safely.

Additionally, all drivers should ensure that they have regular eye tests to ensure that their eyesight remains within the minimum standards for driving.

Drivers should also ensure that if their health changes and this could affect their ability to drive, then they inform their manager of this immediately.

Drivers are also obliged to notify their manager of any driving convictions, endorsements, or disqualifications immediately.

Managers

Managers of those who transport children/young people in their cars must ensure that the staff being asked to carry out this role have the necessary competence and experience.

Whilst defining driver competence is always a subjective decision, drivers will not normally be deemed competent unless they are between the ages of 18 and 70 and have at least 1 year of driving experience after passing their driving test. Managers deeming staff competent to drive outside their parameters will need to fully justify and record the reasons for this decision. Equally, where a member of staff meets the criteria, but the manager has concerns regarding their competence to drive, the reasons a member of staff is not deemed competent and therefore not allowed to transport children/young people should be recorded.

In making any such decision, the needs of the service need to be balanced against the safety of the children/young people and members of staff, and where there is any doubt, the safety of the children/young people and staff should take priority.

Managers should check the documentation of their drivers and vehicles before they have staff driving for them in the first instance and then periodically at an interval relevant to the service after that, for the staff who regularly transport children/young people as part of their role, an annual check may well be appropriate and for staff who only carry this out very infrequently a check each time this happens may be more appropriate.

Children and Young People

Before children and young people are transported in staff cars, the need and reasons for this method of transportation should be clearly established. Once this has been established, a full picture of the needs of the child/young person (including physical, emotional, behavioural, and medical) and the risks that this may present to them, or the staff involved when transporting them, needs to be established. This should involve 103 gathering and sharing information with all agencies involved in supporting the child/young person. This information is required to inform a specific risk assessment for transporting the child/young person. The information will need to be reviewed regularly to ensure it remains valid.

Risk Assessment

The Positive Impact Academy should produce a risk assessment for transporting children/young people based on their circumstances and way of working. The generic risk assessment for this activity can be adapted and used for this. Over and above this, where information gathered on a child/young person or staff member's safety poses a

significant risk to the child/young person or staff member's safety during transportation, then a specific risk assessment relating to this activity must be carried out. It is not possible to give full detailed control measures for such risk assessments as they will relate to the needs of the individual and the specific circumstances involved.

However, when considering children/young people with medical conditions, their transport and any control measures required during transport, if this is to be a regular occurrence, should be included in their individual care/treatment plan. This should be used to inform any risk assessment. A second person, trained in administering medication or the relevant medical procedure, should always be provided where necessary.

For children/young people who present with behavioural difficulties, a range of control measures could be considered; from not transporting the person if it is felt their behaviour is such that doing so is not safe, providing an escort to ensure the driver can concentrate safely on driving, placing the child/young person so they cannot easily distract the driver (diagonally across from the driver in the back seat) amongst others.

Child locks should be used when transporting children/young people as a control measure.

Travelling

Only pre-planned journeys should be undertaken, and these should always be pre-approved by a manager. All journeys should have a fixed start and finish time, and these should not be altered without authorisation.

Staff must ensure an appropriate response and action is taken in the event of an accident or emergency during transport. All staff who transport children/young people as part of their role should have access to a mobile phone or the appropriate means of communication.

All journeys should only be for named children/young people and their family; if necessary, other people should not be transported with the child/young person if they are not named and part of the arrangement.

The law makes drivers responsible for ensuring those under 14 years of age wear an appropriate seatbelt or child restraint. Restraints should also be checked before use to ensure that they are well-maintained and fit for purpose, with no defects. Where staff are

transporting children/young people as part of their job, they will always be responsible for ensuring the children/young people they are transporting are wearing a suitable restraint, irrespective of their age. As there are very clear dangers to passengers and drivers if restraints are not worn, if a driver becomes aware of this, they should stop the journey as soon as it is safe to do so. If the passenger continues to refuse to wear a seatbelt/restraint, then the journey ceases until a solution is found.

Drivers must not use mobile phones, drink, or smoke while transporting children/young people and should be aware of the highway code and drive appropriately and within speed limits. To facilitate this, when planning a journey, adequate time for the journey must be allowed.

Parents and/or Carers

Parents must give their permission for children/young people to be transported in a staff member's vehicle, where this is necessary. Every effort should be made to gain written consent, but where this is not practically possible, details of the verbal consent should be recorded. If no type of consent is obtained, transportation should not be permitted.

If the child/young person has a medical condition that is likely to require additional support/medication, a copy of their Education, Health and Care Plan plus appropriate medication must be available. A parent or member of staff who has received training in administering support/medication should accompany the young person in the vehicle.

Accidents/Incidents

In the case of a road traffic accident, these must be reported by the driver to their own insurance company, and passengers must be advised of the name and address of the insurance company if wishing to make a claim.

This policy is reviewed annually.

Overall responsibility lies with the Director, who liaises with the Senior Leadership Team to ensure a robust and sustainable model of Leadership.

Signed by Director



James Armson

Wellbeing Policy

Principles

At The Positive Impact Academy, we are passionate about making a meaningful difference in the lives of young people. We believe in the power of teamwork - working collaboratively with each other, with staff across the school, with families, and with the wider community. Most importantly, we work alongside The Positive Impact Group in our care, placing their needs and potential at the heart of everything we do.

We act with determination. Whatever challenges our pupils, their families, the setting, our team, or our community may face, we respond with support, resilience, and unity. And above all, we are committed to making a difference. We are active, engaged, and purposeful in our mission to help them grow, thrive, and succeed.

What Inclusion and Effective Mental Health Interventions Mean to Us

- We prioritise those who need our help most, but we intervene with all.
- We support and educate pupils; attendance matters.
- By building positive relationships, pupils are supported to make the right choices and develop a positive approach to learning.
- Build positive relationships between staff, pupils and parents.
- Staff encourage positive self-esteem in pupils, which is further embedded within our curriculum.
- We use evidence-based practice for all our interventions.

Expectations of Each Other

- All communication is to be shared through IRIS in a timely manner.
- To attend Whole School Safeguarding & Child Protection Training annually.
- Have read and understood Keeping Young People Safe in Education each time it is updated.
- Ensure that all relevant policies and protocols are read and understood by all.
- Attend duties to support the wider school community.

- Attend meetings on time and prepare.
- Ensure all pastoral work is evidenced.
- Speak to pupils, staff and each other with courtesy, respect and understanding.

Safeguarding

- Safeguarding pupils comes above everything else we do.
- All staff across the setting have training annually with reminders throughout the year at briefings, staff meetings and inset days.
- All new staff have safeguarding training as part of their induction.
- All staff at The Positive Impact Group recognise that safeguarding is everyone's responsibility, that they should have read and understood section one of Keeping Young People Safe in Education 2025, that early intervention is key, and that context matters.
- All notes are kept securely.

Attendance

- All staff have a role to play in ensuring each pupil attends.
- Mentors support by providing first wave support, checking in with pupils who have poor or low attendance.
- All staff work to remove barriers to good school attendance.
- We work together with external agencies to address and remove barriers to school attendance.
- We prioritise pupils who are classed as disadvantaged, SEMH or SEND; however, we are passionate about providing the same support to all pupils, irrespective of background.
- We follow the protocols which are in place, acknowledging that each pupil and situation is different and adjusting as required.
- We provide a welcoming 'from home, to home' environment for our pupils.

Behaviour

- We have a moral obligation to prepare pupils for the rigours of work and life beyond education.

- We are here to educate the whole pupil, helping with moral and personal development.
- We apply the protocols for each pupil, acknowledging that each pupil and their situation is different and adjusting as required.
- We prioritise pupils who are classed as disadvantaged, SEMH or SEND; however, we are passionate about providing the same support to all pupils, irrespective of background.
- We make reasonable adjustments for pupils with special educational needs or vulnerable pupils.
- We have a Positive Relationship Policy that enables pupils to be supported.
- We involve parents in supporting their pupils to improve their behaviour.

Pastoral Care and Mental Health

- Pastoral support is driven by moral purpose.
- We do not give up on pupils and constantly look for ways to support them.
- Our interventions are directed by evidence-based practice.
- Our team are passionate about becoming experts in their field.
- We work with numerous external agencies to support our pupils.
- We recognise that early intervention is vital.
- We involve parents as appropriate in the support that we put in place.
- Our interventions are assessed and evaluated.
- The mental health of our pupils and staff is of the highest priority.

This policy is reviewed annually.

Overall responsibility lies with the Director, who liaises with the Senior Leadership Team to ensure a robust and sustainable model of Leadership.

Signed by Director



James Armson