Policy Book

The Positive Impact Group

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Data Protection and GDPR Policy

Introduction

This policy is intended to clarify the obligations of The Positive Impact Group under the Data Protection Act 2018 (“the Act”) and the General Data Protection Regulation (GDPR). Everyone has rights with regard to how their personal information is handled. During the course of our activities, we will collect, store and process personal information about a number of different groups of people, and we recognise the need to treat it in an appropriate and lawful manner.

The types of information that we may be required to handle include details of current, past and prospective employees, pupils, parents, trustees, governors, volunteers, suppliers and other individuals that we communicate with. The information, which may be held on paper, on a computer or other media, is subject to certain legal safeguards specified in the GDPR and the Act and other regulations, which impose restrictions on how we may use that information.

Scope

This policy shall apply in its entirety to all employees, including staff, agency workers, contractors, governors and volunteers who shall be referred to in this policy as “staff”.

In this policy, “school” means any of the settings within the organisation.

This policy does not form part of any employee's contract of employment, and it may be amended at any time. Any breach of this policy will be taken seriously and may result in disciplinary action. Breach of the GDPR or the Act may expose the Trust to enforcement action by the Information Commissioner or fines. Furthermore, certain breaches can give rise to personal criminal liability for the organisation’s employees.

All staff must read this policy carefully and make sure that they understand it.

Definition of Terms

Data is information which is stored electronically on a computer or in certain paper-based filing systems.

Data subjects for the purpose of this policy include all living individuals about whom we hold personal data. A data subject need not be a UK national or resident. All data subjects have legal rights in relation to their personal data.

Personal data means data relating to a living individual who can be identified from that data on its own or when taken together with other information. Personal data can be factual (such as a name, address or date of birth) or it can be an opinion (such as a school report) and can include telephone numbers, photographs and CCTV images.

Data controllers are the people who, or organisations which, determine the purposes for which, and the manner in which, any personal data is processed. They have a responsibility to establish practices and policies in line with the Act. The organisation and the schools are the data controllers of all personal data used in the organisation.

Data users include employees whose work involves using personal data. Data users have a duty to protect the information they handle by following our data protection and security policies at all times.

Data processors include any person who processes personal data on behalf of a data controller. Employees of data controllers are excluded from this definition, but it could include suppliers which handle personal data on our behalf.

Processing is any activity that involves the use of the data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data, including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring personal data to third parties.

Special categories of personal data include information about a person's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, genetic or biometric data, physical or mental health or condition or sexual life and sexual orientation. Special categories of personal data can only be processed under strict conditions. Data about criminal convictions and offences are not included under the definition of special categories of personal data, but similar safeguards apply and therefore, for the purposes of this policy, are treated in the same way.

Data Protection Principles

Anyone processing personal data must comply with the six Data Protection Principles. These provide that personal data must:

- be processed fairly, lawfully and transparently;
- be collected and processed only for specified, explicit and legitimate purposes;
- be adequate, relevant and limited to what is necessary for the purposes for which it is processed;
- be accurate and kept up to date;
- not be kept longer than necessary for the purposes for which it is processed;
- be processed securely.

Fair and Lawful Processing

The GDPR is intended not to prevent the processing of personal data, but to ensure that it is done fairly and without adversely affecting the rights of the data subject. The data subject must be provided with certain information, including who the data controller is (in this case, the organisation), the purpose for which the data is to be processed by us and the identities of anyone to whom the data may be disclosed or transferred.

For personal data to be processed lawfully, certain conditions have to be met. These may include, among other things, requirements that the data subject has consented to the processing, or that the processing is necessary for the legitimate interest of the data controller or the party to whom the data is disclosed. When special categories of personal data are being processed, more than one condition must be met. In some cases, the data subject's explicit consent to the processing of such data will be required.

Fair and lawful processing of data includes having legitimate grounds for collecting and using the personal data, not using the data in ways that have unjustified adverse effects on the individuals concerned, being transparent about how you intend to use the data and handling personal data only in ways they would reasonably expect.

Accurate Data

Personal data must be accurate and kept up to date. Information which is incorrect or misleading is not accurate, and steps should therefore be taken to check the accuracy of any personal data at the point of collection and at least annually afterwards. Inaccurate or out-of-date data should be destroyed. If a data subject informs the organisation of a change of circumstances, their computer record will be updated as soon as is practicable.

Where a data subject challenges the accuracy of their data, the organisation will immediately mark the record as potentially inaccurate, or 'challenged'. In the case of any dispute, we shall try to resolve the issue informally, but if this proves impossible, disputes will be referred to the relevant Local Governing Body for their judgment. If the problem cannot be resolved at this stage, either side may seek independent arbitration. Until the ' challenged ' marker is resolved, it will remain, and all disclosures of the affected information will contain both versions of the information.

Timely Processing

Personal data should not be kept longer than is necessary for the purpose for which it is held. This means that data should be destroyed or erased from our systems when it is no longer required, in accordance with our data retention schedules.

Processing in Line with Data Subject's Rights

Data must be processed in line with data subjects' rights. Data subjects have a right to:

- request access to any data held about them by a data controller;
- object to processing based on legitimate interests, the performance of a task in the public interest, for direct marketing purposes or the purposes of scientific or historical research and statistics;
- ask to have inaccurate data amended, completed (if it is incomplete) or erased;
- ask for their personal data to be moved, copied or transferred from one IT environment to another in a safe and secure way;
- request the restriction or suppression of their personal data.

Data subjects also have certain rights in relation to automated decision-making, including profiling. We do not currently use automated decision-making in any of our processing activities. Some of the rights described above are not absolute and will be subject to, amongst other things, the legal basis for processing the personal data. A data subject can exercise these rights by contacting the Data Protection Manager, David Strong.

Data Security

The organisation has taken steps to ensure that appropriate security measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

The GDPR and the Act require us to put in place procedures to maintain the security of all personal data from the point of collection to the point of destruction. Personal data may only be transferred to a third-party data processor if they agree to comply with those procedures and policies, or if they put in place adequate measures themselves.

Maintaining data security means guaranteeing the confidentiality, integrity and availability of the personal data, defined as follows:

- Confidentiality means that only people who are authorised to use the data can access it.
- Integrity means that personal data should be accurate and suitable for the purpose for which it is processed.
- Availability means that authorised users should be able to access the data if s/he needs it for authorised purposes. Personal data should therefore be stored on our central computer system instead of individual PCs.

Security procedures include:

- **Physical Security:** Appropriate building security measures are in place, and only authorised persons are allowed in the computer rooms. Disks, tapes, hard drives, memory sticks and printouts are locked away securely when not in use. Visitors to the school are required to sign in and out, to wear identification badges whilst in the school and are, where appropriate, accompanied.
- **Computer Security:** Only authorised users are allowed access to computer files, and password changes are regularly undertaken. Computer files are backed up regularly. Data users should ensure that individual monitors do not show

confidential information to passers-by and that s/he logs off from their PC when it is left unattended.

- **Procedural Security:** In order to be given authorised access to the computer systems, staff will have to undergo checks and will sign a confidentiality agreement. Staff are trained in their Data Protection obligations and their knowledge updated as necessary. Computer printouts as well as source documents are shredded before disposal. CDROMs and portable drives are physically destroyed when they are no longer required.

Dealing with Subject Access Requests

The GDPR extends to all data subjects a right of access to their own personal data. A request from a data subject for information that we hold may be received verbally or in writing. A fee cannot be charged for the provision of this information except in certain limited circumstances. Any member of staff who receives a written request should forward it to the Director immediately, as there are statutory time limits for responding (currently one month).

In order to ensure that people receive only information about themselves, it is essential that a formal system of requests is in place. Where a request for subject access is received from a pupil, the organisation's policy is that:

- Requests from pupils who are considered mature enough to understand their rights will be processed as any subject access request as outlined below, and the copy will be given directly to the pupil. The Information Commissioner’s guidance is that it may be reasonable to adopt a presumption that by the age of 12, a child has sufficient maturity to understand their rights and to make an access request themselves if s/he wishes. In every case, it will be for the school to assess on behalf of the Trust whether the child is capable of understanding their rights under the Act and the implications of their actions, and so decide whether the parent needs to make the request on the child’s behalf.
- Requests from parents in respect of their own child will be processed as requests made on behalf of the data subject (the child) and the copy will be sent in a sealed envelope to the requesting parent unless the school considers the child to be mature enough to understand their rights, in which case the school shall ask the child for their consent to disclosure of the personal data (subject to any enactment which permits the School to disclose the personal data to a parent without the

child’s consent). If consent is not given to disclose, the school shall not disclose the personal data if to do so would breach any of the data protection principles.

Following receipt of a subject access request, and provided that there is sufficient information to process the request, an entry will be made in the school’s Subject Access log book, showing the date of receipt, the data subject’s name, the name and address of requester (if different), the type of data required (e.g. Student Record, Personnel Record), and the planned date for supplying the information. Should more information be required to establish either the identity of the data subject (or agent) or the type of data requested, the date of entry in the log will be the date on which sufficient information has been provided.

Providing Information Over the Telephone

Any member of staff dealing with telephone enquiries should be careful about disclosing any personal information held by the organisation. In particular s/he should:

- check the caller's identity;
- suggest that the caller put their request in writing;
- refer the request and the caller’s identity details to the Data Protection Compliance Manager or the Head for assistance.

Authorised Disclosures

The organisation will only disclose data about individuals where it has identified a legal basis for doing so. The legal basis for processing personal data is set out in the relevant privacy notices provided to staff and pupils/parents.

Only authorised and trained staff are allowed to make external disclosures of personal data. Data used within the schools by staff will only be made available where the person requesting the information is a professional legitimately working within the organisation who needs to know the information in order to do their work.

CCCTV

The organisation may use CCTV in locations around its sites. This is to:

- safeguard pupils and staff;
- protect the school buildings and their assets;
- increase personal safety and reduce the fear of crime;
- support the Police in a bid to deter and detect crime;
- assist in identifying, apprehending and prosecuting offenders;
- protect members of the public and private property;
- assist in managing the schools.

Enquiries

General information about the Act can be obtained from the Information Commissioner's Office, www.ico.gov.uk.

Useful References:

- The Data Protection Act 2018
- The General Data Protection Regulation

Complaints

If you consider that the policy has not been followed in respect of personal data about yourself or others, you should raise the matter with the relevant Data Protection Compliance Manager, David Strong: david.strong@positive-impactuk.com.

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 and Diversity Policy

Equality Statement

This policy reflects the Single Equality Act 2010, which harmonises and replaces previous legislation and therefore supersedes all previous school policies. The Single Equality Act combines the existing three duties into one new Equality Duty that covers all nine of the equality strands: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief and sex. The Positive Impact Group will ensure, as far as possible, that at every level, in all our work and throughout all aspects of the Trust community, everyone is treated in line with this guidance. This Single Equality Policy sets out our approach and commitment to advancing equality and promoting respect for difference and diversity throughout our vision, ethos and values.

Vision for Equality

Our approach to equality is based on the following key principles:

All members of our organisation are of equal value.

At The Positive Impact Group, we believe in equality for all. We are committed to ensuring all our employees and those who work with us are equipped with the knowledge, understanding and skills to challenge discrimination, injustice and associated perceptions. We aim to empower all to make informed and responsible choices about their own actions. We aim to engender a personal and collective sense of responsibility and accountability to ensure that there is true equity across our organisation.

We recognise, respect and value differences.

We take account of this and strive to remove barriers and disadvantages which people may face, in relation to disability, ethnicity, gender, religion, belief or faith and sexual orientation. We believe that diversity is a strength, which should be respected, embraced and celebrated by all.

We actively promote positive attitudes, mutual respect and relationship building between groups and communities different from each other.

We foster a shared sense of cohesion and belonging where all members of our organisation's community feel a sense of belonging within and across our settings and wider community, and feel that they are respected and able to participate fully in school life.

We observe good equality practices for our staff. We ensure that policies and procedures benefit all employees and potential employees in all aspects of their work, including in recruitment and promotion, and in continuing professional development.

We have the highest expectations of all our pupils. We expect that all pupils can make good progress and that all members of the community can achieve their highest potential.

We work to raise standards for all pupils, with a distinct focus on the most vulnerable and least resourced. We believe that improving the quality of education for the most vulnerable groups of pupils raises standards across the whole organisation.

Legal Duties

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

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

We understand the principle of the Act and the work needed to ensure that those with protected characteristics are not discriminated against and are given equality of opportunity.

A protected characteristic under the act covers the groups listed below:

- age (for employees, not for service provision)
- disability
- ethnicity
- gender
- gender reassignment
- maternity and pregnancy

- marriage and civil partnership (for employees)
- religion and belief
- sexual identity

Recruitment

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

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

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

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

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

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

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

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

Core Statements

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

- All learners are of equal value.
- We recognise, welcome and respect diversity.
- We foster positive attitudes and relationships, and a shared sense of belonging.
- We observe good equality practices, including staff recruitment, retention and development.
- We aim to reduce and remove existing inequalities and barriers.
- We consult and involve widely.
- We strive to ensure that society will benefit.

Addressing Prejudice-Related Incidents

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

Roles and Responsibilities

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

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

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

Ethos and Atmosphere

At The Positive Impact Group, we demonstrate mutual respect between all members of the organisation and the community of settings. There is an openness of atmosphere which welcomes everyone. All within the community will challenge any type of discriminatory, prejudiced, or harassing behaviours. All pupils are encouraged to greet visitors to the settings with friendliness and respect. The displays around the schools are of a high quality and reflect that we value diversity as well as our commitment to equality. Provision is made to cater for the needs of all the pupils through planning of assemblies, classroom-based and externally based activities. Representation is our key driver for all we do.

Monitoring and Reviewing

The Positive Impact Group is working towards greater equality in the community. Our settings use the curriculum and teaching to enhance the self-esteem of all those we serve and to provide learning environments in which each individual is encouraged to respect and value others' differences, as well as to fulfil their own potential.

Schools regularly assess pupils' learning and use this information to track pupils' progress as they move through the school. As part of this process, we regularly monitor the performance of different groups (Ethnicity, Sex, LGBTQ+, SEN, FSM, Gifted and Talented, Vulnerable or At Risk), to ensure that all groups of pupils are making the best possible progress. Our settings use this information to adjust future teaching and learning plans. Resources are made available to support groups of pupils where the information suggests that progress is not as good as it should be. As well as monitoring pupil performance information, our settings regularly monitor a range of other information relating to attendance, exclusions and truancy, racism, disability, sexism, stereotyping, homophobia, biphobia and transphobia, and all forms of bullying and participation in extended learning opportunities. Our monitoring activities enable us to identify any differences in pupil performance and provide specific support as required, including pastoral support.

We also provide training to staff on equality and diversity, and how to disrupt any unconscious bias around pupils' potential achievement. The Positive Impact Group is committed to providing a working environment free from discrimination, bullying, harassment and victimisation. We aim to recruit an appropriately qualified workforce in order to respect and respond to the diverse needs of our population. As part of this work, we collate information on our workforce in order to monitor equality of opportunity. Leaders have had training to ensure equality, diversity and inclusion are at the centre of recruitment.

Developing Best Practice

Teaching and Learning

We aim to provide all our pupils with the opportunity to succeed and to reach the highest level of personal achievement. To do this, teaching and learning will:

- Provide equality of access for all pupils and prepare them for life in a diverse society.
- Use materials that reflect a range of cultural backgrounds and types of families, without stereotyping and that promote a positive image of and attitude towards disability and disabled people.
- Promote attitudes and values that will challenge discriminatory behaviour.
- Provide opportunities for pupils to appreciate their own culture and religions, celebrate the diversity of other cultures, and to celebrate all types of families, including same-sex parents, single parents and carer families.
- Use a range of sensitive teaching strategies when teaching about different cultural and religious traditions.
- Develop pupils' advocacy skills so that they can detect bias, challenge discrimination, leading to justice and equality.

- Ensure that the whole curriculum covers issues of equality and diversity and makes best use of all available resources to support the learning of all groups of pupils.
- Promote and celebrate the contribution of different cultures to the subject matter.
- Seek to involve all parents in supporting their child's education.
- Provide educational visits and extended learning opportunities that involve all pupil groups.
- Take into account the attainment of all pupils when planning for future learning and setting challenging targets.
- Identify resources and training to support staff development.

Learning Environment

There is a consistently high expectation of all pupils regardless of their sex, ethnicity, disability, religion or belief, sexual orientation, age or any other potential area of discrimination. The organisation believes that all pupils can achieve at least national norms.

All pupils are encouraged to improve on their own achievements and not to measure themselves against others; to be the best they can be. Parents are also encouraged to view their own children's achievements in this light. Our settings place a very high priority on the provision for special educational needs and disabilities.

The setting will provide an environment in which all pupils have equal access to facilities and resources and are encouraged to be actively involved in their own learning. Consideration is given to the physical learning environment, both internal and external, including learning spaces that visually celebrate diversity through posters and displays.

Curriculum

We aim to ensure that planning reflects our commitment to equality in all subject areas and cross-curricular themes.

Pupils have opportunities to explore concepts and issues relating to identity and equality, including religious and cultural identity and sexual orientation, in an age-appropriate way. Steps are taken to ensure that all pupils have access to the mainstream curriculum by taking into account their cultural backgrounds, linguistic needs and learning styles. All pupils have access to education which recognises attainment and achievement and promotes progression.

Resources and Materials

The provision of good-quality resources and materials within our settings is a high priority. These resources will:

- reflect the reality of an ethnically, culturally and sexually diverse society
- reflect a variety of viewpoints
- show positive images which promote equality between sexes and sexualities
- show positive images of different types of families, including same-sex parents, single parents and carer families
- include non-stereotypical images of all groups in a global context
- be accessible to all members of the school community
- actively combat stereotypes and provide examples of real role models.

Language

We recognise that it is important that all members of the school community use appropriate language which:

- does not transmit or confirm stereotypes
- does not consciously offend
- does not limit potential or expectation
- creates the conditions for all people to grow healthy self-esteem
- is accurate in referring to particular groups or individuals.

Personal Development and Care, Guidance and Support

Staff take into account sex, ethnicity, disability, religion or belief, sexual orientation, age or any other recognised area of discrimination and the experience and needs of particular groups.

All pupils are encouraged to consider the full range of life opportunities available to them, with no discriminatory boundaries placed on them due to their disability, sex, race or sexual orientation (whilst acknowledging that a disability may impose some practical boundaries to some career aspirations).

All pupils/staff/parents/carers are given support, as appropriate, when they experience discrimination.

Positive role models exist across the organisation, and settings ensure that different groups of pupils can see themselves reflected in the school community. Emphasis is placed on the value that diversity brings to the school community and on celebrating difference as a positive attribute.

Staffing and Staff Development

We recognise the need for positive role models and the distribution of responsibility among staff. This must include pupils' access to a balance of male and female staff at all key stages, where possible. We encourage the career development and aspirations of all school staff. It is our policy to provide staff with training and development, which will increase awareness of the needs of different groups of pupils.

All those involved in recruitment and selection are aware of what they should do to avoid discrimination and ensure good practice through the recruitment and selection process. Equality policies and practices are covered in all staff inductions. All temporary staff are made aware of policies and practices. Employment policies and procedures are reviewed regularly to check compliance with legislation.

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

First Aid Policy

Policy Statement

Positive Impact Primary Academy is committed to providing emergency first aid provision, in order to deal with accidents and incidents affecting staff, pupils and visitors. The setting will take every reasonable precaution to ensure the safety and wellbeing of all staff, pupils and visitors.

This policy has been produced in accordance with The Positive Impact Primary Academy's Health and Safety Policy to ensure that all health and safety issues relating to the provision of First Aid at work are adequately managed. The Positive Impact Primary Academy is committed to protecting the health, safety, welfare and wellbeing of its employees and others who may be affected. It is essential, therefore, that everyone who works for or undertakes work on behalf of The Positive Impact Primary Academy adheres to the requirements of this policy. The application of this policy will ensure that, so far as is reasonably practicable, The Positive Impact Primary Academy meets all relevant statutory requirements regarding the general provision of first aid and duty of care.

Nothing in this policy will affect the ability of any person to contact the emergency services in the event of a medical emergency. For the avoidance of doubt, staff should dial 999 in the event of a medical emergency before implementing the terms of this policy and make clear arrangements for liaison with ambulance services on site.

Policy Aims

This policy aims to:

- Ensure that the school has adequate, safe and effective first aid provision for every pupil, member of staff and visitor to be well looked after in the event of any illness, accident or injury, no matter how major or minor.
- Ensure that staff and pupils are aware of the procedures in the event of any illness, accident or injury.
- Ensure that medicines are only administered at the school when express permission has been granted for this.
- Ensure that all medicines are appropriately stored.

- Promote effective infection control.

Legal Framework

This policy has due regard to legislation and statutory guidance, including, but not limited to, the following:

- Health and Safety at Work etc. Act 1974
- The Health and Safety (First Aid) Regulations 1981
- The Management of Health and Safety at Work Regulations 1999
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013
- DfE (2015) 'Supporting pupils at school with medical conditions'
- DfE (2000) 'Guidance on first aid for schools'
- DfE (2019) 'Automated external defibrillators (AEDs)'

The policy is implemented in conjunction with the following policies:

- Health and Safety Policy
- Positive Relationship and Behaviour Policy
- Safeguarding and Child Protection Policy

Definitions and Terminology

First Aid at Work

This is the application of treatment for the purpose of preserving life and minimising the consequences of injury and illness, until medical help/treatment is obtained, where necessary.

- People at work can suffer injuries or become ill. It doesn't matter whether the injury or illness is caused by the work they do or not; it is important to give them immediate attention and call an ambulance in serious cases. First aid at work covers the arrangements we need to make to ensure this happens. It can save lives and prevent minor injuries from becoming major ones.
- It is important to remember that accidents and illness can happen at any time. First-aid provision needs to be always available when people are at work. It does

not include giving tablets or medicines to treat illness as stated in The Positive Impact Primary Academy's 'Administration of Medicines' Policy.

First Aid Needs Assessment

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

Emergency First Aider

A person holding a valid certificate in 'Emergency First Aid at Work' (EFAW) issued by an organisation whose training and qualifications are approved by the Health and Safety Executive (HSE). A certificate will be issued with details of the level of competence and will be valid for 3 years. Subject to risk assessment, in low-level risk environments or where service delivery needs may be better supported, this will involve attendance on a 1-day (6 hours) Emergency First Aid at Work training course, which includes ongoing assessment throughout the day, but no practical assessment.

First Aider

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

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

Roles and Responsibilities

Directors, Managers and Line Managers must ensure that a first aid needs assessment is undertaken to ensure that first aid arrangements are adequate and appropriate in the circumstances. This means that enough suitably trained staff are available to:

- Give immediate help to casualties with injuries or illness that may occur at work, and call an ambulance or for other professional help.

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

The Head of Primary Academy must:

- Consider the first aid needs assessment as a building requirement rather than on an individual team basis for large, shared office buildings. This is to ensure adequate and proportionate cover for first aid across that building.
- Ensure there are adequate First Aid Notices indicating the names and location of First Aiders and/or Emergency First Aiders and First Aid boxes, around the premises, in a prominent place.
- Agree on common first aid arrangements where a workplace is shared with other organisations.
- Ensure that contractors and others working temporarily on the premises are familiar with the first aid arrangements as part of the signing procedure.

First Aider must:

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

- Call the emergency services to summon an ambulance or other professional help when necessary.
- Be responsible for the restocking of first aid boxes.
- Ensure that a record of first-aid treatment is kept of treatment given for injuries and ill health that are because of a workplace accident/incident.
- Only provide first aid in accordance with the training received.

Emergency First Aiders must:

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

Employees will:

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

First-Aid Arrangements and Organisation

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

The ‘First Aid Needs Assessment Record Sheet’ must be used in conjunction with individual departments' risk assessments to ascertain the basic first aid provision requirement across The Positive Impact Primary Academy, and then identify other considerations which may require that basic provision to be increased or provided in an alternative way.

The training required by the trained personnel is an integral part of The Positive Impact Group's CPD programme, with all courses being certified in accordance with HSE guidance. Nationally, annual refresher training is not mandatory for FAW/EFAW-certified first aiders. An opportunity is provided for those holding the certificates to retake the course as and when appropriate.

First-Aid Provision

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

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

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

A travelling first aid box will include:

- A leaflet giving general guidance on first aid (for example, 'Basic Advice on First Aid at Work' from the HSE).
- 6 individually wrapped sterile plasters (hypoallergenic plasters can be provided, if necessary).
- 2 triangular bandages.
- 2 safety pins.
- Mouth guard.
- 1 large sterile unmedicated dressing.
- Individually wrapped moist cleansing wipes.
- A pair of disposable (non-latex) gloves.

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

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

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

The Positive Impact Primary Academy Procedures

In the event of an accident resulting in injury:

- The closest member of staff present will seek the assistance of a qualified first aider. The pupil will either be moved to the medical room, if appropriate, or remain where they are to be assessed.
- The first aider will assess the injury and decide if further assistance is needed from a colleague or the emergency services. They will remain on scene until help arrives. If the first aider judges that a pupil is too unwell to remain in The Positive Impact Primary Academy, parents will be contacted and asked to collect their child.

If emergency services are called, a member of staff will contact parents immediately. In principle, a member of staff will not travel with a student to the hospital unless in exceptional circumstances.

- In the event of a student self-reporting for first aid/illness/injury, the pupil should report to a member of staff if feeling unwell or needing first aid.
- The member of staff will locate the nearest appropriate first aider who will assess the illness and/or injury.
- No over-the-counter medication will be given, but the illness/injury will be treated as necessary; if it is deemed necessary, the parent/carer will be contacted to collect the student (please refer to the Administration of Medicine Policy).

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

Monitoring and Review

To ensure the effective application of this policy, The Positive Impact Primary Academy is required to have in place arrangements for monitoring and reviewing its implementation at regular intervals. The policy review needs to promote a cycle of continuous improvement; therefore, any actions identified to ensure this should be considered and implemented where reasonably practicable. Successful monitoring and review rely on commitment from managers at all levels and should therefore be included as an integral part of the annual Health and Safety review. The Positive Impact Primary Academy also has a WCC inspection of Health and Safety, which also covers First Aid on a 3-year basis.

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

Complaints 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 pupils' welfare is our paramount concern.

Hearing Complaints

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

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

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

Nothing in this policy applies to complaints which are made by persons other than parents of registered pupils at The Positive Impact Group's settings.

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

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

Procedure for Dealing with Complaints

Stage 1: Initial Complaint

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

Stage 2: Investigation by The Director or Head of Academy

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

Vexatious Complaints

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

General and Monitoring

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

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

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

Lone Workers Policy

Introduction

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

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

Aims of the Policy

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

Risk Assessments

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

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

Procedures

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

- Avoid unnecessary out-of-hours working where possible.
- Notify James Armson/David Strong if you intend to work outside normal hours.
- Familiarise yourself with your location, fire safety procedures and escape routes in the event of an emergency.
- Where possible, ensure that you have keys to all entrances and exits and keep them always locked.
- Do not allow unexpected visitors in unless they carry sufficient identification.
- Familiarise yourself with the alarm system at your location.
- Ensure that you leave your contact details with James Armson/David Strong.
- Make sure that people at home are aware of your movements.
- In the event that you feel unwell, seek help immediately and if necessary, call 999.
- Under no circumstances should you ever undertake the following activities: consumption of any substance that may impair judgment and be detrimental to the Company, or any activity that poses a high risk of injury.

Control Measures

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

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

Health and Safety Policy

Statement of Intent

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

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

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

Organisation and Responsibilities for Health and Safety

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

Health and Safety Roles and Responsibilities

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

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

Director

The Director has been appointed as the responsible person for Health and Safety within The Positive Impact Group. The Director will promote the adequate and proper consideration of health and safety to senior managers and employees within The Positive Impact Primary Academy. The designated member responsible for Health and Safety is Amelia Goodhew, Head of Primary/SENDCo.

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

Health & Safety Manager (Amelia Godhew)

Organising external professionals for setting performance-related targets and objectives:

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

Designated Safeguarding Leads (Amelia Goodhew and Gemma Lish)

Monitoring of Health and Safety to include:

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

Designated Emergency First Aiders

- Amelia Goodhew
- Daisy Jones

Risk Assessment Appointed Persons

- Amelia Goodhew
- Gemma Lish

The organisation's First Aid Kit can be found located in the Staff Room of the premises.

The Director (James Armson) will:

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

place to prevent recurrence, and to ensure continual health, safety, and wellbeing improvement.

- Ensure that their employees understand and accept their individual responsibilities regarding health and safety and are adequately trained to carry out their responsibilities.
- In conjunction with the Senior Leadership Team/ Health and Safety Officer, monitor and review the health and safety targets and priorities in line with the overall school objectives, and ensure the provision of adequate resources to achieve compliance.
- Ensure that health and safety arrangements and performance are formally evaluated, monitored, and reviewed at least on an annual basis.
- Ensure that Warwickshire County Council is consulted, along with employees' representatives, and that professional health and safety advice is sought, e.g., WES Safety and Premises, prior to changes in accommodation and working practices.
- Ensure that Warwickshire County Council is informed of any breach of health and safety statutory requirements, and immediately when there is Health and Safety Executive (HSE) involvement.
- Ensure that safe systems of work are fully discussed, recorded, implemented, and reviewed with the appropriate employees concerning:
    - Current work activities.
    - Planning new activities, methods of work, etc.
    - Design/acquisition of new buildings, plant, and equipment.
- Ensure that informal tours of the workplace are carried out to proactively identify good and poor health and safety performance. This will demonstrate visible management commitment to health and safety within their service areas.
- Ensure that a formalised workplace inspection regime is in place to identify hazards and to take appropriate action.
- Ensure that contractors receive an induction to the premises/area they are working in, including emergency evacuation. This will provide the contractors 40 with information/ awareness of the hazards within the area of work, action to be taken, and the monitoring of their activities.
- Ensure consultation takes place between managers from other employers, organisations, and appropriate employees' safety representatives when sharing premises.
- Consult and seek advice where necessary.
- Provide clear leadership on health and safety and set a personal example.

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

Senior Leadership Team and Heads of Department

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

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

hazards within the area of work, action to be taken, and the monitoring of their activities.

Employees

All the Positive Impact Primary Academy employees will include students, volunteers, agency workers and contract workers, for the terms and reference of this policy. All employees, including those with managerial responsibilities, have an important role to play in effective health and safety management. All employees have a responsibility to:

- Take reasonable care, while at work, to ensure that they do not endanger either themselves or anyone else who might be affected by their actions or omissions.
- Co-operate with their employer or other person in respect of their health and safety duties and follow all instructions (written and verbal) to protect their own and other people's health and safety.
- Not misuse or interfere with any safety equipment and/or protective clothing provided, and avoid improvisation in any form, which could create unnecessary risks to health and safety.
- Ensure that plant and equipment are in a safe condition, before use and acquaint themselves with all relevant processes, materials and substances and use as advised. Report any defects, loss or damage to their manager.
- Be aware of their capabilities and competence, both physically and mentally and inform a manager if they feel unable to continue with their duties.
- Always behave appropriately in the workplace.
- Avoid taking shortcuts or changing work activities, which could create unnecessary risks to their health and safety. Use all safety equipment and/or personal protective equipment that is provided.
- Report all accidents, incidents (including incidents of violence, diseases, and dangerous occurrences), near misses, as well as unsafe methods of work, unsafe conditions/tools/plant/ equipment/premises/appliances/practices, and concerns about health, safety or wellbeing to their manager, even if an injury was not sustained.
- Be familiar with any health and safety policies, procedures, risk assessments or any other health and safety documentation applicable to them and their work. Follow all instructions therein (whether verbal or written).
- Be appropriately dressed for their working environment and activity.

- Be aware of the First Aid provision at their workplace and understand the fire/emergency evacuation and fire prevention procedures, position of fire alarms and equipment and participate in drills as required.
- Take part in health and safety training and development as necessary.
- Take part in health surveillance programmes, as required.
- Set a good personal example in respect of health and safety.

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

Malpractice and Maladministration Policy

Introduction

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

It sets out the steps that our settings, staff, learners or other personnel must follow when reporting suspected or actual cases of malpractice and maladministration and The Positive Impact Group's responsibilities in dealing with such cases. It also sets out the steps we will follow when reviewing the cases.

Our Responsibilities

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

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

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

Should an investigation be undertaken, management must:

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

Designated Malpractice & Maladministration Lead
David Strong (Director of Operations)
david.strong@positive-impactuk.com.

Review Arrangements

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

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

Definition of Malpractice

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

- The assessment processes
- The integrity of a regulated qualification
- The validity of a result or certificate
- The reputation and credibility of The Positive Impact Academy

Malpractice may include a range of issues from the failure to maintain appropriate records or systems to the deliberate falsification of records to claim certificates. For the purpose of this policy, this term also covers misconduct and forms of unnecessary discrimination or bias towards certain groups of learners.

Definition of Maladministration

Maladministration is defined as any activity or practice which results in noncompliance with administrative regulations and requirements and includes the application of persistent mistakes or poor administration within a Centre (e.g., inappropriate learner records).

Examples of Malpractice

The categories listed below are examples of staff and learner malpractice. Please note that these examples are not exhaustive and are intended as guidance on the definition of malpractice:

Examples of Centre malpractice:

- Failure to satisfactorily implement the conditions of Centre recognition within the stated timescales.
- Denial of access to resources (premises, records, information, learners, and staff) for any authorised external representative and/or the regulatory authorities.
- Actions required by External Quality Assurers / Standards Verifiers are not being met within agreed timescales.
- Deliberate failure to carry out delivery, internal and external assessment, and internal verification in accordance with the requirements.
- Deliberate failure to adhere to learner registration and certification procedures.
- Deliberate failure to continually adhere to qualification approval criteria.
- Deliberate failure to maintain auditable records, e.g., certification claims.
- Fraudulent claim for certificates.
- Persistent instances of maladministration.
- The unauthorised use of inappropriate materials/equipment in assessment settings (e.g., mobile phones).
- Intentional withholding of information from external staff, which is critical to maintaining the quality assurance rigour.

- Misrepresentation of The Positive Impact Academy's relationship with awarding bodies.
- Collusion or permitting collusion in exams.
- Learners are still working towards a qualification after certification claims have been made.
- Condoning plagiarism by learners.
- Creation of false records.
- Impersonation of a learner for internal or external assessment.
- Cash for certificates (e.g., the selling of certificates for cash).
- A loss, theft of, or a breach of confidentiality, in any assessment materials.
- Unauthorised amendment, copying or distributing of exam papers and controlled assessments.
- Inappropriate assistance to learners by Centre staff (e.g., unfairly helping them to pass a unit or qualification).
- Submission of false information to gain a qualification or unit.

Examples of Learner Malpractice

- Forgery of evidence.
- Plagiarism of any nature by learners.
- Collusion in an exam or controlled assessment.
- Tampering with another learner’s assessment evidence.
- Not adhering to exam or controlled assessment conditions.
- Not following instructions from invigilators, examiners or The Positive Impact Academy staff during supervised exams or controlled assessments.
- Obtaining, receiving, exchanging or passing on information relating to and during an exam or controlled assessment by talking, written paper or notes or electronic means.
- Copying from other learners during an exam or controlled assessment.
- A loss, theft of, or a breach of confidentiality, in any assessment materials.
- Destruction of another learner’s work.
- Submission of false information to gain a qualification or unit.
- False ID was used in the registration process.
- Making a false declaration of authenticity.
- Impersonation of a learner for an internal or external assessment.
- Disruptive behaviour during an exam or controlled assessment.
- Accessing prohibited websites during an exam or a controlled assessment.

- Inappropriate use of technology during assessments (e.g., mobile phone or tablet computer).
- Cheating.

Examples of Maladministration

The categories listed below are examples of maladministration. Please note that these examples are not exhaustive and are only intended as guidance on our definition of maladministration:

The Positive Impact Group examples:

- Persistent failure to adhere to our learner registration and certification procedures.
- Persistent failure to adhere to Centre recognition and/or qualification requirements and/or associated actions assigned to the Centre.
- Persistent late learner registrations.
- Unreasonable delays in responding to requests and/or communications from awarding bodies.
- Failure to train invigilators adequately.
- Failure to invigilate to awarding body requirements.
- Failure to ensure that assessment venues meet the awarding body requirements.
- Inaccurate claim for certificates.
- Failure to maintain appropriate auditable records (3 years), e.g., certification claims and/or forgery of evidence.
- Withholding of information, by deliberate act or omission, from awarding bodies, which is required to ensure the awarding bodies of The Positive Impact Academy's ability to deliver qualifications appropriately.

Process for making an allegation of malpractice or maladministration

Anybody who identifies or is made aware of suspected or actual cases of malpractice or maladministration at any time must immediately notify Management. In doing so, they should put this in writing and enclose supporting evidence.

All allegations should include (where relevant):

- The learner's name and qualification registration number.
- The name and position of any staff member(s) involved in the case.

- Details of the course/qualification affected, or the nature of the service affected.
- Nature of the suspected or actual malpractice or maladministration.
- Date of the report and the informant's name, position, and signature.

If a member of staff has conducted an initial investigation prior to formally notifying management, the management should ensure that staff involved in the initial investigation are competent and have no personal interest in the outcome of the investigation.

However, it is important to note that in all instances, management must immediately notify awarding bodies if they suspect malpractice or maladministration has occurred.

In all cases of suspected malpractice or maladministration reported to management, the organisation will protect the identity of the 'informant' in accordance with the duty of confidentiality and/or any other legal duty.

Confidentiality and Whistleblowing

Sometimes, a person making an allegation of malpractice or maladministration may wish to remain anonymous. Although it is always preferable to reveal your identity and contact details, if you are concerned about possible adverse consequences, you may request that awarding bodies not divulge your identity. If it helps to reassure you on this point, The Positive Impact Academy can confirm that awarding bodies are not obliged (as recommended by the regulator Ofqual) to disclose information if to do so would be a breach of confidentiality and/or any other legal duty.

While The Positive Impact Group is prepared to investigate issues which are reported anonymously, the organisation shall always try to confirm an allegation by means of a separate investigation before taking up the matter with those to whom the allegation relates. For example, where appropriate:

- The police, fraud prevention agencies or other law enforcement agencies (to investigate or prevent crime, including fraud).
- The courts (in connection with any court proceedings).
- Other third parties, such as the relevant regulatory authority (e.g., Ofqual in England or SQA in Scotland).

At all times, The Positive Impact Group will investigate such allegations from whistleblowers in accordance with relevant whistleblowing legislation.

Responsibility for the Investigation

In accordance with regulatory requirements, all suspected cases of malpractice and maladministration will be examined promptly by The Positive Impact Group to establish if malpractice or maladministration has occurred, and all reasonable steps will be taken to prevent any adverse effect from occurring.

Management will be responsible for ensuring the investigation is carried out in a prompt and effective manner and in accordance with the procedures in this policy, and will allocate a relevant member of staff to lead the investigation and establish whether the malpractice or maladministration has occurred, and review any supporting evidence received.

At all times, The Positive Impact Group will ensure that personnel assigned to the investigation have the appropriate level of training and competence, and they have had no previous involvement or personal interest in the matter.

Notifying Relevant Parties

In all cases of suspected or actual malpractice or maladministration, The Positive Impact Group will notify the awarding body involved in the allegation that the organisation will be investigating the matter and/or in the case of learner malpractice, may ask staff to investigate the issue in liaison with awarding body personnel – in doing so details of the person making the allegation may be withheld if to do so would breach a duty of confidentiality or any other legal duty.

Where applicable, management will inform the appropriate regulatory authorities promptly if it is believed there has been an incident of malpractice or maladministration which could either invalidate the award of a qualification or affect another awarding organisation. We will keep them informed of progress in large and/or complex cases.

Where the allegation may affect another awarding organisation and their provision, The Positive Impact Group will also inform them in accordance with the regulatory requirements and obligations imposed on it by the regulator Ofqual.

Investigation Timelines and Process

The Positive Impact Group aims to act and resolve all stages of the investigation within 20 working days of receipt of the allegation. Please note that in some cases the investigation may take longer. In such instances, The Positive Impact Group will advise all parties concerned of the likely revised timescale.

The fundamental principle of all investigations is to conduct them in a fair, reasonable, and legal manner, ensuring that all relevant evidence is considered without bias. In doing so, investigations will be based around the following broad objectives:

- To establish the facts relating to allegations/complaints to determine whether any irregularities have occurred.
- To identify the cause of the irregularities and those involved.
- To establish the scale of the irregularities and whether other qualifications may be affected.
- To evaluate any action already taken by staff.
- To determine whether remedial action is required to reduce the risk to current registered learners and to preserve the integrity of the qualification.
- To ascertain whether any action is required in respect of certificates already issued.
- To obtain clear evidence to support any sanctions to be applied to the staff/learners.
- To identify any adverse patterns or trends.

Where a member of The Positive Impact Group staff is under investigation, the organisation may suspend them or move them to other duties until the investigation is complete.

If The Positive Impact Group believes there is sufficient evidence to implicate an individual in malpractice/ and/or maladministration, it will:

- Inform them (in writing) of the allegation.
- Provide them with details of the evidence found to support the judgment.
- Inform them of the possible consequences.
- Inform them that information in relation to the allegation and investigation may be, or has been, shared with the regulators and other relevant bodies (e.g., police).

- Provide them with an opportunity to consider and respond to the allegation and findings.
- Inform them of the Appeals policy should they wish to appeal against the decision.

After an investigation, The Positive Impact Group will produce a draft report for the parties concerned to check the factual accuracy.

Throughout the investigation, management will be responsible for overseeing the work of the investigation team to ensure that due process is being followed, appropriate evidence has been gathered and reviewed and for liaising with and keeping informed relevant external parties.

Investigation Report

After an investigation, The Positive Impact Group will produce a draft report for the parties concerned to check the factual accuracy. Any subsequent amendments will be agreed upon between the parties concerned. The report will:

- Identify the breach of the regulatory conditions, if any, that occurred.
- Confirm the facts of the case.
- Identify who is responsible for the breach (if any).
- Confirm an appropriate level of remedial action to be applied.

The Positive Impact Group will make the final report available to the parties concerned and to the regulatory authorities and other external agencies as required.

If it were an independent/third party that notified The Positive Impact Group of the suspected or actual case of malpractice or maladministration, the organisation will also inform them of the outcome, normally within 10 working days of making the decision - in doing so, some details may be withheld if to disclose such information would breach a duty of confidentiality or any other legal duty.

Investigation Outcomes

If the investigation confirms that malpractice or maladministration has taken place The Positive Impact Group will consider what action to take.

- Minimise the risk to the integrity of certification now and in the future.
- Maintain public confidence in the delivery and awarding of qualifications.
- Discourage others from carrying out similar instances of malpractice and maladministration.

The action The Positive Impact Group may take includes:

- Impose actions with specified deadlines to address the instance of malpractice or maladministration and to prevent it from recurring. For example, by:
    - Undertaking additional/increased visits to staff to provide them with a greater level of support and/or monitoring depending on their needs and performance.
    - Requiring specific staff to undergo additional training and/or scrutiny if there are concerns about their ability to undertake their role in the delivery of qualifications.
    - Not permitting specific Centre staff to be involved in the delivery or assessment of qualifications offered by The Positive Impact Group (e.g., not permitting an individual to assess).
    - Appointing independent invigilators to observe an examination when appropriate at The Positive Impact Group, if there are concerns around The Positive Impact Academy arrangements.

- Impose sanctions on staff; if so, these will be communicated in accordance with the Sanctions Policy, along with the rationale for the sanction(s) selected.

- Act against a learner(s) in relation to proven instances of cheating, plagiarism, fraud, as suggested by Ofqual in their guide to "Authenticity", such as:
    - Loss of credits/ marks for the related work/unit.
    - Disqualification from the unit(s)/qualification.

- Amend aspects of the qualification assessment and/or monitoring arrangements and associated guidance to prevent the issue from recurring.

- Inform relevant third parties (e.g., funding bodies) of the findings in case they need to take relevant action.

- Carry out additional, related investigations if we suspect the issue may be more widespread.

In addition to the above, management will record any lessons learned from the investigation and pass these on to relevant internal colleagues to help The Positive Impact Group prevent the same instance of malpractice or maladministration from recurring.

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

Managing Contractors Policy

Aims

This policy outlines the process that The Positive Impact Group will follow to comply with the appropriate legislation regarding the use of contractors on our premises. This will safeguard learners, staff and as far as is feasible any other individual who may be affected by our activities.

This policy sets out our intention that any contractors who attend our premises carry out their work in a manner that does not create any risk to learners, staff, or our neighbours. Clearly, emergency repairs and maintenance cannot be planned for; however, we will endeavour to ensure that they are executed safely.

Our definition of a contractor is any individual (contractor, sub-contractor, or consultant) who is not employed by The Positive Impact Group.

Introduction

All contracted maintenance and repair work should be thoroughly planned and properly risk-assessed. This is to help to ensure that the possibility of accidents and incidents is minimised. Unexpected circumstances could make it necessary to alter pre-planned arrangements even if the work has commenced. This will always be done in consultation and agreement with the Director and the contractors.

Selecting Contractors

The Positive Impact Group will always use reputable contractors who are suitably qualified, insured, and experienced.

It is the Director's responsibility to select each contractor. If necessary, the Contractor checklist will be used (Appendix 1).

Where the value of the contract exceeds £1000, a minimum of two competitive estimates will be sought.

Where the value of the contract exceeds £3000, a minimum of 3 competitive estimates will be sought.

Responsibilities

Communication between the Director and the contractors must be frequent and clear to execute a low-risk and well-organised project.

The Director is responsible for ensuring that:

- A risk assessment is carried out.
- Learners, staff members and any visitors are safe, and no individual interferes with the contractor’s legitimate work.
- Learners and staff are clearly notified of any area of the premises that they may not enter.
- Contractors work in a safe way, using suitably safe and risk-assessed systems of work. This is a legal obligation.
- To review all completed work and fill out the contractor's on-site checklist with the contractor (Appendix 2).
- The company’s insurance covers the activity.

The main contractor is responsible for ensuring that:

- Rules set out in the Contractor’s Pack are adhered to (Appendix 2).
- The health and safety of their staff and safeguarding checks and ID of their staff have been verified.
- Adequate notice of disturbance or interruption to usual business has been provided.
- Any required documents and equipment are provided. These include risk assessments and permits.

Safeguarding

Children and young people should not be permitted in any areas where contractors are working to ensure their health and safety from accident or injury, and to ensure they have no contact with workers. However, it may be impossible to implement this, and there may be occasions when contractors meet children, perhaps by entering and leaving the school.

To keep all children safe from any potential harm, the Director will make sure that such workers have DBS clearance by the contracting company (in accordance with KCSIE 2019).

All contractors should sign in and out when attending and leaving the premises.

Minor Repairs and Maintenance

Occasionally, small repairs and maintenance will need to be carried out, and it will not be possible to wholly isolate the workers from the activities of the centre and learners. It is, therefore, key that an initial meeting occurs between the Director and the main contractor to discuss the extent and consequences of the recommended work. During this meeting, appropriate risk assessments will be agreed, and safe working practises will be discussed and possibly included within the contract.

Major Work

This will include significant refurbishment of existing buildings and/or areas of buildings, and new builds and extensions. This type of major development will need to be separated off by fencing and responsibility for that area effectively handed over to the contractor until the work is complete and signed off. Any such areas will be out of bounds to everyone save the contractors' workers.

Any proposed visits by school staff (i.e., the Director) must be arranged with the main contractor, and visitors must respect all the pertinent rules and regulations, for example, wearing appropriate protective clothing and reporting to the site office.

School staff must not make unofficial or unsupervised visits to any area of major work or development. For the duration of the work, such areas are the responsibility of the contractor, and the members of staff may not be insured against accidents or for public liability.

If the Director has reason to believe that work is being executed in a manner that is not safe or poses any risks to staff or learners, he will instruct the contractor to cease working. If this were to happen, the project manager must be informed and the reason for any such incident recorded.

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 – New Contractors Checklist

Can the company provide fixed-priced contracts?	
Have professional qualifications and trade body memberships been viewed?	
Public Liability cover minimum £5000000 confirmed	
Are any subcontractors being used? Has the contractor vetted these?	
Obtain a minimum of 2 references.	
Are there arrangements for DBS clearance checks?	
Can late penalty clauses be implemented?	

Is it possible to confine the proposed work to outside of term time?	

Appendix 2 – Contractor's Information

This document has been put together so that you may be informed of the layout of our centre and the names of key staff who may assist you while you are on site. Additionally, it outlines some key health and safety arrangements which you should familiarise yourself with.

Please can you read the following points and sign the document.

All Contractors Must:

- Report to the Director upon arrival at the centre.
- Sign in and out of the visitors' book.
- Observe the centre's Health and Safety Policy.
- Ensure that all workers, including those who are sub-contracted, are informed of the contents of this document and observe the centre's code of conduct policy and safeguarding policy.
- Not leave the site without clearing any debris and /or waste materials left because of activities.
- Not leave the site without first making safe any ongoing work.

____

PRINT NAME

____

COMPANY

____

SIGN

Personal Relationships at Work Policy

Introduction

We recognise that employees who work together may form personal friendships and, in some cases, close personal relationships. Generally, we do not wish to interfere with these personal friendships and relationships. However, we must also ensure that employees behave in an appropriate, professional, and responsible manner at work and that they continue to fulfil their job duties both diligently and effectively. These rules are therefore aimed at striking a balance between your right to a private life and our right to protect our business interests.

Specific Subject Matter

The following rules apply to employees embarking on close personal relationships at work, whether the relationship is with a fellow employee, client, customer, supplier, agency worker or contractor, and they apply to all employees at all levels of the business:

- You must not allow your personal relationship to influence your conduct at work. Intimate behaviour during working time is prohibited. This includes, but is not limited to, holding hands, other close physical contact, discussions of a sexual nature or kissing.
- If you embark on a personal relationship with another employee who also works in your department, you should declare this to your manager as soon as reasonably practicable.
- If you embark on a personal relationship with a client, customer, supplier or contractor and your job allows you authority over the client, customer, supplier, or contractor, you must declare the relationship to your manager as soon as reasonably practicable. In these circumstances, the Company reserves the right to elect to transfer you to a job in another Department where you will not be able to exert undue influence over the other party, either on a temporary basis or permanently. We will consult with you to try to reach an amicable agreement on the transfer. Alternatively, we reserve the right to alter working arrangements,

either on a temporary basis or permanently, so that you no longer have any authority over the client, customer, supplier, or contractor.

If you are having or have had a personal relationship at work and you are found to have afforded either more or less favourable treatment to the other employee because of this relationship, or you have exercised undue influence over a client, customer, supplier, or contractor, this is a serious disciplinary offence and will lead to disciplinary action up to and including dismissal.

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

Staff Absence Policy

Introduction

The Positive Impact Group is committed to maintaining the welfare of all its staff, ensuring a safe and healthy environment in which to thrive at work and therefore, strives to fully support staff in all areas of their well-being. Likewise, it is a firm expectation that all staff will attend work every day that they are able to do so. It is accepted that from time to time, employees will have a genuine health reason that prevents them from attending. When this occurs, management will offer appropriate support to the employee whilst they are absent, aiming to facilitate their return to work as soon as is practicable.

The main objective of this policy is to minimise staff absence from work. This strategy will be achieved through promoting a healthy working environment as set out in the Wellbeing Policy and promoting a healthy lifestyle outside of work. All staff will regularly be encouraged to access a range of health-promoting activities via team meetings and staff one-to-ones.

Organisational Responsibilities

- To provide employees with details of the Staff Absence Policy and procedures.
- To maintain accurate records of staff absences.
- To keep reasonable contact with employees, which may involve meeting with them, whilst absent from work and on their return to work.
- To monitor sickness absences at regular intervals.
- To address absences during staff performance reviews.
- To decide the most appropriate actions with any staff member who has accrued an unacceptable number of absences.
- To promote a safe workplace and a healthy lifestyle.

Employee Responsibilities

- To attend work, unless genuinely unable to carry out duties due to illness or injury.
- To observe the organisation's procedure for reporting sickness absence.
- To keep in contact with management and to attend any required meetings over the course of the absence.

Staff Absence Procedure

- To arrange the appropriate cover, a simple absence process is necessary, and all employees must adhere to it. Failure to observe this procedure may result in the absence being considered as unauthorised in alignment with the organisation's disciplinary procedure and/or sick pay being withheld.
- On the first day of absence, the employee must contact David Strong by telephone, no later than 7 am. If there is no answer to your call, you must leave a voicemail message, and David will call you back. You must speak to David before the absence can be authorised. The employee has a duty to keep in contact with David throughout the duration of the absence.
- If the absence lasts for more than 7 consecutive days, the employee must provide a fit note from their GP, without which further absences will not be authorised.
- If management is concerned that a reason for absence is not genuine, either at the beginning of the absence, during the absence, or after the absence has occurred, then this would be considered a conduct issue, and the disciplinary procedure may be actioned.

Returning to Work

A fit note certificate issued by a GP should state the period that the individual will be unfit and whether they need to see the employee again. If the doctor has not advised that they will need to see the employee again, then the employee must return to work immediately after the fit note has expired.

A return-to-work interview between the employee and their line manager will be conducted after an absence period of 1 day or longer. Wherever possible, this should be conducted during the employee’s first day back, but not longer than 3 days after their return. The reasons for this meeting are:

- To greet the employee and welcome them back to work, and to update them on any changes that have occurred whilst they were away. To make available to the employee any minutes from team meetings, training updates or other relevant information pertinent to their role.
- To enquire whether the employee requires any form of support or reasonable adjustment to their role for an appropriate period. For example, if the employee has been absent due to a foot/ankle injury, arrangements could be made for them to work on the ground floor of the building.

- If the employee's absences are a cause for concern, a discussion should take place about the history of the absences, the reasons, any clear pattern, and an action plan drawn up with the aim of reducing further absences.
- If appropriate, the employee will be advised of the next stage in the procedure. For example, a Stage 1 Absence meeting (See below).
- Clear, accurate and factual minutes of this meeting must be recorded and signed by the manager and the employee.

To manage attendance accurately, absence should be monitored and reviewed. Outlined below are the trigger points which will indicate when a staff member's level of absence has reached a cause for concern.

Trigger Points

- 3 or more incidents of absence in six months.
- 6 or more incidents of absence in twelve months.
- 4 weeks of continual absence.
- Where specific patterns of absence are apparent, i.e., every Friday, before school holidays.

These trigger points should not be used as an automatic system to take further action – any such action should depend on the actual reasons for absence. Every employee's circumstances should be duly considered to ensure that all members of staff are treated consistently.

For part-time staff members, trigger points should be pro rata.

Procedure

This procedure may be implemented where, regardless of being discussed during the return-to-work interviews, absences have continued, and the stated trigger points have been passed.

Stage 1 Absence Meeting

The director/manager will invite the employee to a Stage 1 absence meeting, providing the date, time, and venue in writing. The employee must be provided with at least 5 working days' notice of the meeting.

The meeting can go ahead if the employee does not attend, and they will be notified in writing of any decisions made to manage their absences.

During the Stage 1 Absence Meeting, the Director will:

- Explain the reason for the meeting and why the levels of absence are of concern.
- Explore the reasons for absences and if there are any issues at work or in the employee's personal life that may be contributing to the absences.
- Listen attentively to everything that the employee has to say and respond appropriately.
- Implement an agreed plan of identified support to improve attendance.
- Advise that it is expected that there will be a sustained improvement in attendance. Issue an appropriate period to monitor attendance.

Possible Outcomes:

- No further action required at this stage.
- Set or, if necessary, extend a period of informal attendance monitoring.
- Issue the staff member with a Stage 1 warning, which will stay on record for 6 months. Issue a period of attendance monitoring with the express understanding that further absences within this timeframe may trigger the next stage in the procedure.

Stage 2 Absence Meeting

The director/manager will invite the employee to a Stage 2 Absence meeting if no improvements have been made when the target period (of formal or informal monitoring) terminates.

The director/manager will invite the employee to a Stage 1 absence meeting, providing the date, time, and venue in writing. The employee must be provided with at least 5 working days' notice of the meeting.

The meeting can go ahead if the employee does not attend, and they will be notified in writing of any decisions made to manage their absences.

The director/manager must ensure that all the information relating to the employee's absence is accurate and correct, and that any offers of support to the employee via return-to-work meetings or Stage 1 Absence meetings have been given and documented. If the employee would like medical evidence to be considered during this meeting, it must be submitted prior to the event to provide time for the director or manager to give it due consideration.

During the Stage 2 Absence Meeting, the Director will:

- Discuss their concerns about the continued absences and why it remains a management issue.
- Establish the reasons for absence. Are there any issues inside or outside of work that are contributing to or causing absences?
- Review any support measures that have already been put in place to assist staff members in reducing absences.
- Carefully consider the employees' responses and identify any further support that can be offered to help the staff member reduce such absences.

Possible Outcomes:

- No further action needed at this stage.
- An extension of the support plan and absence monitoring set out in stage 1.
- Issue the employee with a Stage 2 warning, which will remain on file for 9 months. Issue a formal absence monitoring time frame. Explain (and provide in writing) that further absences will lead to a Stage 3 absence meeting that could result in dismissal.

Stage 3 Absence Hearing

The member of staff should receive a letter, 10 days in advance of the meeting. This letter should detail:

- The date and time of the hearing and where it will take place. Due consideration must be given to these particulars.
- Any evidence that the organisation will rely on during the hearing. This includes medical evidence.
- Their entitlement to have in attendance a trade union representative / professional association representative or a work colleague not involved in the matter. No other person may attend.
- The possible consequences of the hearing.
- The employee must submit to the director any supporting evidence that he or she will present at the hearing at least 3 working days prior to the hearing.

The member of staff may be granted one extension of up to 5 days if their chosen representative cannot attend on the date or time of the meeting. Moreover, the hearing may go ahead in the absence of the employee and/or the representative. If this were to happen, the member of staff will be notified in writing of any decisions made during the hearing.

The objective of the meeting is to carefully deliberate whether the staff member can continue to be employed with the organisation. This deliberation will consider their health, level of absences and the effect that this has had on their capability to perform their role to the expected standard. Consideration will also be given to the organisation's ability to absorb the staff member's level of absence.

Possible Outcomes:

- If a case for dismissal cannot be ascertained, a final formal warning may be issued, which will stay on the employee's record indefinitely. A formal attendance target will be set, which, if failed, will result in dismissal without notice, on the grounds that the required levels of attendance have not been sustained.
- If the director decides that the staff member's level of absences is unacceptable and unlikely to improve given the heard evidence, then the employee may be dismissed without notice on the grounds that the required levels of attendance have not and will not be sustained.

The Management of Long-Term Absence Due to Sickness

If an employee is absent for 4 weeks or longer, they will receive regular contact from the director or their line manager. These contacts may include regular reviews to talk about their continued absence, a potential time frame for their return to work, and any reasonable adjustments that could be considered to help their return to duties.

Accrual of Annual Leave

All staff have the right to accrue annual leave whilst absent from work due to sickness.

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 — Return to Work Interview

<table>
<tr><td colspan="3">Name of employee:

Name of manager present:</td></tr>
<tr><td>Date of the first day of absence:</td><td colspan="1">Date of return to work:</td><td>No. of days absent:</td></tr>
<tr><td>Reason for absence:</td><td colspan="2">Any absences that are not agreed will be unauthorised and will be:

Paid
Not paid

(Delete as necessary)</td></tr>
<tr><td colspan="3">Was medical advice sought? Was any advice given followed?</td></tr>
<tr><td colspan="3">Was the absence related to an accident at work? Was it reported? Provide details.</td></tr>
</table>

Is the member of staff fit to return to work? If not, provide details.
Is there anything else that may affect recovery or the chances of this type of absence occurring again?
What support can The Positive Impact Academy provide?

Any further action. Additional meeting? Attendance target? Fit note to be adhered to?
Signature of employee: **Date:** **Signature of director/manager:** **Date:**

Staff Behaviour and Code of Conduct Policy

Introduction

The Positive Impact Group expects all its staff to set the highest standards of professionalism and behaviour to provide all our students with role models they can look up to and respect. This policy sets out the boundaries of behaviour and highlights the way in which staff are expected to behave.

This policy needs to be read in conjunction with the following policies:

- The Positive Impact Group Staff Code of Conduct (Appendix 1)
- Child Protection and Safeguarding Policy
- E-Safety Policy
- Health & Safety Policy
- SEND Policy
- Administration of Medicines Policy
- Whistleblowing Policy

Overall Aims

This policy will contribute to safeguarding our students/students and promoting their welfare by:

- Clarifying standards of behaviour for staff
- Contributing to the establishment of a safe, resilient, and robust ethos in The Positive Impact Academy, built on mutual respect and shared values

Expectations

All staff will:

- Be subject to Safer Recruitment processes and checks, whether they are new staff, supply staff, contractors, or volunteers etc.
- Receive appropriate induction training on their responsibilities in being alert to the signs of abuse, bullying or children at risk of radicalisation and on the procedures for recording and referring any concerns to the DSL.
- Read and sign to confirm that they have read Part 1 of Keeping Children Safe in Education.
- Read and sign to confirm that they have read The Positive Impact Group Code of Conduct.
- Read and sign to confirm that they have read The Positive Impact Group Safeguarding Policy.
- receive safeguarding training at intervals of no more than three years. Key staff will undertake more frequent specialist child protection training.

Obligations

All staff should adhere to their relevant code of conduct.

Staff should be aware that it is not appropriate to use social media to communicate with students. Staff are reminded that it is a criminal offence for a person aged 18 or over to have a sexual relationship with a student under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual.

There are occasions when it is entirely appropriate and proper for staff to have physical contact with students, but it is crucial that they only do so in ways appropriate to their professional role. Staff should, therefore, always use their professional judgement. Staff should not have unnecessary physical contact with students and should be alert to the fact that minor forms of friendly physical contact can be misconstrued by students or onlookers.

A member of staff can never take the place of a parent in providing physical comfort and should be cautious of any demonstration of affection.

Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority. If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be recorded as soon as possible, and a senior member of staff should be made aware.

Any restrictive physical intervention should only be used:

- To prevent a student from harming himself/herself
- To prevent a student from harming others
- To prevent a student from causing significant damage to property
- To prevent a student from engaging in a criminal act
- When a student engages in behaviour prejudicial to maintaining good order at the school or among any of the students, whether that behaviour occurs in the classroom during a teaching session or elsewhere within the curriculum provision.

Then, only as a last resort, when all efforts to diffuse the situation have failed.
Where exercises or procedures need to be demonstrated or supported, extreme caution should be used if this involves direct contact with a student and, wherever possible, contact should be avoided. It is acknowledged that some staff, for example, those who teach PE and games, or who offer music tuition, will, on occasions, must initiate physical contact with students to support a student so they can perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or assist them with an exercise. This should, whenever possible, be done with the student's agreement.

Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in an open environment. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the student.

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 — The Positive Impact Group Code of Conduct

1. Introduction

1.1 This Code of Conduct is intended as a guide and a help to all The Positive Impact Academy staff. It sets out standards of conduct which staff are expected to follow when within or representing the organisation. This code is not exhaustive but is written to assist staff and it is important that staff should take advice and guidance if necessary. If in doubt, ask.

1.2 The purpose is to ensure that the organisation provides a high-quality service to its students and partners in accordance with the Mission Statement and to promote public confidence in the integrity of The Positive Impact Academy.

1.3 It takes in the requirements of the law and attempts to define the required levels of professionalism to ensure the well-being of the organisation, its staff, and its customers.

1.4 It has been drafted to comply with the organisations Policies and Procedures.

1.5 Staff are requested to read this Code carefully and consider the issues which it raises.

1.6 The Head of Academy should also ensure that all staff are aware of the Code's contents and are fully briefed on its implications.

1.7 Reference to this Code will be made in all contracts of employment, and copies will be given to all staff. In addition, the induction programme for all new staff will reinforce the principles of this Code.

1.8 Investigations of alleged breaches of this Code will be covered under The Positive Impact Academy's disciplinary procedures and related codes of practice.

2. Code of Conduct

Exclusivity of Service

1. Staff’s off-duty hours are their personal concern, but they should avoid a position where duty and private interests conflict. This includes:
   - Staff members are making online associations/friendships with current pupils via social networking sites such as Facebook, Snapchat, and Twitter.

The above amendments have been included to safeguard the safety of pupils and the safety and professional integrity of The Positive Impact Academy staff.

2. The School does not seek to preclude staff unreasonably from undertaking additional employment, but you are required to devote your full time, attention, and abilities to your duties during your working hours and to act in the best interests of the organisation at all times. Accordingly, you must not, without the written consent of the Head of Academy, undertake any employment or engagement which might interfere with the performance of your duties or conflict with the interests of the organisation.

3. It follows that, regardless of whether you are employed on a full-time or part-time contract, you are required to notify the Head of Academy of any employment or engagement which you intend to undertake whilst in the employment of the organisation.

Specific Aspects

1. **Discrimination:** Staff must always observe the organisation's Equal Opportunities Policies for staff and pupils and treat pupils, parents, and partners in accordance with those policies.

2. **Health and Safety:** Staff must take care of their personal hygiene, safety, and welfare, and that of other persons who may be affected by their acts or omissions. All staff must comply with the requirements of the organisation's Health and Safety policy and relevant legislation and regulations, and ensure that pupils do likewise.

3. **Fire:** Staff must familiarise themselves with the fire precautions, procedures, and drill routines. They must regard practice fire drills or building evacuations in a positive manner, and ensure they are perceived by pupils as an essential precaution to prevent risk of injury or fatality.

4. **Business Practice:** Staff must maintain an impeccable standard of integrity in all their professional relationships.

5. **Media:** Other than on matters of publicity, only the Head of Academy is authorised to speak or send any communication on behalf of the Positive Impact Academy to members of the press or broadcast media. This decision is to avoid any embarrassment or unfair pressure on staff. This authorisation may be extended by the Head of Academy to other staff members.

6. **Copyright:** Staff shall observe copyright laws on computer software, audio-visual and printed material.

7. **Data Protection Act:** It is the responsibility of all employees to ensure the organisation's compliance with the Data Protection Act. Personal data must only be used to assist you in carrying out your work; it must not be given to people who have no right to see it. All staff should maintain the security of all computerised databases of information on individuals, whether they are staff, pupils or members of the general public. Staff should refer any queries to the Head of Academy.

General Points

1. Staff should display the highest possible standards of professional behaviour that are required in an educational establishment (see also Appendix 2).

2. Staff should seek to co-operate with their colleagues, providing support, help and guidance as required by them and their line manager, and enable effective communication throughout the organisation.

3. Staff should not use their position in the organisation for private advantage or gain.

4. Staff should avoid words and deeds that might bring the organisation into disrepute or might undermine colleagues in the perception of others (staff/pupils/parents/community).

5. Staff should retain professional independent objectivity and not promote political bias to others in their working activities.

6. Staff should be aware of, and should follow organisation policies, systems, and procedures. They should normally communicate through the line management structure and should ensure pupils do likewise.

7. Continuing professional development and support shall be provided by The Positive Impact Academy and, where appropriate and agreed, will be based on the objectives of the organisation's Development Plan. Periodically, employees will be required to attend certain training activities.

8. Staff should attend their place of work punctually in accordance with their conditions of service and at the times agreed with their line manager. Those unable to avoid being late or absent should, whenever possible, give as much notice to the Head of Academy so that alternative cover arrangements may be made.

9. The Positive Impact Academy uniform should always be worn. If an additional uniform is required, each member of staff should email the Head of Academy detailing the reasons for this.

Administrative Duties

1. Delivery staff shall inform the Head of Academy at the earliest opportunity of any student absence, and the reasons for this absence.

2. To ensure safeguards both for staff and pupils, staff must obtain permission from the Director:

- before taking pupils off the organisation’s premises.
- before arranging for any visiting speakers.
- before incurring any expenditure on behalf of the organisation.

Confidentiality

Staff shall maintain the appropriate levels of confidentiality with respect to student and staff records and other sensitive matters. They should take care not to discuss issues of particularly sensitive matters within the organisation's community, which could cause distress to staff, pupils or parents.

WHEN IN DOUBT, ASK!

If any member of staff is in any doubt regarding the guidelines of this Code and how they apply in any situation, then please consult with the Head of Academy. It is re-emphasised that this Code is intended to be a help and to enable fairness and equity between all staff.

Appendix 2 — Professional Behaviour

Professional behaviour is a generic term, but within this Code of Conduct includes such aspects as:

- Acting in a fair, courteous, and mature manner to pupils, colleagues, and other partners.
- Co-operating and liaising with colleagues, as appropriate, to ensure pupils receive a coherent and comprehensive educational service.
- Endeavouring to assist the organisation in achieving its corporate and strategic objectives, in particular, by adopting a positive attitude to marketing and the achievement of quality and equality.
- Respect for The Positive Impact Academy property.
- Maintaining the image of the organisation through standards of dress, general courtesy, correct use of the organisation's stationery, etc.
- Taking responsibility for the behaviour and conduct of pupils in the classroom and sharing such responsibility elsewhere on the premises.
- Being fit for work (i.e., not adversely influenced by drugs, alcohol, etc.)
- Not taking any illegal substances either in or out of the workplace.
- Being familiar with job requirements (e.g., proper preparation, uniform, use of suitable methods/systems, maintenance of appropriate/required records, etc), including keeping up to date with developments relevant to the job.
- Being familiar with communication channels and organisational procedures applicable to both students and staff.
- Ensuring all assessments/exams/tests are conducted in a fair and proper (prescribed) manner, and that procedures are strictly followed with respect to confidentiality and security.
- Respect for the rights and opinions of others.

This list is not exhaustive, but the examples are given as a summary.

Appendix 3 — Disciplinary Rules

The following are examples of behaviour which the organisation finds unacceptable. The list is not exhaustive, and it is acknowledged that it will be necessary to exercise judgment in all cases and to be fair and reasonable in all the circumstances.

- Any form of physical/verbal violence towards students.
- Physical violence, actual or threatened, towards other staff or visitors to the organisation.
- Sexual offences, sexual insults or sexual discrimination against students, other staff, or visitors to the organisation.
- Racial offences, racial insults or racial discrimination against students, other staff, or visitors to the organisation.
- Theft of the organisation's monies or property and of monies or property of colleagues or visitors to the organisation. Removal from the organisation's premises of property which is not normally taken away without the express authority of the Head of Academy or of the owner of the property may be regarded as gross misconduct.
- Deliberate falsification of documents such as expense claims for the purpose of gain.
- Acceptance of bribes or other corrupt financial practices.
- Wilful damage of The Positive Impact Academy property or of property belonging to other staff or visitors to the organisation.
- Wilful disregard of safety rules or policies affecting the safety of students, other staff, or visitors to the organisation.
- Any wilful act which could result in actionable negligence for compensation against the organisation.
- Refusal to comply with reasonable instructions given by staff with a supervisory responsibility.
- Gross neglect of duties and responsibilities.
- Unauthorised absence from work.
- Being untruthful and/or engaging in deception in matters of importance within the organisation’s community.
- Deliberate breaches of confidentiality, particularly on sensitive matters.
- Being incapable by reason of alcohol or drugs (not prescribed for a health problem) from fulfilling duties and responsibilities of employment.
- Using illegal substances either in or out of the workplace.

- Conduct which substantially brings the name of the organisation into disrepute, or which seriously undermines confidence in the employee.

All the above disciplinary rules are examples of behaviour which could lead to formal disciplinary warnings.

PRINT NAME

SIGN

DATE

Whistleblowing Policy

Introduction

Positive Impact Group is committed to the highest possible standards of openness, inclusiveness, accountability and integrity. In line with that commitment, the aims of this policy are to:

- Encourage those working for the organisation to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate and that their confidentiality will be respected.
- Provide guidance on how to raise concerns about suspected wrongdoing.
- Reassure those raising concerns that they are able to raise genuine concerns "made in the public interest" without fear of reprisals, even if they turn out to be mistaken.

We will provide all reasonable protection for those who raise concerns "made in the public interest" and ensure that appropriate personal support is offered both to an employee raising a concern and to any employee against whom allegations have been made under this policy.

Whistleblowing

Whistleblowing is when an employee reports their concern(s) about practices or incidents that have occurred or are occurring in the workplace. Such practises could include unlawful conduct, financial misconduct or negligence, danger to the staff, learners or any visitors to the centre, or the poor conduct or misconduct of employees. This policy complements The Positive Impact Group's Safeguarding Policy, Code of Conduct and Health and Safety Policy.

Other individuals performing work for or on behalf of the organisation (such as agency workers or contractors) are also encouraged to use it to raise similar concerns.

Wrongdoing may include, for example, fraud, corruption, malpractice, breach of health and safety law, any other illegal or unethical act or serious breaches of the organisation's policies, including concealment of any of the above. Employees may, for this purpose, include contractors and agency workers.

Disclosures concerning alleged criminal offences or other wrongdoing are “protected”, meaning that employees have certain legal rights, provided the disclosure is made in the public interest.

Further information on the law can be found at:
www.acas.org.uk
www.legislation.gov.uk/ukpga/1998/23/contents.

The aim of this policy is to encourage and empower staff to report serious concerns rather than ignore any arising issues.

The Director (James Armson) and management are committed to the highest possible standards of transparency and accountability and will take actions to deal with any inappropriate or unsuitable practice. The Director and management will:

- Provide avenues for staff to report concerns outside of their line management.
- Will not allow any staff member who comes forward with an issue reported in good faith to be treated unfairly or victimised in any way.
- Make sure that all reports are dealt with in strict confidence and do their utmost to protect the identity of the whistle-blower.
- Look into any concerns brought to their attention and provide a response to the issue raised.
- Act against the wrongdoers in line with The Positive Impact Group’s Code of Conduct, Health and Safety Policy and Safeguarding Policy.
- Similarly, action will be taken against any staff member found to have made a deliberate false allegation.

Protecting the Whistleblower

Under the Public Interest Disclosure Act 1998, a Whistleblower is protected from dismissal, selection for redundancy or being subjected to any other detriment for having made a protected disclosure. The organisation will support and not discriminate against concerned employees who apply the Whistleblowing procedure, provided any claim is made in good faith.

When the Whistleblowing Policy Applies

The Public Interest Disclosure Act 1998 outlines when statutory whistleblowing protection applies. These are:

- A criminal offence
- Failure to comply with a statutory or legal duty
- Improper or unauthorised use of funds
- A miscarriage of justice
- Sexual or physical abuse of any staff member or learner
- Any discrimination against any staff member or learner on the grounds of sex, age, race, disability, religion, belief, or sexual orientation
- Endangering a person's health and safety
- Damage to the environment
- Deliberate concealment of any of the above

Similarly, the Director will provide protection to any employee who raises concerns deemed to be contravening The Positive Impact Group's Code of Conduct. This policy will be implemented, encompassing relevant legislation.

The Procedure

Any issue raised will be kept confidential while the procedure is being used.

The employee should raise the concern with the Director of Operations, David Strong. Concerns can be raised orally, but it is good practice for the concern to be recorded in writing at an early stage to ensure that all the details are correctly understood.

In the event the concerns are regarding the Director of Operations, the employee should raise concerns directly with the Director, James Armson.

A written allegation should set out the background and history of the concern (giving names, dates and places where possible) and the reason for the concern about the situation. It is preferable to record this in writing. However, where the person to whom the concerns are voiced writes these down, a copy will be sent to the person raising the concerns, home address or via a nominated representative to give an opportunity to agree on this as a correct record. The earlier the concerns are expressed, the easier it is to take action.

Although not expected to prove the truth of an allegation, this will need to demonstrate to the person contacted that there are sufficient grounds for the concern. Employees may wish to seek advice from a trade union representative on how best to raise a concern.

The action taken by the organisation will depend on the nature of the concern. After initial enquiries to assess the seriousness of the matter, it may be investigated internally by the Director of Operations.

The Director of Operations will:

- Interview the employee as soon as possible, within seven working days, in confidence. An early interview will be essential if the concern relates to an immediate danger (e.g. potential loss of life, serious injury or risk to any person).
- Obtain as much information as possible from the employee about the grounds for the belief of wrongdoing.
- Consult with the employee about further steps which could be taken.
- Advise the employee of the appropriate route if the matter does not fall under this procedure.
- If urgent action is required in response to a concern, this may take place immediately.

At the interview, the employee may be accompanied by a recognised trade union representative or a work colleague. The Director of Operations may be accompanied by a member of staff to take notes.

The Director of Operations may at any time disclose the matter to a professionally qualified lawyer for the purpose of taking legal advice. He/she may also discuss the issue, in confidence, with other suitable professionals, such as internal or external HR advisors, the Director or SLT, in order to assess the nature of the case and to inform the outcome of the investigation. If this is the case, the employee involved in raising the issue will be informed so as to keep them abreast of the way in which the issue is being addressed by the organisation.

Within ten working days of the interview, the Director of Operations will recommend one or more of the following:

- The matter be further investigated internally by the organisation;
- the matter be further investigated by external consultants appointed by the organisation;
- the matter be reported to an external agency;
- disciplinary proceedings be initiated against an employee;
- the route for the employee to pursue the matter if it does not fall within this procedure; or
- that no further action is taken by the organisation.

Where possible, without breaching confidentiality or impacting on any investigation, the employee will be kept informed of progress in relation to the matter.

The grounds on which no further action is taken include:

- The Director of Operations is satisfied that, on the balance of probabilities, there is no evidence that wrongdoing within the meaning of this procedure has occurred, is occurring or is likely to occur.
- The Director of Operations is satisfied that the employee is not acting in good faith.
- The matter is already (or has been) the subject of proceedings under one of the organisation's other procedures or policies.
- The matter concerned is already (or has been) the subject of legal proceedings, or has already been referred to an external agency.

The recommendation of the Director of Operations will be made to the Director, as appropriate.

The employee's identity will be kept confidential unless the employee otherwise consents or unless evidence emerges that demonstrates that the employee may have acted maliciously. In the absence of such consent or grounds, the Director of Operations will not reveal the identity of the employee except:

- Where there is a legal obligation to do so; or
- where the information is already in the public domain or on a legally privileged basis to a professionally qualified lawyer for the purpose of obtaining legal advice, where the information relates to any of the organisation's policies, including, but not restricted to, the organisation's Safeguarding Policy or if it is believed that others may be under threat or in danger.

The conclusion of any agreed investigation will be reported by the Director of Operations to the employee promptly within twenty-eight working days of the initial interview. All responses to the employee will be made in writing and sent to the employee's home.

Employees may request an alternative means of communication other than correspondence to their home address. Whilst feedback will be given where appropriate, there may be limits on what detail can be shared for data protection reasons.

If the employee has not had a response within the above time limit or such reasonable extensions as the organisation requires, the employee may go to an appropriate external agency, but will inform the Director of Operations before doing so.

The employee may at any time disclose the matter on a legally privileged basis to a professionally qualified lawyer for the purpose of taking legal advice.

If the employee believes the outcome of the investigation is unfair, they may raise this directly with the Director.

Malicious Accusations

A deliberately false or malicious accusation made by an employee is a disciplinary offence and will be dealt with under the organisation's disciplinary procedure, as well as potentially exposing the employee to legal liability.

Confidentiality

Employees may, on a confidential basis, seek prior guidance from the Director of Operations if they wish to establish whether any course of conduct on their part or on the part of another employee may amount to wrongdoing under these procedures. Such enquiries shall be kept confidential. The Director of Operations will attempt to provide guidance on the basis of the information provided, but such guidance shall not prejudice the rights of the organisation or any person under these procedures.

Whistleblowing concerns can be reported anonymously, but the claim may not be taken further if there is insufficient information. Confidentiality can be requested where a name is provided - the person or body advised should make every effort to protect the identity.

An employee raising a concern can be confident that confidentiality is being maintained and identity is protected. Whilst confidentiality will be protected wherever possible, the organisation cannot prevent colleagues and others from speculating as to the identity of a Whistleblower.

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

Safeguarding Policies

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 co-ordinating 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 DDSLs 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 69 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/suspicions 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/channelguidanceple

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 76 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, where 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 81 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 disproportionally 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 thresholds 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 anti-social 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.

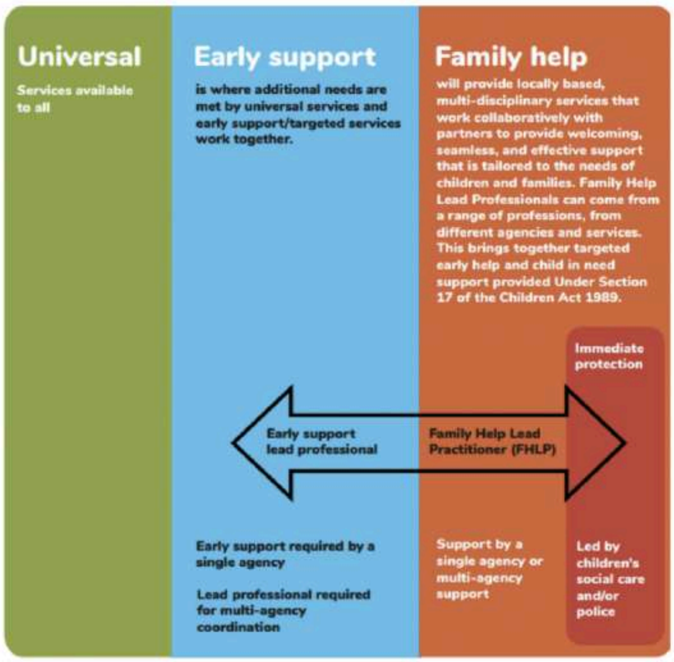
The DSL will maintain a list of students who the school has identified to be at potential risk, including those with a social worker, and ensure that relevant staff are aware and that these students are monitored closely and supported to achieve the best possible outcomes. This will include children 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 anti-social 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 the 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 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 helpdesk 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

<table>
<tr><th colspan="3">Low Level Concerns Form</th></tr>
<tr><td colspan="3">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.</td></tr>
<tr><td>Name of Staff Member:</td><td>Team/Role:</td><td>Date:</td></tr>
<tr><td colspan="3">Details of Concern:</td></tr>
<tr><td>Name:</td><td>Signed:</td><td>Date:</td></tr>
</table>

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

James Armson

Privacy Policy

Introduction

Positive Impact is committed to protecting and respecting your privacy.

This Privacy Policy explains how we collect, use and store personal information through our website and any related communication channels.

By using our website, you agree to the collection and use of information in accordance with this policy.

Who We Are

Positive Impact works across education, youth work and community through:

- The Academy
- The Foundation
- The Hub

For the purpose of data protection legislation, Positive Impact is the data controller responsible for the personal information collected through this website.

Information We Collect

We may collect and process the following information:

- Name
- Email address
- Phone number
- Organisation details
- Information submitted through contact or referral forms
- Website usage information through cookies and analytics

We only collect information that is necessary for communication, safeguarding, referrals or improving our services.

How We Use Your Information

We may use your information to:

- Respond to enquiries
- Process referrals
- Provide information about our services
- Improve our website and user experience
- Maintain safeguarding and compliance obligations
- Communicate with you where appropriate

We will never sell your personal information to third parties.

Lawful Bias for Processing

We process personal information under one or more of the following lawful bases:

- Consent
- Legitimate interests
- Legal obligations
- Safeguarding responsibilities

Sharing Information

We may share information where necessary with:

- Schools
- Local authorities
- Safeguarding agencies
- Professional partners
- Service providers supporting our operations

Information is only shared where appropriate, lawful and necessary.

Data Storage and Security

We take appropriate steps to protect personal information from loss, misuse, unauthorised access or disclosure.
Information submitted through the website is stored securely and only accessible by authorised personnel.

Cookie and Website Analytics

Our website may use cookies and analytics tools to understand how visitors use the site and improve functionality.

You can manage cookie settings through your browser preferences.

Your Rights

Under UK GDPR, you have the right to:

- Access your personal information
- Request corrections
- Request deletion where appropriate
- Restrict or object to processing
- Withdraw consent where applicable

To exercise these rights, please contact us directly.

Contact Us

If you have any questions about this Privacy Policy or how your information is handled, please contact:

info@positive-impactuk.com
07857 668319

Changes to This Policy

We may update this Privacy Policy from time to time. Any updates will be published on this page.

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

Accessibility Policy

Our Commitment

Positive Impact is committed to making our website accessible and inclusive for as many people as possible.

We want everyone to be able to access information about our services, regardless of ability, technology or individual needs.

Accessibility Standards

We aim for this website to follow recognised accessibility best practice and work towards compliance with the Web Content Accessibility Guidelines (WCAG) 2.1 AA standard.

Accessibility Features

The website has been designed to support accessibility through:

- Clear navigation and page structure
- Responsive design across devices
- Readable typography and spacing
- Appropriate colour contrast
- Alternative text for imagery where appropriate
- Keyboard-friendly navigation
- Simple and consistent layouts

Ongoing Improvements

We recognise that accessibility is an ongoing process and we are committed to continually improving the accessibility and usability of our website.

We regularly review content, structure and functionality to identify areas for improvement.

Third-Party Content

Some third-party content or external links may not be fully accessible. Where possible, we aim to provide accessible alternatives or support.

Feedback and Support

If you experience any accessibility barriers while using this website or need information in a different format, please contact us.

We will do our best to provide support and alternative access where possible.

Contact Us

info@positive-impactuk.com
07857 668319

Reporting Accessibility Issues

If you find any accessibility problems not listed on this page, please let us know so we can continue improving the website experience for everyone.

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