



STAFF HANDBOOK

Responsible Persons:	Director of Human Resources
Date of Policy (Review Date):	May 2024
Date of next Review:	May 2024
<i>This Policy is on the Staff Portal, and is also available to colleagues on request from Human Resources.</i>	

STAFF HANDBOOK FOR IMMANUEL COLLEGE

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THE STAFF HANDBOOK - INTRODUCTION

This Staff Handbook is for all teaching and support employees and offers information on a wide range of subjects, related to the school and your employment. All employees should familiarise themselves with its content. This Handbook will also be helpful to individuals that work for or provide services to the School, for example volunteers (including governors), casual workers, agency workers, contractors, temporary and supply staff, and placement students as well as employees. Although some policies are explicitly for employees others apply to everyone such as data protection, code of conduct etc. Please do seek advice from the HR Department if you are unsure as to which policies apply.

It is designed to help you settle in to the School by telling you a little about our background, objectives, the facilities, amenities, and benefits open to staff, the employment policy framework within which we operate and the codes of conduct and safety standards required.

This document will develop and change and we will endeavour to keep it up to date. We reserve the right to vary the terms of the Handbook at any time, and will endeavour to give you one month's notice of any variation.

The contents of this Handbook do not form part of your contract of employment but you are required to comply with the provisions, rules and procedures set out within it. Where there is any difference between the terms and conditions set out in your contract of employment or offer letter, and the contents of this Handbook, the terms, and conditions in the contract of employment will prevail.

We hope that you will read the handbook in its entirety, but the table of contents offers ready reference and will help you quickly locate those subjects in which you are particularly interested.

Although it is designed to answer many of your questions, please feel free to ask your Department Head/Manager about anything which remains unclear.

The Head Master will welcome any suggestions you may have to improve the Handbook.

In addition to the information contained within this Staff Handbook it is important that you also read and are aware of all other policies, rules, and procedures applicable to your role at the School, in particular:

- Child Protection & Safeguarding Policy
- Staff Code of Conduct
- Low-level Concerns Policy
- Data Protection Policy
- Whistleblowing Policy

These policies and procedures can be found in the Shared Drive under Policies.

SECTION A - ABOUT THE SCHOOL

1. ETHOS AND VISION OF THE SCHOOL

Chief Rabbi Lord Immanuel Jakobovits z"l was famous for two apothegms: 'Let my people know,' and 'Let my people grow.' Immanuel College is dedicated to those aims in spirit and in practice. The future Chief Rabbi Lord Jonathan Sacks proposed our mission statement in 1988:

'The school will aim at the highest standards of academic excellence in both Jewish and secular studies. It will aim at producing students who are thoroughly at home in both contemporary society and the full range of their Jewish heritage. It will unashamedly aim at creating leaders in all spheres of contemporary life, individuals whose sense of Jewish responsibility is deep and broad, encompassing identification with the Jewish people in its totality, with Jewish history in its diversity, and with the state of Israel in its centrality. It will promote the Jewish traditions of principle and tolerance, intellectual depth and social concern, loyalty and generosity, academic rigour, and ethical example. It will take as its task the projection of an Orthodox way of life and thought that earns the admiration of others of whatever faith.'

Immanuel College provides an excellent academic curriculum and attentive, expert teaching, culminating with top grades in the most challenging and respected public examinations. Immanuel competes proudly for results with its neighbours, who are among the most selective, sought-after, and high-performing schools in the nation. We achieve our results not by taking only those who find examinations easy, but through a culture of building self-confidence, self-esteem and added value into each individual pupil, understanding their learning profiles and growing independence, resilience, and better processing of information as necessary. As children grow older, we increasingly teach them in ability-related sets, to all pupils to progress at their best rate, and to enable learning support to be given as needed. Our Special Educational Needs provision, including individual support with examinations, has helped our students achieve their highest dreams from difficult starts, year after year. This is one of our distinctive features.

Immanuel College is most distinguished, however, by its sense of mishpacha and ruach, family feeling and spirit. We listen to children with respect, and our behaviour policies and practice encourage children to choose and develop their own self-image in tselem Elokim, the image of HaShem. While there is and must be discipline, it is not imposed for its own sake but to teach self-discipline, observing the religious principle of tsimtsum, using controlling power only when necessary and preferably to guide individuals in their exercise of free will.

We run our school Jewishly, mindful of Torah, building relationships which are not merely transactional, but transformational, designed to make us better people through principled action. We expect and guide our students to develop high personal standards and self-discipline; a sense of communal belonging, to sustain them as moral human beings through university and later life, and in relationships with others; and a positive and mature personal relationship with HaShem. We ask staff, parents, and pupils to respect these values, which are intended to serve the ultimate goals of shevet achim, dwelling together in harmony, and tikkun olam, acting, when we find things wrong in the world, to make them better and not worse. Our staff, both Jewish and of other backgrounds, are employed to be great teachers, who understand, respect, and support these goals.

We take great pride in our outstanding examination results, often representing progress beyond imagination for our pupils; we take even greater pride when they vote for the organisations which will specially receive their chesed and tzedakah, then busy themselves improving lives from Watford to Ukraine to Sierra Leone, through secular charities and those supporting Am and Eretz Israel. We take most pride when our children do good on their own initiatives, with teamwork, while enjoying companionship and common cause. We encourage our students to learn how and when to lead, how and when to follow, both Jewishly and secularly, whether as shlichei tzibur leading our davening, or in the Duke of Edinburgh's Award Scheme through JLGB,

whether organising our feeding of the local homeless or running an ethically aware Young Enterprise company.

We wish our children to act justly, love mercy, and walk humbly with HaShem. We have standards of modesty, of kashrut and of respect for Shabbat and chaggim in the same way that we wear uniform – to set us all on an equal, shared footing, based not on the lowest common denominators of our Jewishness, but on high standards appropriate to our Founder. These standards and expectations are set out, along with our other key policies, on our website, particularly at Kashrut, Jewish Life and Behaviour. We take tefillah seriously as an essential part of our school day and life, davening shacharit and mincha together, and we observe the key holidays of Medinat Israel, such as Yom Ha'zikaron and Yom Ha'atzmaut, as well as observing the mitzvot of Chanukah and Purim with appropriate ceremonies and activities. Harav Immanuel Jacobovits believed that these Jewish observances would bind with and strengthen the secular learning of our children, not detract from it, and through the collaborative hard work of our teachers, parents and pupils, time and again we have proved him right with our students' A Level results, university entry, communal leadership, career success and family lives.

2. OUR PUPILS

Our pupils range in age from 4 years to 18 years and our school's primary purpose is to educate and support our pupils and to ensure their wellbeing. All staff will need to ensure that they are fully conversant with our child protection policy and that they know how to report any concerns.

3. OUR STAFF

We recognise the benefit derived from investing in people through training and development to constantly improve efficiency and quality of service.

4. SIMPLICITY

Constant attention is paid to keeping all systems as simple and straightforward as possible.

5. INTEGRITY

We undertake to demonstrate the highest standard of integrity in all elements of our school.

6. ADMINISTRATIVE STRUCTURES

The Senior Leadership Team

The Head is responsible for the day to day running of the School in all its departments and also, in conjunction with the Governors, for long term planning. The Senior Leadership Team is comprised as follows:

Dr Millan Sachania, Head Master

Mr Daniel Endlar, Senior Deputy Head

Mrs Sharron Shackell, Deputy Head: Pastoral, Designated Safeguarding

Rabbi Yoni Golker, Deputy Head: Jewish Life & Learning

Ms Mary Beer, Director of Strategic Communications & Development

Mr Nicholas Brann, Director of Finance & Operations

Mrs Jo Fleet, Assistant Head: Director of Studies

Mrs Alexis Gaffin, Head of Immanuel College Preparatory School, Designated Safeguarding Leader for Preparatory School including EYFS

Ms Rachelle Hackenbroch, Director of Human Resources
Mr Aryeh Richman, Assistant Head: Head of Inclusion & Learning Support
Mrs Nicola Fahidi, Assistant Head: Director of Sixth Form

Our Staff

We depend upon our staff, each one of whom is valued for the contribution he or she makes to the reputation and success of the school.

We currently have 58 support staff and 91 teaching staff.

7. FINDING YOUR WAY AROUND

Immanuel College Addresses Phone

Address: Elstree Road, Bushey, Hertfordshire, WD23 4EB

Phone: 020 8950 0604

Website: www.immanuelcollege.co.uk

Email: enquiries@immanuelcollege.co.uk

Postal Service

There is no set time for incoming post. It usually gets to the Front Office anytime between 9.30am and midday. It is sorted in the front office and taken to the pigeon holes/ when time permits but 99.9% of the time this is before lunch.

Outgoing post is collected around 2.50pm from the Front Office. Items for the post should reach the front office at least 20 minutes before this. However, if there is a lot of post to frank, please give us as much time as possible.

Requirements for special deliveries, including recorded and registered post, proof of delivery, Datapost and courier services should be directed to the Front Office.

Telephones

Requests for additional or specialised equipment should be made to the IT Services Department as should any faults.

In case of emergency dial 999 from any telephone. Alternatively, security can be contacted on 443.

Office Equipment and Supplies

The two main photocopiers for staff use are located in the areas of the Staff Room by the pigeon holes. There is a third photocopier located at the back of the Main Reception area but this is mainly used by the Front Office staff. If you have bulk photocopying/laminating/booklets etc to do and it is not required urgently, you can ask the Front Office staff to do this for you by completing a blue form (found by the two main staff photocopiers by the pigeon holes), attaching it to your document(s) and placing this in the "Reception" pigeon hole. When completed, the documents will come back to you via your pigeon hole or wherever you have stated on the blue form for it to be returned to you.

Audio visual equipment is available from the IT Services Department and should be requested via the online HelpDesk.

Any breakdowns or faults should be reported to the IT Services Department via the online HelpDesk.

Stationery and office materials can be requested via the online purchase order system.

Reception

All visitors must be directed to and collected from the airlock/Reception and remain with a member of staff whilst on site at all time.

All visitors must sign in and sign out using the Sign-In Visitor System and wear a Visitor lanyard at all times.

If you have a visitor coming to school you must log this on the Sign-in Visitor System to let them know the time, date and vehicle details of the visitor coming to see you. Please refer to the Visitors Policy for more information.

Security

On starting your employment at Immanuel, you will be given a lanyard with a staff pass on it. You will need to show this to Security as you enter the premises each day. It is important that you wear the lanyard at all times whilst at School. Every member of staff is required to sign in and out each day using the Sign-In system. This can be done via the app or the units based in the Front office and senior school staff kitchen. Details of how to do this will be explained as part of your induction but if you experience any problems please contact the IT department.

In the interests of security, you are required to agree, on request from any authorised person, to a search of your outer clothing, desk/drawer, bag, vehicle etc.

8. IMMANUEL COLLEGE AND THE COMMUNITY

The school acknowledges its responsibilities to the community in a tangible way through supporting a range of community activities including encouraging staff to involve themselves in local social and sporting events.

The school endeavours to be a 'good neighbour' through applying our well-developed environmental policies which commit us to taking all reasonable precautions to ensure that our activities have no adverse effects, particularly with regards to car parking in the local vicinity.

We comply with all legal requirements and seek to exceed minimum standards where possible, protecting the air, land, and water from any sort of pollution through the careful control of noise, waste, energy etc. We rely on the full co-operation of our staff to maintain and improve our standards in such respects.

SECTION B - SCHOOL FACILITIES AND AMENITIES

1. PERSONAL PROPERTY AND VEHICLES

Whilst the school will take all reasonable precautions, it regrets that it is unable to accept responsibility for personal property, including vehicles brought onto the site. Valuables should not be brought to work and you should keep essential belongings with you, secured in your desk or in a safe place.

Lost and found property should be reported immediately to the Front Office.

Staff car parking is available on the School grounds. Vehicles must not be parked in any place within the school grounds other than that which has been allocated for the purpose and must not be parked in a way that could restrict access for emergency vehicles or cause inconvenience to our neighbours.

Vehicles must be driven with great care on the school site and due regard must be paid to notices displayed in this respect and to other traffic and pedestrians. Speed limits should be observed at all times.

You will also be given a staff pass for your car, which should be attached to the top-right corner of your windscreen. Security will not allow you onto the campus unless this pass is clearly visible.

Bicycles should be secured in the designated areas and changing facilities with showers are available for staff use on the ground floor of B Block.

2. CATERING SERVICES

Kosher hot and cold meals are available free of charge to staff from the Dining Room during the lunchtime period. Please note that, in order to properly maintain a kosher Dining Room, no food or drink is permitted to be taken into the Dining Room. All meals taken out of the Dining Room should be served on disposable plates and eaten with disposable cutlery. Under no circumstances should any other items of crockery or cutlery be taken from the Dining Room.

The main staff room and kitchen on the ground floor of the Caldecote building and the Prep School staff room are for the use of all staff. Consequently, staff may prepare and consume any food that they have brought in to the College within the kitchen and staff room. The microwave is to be used for supervised kosher products only.

If you have any questions please do not hesitate to contact Rabbi Golker who will be able to help you.

SECTION C – GENERAL

1. PENSIONS

The School abides by all relevant pension regulations and thus, where applicable, staff will be auto enrolled into a suitable pension scheme and make at least the minimum contribution required by the regulations and the scheme.

2. TEACHER'S PENSIONS

If you are eligible for membership of the Teachers' Pension Scheme, then this scheme will be used as the default scheme for auto enrolment. If you wish to opt out, then you must inform the Director of Finance & Operations in writing.

The School's chosen pension provider and the terms of any pension scheme offered are subject to regular review and may change from time to time.

3. PENSION PLANS FOR OTHER STAFF

All other members of staff are eligible to join the Now pension scheme offered by the School. If you wish to opt out, then you must inform the Director of Finance & Operations in writing.

The School's chosen pension provider and the terms of any pension scheme offered are subject to regular review and may change from time to time.

4. SCHOOL FEES REMISSION

Employees who have children who are eligible to attend the School, and who have satisfied the entry criteria as set out in the School's Admissions procedure and awarded a place, may receive fee concessions in accordance with our policy.

Fee concessions are granted at the absolute discretion of the Governors and are subject to amendment or withdrawal. A copy of the policy is available from the Bursary.

5. OUTSIDE INTERESTS

You are expected to be loyal to the stated aims and objectives of the School and may not engage in any outside activities or undertake any additional work, whether paid or unpaid, which in the reasonable view of the Head might conflict with the School's interests or might interfere with the efficient discharge of your duties, without the written consent of the Head.

If you are in any doubt as to whether a conflict of interest exists, you should discuss the situation with the Head.

6. RIGHT OF SEARCH

In the interests of security, you are required to agree on request from any authorised person to a search of your outer clothing, desk, bag, vehicle etc. Failure to give such permission may result in disciplinary action.

7. CHANGE OF TERMS

The content of this Handbook is for guidance only, although it applies to all employees. It is non contractual (unless stated otherwise) and in the case of conflict between this Handbook and the terms within your

contract of employment, your contract will usually take precedence. The School reserves the right to vary this handbook at any time and will endeavour to give you one month's notice of any variation.

7. EXPENSES

Immanuel College will refund all expenses incurred by staff wholly exclusively and necessarily on school business according to the following principles and in accordance with the School's Expenses Policy:

- Employees should neither gain nor lose.
- Reimbursement will be made in accordance with the requirements of HMRC and the School's auditors.

The reimbursement of expenses must be authorised by the line manager of the employee making the claim and itemised on the School's expense claim form. It is subject to the production of satisfactory receipts or other satisfactory evidence of payment.

Travel

The School will reimburse the reasonable cost of necessary travel in connection with school business. Provided it has been cleared with the Director of Finance & Operations first and evidence of adequate insurance cover provided, employees may use private cars for journeys on school business. However, school pupils should not be carried in private vehicles.

- **Car:** Mileage rates are available from the Bursary. Mileages should be based on the distance between the School and destination, or home and destination, if less.

We will not reimburse penalty fares or fines for parking or driving offences, other than at our discretion in exceptional circumstances.

Employees can also claim for any necessary parking costs which must be supported by a receipt or the display ticket.

- **Trains:** Rail travel should be by Standard class.
- **Taxis:** A receipt should be obtained for any journeys by taxi.

Accommodation and Subsistence

If you are required to stay away overnight in the course of your duties, you should discuss accommodation arrangements with your line manager in advance.

The School will reimburse the reasonable cost of food and accommodation on the production of receipts or other satisfactory evidence of payment.

Telephones

The School will reimburse all employees for the cost of business calls on the production of receipts so long as this has been agreed in advance with the Director of Finance & Operations.

Professional Subscriptions

The School will consider the payment of subscriptions for employees who belong to various bodies where membership is directly relevant to the employee's job. Requests for reimbursement of subscriptions must be made to the Finance Department.

8 LIFE ASSURANCE

The Teachers' Pension Scheme operates a death in service benefit of three times pensionable salary should members die whilst in employment. This benefit is only available to members of the Teachers' Pension Scheme. In addition, the College operates a Group Life Assurance scheme which provides three times annual salary as death in service cover. All eligible employed staff not covered by the death in service benefit provided by the Teachers' Pension Scheme are enrolled in this scheme, which is renewed annually.

SECTION D – REGULATORY REQUIREMENTS AND OBLIGATIONS

1. CHILD PROTECTION - INDUCTION AND TRAINING

The School supports its staff and volunteers who work with children in providing them with appropriate training to carry out their individual responsibilities for child protection effectively. New staff will be made aware of the School's arrangements for safeguarding and child protection and their own responsibilities with regard to safeguarding the welfare of pupils at the School.

Induction training for staff will include:

- Definitions and signs and indicators of physical, emotional, sexual abuse and neglect, online safety (to include sexting and consensual and non-consensual sharing of nudes/semi-nudes, and an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring), plus other specific safeguarding issues, for example, so-called 'honour based violence', child sexual exploitation, harmful sexual behaviours (including child on child sexual violence and sexual harassment) forced marriage, female genital mutilation, child on child abuse, radicalisation and Prevent, and bullying, including cyberbullying and prejudice-based and discriminatory bullying.
- Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and how to refer children and young people for further help.
- The School's online safety policy, including an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring. More information on the School's filtering and monitoring systems and processes is provided in the School's Child Protection and Safeguarding Policy.
- The role and identity of the Designated Safeguarding Lead and Deputies.
- A copy of the School's Child Protection Policy, Staff Code of Conduct Policy and the School's Whistleblowing Policy which will provide staff with the identity and contact details of the School's designated safeguarding lead and his/her deputy, plus information on the School's procedures for reporting abuse and allegations of abuse.
- Reading at least Part One of the statutory 'Keeping Children Safe in Education' 2023 which all staff who work directly with children must read. Staff are required to confirm that they have read and understood the key information contained in Part One. Those members of staff who do not work directly with children will be required to read Part One or may read Annex A.
- School leaders and staff who work directly with children will also be required to read Annex B of Keeping Children Safe in Education 2023.
- The Staff Code of Conduct, including the School's Whistleblowing procedure and the acceptable use of technologies policy, staff/pupil relationships and communications including the use of social media.
- The Behaviour Management Policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying).
- The safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods or children missing education.

Copies of the documents referred to above are provided to all staff during induction.

All staff and volunteers are required to attend regular refresher training in line with advice from the School's local three safeguarding partners. In addition, all staff receive safeguarding and child protection updates as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively, including online. The designated safeguarding leads will receive training every two years in order to provide them with the knowledge and skills to carry out their role. In addition to their formal training, the designated safeguarding leads should update their knowledge and skills (for example via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments), at regular intervals, but at least annually, to keep up with any developments relevant to their role.

2. DISQUALIFICATION UNDER THE CHILDCARE ACT 2006

The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 ("the Regulations") provide that a person who is disqualified under the Regulations may not provide relevant childcare or be directly involved in the management of such provision. Further, the Regulations provide that we are prohibited from employing a disqualified person in connection with relevant childcare provision and it is an offence to knowingly employ such an individual.

Disqualification means disqualification from providing childcare. The list of criteria for disqualification is long (the full version can be seen in the DfE guidance which can be accessed via the following link: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719794/Disqualification_under_the_childcare_act_July2018.pdf but the highlights are as follows:

- a. inclusion on the Disclosure and Barring Service (DBS) Children's Barred List;
- b. being found to have committed certain violent and sexual criminal offences against children and adults which are referred to in regulation 4 and Schedules 2 and 3 of the Regulations;
- c. certain orders made in relation to the care of children which are referred to in regulation 4 and listed at Schedule 1 of the Regulations;
- d. refusal or cancellation of registration relating to childcare, or children's homes, or being prohibited from private fostering, as specified in Schedule 1 of the Regulations;
- e. being found to have committed an offence overseas which would constitute an offence regarding disqualification under the Regulations if it had been committed in any part of the United Kingdom.

The disqualification requirements apply to the following staff:

- Early years provision - any member of staff who provides any care for a child up to and including reception age. This includes breakfast clubs, lunchtime supervision and after school care provided by the school both during and outside of school hours for this early years age range.
- Later years' provision, for children under 8 – save that the Regulations do not apply to education or supervised activity for children above reception age during school hours or in after school or co-curricular educational clubs. However, the Regulations do apply to before school settings, such as breakfast clubs and after school provision that would constitute childcare.
- The Regulations also apply to staff who are directly concerned in the management of either the early or later years' provision in that setting. We are required to use our judgement to determine who is covered (but it will include the Head and may also include other members of the School's leadership team and any manager, supervisor, leader, or volunteer responsible for the day-to-day management of the provision).

In order to demonstrate compliance with the Regulations it is important that we make you aware of the legislation.

With this in mind you must inform the Head immediately of any circumstance that may impact on your suitability to work with children in accordance with the Regulations. You may also be required to complete an annual self-declaration form to ensure that the information we hold in this regard is up to date.

Any failure to disclose such information may be treated as a disciplinary matter in accordance with the School's Disciplinary Procedure. If you are unsure as to whether you are covered by the Regulations or whether a disclosure is required, you must seek guidance from the Head.

3. DISCLOSURE OF CIRCUMSTANCES IMPACTING ON YOUR SUITABILITY TO WORK WITH CHILDREN

In addition, staff are required to notify the School immediately if there are any reasons why they should not be working with children. You must immediately disclose to the Head:

- any circumstances in which you are cautioned for, convicted of, or charged with a criminal offence;
- any circumstances impacting on your suitability to work with children;
- any circumstances where you behaved or may have behaved in a way that indicates that you may not be suitable to work with children; and
- any medical conditions or medication that may impact on your suitability to work with children and/or the safety of pupils and/or staff generally.

You may be required to complete an annual self-declaration form to ensure that the information we hold in this regard is up to date.

A failure to make such a disclosure may be considered a disciplinary matter and could lead to dismissal. If you are unsure whether a particular circumstance impacts on your suitability to work with children you must seek guidance from the Head.

4. DATA PROTECTION POLICY

4.1 Background

Data protection is an important legal compliance issue in the School. During the course of the School's activities it collects, stores and processes personal data (sometimes sensitive in nature) about staff, pupils, their parents, its contractors and other third parties (in a manner more fully detailed in the School's Privacy Notice. The School, as "data controller", is liable for the actions of its staff and governors in how they handle data. It is therefore an area where all staff have a part to play in ensuring we comply with and are mindful of our legal obligations, whether their personal data handling is sensitive or routine.

The law changed on 25 May 2018 with the implementation of the General Data Protection Regulation (GDPR) – an EU Regulation that is directly effective in the UK, regardless of Brexit status – and a new Data Protection Act 2018 (DPA 2018) was also passed to deal with certain issues left for national law. The DPA 2018 included specific provisions of relevance to independent schools: in particular, in the context of our safeguarding obligations, and regarding the right of access to personal data.

Without fundamentally changing the principles of data protection law, and while providing some helpful new grounds for processing certain types of personal data, in most ways this new law has strengthened the rights of individuals and placed tougher compliance obligations on organisations including schools that handle personal information. The Information Commissioner's Office (ICO) is responsible for enforcing data protection law, will typically look into individual's complaints routinely and without cost, and has various powers to take action for breaches of the law.

4.2 Definitions

Key data protection terms used in this data protection policy are:

- **Data controller** – a person or body that determines the purpose and means of the processing of personal data, and who is legally responsible for how it is used. For example, the School (including by its governors) is a controller. An independent contractor who makes their own such decisions is also, separately, likely to be a data controller.
- **Data processor** – an organisation that processes personal data on behalf of a data controller, for example a payroll or IT provider or other supplier of services with whom personal data may be shared but who is not authorised to make any decisions about how it is used.
- **Personal data breach** – a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.
- **Personal information (or “personal data”)** – any information relating to a living individual (data subject) by which that individual may be identified by the controller. That is not simply a name but any form of identifier, digital or contextual, including unique ID numbers, initials, job titles or nicknames. Note that personal information will be created almost constantly in the ordinary course of work duties (such as emails, notes of calls and minutes of meetings). The definition includes expressions of opinion about the individual or any indication of the School’s, or any person’s, intentions towards that individual.
- **Processing** – virtually anything done with personal information, including obtaining or collecting it, structuring it, analysing it, storing it, sharing it internally or with third parties (including making it available to be viewed electronically or otherwise), altering it or deleting it.
- **Special categories of personal data** – data relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health and medical conditions, sex life or sexual orientation, genetic or biometric data used to identify an individual. There are also separate rules for the processing of personal data relating to criminal convictions and offences.

4.3 Applications of this policy

This policy sets out the School’s expectations and procedures with respect to processing any personal data we collect from data subjects (including parents, pupils, employees, contractors and third parties).

Those who handle personal data as employees or governors of the School are obliged to comply with this policy when doing so. For employees, breaches of this policy may result in disciplinary action. Accidental breaches of the law or this policy in handling personal data will happen from time to time, for example, by human error, and will not always be treated as a disciplinary issue. However, failure to report breaches that pose significant risks to the School or individuals will be considered a serious matter.

In addition, this policy represents the standard of compliance expected of those who handle the School’s personal data as contractors, whether they are acting as “data processors” on the School’s behalf (in which case they will be subject to binding contractual terms) or as data controllers responsible for handling such personal data in their own right.

Where the School shares personal data with third party data controllers – which may range from other schools, to parents, to appropriate authorities, to casual workers and volunteers – each party will need a lawful basis to process the personal data, and will be expected to do so lawfully and with due regard to security and confidentiality, as set out in this policy.

If you are a volunteer or contractor, you will be a data controller in your own right, but the same legal regime and best practice standards set out in this policy will apply to you by law.

4.4 Person responsible for Data Protection at the School

The School has appointed Mr Nicholas Brann as the Data Protection Lead who will endeavour to ensure that all personal data is processed in compliance with this Policy and the principles of the GDPR. Any questions about the operation of this policy or any concerns that the policy has not been followed should be referred in the first instance to Mr Brann.

4.5 The Principles

The GDPR sets out six principles relating to the processing of personal data which must be adhered to by data controllers (and data processors). These require that personal data must be:

- 1 Processed **lawfully, fairly** and in a **transparent** manner;
- 2 Collected for **specific** and **explicit purposes** and only for the purposes it was collected for;
- 3 **Relevant** and **limited** to what is necessary for the purposes it is processed;
- 4 **Accurate** and kept **up to date**;
- 5 **Kept for no longer than is necessary** for the purposes for which it is processed; and
- 6 Processed in a manner that ensures **appropriate security** of the personal data.

The GDPR's broader "accountability" principle also requires that the School not only processes personal data in a fair and legal manner but that we are also able to *demonstrate* that our processing is lawful. This involves, among other things:

- keeping records of our data processing activities, including by way of logs and policies;
- documenting significant decisions and assessments about how we use personal data (including via formal risk assessment documents called Data Protection Impact Assessments); and
- generally having an "audit trail" vis-à-vis data protection and privacy matters, including for example, when and how our Privacy Notice was updated; when staff training was undertaken; how and when any data protection consents were collected from individuals; how personal data breaches were dealt with, whether or not reported (and to whom) etc.

4.6 Lawful grounds for data processing

Under the GDPR there are several different lawful grounds for processing personal data. One of these is consent. However, because the definition of what constitutes consent has been tightened under GDPR (and the fact that it can be withdrawn by the data subject) it is considered preferable for the School to rely on another lawful ground where possible.

One of these alternative grounds is "legitimate interests", which is the most flexible basis for processing. However, it does require transparency and a balancing assessment between the rights of the individual and the interests of the School. It can be challenged by data subjects and also means the School is taking on extra responsibility for considering and protecting people's rights and interests. The School's legitimate interests are set out in its Privacy Notice, as GDPR requires.

Other lawful grounds include:

- compliance with a legal obligation, including in connection with employment, engagement of services and diversity;
- contractual necessity e.g. to perform a contract with staff or parents, or the engagement of contractors;
- a narrower set of grounds for processing special categories of personal data (such as health information), which includes explicit consent, emergencies, and specific public interest grounds.

4.7 Headline responsibilities for all staff

Record-keeping

It is important that personal data held by the School is accurate, fair and adequate. Staff are required to inform the School if they believe that *any* personal data is inaccurate or untrue or if you are dissatisfied with how it is recorded. This applies to how staff record their own data, and the personal data of others – in particular colleagues, pupils and their parents – in a way that is professional and appropriate.

Staff should be aware of the rights set out below, whereby any individuals about whom they record information on School business (notably in emails and notes) digitally or in hard copy files may have the right to see that information. This absolutely must not discourage staff from recording necessary and sometimes difficult records of incidents or conversations involving colleagues or pupils, in accordance with the School's other policies, and grounds may sometimes exist to withhold these from such requests. However, the starting position for staff is to record every document or email in a form they would be prepared to stand by should the person about whom it was recorded ask to see it.

Data handling

All staff have a responsibility to handle the personal data which they come into contact with fairly, lawfully, responsibly and securely and in accordance with the Staff Handbook and all relevant School policies and procedures (to the extent applicable to them). In particular, there are data protection implications across a number of areas of the School's wider responsibilities such as safeguarding and IT security, so all staff should read and comply with the following policies:

- Safeguarding (including child on child abuse)
- Social media
- IT acceptable use

Responsible processing also extends to the creation and generation of new personal data/records (if separate), which should always be done fairly, lawfully, responsibly and securely.

Avoiding, mitigating and reporting data breaches

One of the key new obligations contained in the GDPR is on reporting personal data breaches. Data controllers must report certain types of personal data breach (those which risk an impact to individuals) to the ICO within 72 hours.

In addition, data controllers must notify individuals affected if the breach is likely to result in a "high risk" to their rights and freedoms. In any event, the School must keep a record of any personal data breaches, regardless of whether we need to notify the ICO. If staff become aware of a personal data breach they must notify Mr Nicholas Brann, Director of Finance & Operations. If staff are in any doubt as to whether to report something internally, it is always best to do so. A personal data breach may be serious, or it may be minor; and it may involve fault or not; but the School always needs to know about them to make a decision.

As stated above, the School may not need to treat the incident itself as a disciplinary matter – but a failure to report could result in a significant exposure for the School, and for those affected, and could be a serious disciplinary matter whether under this policy or the applicable staff member’s contract.

Care and data security

More generally, we require all School staff (and expect all our contractors) to remain mindful of the data protection principles (see section above), and to use their best efforts to comply with those principles whenever they process personal information. Data security is not simply an online or digital issue but one that effects daily processes; filing and sending correspondence, notably hard copy documents. Data handlers should always consider what the most assured and secure means of delivery is, and what the consequences would be of loss or unauthorised access.

We expect all those with management/leadership responsibilities to be particular champions of these principles and to oversee the swift reporting of any concerns about how personal information is used by the School to Mr Nicholas Brann, and to identify the need for regular staff training. Staff must attend any training we require them to.

4.8 Rights of Individuals

In addition to the School’s responsibilities when processing personal data, individuals have certain specific rights, perhaps most significantly that of access to their personal data held by a data controllers (i.e. the School). This is known as the “subject access right” (or the right to make “subject access requests”). Such a request must be dealt with promptly and does not need any formality, not to refer to the correct legislation. If you become aware of a subject access request (or indeed any communication from an individual about their personal data), you must tell Mr Nicholas Brann as soon as possible.

Individuals also have legal rights to:

- require us to correct personal data we hold about them if it is inaccurate;
- request that we erase their personal data (in certain circumstances);
- request that we restrict our data processing activities (in certain circumstances);
- receive from us the personal data we hold about them for the purpose of transmitting it in a commonly used format to another data controller; and
- object, on grounds relating to their particular situation, to any of our particular processing activities where the individual feels this has a disproportionate impact on them.

None of the above rights for individuals are unqualified and exceptions may well apply. However, certain rights are absolute and must be respected, specifically the right to:

- object to automated individual decision-making, including profiling (i.e. where a significant decision is made about the individual without human intervention);
- object to direct marketing; and
- withdraw one’s consent where we are relying on it for processing their personal data (without affecting the lawfulness of processing carried out prior to that point in reliance on consent, or any processing carried out on some other legal basis other than consent).

In any event, however, if you receive a request from an individual who is purporting to exercise one or more of their data protection rights, you must tell Mr Nicholas Brann as soon as possible.

4.9 Data Security: online and digital

The School must 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. Further details on this can be found in the IT Acceptable Use Policy. In particular:

- no member of staff is permitted to remove personal data from School premises, whether in paper or electronic form and wherever stored, without prior consent of the Director of Finance & Operations.
- no member of staff should provide personal data of pupils or parents to third parties, including a volunteer or contractor, unless there is a lawful reason to do so.
- where a worker is permitted to take data offsite on memory sticks or personal devices it will need to be encrypted.
- use of personal email accounts or unencrypted personal devices by governors or staff for official School business is not permitted.

4.10 Processing of Financial/Credit Card Data

The School complies with the requirements of the PCI Data Security Standard (PCI DSS). Staff are required to process credit card data must ensure that they are aware of and comply with the most up to date PCI DSS requirements. If you are unsure in this regard please see further guidance from the Director of Finance & Operations. Other categories of financial information, including bank details and salary, or information commonly used in identity theft (such as national insurance number or passport details), may not be treated as legally sensitive but can have material impact on individuals and should be handled accordingly.

4.11 Summary for Staff

It is in everyone's interests to get data protection right and to think carefully about data protection issues: this means handling all personal information with which you come into contact fairly, lawfully, securely and responsibly.

A good rule of thumb here is to ask yourself questions such as:

- *Would I be happy if my own personal information were being used (for example, shared with a third party) in the way I am proposing? Would I expect it?*
- *Would I wish to stand by how I have recorded this information in an email or official record if the person concerned was able to see it?*
- *What would be the consequences of my losing or misdirecting this personal data?*

Data protection law is therefore best seen not as oppressive red tape, or a reason not to do something necessary or important, but a code of useful and sensible checks and balances to improve how to handle and record personal information and manage our relationships with people. This is an important part of the School's culture and all its staff and representatives need to be mindful of it.

PRIVACY NOTICES

The School will issue privacy notices from time to time, informing you about the personal information that we collect and hold relating to you, as well as our parents, pupils, alumni and suppliers, how you can expect your personal information to be used and for what purposes.

We will take appropriate measures to provide information in privacy notices in a concise, transparent, intelligible and easily accessible form, using clear and plain language.

It is important that you read and comply with the School's privacy notices.

5. STAFF PRIVACY NOTICE

In the course of your work undertaken for the school, we will collect, use and hold ("process") personal data relating to you as a member of our staff or wider school team, regardless of your employment status. This makes the school a data controller of your personal information, and this Privacy Notice sets out how we will use that information and what your rights are.

Who this document applies to

This notice applies to staff at the School, including: employees, contractors, visiting music teachers and other peripatetic workers, casual workers, temps and volunteers who may be employed or engaged by the School to work for it in any capacity, as well as prospective applicants for roles. This policy also applies to our governors.

Please note that, even if this Notice applies to you, references to "employment", "staff" etc in this Notice are not intended to imply or confer any employment rights on you if you are a contractor, non-employed worker or job applicant, even if the Notice is relevant to how we process your personal data.

This Notice is not aimed at pupils, or parents of pupils (whether current, past or prospective) or other members of the public. This information may be found in the School's Privacy Notice, which provides further details about how such personal data will be used by the School. Nor does it inform staff how to handle the personal data of the same, which is covered by the School's Data Protection Policy.

About this Notice

This Staff Privacy Notice explains how the school collects, uses and shares (or "processes") personal data of staff, and your rights in relation to the personal data we hold.

This Privacy Notice also applies in addition to the school's other relevant terms and conditions and policies that may (depending on your role and status) apply to you, including:

- any contract between the school and its staff, such as the terms and conditions of employment, and any applicable staff handbook.
- the school's CCTV policy and/or biometrics policy;
- the School's retention of records policy;
- the School's disciplinary, safeguarding, pastoral, anti-bullying, or health and safety policies, including as to how concerns, low-level concerns or incidents are reported or recorded (both by and about staff);
- the School's data protection policy; and
- the School's IT policies, including its Acceptable Use policy, eSafety policy and Social Media policy.

Please note that any contract you may have with the School will be relevant to how the School processes your data, in accordance with any relevant rights or obligations under that contract. However, this Staff Privacy Notice is the primary document by which we notify you about the use of your personal data by the School.

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

How we collection your information

We may collect your personal data in a number of ways, for example:

- from the information you provide to us before making a job application, for example when you come for an interview;
- when you submit a formal application to work for us, and provide your personal data in application forms and covering letters, or when you complete a self-declaration etc.; and
- from third parties, for example the Disclosure and Barring Service (DBS) and referees (including your previous or current employers or school), or from third party websites (as part of online suitability checks for shortlisted candidates) or (if you are a contractor or a substitute) your own employer or agent, in order to verify details about you and/or your application to work for us.

More generally, during the course of your employment with us, as a member of staff, we will collect data from or about you, including:

- when you provide or update your contact details;
- when you or another member of staff completes paperwork regarding your performance reviews;
- in the course of fulfilling your employment (or equivalent) duties more generally, including by filling reports, note taking, or sending emails on School systems;
- in various other ways as you interact with us during your time as a member of staff, and afterwards, where relevant, for the various purposes set out below.

The types of information we collect

We may collect the following types of personal data about you (and your family members and 'next of kin', where relevant):

- contact and communications information, including:
 - your contact details (including email address(es), telephone numbers and postal address(es);
 - contact details (through various means, as above) for your family members and 'next of kin', in which case you confirm that you have the right to pass this information to us for use by us in accordance with this Privacy Notice;
 - records of communications and interactions we have had with you;
- biographical, educational and social information, including:
 - your name, title, gender, nationality and date of birth;
 - your image and likeness, including as captured in photographs taken for work purposes;
 - details of your education and references from your institutions of study;
 - lifestyle information and social circumstances;
 - your interests and extra-curricular activities;
 - information in the public domain, including information you may have posted to social media, where relevant to your role (e.g. as part of pre-employment screening);
- financial information, including:

- your bank account number(s), name(s) and sort code(s) (used for paying your salary or invoices and processing other payments);
- your tax status (including residence status);
- Gift Aid declaration information, where relevant (for example, where we help you to administer donations to charity from your pre-tax earnings);
- information related to pensions, national insurance, or employee benefit schemes;
- work related information, including:
 - details of your work history and references from your previous employer(s);
 - your personal data captured in the work product(s), notes and correspondence you create while employed by or otherwise engaged to work for the school;
 - details of your professional activities and interests;
 - your involvement with and membership of sector bodies and professional associations;
 - information about your employment and professional life after leaving the school, where relevant (for example, where you have asked us to keep in touch with you);
 - nationality and other immigration status information (i.e. about your entitlement to work in the UK), including copies of passport information (if applicable);
- and any other information relevant to your employment or other engagement to work for the School.

Where this is necessary for your employment or other engagement to work for us, we may also collect special categories of data, and information about criminal convictions and offences, including:

- information revealing your racial or ethnic origin;
- trade union membership, where applicable;
- information concerning your health and medical conditions (for example, where required to monitor and record sickness absences, dietary needs, or to make reasonable adjustments to your working conditions or environment);
- biometric information, for example where necessary for School security systems;
- information concerning your sexual life or orientation (for example, in the course of investigating complaints made by you or others, for example concerning discrimination); and
- information about certain criminal convictions (for example, where this is necessary for due diligence purposes, or compliance with our legal and regulatory obligations);

However, this will only be undertaken where and to the extent it is necessary for a lawful purpose in connection with your employment or other engagement to work for the school.

The basis for processing your personal data, how that data is used and whom it is shared with

Entering into, or fulfilling, our contract with you

We process your personal data because it is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract, such as a contract of employment or other engagement with us. In this respect, depending on your role and status, we are likely to use your personal data for the following purposes:

- administering job applications and, where relevant, offering you a role with us;
- carrying out due diligence checks on you, whether during the application process for a role with us or during your engagement with us, including by checking references in relation to your education and your employment history and obtaining any required self-declarations;
- once you are employed or engaged by us in any capacity, for the performance of the contract of employment (or other agreement) between you and us;
- to pay you and to administer benefits (including pensions) in connection with your employment or other engagement with us;
- monitoring your attendance and your performance in your work, including in performance reviews;
- promoting the school to prospective parents and others, including by publishing the work product(s) you create while employed by or otherwise engaged to work for the School;
- for disciplinary purposes, including conducting investigations where required;
- for other administrative purposes, for example to update you about changes to your terms and conditions of employment or engagement, or changes to your pension arrangements;
- for internal record-keeping, including the management of any staff feedback or complaints and incident reporting; and
- for any other reason or purpose set out in your employment or other contract with us.

Legitimate Interests

We process your personal data because it is necessary for our (or sometimes a third party's) legitimate interests. Our "legitimate interests" include our interests in running the School in a professional, sustainable manner, in accordance with all relevant ethical, educational, charitable, legal and regulatory duties and requirements (whether or not connected directly to data protection law). In this respect, depending on your role and status, we are likely to use your personal data for the following:

- providing you with information about us and what it is like to work for us (where you have asked for this, most obviously before you have made a formal application to work for us);
- for security purposes, including by operating security cameras in various locations on the school's premises;
- to enable relevant authorities to monitor the school's performance and to intervene or assist with incidents as appropriate;
- to provide education services to pupils, including where such services are provided remotely (either temporarily or permanently);
- to safeguard staff and pupils' health and welfare and provide appropriate pastoral care;
- to carry out or cooperate with any school or external complaints, disciplinary or investigatory process;
- for the purposes of management planning and forecasting, research and statistical analysis;
- in connection with organising events and social engagements for staff;
- making travel arrangements on your behalf, where required;
- contacting you or your family members and 'next of kin' for business continuity purposes, to confirm your absence from work, etc.;

- publishing your image and likeness in connection with your employment or engagement with us;
- to monitor (as appropriate) use of the School's IT and communications systems in accordance with the School's IT Acceptable Use Policy and government guidance such as KCSIE.

Link to Staff Acceptable Use Policy : https://immanuelhertsschuk-my.sharepoint.com/:w:/g/personal/bfreedman_immanuelcollege_co_uk/Ed7vGG5og11Am182HWWh63MBR_t-Fu4IOV0oWZV1Jp3yxA?e=ggSBHW

Legal Obligations

We also process your personal data for our compliance with our legal obligations, notably those in connection with employment, charity / company law, tax law and accounting, and child welfare. In this respect, depending on your role and status, we are likely to use your personal data for the following:

- to meet our legal obligations (for example, relating to child welfare (including following the requirements and recommendations of KCSIE), social protection, diversity, equality, and gender pay gap monitoring, employment, immigration/visa sponsorship compliance and health and safety);
- for tax and accounting purposes, including transferring personal data to HM Revenue and Customs to ensure that you have paid appropriate amounts of tax, and in respect of any Gift Aid claims, where relevant;
- for the prevention and detection of crime, and in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities.

Special categories of data

Depending on your role and status, we process special categories of personal data (such as data concerning health, religious beliefs, racial or ethnic origin, sexual orientation or union membership) or criminal convictions and allegations (treated for these purposes as special category data) for the reasons and purposes set out below.

In particular, we process the following types of special category personal data for the following reasons:

- your physical or mental health or condition(s) in order to record sick leave and take decisions about your fitness for work, or (in emergencies) act on any medical needs you may have. This may include Covid-19 (or similar) testing: including managing on-site testing and/or processing the results of tests taken by staff, and sharing this information with relevant health authorities;
- recording your racial or ethnic origin in order to monitor our compliance with equal opportunities legislation;
- trade union membership, in connection with your rights as an employee, agent or contractor and our obligations as an employer or engager of your services;
- categories of your personal data which are relevant to investigating complaints made by you or others, for example concerning discrimination, bullying or harassment, or as part of a complaint made against the School;
- data about any criminal convictions or offences committed by you, for example when conducting criminal background checks with the DBS, or via a self-declaration, or where a matter of public record (online or by any media), or where it is necessary to record or report an allegation (including to police or other authorities, with or without reference to you);

We will process special categories of personal data for lawful reasons only, including because:

- you have given us your explicit consent to do so, in circumstances where consent is appropriate;

- it is necessary to protect your or another person's vital interests, for example, where you have a life-threatening accident or illness in the workplace and we have to process your personal data in order to ensure you receive appropriate medical attention;
- it is necessary for the purposes of carrying out legal obligations and exercising rights (both yours and ours) in connection with your employment or engagement by us;
- it is necessary in connection with some function in the substantial public interest, including:
 - the safeguarding of children or vulnerable people; or
 - to prevent or detect unlawful acts; or
 - as part of a function designed to protect the public, pupils or parents from seriously improper conduct, malpractice, incompetence or unfitness in a role, or failures in service by the School (or to establish the truth of any such allegations) or
 - to cooperate with a relevant authority, professional or regulatory body (such as the ISI, DfE, LADO or TRA) in such matters.
- to comply with public health requirements (e.g. in respect of Covid-19 (or in similar circumstances)); or
- it is necessary for the establishment, exercise or defense of legal claims, such as where any person has brought a claim or serious complaint against us or you.

Low-level concerns about adults

We will process personal data about you, whether or not it constitutes special category data, in accordance with our policy on recording and sharing low-level concerns about adults. This will be processed for the same safeguarding and/or employment law reasons as set out above.

Such records are subject to the rules on retention set out in the School's Low Level Concerns Policy, and you have the same rights in respect of that information, as any other personal data that we hold on you. However, any requests to access, erase or amend personal data we hold in accordance with this policy may be subject to necessary exemptions, for example if we consider that compliance with the request might unreasonably impact the privacy rights of others or give rise to a risk of harm to children.

As a general rule, records of low-level concerns will be kept for up to 7 years following the termination of your employment, but may need to be retained longer e.g. where relevant, individually or cumulatively, to any employment, disciplinary or safeguarding matter. Low-level concerns will not be included in references unless they relate to issues which would normally be included in reference, for example, misconduct or poor performance. A low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in a reference.

Sharing your information with others

For the purposes referred to in this privacy notice and relying on the bases for processing as set out above, we may share your personal data with certain third parties. We may disclose limited personal data (including in limited cases special category or criminal data) to a variety of recipients including:

- other employees, agents and contractors (e.g. third parties processing data on our behalf as part of administering payroll services, the provision of benefits including pensions, IT etc. – although this is not sharing your data in a legal sense, as these are considered data processors on our behalf);
- DBS and other government authorities (e.g. HMRC, DfE, CAF/CASS, police, Home Office, a relevant public health/NHS body and /or local authority) and/or appropriate regulatory bodies e.g. the TRA, the ISI, the Charity Commission;
- external auditors or inspectors;

- our advisers where it is necessary for us to obtain their advice or assistance, including insurers, lawyers, accountants, or other external consultants;
- third parties and their advisers in the unlikely event that those third parties are acquiring or considering acquiring all or part of our School or we are reconstituting or setting up some form of joint working or partnership arrangement in the unlikely event that those third parties are acquiring or considering acquiring all or part of our School, or we are reconstituting or setting up some form of joint working or partnership arrangement in the UK or abroad;
- when the school is legally required to do so (by a court order, government body, law enforcement agency or other authority of competent jurisdiction), for example HM Revenue and Customs or police.

We may also share information about you with other employers in the form of a reference, where we consider it appropriate, or if we are required to do so in compliance with our legal obligations. References given or received in confidence may not be accessible under your UK GDPR rights.

How long your information is kept

Personal data relating to staff is retained for 7 years post termination.

Personal data relating to unsuccessful job applicants is deleted within twelve months of the end of the application process, except where we have notified you we intend to keep it for longer and you have not objected.

Subject to any other notices that we may provide to you, we may retain your personal data for a period of seven years after your contract has expired or been terminated.

However, some information may be retained for longer than this, for example incident reports and safeguarding files, in accordance with specific legal requirements.

Your rights

Please see the School's external Privacy Notice which has details of your rights as a 'data subject', which are the same as if you were any member for the public. You can find out more about your rights under applicable data protection legislation from the Information Commissioner's Office website available at www.ico.org.uk.

As a guide, you have the following rights:

- to obtain access to, and copies of, the personal data that we hold about you;
- to require us to correct the personal data we hold about you if it is incorrect;
- to require us (in certain circumstances) to erase your personal data;
- to request that we restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal);
- to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller;
- to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply. The School will endeavour to respond to any such requests as soon as is reasonably practicable and in any event within statutory time-limits (which is generally one month, but actually fulfilling more complex or multiple requests, e.g. those involving third party information, may take 1-2 months longer).

You can find out more about your rights under applicable data protection legislation from the Information Commissioner's Office website available at www.ico.org.uk.

This notice

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

Contact and complaints

If you have any queries about this privacy notice or how we process your personal data, or if you wish to exercise any of your rights under applicable law, you may contact the Director of Finance & Operations or refer the matter through the staff grievance procedure.

If you are not satisfied with how we are processing your personal data, or how we deal with your complaint, you can make a complaint to the Information Commissioner: www.ico.org.uk. The ICO does recommend you seek to resolve any issues with the data controller initially prior to any referral.

SECTION E - COMMUNICATIONS AND INFORMATION

1. COMMUNICATIONS

The School strongly believes in effective communication of information to all employees in order to promote a greater understanding of the School's activities, the issues it faces and the direction it is taking. The School also values the comments and ideas of staff. The methods used for communication are designed to encourage a two-way exchange between management and staff. In order to be truly effective, the full commitment of everyone within the School is essential.

Staff Briefings are held each Monday morning during Break Time in the Staff Room and usually include important Safeguarding Updates. These meetings are followed up with an email to all staff from the Head Master's PA, Mrs Simone Garfield.

Informal Communications

Notwithstanding all the more structured communications systems operated within the school, effective communications depend ultimately upon mutual trust and respect between the parties on a day to day basis to promote positive relationships and to avoid conflict. Your sustained support and co-operation is, of course, encouraged and will produce better relationships and an amicable working environment.

2. CONFIDENTIALITY

Any School information/records including details of pupils, parents and employees whether actual, potential or past, other than those contained in authorised and publicly available documents, must be kept confidential unless the Head's prior written consent has been obtained. This requirement exists both during and after your employment. In particular, you must not use such information for the benefit of any future employer.

The law states that where a teacher is facing an allegation of a criminal offence involving a pupil registered at the School, the teacher concerned is entitled to anonymity until the teacher is either charged with an offence, the Secretary of State [or the General Teaching Council for Wales] publishes information about an investigation or decision in a disciplinary case arising from the allegation, the anonymity is waived by the teacher or a judge lifts the restrictions in response to a request to do so.

If publication is made on behalf of the School, the School, including senior management and governors, could be prosecuted. If a teacher is charged with such an offence, all communication must be directed through the Head/a nominated governor who will have authority to deal with the allegation and any enquiries to ensure that this restriction is not breached. If a member of staff is found to have breached (whether intentionally or otherwise) this duty, any accusations will be dealt with under the School's Disciplinary Procedure.

3. WHISTLEBLOWING

The School has adopted this policy and the accompanying procedure on whistleblowing to enable members of staff to raise concerns internally and in a confidential fashion about fraud, malpractice, health and safety, criminal offences, miscarriages of justice, a failure to comply with legal obligations, inappropriate behaviour or unethical conduct. The policy also provides, if necessary, for such concerns to be raised outside the organisation.

About this Policy

The School is committed to conducting its business with honesty and integrity, and expects all staff to maintain high standards in accordance with the Staff Code of Conduct. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A

culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

Aims

The School's policy on whistleblowing is intended to demonstrate that it:

- will not tolerate malpractice;
- encourages staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated, as appropriate;
- respects the confidentiality of staff raising concerns and will provide procedures to maintain confidentiality so far as is consistent with progressing the issues effectively;
- will provide the opportunity to raise concerns outside of the normal line management structure where this is appropriate;
- will only invoke the School's disciplinary procedure in the case of false, malicious, vexatious or frivolous allegations. The policy seeks to reassure staff that they can raise genuine concerns without fear of reprisal, even if they turn out to be mistaken; and
- will provide a clear and simple procedure for raising concerns, which is accessible to all members of staff.

Scope of this policy

This procedure is separate from the School's adopted procedures regarding grievances. Individuals should not use the whistleblowing procedure to raise concerns relating to their own personal circumstances, such as the way they have been treated at work. In those cases, the School's Grievance Procedure or Anti-Harassment and Bullying Policy should be used, as appropriate. If you are uncertain whether something is within the scope of this procedure you should seek advice from the Head.

This procedure is to enable members of staff to express a legitimate concern regarding suspected malpractice within the School.

What is whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing, malpractice or dangers at work. Malpractice is not easily defined; however, it includes allegations of fraud, financial irregularities, corruption, bribery, dishonesty, acting contrary to the staff code of ethics, criminal activities, or failing to comply with a legal obligation, a miscarriage of justice, or creating or ignoring a serious risk to health, safety or the environment (negligence).

A whistleblower is a person who raises a genuine concern relating to suspected malpractice within the School. If you have any genuine concerns related to suspected malpractice affecting any of the School's activities (a whistleblowing concern) you should report it under this procedure.

If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may report their concerns to other whistleblowing channels, such as:

- Protect (an independent whistleblowing charity), previously known as Public Concern at Work (helpline: 0203 117 2502, email: whistle@protect-advice.org.uk, website: www.pcaw.co.uk).
- The NSPCC whistleblowing helpline (tel: 0800 028 0285 or email: help@nspcc.org.uk).

Confidentiality

We hope that staff will feel able to voice whistleblowing concerns openly under this procedure. However, if you wish to raise a concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating the concern to know your identity, this will be discussed with you.

If there is evidence of criminal activity, then the Police will in all cases be informed.

We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should discuss this with the Head and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt you can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are set out above.

Raising a whistleblowing concern

We hope that in many cases you will be able to raise any concerns with your line manager or a member of the SLT. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to the Head, Deputy or Director of Finance & Operations.

However, where the matter is more serious, or you feel that your line manager or SLT member has not addressed your concern, or you prefer not to raise it with them for any reason, you are at liberty to raise a whistleblowing concern to the Head, Deputy or the Director of Finance & Operations directly. If you feel unable to approach them directly, then the Chair of Governors should be the first point of contact.

A meeting will be arranged with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this procedure. Your companion must respect the confidentiality of your disclosure and any subsequent investigation. You may be required to attend additional meetings in order to provide further information as the concerns raised are investigated.

Any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued. You will be kept informed of the progress of the investigation and its likely timescale. Whenever possible and subject to third party rights, you will be informed of the resolution. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If you are not satisfied that your concern is being properly dealt with you will have a right to raise it in confidence with the Chair of the Governing Body. Alternatively, you can follow the external procedure below.

External Procedures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in School. In most cases you should not find it necessary to alert anyone externally.

However, where all internal procedures have been exhausted, a member of staff shall have a right of access to an external person/body. This may include (depending on the subject matter of the disclosure) HMRC, the Audit Commission, the Health and Safety Executive and/or the Local Authority Designated Officer (where the disclosure relates to a child protection issue).

It will very rarely, if ever, be appropriate for you to alert the media.

It should be noted that under the Public Interest Disclosure Act 1998, there are circumstances where a member of staff may be entitled to raise a concern directly with an external body where the individual reasonably believes:

- that exceptionally serious circumstances justify it;
- that the School would conceal or destroy the relevant evidence;
- where they believe they would be victimised by the School;
- where the Secretary of State has ordered it.

We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern.

Malicious Accusations

False, malicious, vexatious or frivolous accusations will be dealt with under the School's Disciplinary Procedure.

Protection from Reprisal or Victimisation

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

No member of staff will suffer a detriment or be disciplined for raising a genuine and legitimate concern, providing that they do so in good faith and following the Whistleblowing procedures. If you believe you have suffered any such treatment, you should inform the Head or Director of Finance & Operations immediately. If the matter is not remedied, you may raise it formally using the School's Grievance procedure.

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action.

4 CCTV AND SURVEILLANCE SYSTEMS POLICY FOR STAFF

4.1 Purpose and Scope

We use CCTV cameras to view and record individuals on and around the School site in order to maintain a safe environment for pupils, staff and visitors, and to protect School property. This policy relates to the use and management of CCTV throughout the School premises and should be read alongside our Data Protection Policy.

We recognise that the images of individuals recorded by CCTV cameras are personal data which must be processed in accordance with applicable Data Protection Legislation (as defined below) as well as the Information Commissioner's Office (ICO) CCTV guidance relating to the use of video surveillance. As a data controller, we have notified our use of personal data (which includes CCTV) with the ICO and seek to comply with its best practice guidance.

The purpose of this policy is to:

- outline why and how we will use CCTV, and how we will process data recorded by CCTV cameras;
- ensure that the legal rights of staff, relating to their personal data, are recognised and respected;
- assist staff in complying with their own legal obligations when working with personal data in certain circumstances, misuse of information generated by CCTV or other surveillance systems could constitute a criminal offence; and
- explain how to make a subject access request in respect of personal data created by CCTV.

This policy does not form part of any contract of employment or other contract to provide services, and we may amend it at any time.

We take compliance with this policy very seriously. Failure to comply puts at risk the individual's whose information is being processed, carries the risk of significant civil and criminal sanctions for the individual and for us, and may, in some circumstances, amount to a criminal offence by the individual. As a result, breach of this policy may be treated as a disciplinary matter and, following investigation, may be regarded as misconduct leading to disciplinary action, up to and including dismissal.

4.2 Definitions

For the purposes of this policy, the following terms have the following meanings:

- **Biometric Data:** means personal data resulting from specific technical processing relating to the physical, physio-logical or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or fingerprint data, as defined at Article 4(14) UK GDPR.
- **CCTV:** means fixed and domed cameras designed to capture and record images of individuals and property.
- **Data:** is information which is stored electronically, or in certain paper-based filing systems. In respect of CCTV, this generally means video images. It may also include static pictures such as printed screen shots.
- **Data subjects:** means all living individuals about whom we hold personal information as a result of the operation of our CCTV (or other surveillance systems).
- **Personal data:** means data relating to a living individual who can be identified from that data (or other data in our possession). This will include video images of identifiable individuals.
- **Data controllers:** are the people who, or organisation which, determine the manner in which any personal data is processed. They are responsible for establishing practices and policies to ensure compliance with the law. We are the data controller of all personal data used in our School for our own purposes.
- **Data users:** are those of our employees whose work involves processing personal data. This will include those whose duties are to operate CCTV cameras and other surveillance systems to record, monitor, store, retrieve and delete images. Data users must protect the data they handle in accordance with this policy and our Data Protection Policy.
- **Data processors:** are any personal or organisation that is not a data user (or other employee of a data controller) that processes data on our behalf and in accordance with our instructions (for example, a supplier which handles data on our behalf);
- **Data Protection Legislation:** means the Retained Regulation (EU) 2016/679, the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018), and related laws including but not limited to, the Human Rights Act 1998.
- **Processing:** is any activity which involves the use of data. It includes obtaining, recording or holding data, or carrying out any operation on the data including organising, amending, retrieving, using, disclosing or destroying it. Processing also includes transferring personal data to third parties.
- **Surveillance systems:** means any devices or systems designed to monitor or record images of individuals or information relating to individuals. The term includes CCTV systems as well as any technology that may be introduced in the future that capture information of identifiable individuals or information relating to identifiable individuals.

4.3 Reasons for the use of CCTV

We have considered and determined that the purposes for which CCTV is deployed are legitimate, reasonable, appropriate and proportionate. For ease of reference, CCTV systems are deployed around the School site on the legal basis set out in our Privacy Notice and its purpose is in order to:

- deter crime and assist in the prevention and detection of crime and/or serious breaches of policies and procedures;
- protect buildings and assets from damage, disruption, vandalism and other crime;
- assist with the identification, apprehension and prosecution of offenders;
- for the personal safety of pupils, staff, visitors and other members of the public;
- to assist in day-to-day management, including ensuring the health and safety of staff and others; and
- assist internal investigations.

This list is not exhaustive and other purposes may be or become relevant as set out in our Privacy Notice.

The CCTV system will not be used to:

- record sound unless in accordance with the policy on covert recording (see below);
- for any automated decision taking; or
- monitoring private and/or residential areas or premises.

Before installing and using CCTV systems on our premises, we have:

- assessed and documented the appropriateness of and reasons for using CCTV;
- established and documented who is responsible for day-to-day compliance with this policy; and
- ensured signage is displayed to inform individuals that CCTV is in operation, and that CCTV operations are covered in appropriate policies.

We keep a record of the CCTV installed and used.

Once installed, reviews will be regularly undertaken to ensure that the use of CCTV systems and the processing of personal data obtained through it remains justified.

4.4 Monitoring

Camera locations are chosen to minimise viewing spaces not relevant to the legitimate purpose of the monitoring. As far as practically possible, CCTV cameras will not focus on private homes, gardens or other areas of private property.

Surveillance systems will not be used to record sound.

Images are monitored by authorised personnel.

Staff using surveillance systems will be given appropriate training to ensure they understand and observe the legal requirements related to the processing of video and images captured by CCTV on this site.

4.5 How we will operate any CCTV

Where CCTV cameras are placed in the workplace, we will ensure that signs are clearly displayed in the vicinity of the cameras to alert individuals that their image may be recorded. Our CCTV signs will state:

- that we are responsible for CCTV recording;
- the legal purpose(s) of the CCTV recording and how recording may be used;
- how long recordings will be kept;
- that individuals can access recordings; and
- contact details for queries regarding the CCTV scheme.

We will ensure that live feeds from cameras and recorded images are only viewed by approved members of staff whose role requires them to have access to such data. This may include HR staff involved with disciplinary or grievance matters. Recorded images will only be viewed in designated, secure offices.

4.6 Data and Image Retention

Images and recording logs must be retained and disposed of in accordance with the Data Protection Policy. Images stored on removable media will similarly be erased or destroyed once the purpose of the recording is no longer relevant. Data will only be retained for legal and/or compliance reasons in accordance with the relevant Data Protection Policy.

In order to ensure that the rights of individuals recorded by the CCTV system are protected, we will ensure that data gathered from CCTV cameras is stored in a way that maintains its integrity and security. This may include encrypting the data, where it is possible to do so.

Given the large amount of data generated by surveillance systems, we may store video footage using a cloud computing system. We will take all reasonable steps to ensure that any cloud service provider maintains the security of our information, in accordance with industry standards.

We may engage data processors to process data on our behalf. We will ensure reasonable contractual safeguards are in place to protect the security and integrity of the data.

4.7 Retention and erasure of data gathered by CCTV

Exactly how long images will be retained for will vary according to the purpose for which they are being recorded. For example, where images have been authorised to be used for any disciplinary purpose or other legal reason, the footage must be retained in the relevant case file. The retention period for this file is set out in the School's Data Protection Policy.

At the end of their useful life, all images stored in whatever format will be erased permanently and securely. Any physical matter such as tapes, discs, still photographs and/or hard copy prints will be disposed of as confidential waste. We will maintain a log of when data is deleted.

4.8 Use of additional surveillance systems

Prior to introducing any new surveillance system, including placing a new CCTV camera in any workplace location, we will carefully consider if they are appropriate by carrying out a data privacy impact assessment (DPIA).

A DPIA is intended to assist us in deciding whether new surveillance cameras are necessary and proportionate in the circumstances and whether they should be used at all or whether any limitations should be places on their use.

Any DPIA will consider the nature of the problem that we are seeking to address at that time and whether the surveillance camera is likely to be an effective solution, or whether a better solution exists. In particular, we will consider the effect of a surveillance camera will have on individuals and therefore whether its use is a proportionate response to the problem identified.

The School will confine CCTV to areas where expectations of privacy are low. No surveillance cameras will be placed in areas where there is an increased expectation of privacy (for example, in changing rooms or toilets) unless, in very exceptional circumstances, it is judged to be necessary to deal with very serious concerns. In this situation we will always complete a DPIA and have regard to it before deciding whether to proceed.

4.9 Covert monitoring

Covert monitoring means monitoring carried out in a manner calculated to ensure those subject to it are unaware that it is taking place.

We will never engage in covert monitoring or surveillance unless, in very limited and highly exceptional circumstances, there are reasonable grounds to suspect that criminal activity or serious malpractice is

taking place within the workplace and, after suitable consideration (including the completion of a DPIA), we reasonably believe there is no less intrusive way to tackle the issue. If necessary, we will only undertake covert recording in accordance with the Data Protection Laws and ICO guidelines.

In the unlikely event that covert monitoring is considered to be justified, it will only be carried out with the express authorisation of the Head following receipt of advice from the Data Protection Lead. The decision to carry out covert monitoring will be fully documented and will set out how the decision to use covert means was reached and by whom. The risk of intrusion on innocent workers will always be a primary consideration in reaching any such decision. The Data Protection Lead will have regard to the completed DPIA when making their decision.

Only limited numbers of people will be involved in any covert monitoring.

Covert monitoring will only be carried out for a limited and reasonable period of time consistent with the objectives of making the recording and will only relate to the specific suspected illegal or unauthorised activity. Its use should be immediately stopped when that specific investigation has been completed. Any decision to use covert surveillance for any reason must be fully documented and records of such decision retained securely.

4.10 Requests for disclosure

No images from our CCTV cameras will be disclosed to any other third party, without express permission being given by the Head. Data will not normally be released unless satisfactory evidence is given that it is lawful to do so, e.g. when it is required for legal proceedings or under a court order.

In other appropriate circumstances, we may allow law enforcement agencies to view or remove CCTV footage where this is required in the detection or prosecution of crime.

We will maintain a record of all disclosures of CCTV footage, including the location to which the footage are being transferred to (if footage/images are being removed from the CCTV system), any crime incident number (if applicable) and the signature/written confirmation of receipt of the person to whom the images have been transferred.

No images from CCTV will ever be made public (including posting online) or disclosed to the media.

4.11 Subject access requests

Data subjects, including staff, may make a request for disclosure of their personal information and this may include CCTV images (subject access request). A subject access request should be made in writing in accordance with our Data Protection Policy and Staff Privacy Notice and it will be handled in line with data protection law and the School's applicable policies and procedures.

In order for us to locate relevant footage, any requests for copies of recorded CCTV images should normally include the date and timing of the recording, the location where the footage was captured and, if necessary, information identifying the individual (e.g. what they were wearing).

We may be required or permitted to obscure images of third parties (i.e. other individuals) when disclosing CCTV or other footage as part of a subject access request. We may also offer for you to view the footage on school premises if appropriate.

If we cannot comply with the request, the reasons for not being able to comply will be documented and the data subject will be advised of these in writing.

4.12 Requests to prevent processing

We recognise that, in certain circumstances, we may be required to stop processing personal data, if an individual requests it. Under data protection law individuals also have other legal rights with respect to

their data as listed and set out in the Staff Privacy Notice. For further information regarding this, please contact the Director of Finance & Operations.

4.13 Complaints

If any member of staff has any concerns about our use of CCTV, they should speak to the Director of Finance & Operations in the first instance. Where this is not appropriate, or matters cannot be resolved informally, employees should use the School's formal Grievance Procedure.

If a complainant or enquirer is not satisfied with the response received, they are entitled to write to the ICO. Details of how to do this can be found on the ICO website: www.ico.org.uk.

4.14 Enforcement and Compliance

All authorised users of our surveillance technology and its underlying data are required to adhere to the controls around the use of CCTV as set out in this policy and as may be advised separately from time to time. The use of the CCTV systems for any other purpose other than those specifically authorised will be subject to a full investigation and could lead to disciplinary action up to and including dismissal without notice.

The misuse of our surveillance systems and unauthorised use of images and CCTV footage may constitute a criminal offence.

Any concerns regarding the use of CCTV should be shared with the Director of Finance & Operations.

USE OF E-MAIL, INTERNET AND COMMUNICATION SYSTEMS About this policy

Our IT and communication systems are intended to promote effective communication and working practices within the School. This policy outlines the standards you must observe when using these systems, the circumstances in which we will monitor your use, and the action we will take in respect of breaches of these standards.

Misuse of IT and communication systems can damage the School and its reputation and may result in legal and financial liability. Hence, breaches of this policy may be dealt with in accordance with the School's Disciplinary Procedure.

You must familiarise yourself with this policy and comply with its terms. You should also refer to the School's Data Protection Policy and Privacy Notice and, where appropriate, to our other relevant policies including in relation to Social Media.

General

- This policy applies to the use of all internet and electronic mail facilities and communication systems, multi-user computers, workstations, micro-computers, and any networks and systems connecting them provided by the School; and
- all hardware owned, leased, rented or otherwise provided by you and connected to or otherwise accessing School networks or other facilities. Hardware owned, leased, rented or otherwise provided by staff may be directly connected only by arrangement with, and with the explicit approval of the Head of IT.

If you are connecting or otherwise accessing School networks or other facilities using a personal device, you must comply with the relevant policy.

Personal use of our systems

The School acknowledges that personal use of its systems may occur from time to time. Incidental use of email, internet and communication systems for personal purposes is permitted, subject to certain conditions as set out below.

Personal use must meet the following conditions:

- use must be minimal and take place substantially out of normal working hours;
- personal emails should be labelled “personal” in the subject header;
- use must be in accordance with this policy;
- use must not disrupt staff duties or commitments; and
- use must not incur costs to the School.

You should be aware that personal use of our systems may be monitored (as set out below).

Personal use is a privilege and not a right. It must not be overused or abused. Abuse or excessive use of email, the internet and/or other communication systems will be dealt with through the Disciplinary Procedure. We may withdraw permission for personal use at any time or restrict access at our discretion.

Prohibited use of our systems

You must not interfere with the work of others or the system itself. The facilities must be used in a responsible manner - in particular, you must not:

- create, transmit or cause to be transmitted material which is designed or likely to cause annoyance, inconvenience, needless anxiety or offence, and you must not create, transmit or cause to be transmitted offensive, obscene or indecent material;
- create, transmit or cause to be transmitted defamatory material;
- create, transmit or cause to be transmitted material such that the copyright of another person is infringed;
- download any files unless virus scanned;
- use networked computing equipment for playing computer games or online gambling;
- gain deliberate unauthorised access to facilities or services accessible via local or national networks;
- transmit by e-mail any confidential information of the School otherwise than in the normal course of your duties;
- send any message internally or externally which is abusive, humiliating, hostile or intimidating;
- join any mailing groups or lists without the consent of the School.
- gain unauthorised access to or violate the privacy of other people's files, corrupt or destroy other people's data or disrupt the work of other people;
- disclose passwords to third parties without the consent of the School.

Misuse of the internet can in some circumstances be a criminal offence. In particular, it will usually amount to gross misconduct to misuse our systems by creating, viewing, accessing, transmitting or downloading any of the following material (this list is not exhaustive): pornographic material, offensive, obscene, or criminal

material, or material which is liable to cause embarrassment; material which is discriminatory, or material which is or may be offensive.

Email

You must:

- ensure that you use the School standard e-mail sign off and disclaimer for all external e-mail;
- produce and write e-mails with the care normally given to any form of written communication;
- appreciate that electronic mail is relatively insecure and consider security needs and confidentiality before transmission;
- be vigilant when using our email system and particularly cautious in relation to unsolicited emails from unknown sources;
- not send messages from another person's email address (unless authorised in the proper performance of their duties) or under an assumed name; and
- inform the sender if you receive an email in error.

You should be mindful that email messages may be disclosed in legal proceedings in the same way as paper documents. Deletion from a user's inbox or archives does not mean that an email cannot be recovered for the purposes of disclosure. All email messages should be treated as potentially retrievable, either from the main server or using specialist software.

Using the internet

Internet access is provided primarily for work purposes. Occasional personal use may be permitted (as set out above).

Postings placed on the internet may display the School's address. For this reason, you should make certain before posting information that the information reflects our standards and policies. Under no circumstances should information of a confidential or sensitive nature be placed on the internet. You must not use the School's name in any internet posting (inside or outside work) unless it is for a work-related purpose.

You should be mindful that when a website is visited, devices such as cookies, tags or web beacons may be employed to enable the site owner to identify and monitor visitors.

We may block or restrict access to any website at our discretion.

Monitoring

The School's systems enable us to monitor telephone, email, voicemail, internet and other communications. For business reasons, and in order to carry out our legal obligations in our role as an employer, use of our systems including the telephone and computer systems, and any personal use of them, may be continually monitored by automated software or otherwise.

Monitoring is only carried out to the extent permitted or as required by law and as necessary and justifiable for business purposes.

The School reserves the right to monitor staff communications in order to

- establish the existence of facts;
- ascertain compliance with regulatory or self-regulatory procedures;
- monitor standards which are achieved by persons using the system in the course of their duties and for staff training purposes;
- prevent or detect crime;
- investigate or detect unauthorised use of the School's telecommunication system;
- ensuring the effective operation of the system such as protecting against viruses, backing up and making routine interceptions such as forwarding e-mails to correct destinations; and
- gain access to routine business communications for instance checking voice mail and e-mail when staff are on holiday or on sick leave.

We reserve the right to retrieve the contents of email messages or check internet usage (including pages visited and searches made) as reasonably necessary in the interests of the business, including for the following purposes (this list is not exhaustive):

- to monitor whether the use of the email system or the internet is legitimate and in accordance with this policy;
- to find lost messages or to retrieve messages lost due to computer failure;
- to assist in the investigation of alleged wrongdoing; or
- to comply with any legal obligation.

Equipment Security and Passwords

You are responsible for the security of the equipment allocated to or used by you and must not allow it to be used by anyone other than in accordance with this policy.

You are responsible for the security of any computer terminal used by you. You should lock your terminal or log off when leaving it unattended or on leaving the School, to prevent unauthorised users accessing the system in your absence. Anyone who is not authorised to access our network should only be allowed to use computer terminals under supervision.

Desktop PCs and cabling for telephones or computer equipment should not be moved or tampered with without first consulting a member of the IT Services Department.

You should use passwords on all IT equipment, particularly items that you take out of School. You must keep your passwords confidential and change them regularly. You must not use another person's username and password or make available or allow anyone else to log on using your username and password unless authorised by the Director of Human Resources. On the termination of employment (for any reason) you must provide details of your passwords to your Head of Department and return any equipment, key fobs or cards.

If you have been issued with a laptop, tablet computer, smartphone or other mobile device, you must ensure that it is kept secure at all times, especially when travelling. Passwords must be used to secure access to data kept on such equipment to ensure that confidential data is protected in the event of loss or theft. You should also be aware that when using equipment away from the workplace, documents may be read by third parties, for example, passengers on public transport.

Systems and data security

You should not delete, destroy or modify existing systems, programmes, information or data (except as authorised in the proper performance of your duties).

You must not download or install software from external sources without authorisation from the IT Department. This includes software programmes, instant messaging programmes, screensavers, photos, video clips and music files (incoming files and data should always be virus-checked by the IT Department before they are downloaded. If in doubt, staff should seek advice from the IT Department.

You must not attach any device or equipment to our systems without authorisation from the IT Department. This includes any USB flash drive, MP3 player, tablet, smartphone or other similar device, whether connected via the USB port, infra-red connection or in any other way.

We monitor all emails passing through our system for viruses. You should exercise particular caution when opening unsolicited emails from unknown sources or an email which appears suspicious (for example, if it contains a file whose name end in .exe). Inform the IT Department immediately if you suspect your computer may have a virus. We reserve the right to delete or block access to emails or attachments in the interests of security. We also reserve the right not to transmit any email message.

You should not attempt to gain access to restricted areas of the network, or to any password-protected information, except as authorised in the proper performance of your duties.

You must be particularly vigilant if you use our IT equipment outside the workplace and take such precautions as we may require from time to time against importing viruses or compromising system security. The system contains information which is confidential and/or subject to data protection legislation. Such information must be treated with extreme care and in accordance with our Data Protection Policy.

5. BRING YOUR OWN DEVICE TO WORK

Policy statement

We recognise that many of our staff have personal mobile devices (such as tablets, smartphones and handheld computers), which they could use for work purposes, and that there can be benefits for both us and staff, including increased flexibility in our working practices, in permitting such use. However, the use of personal mobile devices for work purposes gives rise to increased risk in terms of the security of our IT resources and communications systems, the protection of confidential and proprietary information, and compliance with legal obligations.

Anyone covered by this policy may use a personal mobile device for work purposes, subject to adherence to the terms of this policy.

Who is covered by the policy?

This policy covers all individuals working at Immanuel College (collectively referred to as **staff** in this policy).

Scope and purpose of the policy

This policy applies to staff who use a personal mobile device including any accompanying software or hardware (referred to as a **device** in this policy) for work purposes. It applies to use of the device both during and outside School hours and whether or not use of the device takes place at School.

This policy applies to all devices used to access our IT resources and communications systems (collectively referred to as **systems** in this policy), which may include (but are not limited to) smartphones, mobile or cellular phones, PDAs, tablets, and laptop or notebook computers.

When you access our systems you may be able to access data about the School, including information which is confidential, proprietary or private (collectively referred to as **school data** in this policy).

When you access our systems using a device, we are exposed to a number of risks, including from the loss or theft of the device, the threat of malware and the loss or unauthorised alteration of school data. Such risks could result in damage to our systems, our business and our reputation.

Breach of this policy may lead to us revoking your access to our systems, whether through a device or otherwise. It may also result in disciplinary action up to and including dismissal.

Connecting devices to our systems

Connectivity of all devices is centrally managed by the IT Department, who must approve a device before it can be connected to our systems. We reserve the right to refuse or remove permission for your device to connect with our systems. You are not permitted to connect any device to our system other than a device that has been approved by us.

In order to access our systems, it may be necessary for the IT Department to install software applications on your device. If you remove any such software, your access to our systems will be disabled.

For the avoidance of doubt, this does not include connecting personal devices to our WIFI network.

Monitoring

The contents of our systems and school data are our property. All materials, data, communications and information, including but not limited to e-mail (both outgoing and incoming), telephone conversations and voicemail recordings, instant messages and internet and social media postings and activities, created on, transmitted to, received or printed from, or stored or recorded on a device (collectively referred to as content in this policy) during the course of business or on our behalf is our property, regardless of who owns this device.

We reserve the right to monitor, intercept, review and erase, without further notice, all content on the device that has been created for us or on our behalf. This might include, without limitation, the monitoring, interception, accessing, recording, disclosing, inspecting, reviewing, retrieving and printing of transactions, messages, communications, postings, log-ins, recordings and other uses of the device, whether or not the device is in your possession.

It is possible that personal data may be inadvertently monitored, intercepted, reviewed or erased. You should have no expectation of privacy in any data on the device. Staff are advised not to use our systems for any matter intended to be kept private or confidential.

Monitoring, intercepting, reviewing or erasing of content will only be carried out to the extent permitted by law in order for us to comply with a legal obligation or for our legitimate school purposes, including, without limitation, in order to:

- prevent misuse of the device and protect school data;
- ensure compliance with our rules, standards of conduct and policies in force from time to time (including this policy);
- monitor performance at work; and

- ensure that staff members do not use our facilities or systems for any unlawful purposes or activities that may damage the school, its systems or reputation.

We may also store copies of any content for a period of time after they are created and may delete such copies from time to time without notice. We may obtain and disclose copies of such content or of the entire device (including personal content) for litigation or investigations.

You acknowledge that the School is entitled to conduct such monitoring where it has a legal obligation or legitimate basis to do so, and that (without further notice or permission) we have the right to copy, erase or remotely wipe the entire device (including any personal data stored on the device).

Whenever we monitor personal data it will be carried out in line with the school's policies and government guidance such as KCSIE. This is also set out in the School's Staff Privacy Notice.

You acknowledge that you use the device at your own risk and that we will not be responsible for any losses, damages or liability arising out of its use, including any loss, corruption or misuse of any content or loss of access to or misuse of any device, its software or its functionality.

Security requirements

You must comply with the Use of Phone, E-Mail systems and Internet Policy in our Staff Handbook when using your device to connect to our systems.

We reserve the right, without further notice or permission, to inspect your device and access data and applications on it, and remotely review, copy, disclose, wipe or otherwise use some or all of the school data on it for legitimate business purposes.

You must co-operate with us to enable such inspection, access and review, including providing any passwords or pin numbers necessary to access the device or relevant applications.

If we discover or reasonably suspect that there has been a breach of this policy, including any of the security requirements listed above, we shall immediately remove access to our systems and, where appropriate, remove any school data from the device. Although we do not intend to wipe other data that is personal in nature (such as photographs or personal files or e-mails), it may not be possible to distinguish all such information from school data in all circumstances. You should regularly backup any personal data contained on the device.

You acknowledge that, without further notice or permission, we may need to inspect a device and applications used on it, and remotely review, copy, disclose, wipe or otherwise use some or all of the data on or from a device for legitimate business purposes.

Lost or stolen devices and unauthorised access

In the event of a lost or stolen device, or where a staff member believes that a device may have been accessed by an unauthorised person or otherwise compromised, the staff member must report the incident to the IT Department immediately.

Appropriate steps will be taken to ensure that school data on or accessible from the device is secured, including remote wiping of the device where appropriate. The remote wipe will destroy all school data on the device (including information contained in a work e-mail account, even if such e-mails are personal in nature).

Although we do not intend to wipe other data that is strictly personal in nature (such as photographs or personal files or e-mails), it may not be possible to distinguish all such information from school data in all circumstances. You should regularly backup all personal data stored on the device.

Procedure on termination of employment

On your last day of work, or your last day before commencing a period of garden leave, all school data (including work e-mails), and any software applications provided by us for work purposes, will be removed from the device. If this cannot be achieved remotely, the device must be submitted to the IT Department for wiping and software removal. You must provide all necessary co-operation and assistance in relation to this process.

Personal Use

We have a legitimate basis or legal obligation to access and protect school data stored or processed on your device, including the content of any communications sent or received from the device. Where we are relying on our legitimate interests, we recognise the need to balance our need to process data for legitimate purposes, with your expectations of privacy in respect of your personal data. Therefore, when taking (or considering taking) action to access your device or delete data on your device (remotely or otherwise) in accordance with this policy, we will, where practicable:

- consider whether the action is proportionate in light of the potential damage to the School, its pupils or other people impacted by school data;
- consider if there is an alternative method of dealing with the potential risks to the School's interests (recognising that such decisions often require urgent action);
- take reasonable steps to minimise loss of your personal data on your device, although we shall not be responsible for any such loss that may occur; and
- delete any such personal data that has been copied as soon as it comes to our attention (provided it is not personal data, which is also school data, including all personal emails sent or received using our email system).

To reduce the likelihood of the School inadvertently accessing your personal data, or the personal data of third parties, you must comply with the following steps to separate school data from your personal data on the device:

- organise files within the device specifically into designated folders that clearly distinguish between school data and personal data (for example, marking your own folders as "PERSONAL");
- do not use work email for personal purposes but if you do ensure that it is labelled appropriately in the subject line;
- regularly back up all personal data stored on the device.

Appropriate use

You should never access or use our systems or school data through a device in a way that breaches any of our other policies. Any breach may result in disciplinary action up to and including dismissal.

You must not talk, text, email or otherwise use a device while operating a school vehicle or while operating a personal vehicle for school purposes. You must comply with any applicable law concerning the use of devices in vehicles.

Who is responsible for this policy?

The Head/Director of Finance & Operations in conjunction with the IT Department shall have overall responsibility for the effective operation of this policy and shall be responsible for reviewing this policy to ensure that it meets legal requirements and reflects best practice.

6. INVENTIONS, PATENTS, COPYRIGHT

You are required to inform the School immediately of any invention, improvement, discovery, process, design or copyright which you create or obtain whilst in the School's employment or as a consequence of it. This will become the absolute property of the School except as otherwise stated by statute. You irrevocably waive all moral rights under the Copyright, Designs and Patents Act 1988 in any existing or future works created by you.

7. COMMUNICATIONS WITH THE MEDIA

You must not speak to or communicate with the media on matters concerning the School's affairs or regarding your position in the School without the prior written permission of the Head or Director of Finance & Operations. This includes postings on social media, e-petitions etc where you may be identified as an employee of the school.

8. SOCIAL MEDIA POLICY

This policy is in place to minimise the risks to the School through use of social media by staff. It is designed to help staff use these platforms and services responsibly, to minimise the risks and to ensure consistent standards of use of social media.

A social networking site is any website which enables its users to create profiles, form relationships and share information with other users. It also includes sites which have online discussion forums, chat-rooms, media posting sites, blogs and any other social space online. It includes but is not limited to, sites such as Facebook, Snapchat, Instagram, Ping, YouTube, TikTok, Twitter and Wikipedia.

It is not intended to affect your ability to use social media if appropriate for purely professional purposes.

This policy applies to the use of social media for both business and personal purposes, whether during School/working hours or otherwise. The policy applies regardless of whether the social media is accessed using our IT facilities and equipment or equipment belonging to members of staff or any other IT equipment.

Breach of this policy may result in disciplinary action up to and including dismissal. Disciplinary action may be taken regardless of whether the breach is committed during working hours, and regardless of whether our equipment or facilities are used for the purpose of committing the breach. Any member of staff suspected of committing a breach of this policy will be required to co-operate with our investigation, which may involve handing over relevant passwords and login details so far as this is consistent with the right of an individual to private and family life.

Staff may be required to remove internet postings which are deemed to constitute a breach of this policy. Failure to comply with such a request may in itself result in disciplinary action.

Implementation of the policy

The Head has overall responsibility for the effective operation of this policy, but has delegated day to day responsibility for its operation to the Director of Finance & Operations/Deputy Head. Responsibility for monitoring and reviewing the operation of this policy and making recommendations for change to minimise risk also lies with the IT Department.

All Heads of Departments and line managers have a specific responsibility for operating within the boundaries of this policy, ensuring that all staff understand the standards of behaviour expected of them and if necessary, enforcing this policy by taking action when behaviour falls below its requirements.

All staff are responsible for the success of this policy and should ensure that they take the time to read and understand it. Any misuse of social media should be reported to the Director of Finance & Operations. Questions regarding the content or application of this policy should be directed to the Director of Finance & Operations.

Relationship with other School policies

If an internet post would breach any of our policies in another forum it will also breach them in an online forum. For example, staff are prohibited from using social media to:

- breach our Use of Email, Internet and Communications policies;
- breach our obligations with respect to the rules of relevant regulatory bodies;
- breach any obligations they may have relating to confidentiality;
- breach our Disciplinary Policy or related rules, policies and procedures;
- defame or disparage the School or our affiliates, parents, staff, pupils, business partners, suppliers, vendors or other stakeholders;
- harass or bully other staff in any way or breach our Anti-harassment and Bullying policy;
- unlawfully discriminate against other staff or third parties or breach our Equal Opportunities policy;
- breach our Data Protection Policy (for example, never disclose personal information about a colleague, pupil or parent online);
- breach any other laws or ethical standards (for example, never use social media in a false or misleading way, such as by claiming to be someone other than yourself or by making misleading statements).

Behaviour online can be permanent and so staff must be extra cautious about what they say as it can be harder to retract.

Staff must also be aware of the particular risks to internet security that social media presents and so to comply with the existing School policy on internet security must take any extra measures necessary not to allow any of their actions on social media sites to create vulnerability to any School systems.

Staff who breach any of the above policies will be subject to disciplinary action up to and including termination of employment.

General rules for the responsible use of social media

Staff must be aware that their role comes with particular responsibilities, and they must adhere to the School's strict approach to social media.

Staff must:

- ensure that wherever possible their privacy settings on social media sites are set so that pupils cannot access information related to their personal lives;
- obtain the prior written approval of the Head, to the wording of any personal profile which you intend to create where the School is named or mentioned on a social networking site;
- seek approval from the Head before they speak about or make any comments on behalf of the School on the internet or through any social networking site;
- report to their Head of Department or Line Manager immediately if they see any information on the internet or on social networking sites that disparages or reflects poorly on the School or raises any safeguarding concerns about pupils within the School;
- immediately remove any internet postings which are deemed by the School to constitute a breach of this or any other School policy;

- consider whether a particular posting puts their effectiveness as a teacher/staff member at risk; and
- post only what they want the world to see.

Staff must not:

- provide references for other individuals, on social or professional networking sites, as such references whether positive or negative can be attributed to the School and create legal liability for both the author of the reference and the School;
- post or publish on the internet or on any social networking site, any reference to the School, your colleagues, parents or pupils;
- use commentary deemed to be defamatory, obscene, proprietary or libellous. Staff must exercise caution with regards to exaggeration, colourful language, guesswork, obscenity, copyrighted material, legal conclusions, and derogatory remarks or characterisations;
- discuss pupils or colleagues or criticise the School or staff;
- post images that include pupils;
- harass or bully other members of staff;
- attempt to communicate with pupils on any personal social networking sites;
- initiate friendships with pupils on any personal social network sites;
- accept pupils as friends on any such sites; staff must decline any pupil-initiated friend requests and report to the DSL.

The use of social media for School purposes and in the School's name.

Social media should not be used for purposes relating to the School's business or the delivery of its curriculum to pupils unless the prior authority of the Head/Deputy Head has been obtained. Any breach of this restriction will be treated as a disciplinary matter. If you are permitted to use social media platforms in the School's name, in addition to complying with general rules above, you must also:

- clearly identify who you are, including your name and job title, and include contact details as appropriate as instructed by the Head;
- ensure that all arrangements with any third party in relation to your use of social media (e.g. online advertising search engine optimisation or other arrangements) are properly documented, notified and approved by the Head;
- ensure that your use of the School's logos and other branding material is consistent with the School's relevant policies and procedures;
- ensure that your communications are professional in tone rather than overly-informal; and
- link back to School's website as appropriate to highlight the School's offering.

Any social media accounts (including blogs, forums, twitter etc), sites or pages used or set up for the purpose of furthering the School's business or facilitating the provision of the curriculum to its pupils shall remain the property of the School and the Deputy Head must have access to it.

Personal use of social media

Personal use of social media is never permitted during working hours or by means of our computers, networks and other IT resources and communications systems (including via smartphones and tablets).

We prohibit staff from using their work email address for any personal use of social media.

The monitoring of social media

The School's Use of Email, Communications and Internet Guidance in particular in relation to the School's right to monitor, intercept and review communications applies equally to the use of social media platforms (and any postings and activities) made via the School's system or network. Any such monitoring will be for legitimate business purposes which include:

- ascertaining and demonstrating that our rules are being complied with;
- demonstrating that expected standards are being met by those using the systems; and
- for the detection and investigation of unauthorised use of the systems (including where this is necessary to prevent or detect crime).

This might include, without limitation, the monitoring, interception, accessing, recording, disclosing, inspecting, reviewing, retrieving and printing of transactions, messages, communications, postings, log-ins, recordings and other uses of the systems as well as keystroke capturing and other network monitoring technologies.

We may store copies of such data or communications for as long as is necessary for our legitimate business purposes in accordance with data protection law. We may delete such copies periodically or from time to time without notice when their retention is no longer necessary.

Do not use our IT resources and communications systems for any matter that you wish to be kept private or confidential from the School.

Social media and the end of employment

If a member of staff's employment with the School should end, for whatever reason, any personal profiles on social networking sites should be immediately amended to reflect the fact that you are no longer employed or associated with the School.

All professional contacts that a member of staff has made through their course of employment with us belong to the School, regardless of whether or not the member of staff has made social media connections with them.

On the termination of employment for any reason, and when requested by the School at any time, staff will provide to the IT Department any relevant passwords and other information to allow access to any social media site, page or account which has been used or set up for the purpose of furthering the School's business or facilitating the provision of its curriculum and will relinquish any authority they may have to manage or administer any such site, page or account.

9 HOMEWORKING POLICY

The School supports homeworking in appropriate circumstances either occasionally (to respond to specific circumstances or to complete particular tasks) and in some cases on a regular full or part-time basis. In addition, occasional or permanent homeworking can, in certain circumstances, be a means of accommodating a disability and can be requested as means of flexible working under our Flexible Working Policy.

This policy sets out how we will deal with requests for homeworking and conditions on which homeworking may be allowed. If you are allowed to work from home, either on an occasional, temporary or permanent basis, you must comply with this policy.

This policy covers all employees, consultants, contractors, volunteers, casual workers and agency workers. This policy does not form part of any employee's contract of employment and we may amend it at any time.

Working from home on an occasional or temporary basis

The School recognises there may be circumstances in which the ability to work from home on an occasional or temporary basis may be of benefit to you.

Working at home may be authorised in such circumstances by the Head or the Director of Human Resources where, in their opinion:

- you have work than effectively be undertaken at home; and
- working at home is cost-effective and any increase in work that may be passed to your colleagues as a result is kept to a minimum.

Any request to work from home, either on an occasional or permanent basis, must meet the needs of the School and be agreed in advance.

Applying for homeworking

You may want to vary your working arrangements so that, either permanently or for a fixed period, you work from home for all or part of your working week. You can make an application for homeworking which will be considered on its merits in accordance with the School's Flexible Working Policy. However, not all roles and not all jobs are suitable for homeworking.

A request for homeworking is unlikely to be approved, on either an occasional or permanent basis if:

- you need to be present in School to effectively perform your job;
- your most recent performance review identifies any aspect of your performance as unsatisfactory;
- you have an unexpired warning, whether relating to conduct of performance; or
- you need supervision to deliver acceptable quality and/or quantity of work.

If home working is permitted, we may ask for you to agree to a home visit by the Director of Human Resources/IT staff in order to carry out a risk assessment, install or service equipment, or to reclaim equipment on termination of your homeworking arrangement.

Any terms on which it is agreed that you may work from home will include the following:

- We reserve the right to terminate the homeworking arrangements, for example, if your role changes such that homeworking is no longer suitable, subject to reasonable notice.
- You will be subject to the same performance measures, processes and objectives that would apply if you worked in School.
- If you receive an unsatisfactory performance review or are subject to a written warning for any reason, your homeworking arrangements may be terminated immediately, and you will be expected to return to work at School.
- Your line manager will remain responsible for supervising you, will regularly review your homeworking arrangements and take steps to address any problems. They will ensure that you are kept up to date with news and information relevant to your work.
- You agree to attend the School or other reasonable location for meetings, training or other events which we expect you to attend as part of your role.

Working at or from home may affect your home and contents insurance policy, mortgage, lease or rental agreement. You must make any necessary arrangements with your insurers, bank, mortgage provider or landlord before commencing homeworking.

Equipment and suitable workspace

If you are permitted to work from home, it is your responsibility to ensure that you have sufficient and appropriate equipment for working from home. We are not responsible for the provision, maintenance, replacement, or repair, in the event of loss or damage to any personal equipment used by you when working for us.

We are not responsible for associated costs of you working from home including the costs of heating, lighting, electricity or telephone calls.

Data security and confidentiality

When working from home, all equipment and information must be kept securely. You should take all necessary steps to ensure that private and confidential material is always kept secure.

You may only use equipment which has been provided by or authorised by us. You agree to comply with our instructions relating to software security and to implement all updates to equipment as soon as you are requested to do so.

You confirm that you have read and understood our Use of Email, Internet and IT Systems Policy, Data Protection Policy, Social Media Policy and other IT and data security policies and that you will regularly keep yourself informed of the most current version of these policies.

If you discover or suspect that there has been an incident involving the security of information relating to the School, pupils, parents, or anyone working with or for the School, you must report it immediately to your line manager.

Health and safety

When working at home you have the same health and safety duties as other staff. You must take reasonable care of your own health and safety and that of anyone else who might be affected by your actions or omissions.

We retain the right to check home working areas for health and safety purposes. The need for such inspections will depend on the circumstances including the nature of the work undertaken.

You must not have meetings in person in your home with pupils or parents and must not give pupils, parents or school contacts your home address or telephone number.

You must ensure that your working patterns and levels of work both over time and during shorter periods are not detrimental to your health and wellbeing.

You must use your knowledge, experience and training to identify and report any health and safety concerns to your line manager.

Safeguarding and child protection

Whilst working from home you must at all times comply with the School's policies on safeguarding and child protection, including but not limited to, the School's Safeguarding Policy and Staff Code of Conduct.

SECTION F – HR MATTERS

1. PRINCIPLES

Our employment policies are designed to produce a framework within which all staff are treated in a fair and consistent manner. They have been developed to ensure that staff are aware of what is expected of them and what the school, for its part, offers in return.

The objectives are therefore to match the school's needs with staff satisfaction so far as is possible, but also to motivate employees towards the achievement of the school's primary purpose. To achieve this, several principles have been adopted in preparing our employment policies and these are as follows:

- To promote the utilisation of knowledge, skill and experience of all employees to ensure the efficient and timely operation of all the School's support services.
- To reflect a sensitivity to the attitudes and views of all employees.
- To offer opportunities for personal development and advancement, where this is possible, to all employees with the necessary ability, ambition and integrity, in order to meet the needs of the School.
- To provide pay and benefits that are fair and competitive for the job they hold.
- To support the good faith with which all employees and their representatives are dealt.

2. EMPLOYEE RELATIONS

The School places great value on good working relationships between employer and employee and between employees. Efforts are continuously directed towards maintaining a constructive relationship and finding mutually acceptable solutions to workplace problems and issues. To this end, the following basic principles apply:

- Achieve high performance standards by encouraging employee commitment and teamwork and promoting an attitude of trust.
- Maintain a work environment in which the personal dignity of each individual is respected and discrimination and harassment are not tolerated.
- Provide employment conditions that are competitive.
- Communicate regularly with employees about the School's objectives, achievements and significant developments.
- Recognise the right of every employee to present a complaint, to appeal against a decision and to receive a response within a reasonable time.

Many employers set out detailed disciplinary rules which apply to employees. Notwithstanding this, we have attempted to keep such rules to a minimum to demonstrate trust in our staff and confidence that normal standards of behaviour will prevail through self-discipline rather than through a rigid application of rules.

The rules we do have, therefore, are for a practical purpose and are in addition to the expectations which society has regarding acceptable behaviour. The aim is to promote efficient and safe working.

3. EQUAL OPPORTUNITIES POLICY

Immanuel College is an equal opportunities employer.

In order to promote an environment within which the school can call upon the widest possible range of knowledge, skill and experience, as well as ensuring compliance with the relevant legislation and codes of practice, we are committed to achieving and maintaining a workforce which represents the population within our recruitment area in terms of race or colour, nationality or national or ethnic origins, religion or belief, sex, sexual orientation, pregnancy or maternity, marital or civil partnership status, gender reassignment, age, and disability (together known as “**Protected Characteristics**”).

To this end, we shall regularly review the operation of our recruitment, promotion, training and development policies to ensure that no applicant for employment or member of staff is disadvantaged by conditions or requirements which cannot be shown to be justifiable.

No employee or prospective employee will receive unfair or unlawful treatment on the grounds of a Protected Characteristic, because they are perceived to have a Protected Characteristic or because they are associated with someone who has a Protected Characteristic, in particular but not only, in relation to:

- Recruitment and selection
- Promotion, transfer and training opportunities
- Benefits, terms and conditions of employment
- Grievance and disciplinary procedures
- Termination of employment including redundancies
- Conduct at work

Procedures are in place to ensure fair and equitable treatment in relation to the admission and assessment of pupils.

The principles of non-discrimination and equality of opportunity also apply to the way in which staff must treat visitors, pupils, parents, suppliers and former members of staff.

Immanuel College is a Modern Orthodox Jewish School and is registered with the Secretary of State as being of a designated religious character. This may be taken into account when recruiting staff where appropriate to do so.

Implementation

The School, with the assistance of the staff, will:

- Break down any barriers to equality of opportunity which may prevent staff members realising their full potential or accessing benefit
- Advertise vacancies and ensure job selection criteria are appropriate for the job.
- Promptly and fully investigate all complaints of discrimination and harassment, taking appropriate action where necessary.
- Ensure that all members of staff are fully informed and trained on this Policy.

- Monitor the composition of the School and the effects of its recruitment practices.
- Examine and review existing procedures to ensure they are not discriminatory in their operation.
- Ensure that the language used in official communication reflects the letter and spirit of the policy.

Recruitment and Selection

- The staffing process is governed by the school's principles of non-discrimination and is designed to achieve the best match between, on the one hand, the individual's knowledge and skills, experience and character and, on the other hand, the requirements of the vacant post, recognising the need for flexibility to respond to changing conditions.
- The capability of the individual to perform in the position will be the major selection criterion but the ability both to work with others and to be trained, coupled with individual potential will be considered.
- All applicants will be dealt with courteously and as expeditiously as possible.
- Carefully selected and validated skills and/or psychometric tests may be used as part of the selection process and will be administered by a trained tester.
- Shortlisted applicants will be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children.
- All offers of appointment shall be conditional on satisfactory completion of the pre-employment checks, as set out within KCSIE.

Training and Promotion

Training needs will be identified through regular performance reviews. Staff will be given appropriate access to training to enable them to progress within the School and all promotion decisions will be made on the basis of merit.

Termination of Employment

The School will ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory.

The School will also ensure that disciplinary procedures and penalties are applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

Disability

If you are disabled or become disabled, we encourage you to tell us about your condition so that we can support you as appropriate.

A disability will not of itself justify the non-recruitment of an applicant for a position at the School. Such reasonable adjustments to the application procedures shall be made as are required to ensure that applicants are not disadvantaged because of their disability. For example, where written tests are used, alternative arrangements will be made for visually impaired applicants.

If you experience difficulties at work because of your disability, you may wish to contact the Director of Human Resources to discuss any reasonable adjustments that would help overcome or minimise the difficulty. The Director of Human Resources may wish to consult with you and your medical adviser about possible adjustments and you may be required to give your consent to a report being produced about your state of health and ability to perform your duties. We will consider the matter carefully and try to accommodate your needs within reason. If we consider a particular adjustment would not be reasonable, we will explain our reasons and try to find an alternative solution where possible. Once an adjustment has been made its operation may need to be reviewed at agreed intervals, to assess its continuing effectiveness.

The School will make such adjustments to work arrangements or School premises as are reasonable to enable a disabled staff member to carry out his or her duties. This will include, but is not limited to, consideration of the provision of specialist equipment, job redesign and/or flexible hours.

Where, during the course of their employment, a disabled member of staff recognises their need for a reasonable adjustment to be made to work arrangements or School premises, he or she should discuss this requirement with the Director of Human Resources.

Part-time and fixed term work

Part-time and fixed-term staff should be treated the same as comparable full-time or permanent staff and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate), unless different treatment is justified.

Breaches of this policy

We take a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Procedure. Serious cases of discrimination may amount to gross misconduct resulting in dismissal.

If you believe that you have been the subject of discrimination you can raise the matter informally in accordance with the Anti-Harassment and Bullying Policy, or formally through our Grievance Procedure. Complaints will be treated in confidence and investigated as appropriate.

There must be no victimisation or retaliation against staff who complain about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our Disciplinary Procedure.

4. ANTI-HARASSMENT AND BULLYING POLICY

The School is committed to providing a working environment free from harassment and bullying and ensuring all staff are treated, and treat others, with dignity and respect. You should not engage in any behaviour or conduct which may amount to harassment of another person at work. Harassment of any kind is regarded as a disciplinary offence and in serious instances may lead to instant dismissal.

This policy covers harassment or bullying which occurs at work and out of the workplace, such as on School trips or at work-related events or social functions. It covers bullying and harassment by staff (which may include volunteers, consultants, contractors and agency workers) and by third parties such as parents, suppliers or visitors to our premises.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

What is harassment?

Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment.

It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation. Harassment is unacceptable even if it does not fall within any of these categories.

Harassment may include, for example:

- unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing;
- unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless);
- racist, sexist, homophobic or ageist jokes, or derogatory or stereotypical remarks about a particular ethnic or religious group or gender;
- outing or threatening to out someone as gay or lesbian;
- offensive e-mails, text messages or social media content;
- mocking, mimicking or belittling a person's disability.

A person may be harassed even if they were not the intended "target". For example, a person may be harassed by racist jokes about a different ethnic group if the jokes create an offensive environment.

What is bullying?

Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority but can include both personal strength and the power to coerce through fear or intimidation.

Bullying can take the form of physical, verbal and non-verbal conduct. Bullying may include, by way of example:

- physical or psychological threats;
- overbearing and intimidating levels of supervision;
- inappropriate derogatory remarks about someone's performance;

Legitimate, reasonable and constructive criticism of a worker's performance or behaviour, or reasonable instructions given to workers in the course of their employment, will not amount to bullying on their own.

If you are being harassed or bullied

If you are being harassed or bullied, consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly to them that their behaviour is not welcome or makes you uncomfortable. If this is not appropriate or has not been successful, you should speak to your line manager or Director of Human Resources, who can provide confidential advice and assistance in resolving the issue formally or informally.

If you are not certain whether an incident or series of incidents amounts to bullying or harassment, you should initially contact your line manager or Director of Human Resources informally for confidential advice.

If informal steps are not appropriate, or have not been successful, you should raise the matter formally under the Grievance Procedure.

If, following the conclusion of the process, we consider you have been harassed or bullied by an employee the matter will be dealt with under the Disciplinary Procedure as a case of possible misconduct or gross misconduct. If the harasser or bully is a third party such as a parent or visitor, we will consider what action would be appropriate to deal with the problem. Whether or not your complaint is upheld, we will consider how best to manage any ongoing working relationship between you and the person concerned.

Protection and support for those involved

Staff who make complaints or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under our Disciplinary Procedure. The School will seek to ensure that you are not in any way penalised whether directly or indirectly for bringing a complaint and the situation will be monitored to ensure that the harassment has stopped.

If you believe you have suffered any such treatment you should inform your line manager or Director of Human Resources. If the matter is not remedied, you should raise it formally under the Grievance Procedure.

We offer access to confidential counselling, which is available on request for anyone affected by, or accused of, bullying or harassment or through the Simplyhealth Scheme. The details are available in confidence from the Director of Human Resources.

False or malicious allegations

Making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our Disciplinary Procedure.

Record keeping

Information about a complaint by or about an employee may be placed on the employee's personnel file, along with a record of the outcome and of any notes or other documents compiled during the process. These will be processed in accordance with our Data Protection Policy.

5. STAFF CODE OF CONDUCT

Introduction

This policy applies to all Staff and volunteers in the School regardless of their position, role or responsibility. It sets out clear guidance on the standards of behaviour expected from all Staff (as defined below) at the School.

References to “**Staff**” throughout this policy relate to all of the following groups:

- all members of staff including teaching and support staff;
- governors;
- volunteers;
- casual workers;
- temporary and supply staff, either from agencies or engaged directly; and
- student placements, including those undertaking initial teacher training and apprentices.

The principles underlying the guidance aim to encourage Staff to achieve the highest possible standards of conduct and minimise the risk of inappropriate conduct occurring.

Staff are in a unique position of trust and influence as role models for pupils and must adhere to behaviour that sets a good example to all pupils within the School.

Staff also have an individual responsibility to maintain their reputation and the reputation of the School, both inside and outside working hours and whether they are inside or outside the work setting. This policy therefore applies equally when staff are conducting lessons online or when it is necessary for them to work from home.

The School requires that all Staff have read and agree to comply with this policy. Breach or failure to observe this policy may result in action being taken under the School disciplinary procedures including, but not limited to, dismissal.

This Staff Code of Conduct Policy is not an exhaustive list of acceptable and unacceptable standards of behaviour. In situations where guidance does not exist in this policy, Staff are expected to exercise their professional judgement and act in the best interests of the pupils and the School.

This policy should be read in conjunction with the following related policies and procedures:

- Safeguarding & Child Protection Policy;
- Low-level Concerns;
- Equal Opportunities Policy;
- E-Safety Policy
- Social Media Policy;
- Health and Safety Policy;
- Anti-Bribery Policy; and
- Whistleblowing Policy.

Staff should ensure that they have read and are familiar with these policies and procedures.

Staff who work directly with children are required to read and understand Part One and Annex A of the statutory guidance “Keeping Children Safe in Education”. Those members of staff who do not work directly with children will be required to read Part One or Annex A of Keeping Children Safe in Education.

Attendance and Timekeeping

Staff are expected to maintain the highest possible levels of attendance and excellent timekeeping.

If you are going to be absent due to sickness, please email staffabsence@immanuelcollege.co.uk and copy in your line manager. Teachers must ensure that adequate and meaningful cover work is available for each of their classes. You will be required to complete a self-certification form for your absence upon your return. Further details can be found in the Sickness Policy.

There may be occasions where you need to be absent from School for a planned reason e.g. a hospital appointment. In such cases you are required to complete a Special Leave Form and obtain the appropriate authorisation in advance. Further details, including forms, can be found in the Special Leave Policy.

Eating and Drinking

The main staff room and kitchen on the ground floor of the Caldecote building are for the use of all staff. Consequently, staff may prepare and consume any food that they have brought in to the School within

the kitchen and staff room. The microwave is to be used for supervised kosher products only. If you have any questions or queries, please contact Rabbi Yoni Golker Director of Jewish Life & Learning.

All members of staff are invited to make use of the School Dining Room, which is strictly Kosher and non-dairy. To this end, meals are available to staff free of charge. Staff must not take any food or drink into the Dining Room. All meals taken out of the Dining Room should be served on disposable plates and eaten with disposable cutlery. In no circumstances should any other items of crockery or cutlery be taken from the Dining Room.

Please note that for medical reasons, staff and students are not permitted to bring nuts onto site.

Smoking

To promote a healthy and pleasant working environment and because of the fire risk, smoking (in any form, including the use of e-cigarettes) is not allowed anywhere on site or within any of the School's vehicles. Smoking is not permitted on school premises or outside school gates. Any member of Staff wishing to smoke must leave the school grounds.

You must not smoke whilst working with or supervising pupil's offsite.

Alcohol and Illegal Drugs

Consumption of alcohol or illegal drugs is not permitted on site, save where at a school function or otherwise agreed when modest amounts of alcohol may be consumed. Consumption of illegal drugs is never permitted. Your conduct and performance must not be adversely impacted by alcohol or drugs when undertaking your duties.

Security

In the interests of security, employees must wear their identity card whilst in School and produce it on request. You must not remove any School documents from the site or take any photographs without due permission. The School reserves the right to search the outer clothing, bags, desks and vehicles etc of employees whilst on site. Staff may have a colleague in attendance on such occasions.

Health and Safety

All Staff have a duty to ensure that a safe working environment exists. Fire, invacuation and evacuation procedures must be adhered to at all times and Staff are required to familiarise themselves with the procedures and their responsibilities set out in the Health and Safety Policy.

Staff Dress and Personal Appearance

In line with expected professional standards, our Modern Orthodox Jewish ethos and our responsibility to role model appropriately for our pupils, staff are required to look smart and professional in appearance at all times. This is both within School and also when acting as a representative of the School at external venues. This allows us to:

- convey a professional image of both the School and the individual;
- reflect the dress expectations of parents who choose to send their children to a School which is under the jurisdiction of the Chief Rabbi;
- have due regard to health and safety considerations for staff; and
- ensure staff and student dress codes are consistent with the School policy.

Staff are individually responsible for their general presentation, appearance and personal hygiene. Dress should be appropriate to the staff role and identity badges must be worn at all times.

As a guide, staff members wear formal business attire with male staff generally wearing a shirt, jacket and tie (kippah if Jewish) and female staff generally wearing a smart top and skirt or dress. Staff should avoid sleeveless, crop or low-cut tops, leggings (unless under a skirt/dress) or anything with holes/rips.

We recognise and welcome the diversity of cultures and religions represented amongst our staff and take a sensitive and respectful approach when this affects dress requirements. Please speak to the Director of Human Resources if you have any cultural or religious concerns.

This guidance is not exhaustive in defining acceptable standards of dress and appearance and staff will use their common sense in adhering to the principles underpinning the dress code.

When working from home or remotely (including the delivery of online lessons, or virtual meetings using a virtual meeting platform such as Teams) staff must ensure they are dressed appropriately in clothing that is smart and of a similar style to what they would wear on a normal school day.

If you have any queries, please do not hesitate to get in touch with the Director of Human Resources.

Mobility and Flexibility

Due to the demands and nature of the School, staff should be prepared to transfer upon request within departments either temporarily or permanently and/or to undertake work of a different nature, providing it is reasonable and safe to do so and the individual is adequately trained. This may include working from home, if appropriate, and in the sole discretion of the School.

Gifts, rewards and favours

Staff should take care to ensure that they do not appear to accept a gift that may be construed as a bribe or lead the giver to expect preferential treatment. Staff are required to familiarise themselves with the content of the School's Anti-Corruption and Bribery Policy.

Staff should exercise care when selecting pupils for school teams, productions, trips and/or specific work tasks in order to avoid perceptions of favouritism or injustice. Similar care should be exercised when excluding a child from an activity without prior consultation with the Head or the Deputy Heads.

Staff should not give presents/rewards to an individual outside of the School reward system.

Communication

Good communication between all members of the School community is vital. All communication between staff, pupils and parents should take place within clear, explicit and professional boundaries.

Communication with parents

Form tutors are expected to be the first point of contact between parents and the School, although enquiries will also come through the School Office. Staff can contact parents by telephone, email, the School Post System or letter. Microsoft Teams can also be used with prior arrangement. Staff should not contact pupils, parents or conduct any school business using personal email addresses.

Where a member of Staff receives an email from a parent, a reply should normally be made within two working days. If a full reply cannot be made within that time, the member of Staff should send a brief acknowledgment e-mail and let the parent know when a fuller reply can be expected.

Staff sending emails to parents/carers are advised to send a copy (cc or bcc) to the Head, the Deputy Heads, the pastoral/line manager or the class teacher/tutor as appropriate.

Staff must inform the Head or Deputy Heads if they receive an offensive email.

Communication with Pupils

Staff should carefully consider the manner in which they communicate with pupils at all times so as to avoid any possible misinterpretation of their motives or behaviours.

Staff should not give their personal mobile phone numbers or email addresses to pupils, nor should they communicate with them by social media, text message or personal email. If they need to speak to a pupil by telephone, they should use one of the School's telephones and email using the School system. Any communication on video call platforms, such as Microsoft Teams or Zoom must be for professional reasons only and should accord with the rules of this policy at all times.

The group leader on all trips and visits involving an overnight stay should take a school mobile phone with him/her and may ask the pupils for their mobile numbers before allowing them out in small, unsupervised groups. The School mobile should be used for any contact with pupils that may be necessary. The group leader will delete any record of pupils' mobile phone numbers at the end of the trip or visit and should ensure that pupils delete any staff numbers that they may have acquired during the trip.

Pupils should be encouraged to discuss with their parents or guardians, issues that are troubling them. It may be appropriate to suggest that a pupil sees the School counsellor or a member of the pastoral team.

Relationships with pupils

Staff should understand that they are in a position of trust in relation to pupils, giving them influence and power by virtue of the knowledge they have and/or the authority invested in their role. Staff should ensure that their relationship with pupils clearly takes place within the boundaries of a respectful, professional relationship and avoid behaviour which may be misinterpreted by others.

Staff are encouraged to self-refer under the School's low-level concerns procedure (as set out within the School's Safeguarding Policy) in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

Staff are reminded that it is a criminal offence for a person aged 18 or over to have a sexual relationship with a child under 18 where that person is in a position of power, even if the child is over 16 and the relationship is consensual.

Infatuations

On occasion, pupils may develop an infatuation for a member of Staff. If a member of Staff suspects or becomes aware of an infatuation, the advice of the Head or Deputy Head (Pastoral) must be sought immediately.

Other members of Staff must alert a colleague to the possibility of an infatuation in order that appropriate steps can be taken.

Staff should deal with these situations sensibly and appropriately to maintain the dignity and safety of all concerned.

One to one situations

Staff working individually with pupils should be aware of the potential vulnerability of pupils and staff in such situations. Staff should manage these situations and take reasonable and sensible precautions to ensure the safety and security of the pupil and staff alike.

Individual work with pupils should not be undertaken in secluded areas or behind a closed door. Where it is necessary to close doors for reasons of confidentiality a colleague should be made aware of this and asked to remain vigilant. Wherever possible one-to-one work should only be undertaken with the knowledge and consent of a senior member of staff to minimise risk to those involved.

Where it is necessary to conduct a one-to-one session online (for example, using a platform such as teams) staff must ensure that a senior member of staff is aware of the session and, wherever possible, arrange for a parent to be in the same room, or alternatively, ask a colleague or a member of SLT to join the session.

Where possible, a gap or barrier should be maintained between teacher and child at all times. Any physical contact should be the minimum required for care, instruction or restraint.

Physical contact with pupils

There are occasions when it is entirely appropriate and proper for staff to have physical contact with pupils, but it is crucial that they only do so in ways appropriate to their professional role. Physical contact may be appropriate in the following circumstances:

- when a pupil needs to get comfort or reassurance e.g. following an accident or personal crisis;
- when a pupil needs encouragement to attempt a new challenge e.g. to climb on to a piece of apparatus;
or
- when there is a need to take urgent action to avoid an incident or injury.

Staff should use their professional judgement at all times. Physical contact must be appropriate for the age, understanding and sex of the child and must never threaten or be sexually inappropriate. Staff must also be sensitive to an individual's cultural background and any special educational needs.

Staff should not have unnecessary physical contact with pupils and should be alert to the fact that minor forms of friendly physical contact can be misconstrued by pupils or onlookers.

Staff are referred to the School's Behaviour Policy and Code of Conduct for guidance on the use of reasonable force in relation to pupils.

Prevent Duty

All staff should understand that the school has a legal duty under 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 is known as the Prevent duty.

The School is required, in recognition that pupils may be susceptible to being drawn into terrorism or other forms of extremism, to carry out appropriate risk assessments. Consequently, staff should be aware of:

- what extremism and radicalisation means and why people – including students and fellow staff members – may be vulnerable to being drawn into terrorism as a consequence of it. Staff need to be aware of what is meant by the term "extremism" and the relationship between extremism and terrorism

- what measures are available to prevent people from being drawn into terrorism and how to challenge the extremist ideology that can be associated with it; and
- how to obtain support for people who may be being exploited by radicalising influences.

The School protects children from being drawn into terrorism by having robust safeguarding policies in place to identify children at risk, and intervening as appropriate. The School's procedure for dealing with concerns that a pupil may be susceptible to being drawn into terrorism is set out in the School's Child Protection and Safeguarding Policy. There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be susceptible and act proportionately, which may include making a Prevent referral.

More guidance for schools from the DfE on this can be found at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf

This guidance should be read in conjunction with other relevant guidance including Working Together to Safeguard Children, Keeping Children Safe in Education and Information Sharing: HM government advice for professionals providing safeguarding services to children, young people, parents and carers.

Protect Duty

All staff should understand the requirements under the Protect Duty.

Transporting Pupils

In certain circumstances it may be appropriate for Staff to transport pupils offsite on approved school business. The Head or Deputy Heads must oversee the plan and provide oversight of all transport arrangements. Staff should not transport pupils without prior authorisation or in the case of an emergency.

Staff should ensure that the driver is not distracted while the vehicle is in motion for any reason other than an emergency and should also ensure all passengers are wearing correctly fastened seatbelts.

Prior to transporting pupils offsite, consent must be obtained from a pupil's parent/guardian and staff should be aware that the safety and welfare of the pupils is their responsibility until they are safely passed back to their parent/carer.

Staff should never be alone in a vehicle with a pupil, except in cases of an emergency.

Contact with Pupils Out of School

Staff should not:

- arrange meetings with pupils off the School premises (whether in person or online) without the prior approval of the Head;
- arrange private tuition of any of the School's pupils in school or outside of school whether in term-time or outside of term-time without the prior written approval of the Head; and
- give pupils their home address or any of their personal contact details.

Conduct Out of School

Staff are expected to be loyal to the stated aims and objectives of the School and may not engage in any outside activity which, in the reasonable view of the Head, might interfere with the efficient discharge of their duties or is in conflict with the interests of the School.

Staff should at all times, both in and out of School, uphold the ethos of the School and conduct themselves in a manner consistent with their position.

Staff must notify the School of any outside conduct, activity or circumstances that are likely to either bring the School into disrepute or put into question a staff members suitability for their role at the School.

School Events

Staff are expected to behave appropriately at School events, including School organised social occasions. A School event, which may or may not take place outside of working hours or on School premises, is sufficiently connected to the School such that the standards of behaviour expected will be in line with the requirements in this policy.

Acceptable use of technologies

Staff should ensure that they are familiar with and comply with the School's E-Safety Policy and the Acceptable Use Policy at all times. In particular, staff must:

- not engage in inappropriate use of social network sites which may bring themselves, the School or the School community into disrepute;
- adopt the highest security settings on any personal profiles they have;
- remain mindful of their digital footprint and exercise caution in all their use of social media or any other web based presence they have. This includes written content, videos or photographs and views expressed either directly or by 'liking' certain pages or posts or following certain individuals or groups;
- exercise care when using dating websites where Staff could encounter students; and
- not make contact with pupils, their guardians or family members, accept or initiate friend requests or follow pupils' or their guardians' accounts on any social media platform.

Equal treatment

We are committed to equal treatment for all staff and pupils regardless of their race or colour, nationality or national or ethnic origins, religion or belief, sex, sexual orientation, pregnancy or maternity, marital or civil partnership status, gender reassignment, age, and disability (together known as "Protected Characteristics").

We aim to create a friendly, caring and perceptive environment in which every individual is valued. We endeavour to contribute positively towards the growing autonomy, self-esteem and safety of each pupil. Staff will be required to undertake regular consultation activities with pupils e.g. through safety questionnaires, participation in anti-bullying week and speaking to children about their experiences at lunchtime and break times.

Bullying, harassment, victimisation and/or discrimination will not be tolerated. We treat all our pupils and their parents fairly and with consideration which we expect them to reciprocate towards each other, the Staff and the School. Staff should ensure that they are familiar with the School's staff Equal Opportunities Policy and the Anti-Bullying and Harassment Policy and the School's pupil policies on Equal Opportunities and Anti-Bullying.

Photographs

Many school activities involve recording images as part of the curriculum, extra school activities, publicity or to celebrate an achievement. In accordance with data protection legislation, the image of a pupil is personal data.

Photographs must only be taken of children with the permission of a parent or an individual with parental responsibility. Such consent must have been provided in writing via the School's consent form. It is also important to consider the wishes of the pupil, remembering that some pupils do not wish to have their photograph taken or be filmed.

Where photographs are taken by Staff to evidence a child's progress, such photos should only be taken on School cameras. They must then be downloaded onto a School computer. Photos cannot be used or passed on outside the School. Neither Staff nor children should use their own mobile phones or any other personal device to take or store photographs.

Concerns or Complaints

The School aims to create an atmosphere in which a diverse range of people can work together openly in the spirit of mutual respect and trust towards a common purpose. Nevertheless, we recognise that it is possible for misunderstandings and disagreements to arise or for mistakes to occur.

Staff Complaints

Complaints should be dealt with immediately and openly and staff should try to resolve issues informally in the first instance. If this approach is impractical or unsuccessful, staff may wish to raise their concerns more formally in accordance with the School's Grievance Procedure or Whistleblowing Procedure, depending upon the nature of the concern.

Parental Complaints

Staff must ensure that parental complaints are dealt with in accordance with the School's Complaints Policy.

Safeguarding

For procedures for dealing with allegations or concerns about a child or disclosures/allegations of abuse, staff should refer to the School's Safeguarding Policy.

Low-level Concerns

As part of our whole school approach to safeguarding, we promote an open and transparent culture in which all concerns about adults working in or on behalf of the school are dealt with promptly and appropriately. This includes any concern – no matter how small, and even if no more than causing a sense of unease or a “nagging doubt” – that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with this Staff Code of Conduct Policy, including in appropriate conduct outside of work; and
- does not meet the harm threshold set out in Part 4 of the statutory guidance, Keeping Children Safe in Education (KCSIE), or is otherwise not serious enough to consider a referral to the LADO.

Such allegations or concerns are referred to as “low-level concerns” within KCSIE. The term “low-level” does not mean that it is insignificant. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

In order to create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour set out in this Code of Conduct are lived, monitored and reinforced constantly by all staff, it is vital that any such low-level concerns are shared in accordance with the school's low-level concerns policy.

Any questions regarding low-level concerns and/or the procedure for reporting them should be raised with the DSL and/or Head Master.

6. PERFORMANCE REVIEW POLICY – TEACHING STAFF

Purpose

Performance Reviews in the School will be a supportive and developmental process designed to ensure that all staff have the skills and support they need to carry out their role effectively. It will help to ensure that staff continue to improve and develop in their role.

Application of the Policy

The policy applies to all teaching staff, except those on contracts of less than one term, those in a probationary period or undergoing induction (i.e. ECTs). It does not form part of your contractual terms.

The Performance Review Period

The appraisal period will normally run for twelve months from the Pesach term in each year. Teachers who are employed on a fixed term contract of less than one year will have their performance managed in accordance with the principles underpinning this policy. The length of the period will be determined by the duration of their contract.

Appointing Reviewers

The Head will be the reviewer for those staff he directly line manages and will delegate the role of reviewer to the relevant line managers or appropriate alternative for other teachers. Where a teacher has more than one line manager, the Head will determine which line manager will be best placed to manage and review the teacher's performance.

The Head will be appraised by the Governing Body. The task of appraising the Head, including the setting of objectives, may be delegated to a sub-group consisting of three members of the Governing Body.

Setting Objectives

Objectives for each member of staff will be set before, or as soon as practicable after, the start of each performance review period. There will normally be at least three objectives set. The objectives will be specific, measurable, achievable, realistic and time-bound and will be appropriate to the employee's role and level of experience. Objectives will be drawn up by the reviewer in consultation with the member of staff. Objectives may be revised if circumstances change.

The objectives set for each employee will, if achieved, contribute to the School's plans for improving the School's educational provision and performance and improving the education of students at the School. This will be achieved by ensuring that the objectives directly relate to the School or Departmental Development Plans.

The Head may review all objectives to ensure that they have been set appropriately, that they are consistent with Department/School Development Plans and that they are written in such a way that measuring success can be done objectively. If necessary, the Head will require objectives to be re-considered.

The School will set reasonable and objective standards it expects staff to achieve.

Reviewing Performance

Lesson Observation

The observation of classroom practice and other responsibilities is important both as a way of assessing teachers' performance in order to identify any particular strengths and areas for development they may have and of gaining useful information which can inform school improvement more generally. All observations will be carried out in a supportive fashion.

Lessons will be regularly observed but the amount and type of classroom observation for appraisal purposes will depend on the individual circumstances of the teacher (particularly if concerns have been raised about their performance) and the overall needs of the School. The total number of lessons to be observed for appraisal purposes will normally be one teaching period per year. Where evidence emerges which gives rise to concern about the teacher's performance, additional observations may be arranged.

In addition to formal observation, the Head or other senior leaders with responsibility for teaching standards may carry out "drop-in" observations in order to evaluate the standards of teaching and to check that high standards of professional performance are established and maintained. The notice period, length and frequency of "drop-in" observations will vary depending on specific circumstances. Feedback on observations will ideally be given as soon as possible. We also encourage teachers to informally observe each other's lessons as a mean of developing teaching across the College.

Teachers (including the Head) who have responsibilities outside the classroom should also expect to have their performance of those responsibilities observed and assessed.

Development and support

Performance reviews are a supportive process which will be used to inform continuing professional development. The School wishes to encourage a culture in which all teachers take responsibility for improving their teaching through appropriate professional development. Professional development will be linked to School Development Plan priorities and to the ongoing professional development needs and priorities of individual teachers. In the case of competing demands on the school budget, priority will be given to the training and support which will help to achieve the school and departmental development plan objectives.

Feedback

Teachers will receive constructive feedback on their performance as soon as practicable after a formal observation has taken place or other evidence has come to light.

Feedback will highlight particular areas of strength as well as any areas that need attention. Where there are concerns about any aspects of the teacher's performance the reviewer will meet the teacher to:

- give clear feedback to the teacher about the nature and seriousness of the concerns;
- give the teacher the opportunity to comment and discuss the concerns;
- agree any support that will be provided to help address those specific concerns;
- make clear how, and by when, the reviewer will review progress; and
- explain the implications and process if no – or insufficient – improvement is made.

When progress is reviewed, if the reviewer is satisfied that the teacher has made, or is making, sufficient improvement, the professional review process will continue as normal, with any remaining issues continuing to be addressed through that process.

If the reviewer is not satisfied with progress, the employee will be notified in writing that their performance will be addressed under the Capability Procedure.

Annual Assessment

The performance of all employees will be formally assessed in respect of each period of performance review.

This assessment is the end point to the annual process, but performance and development priorities should be reviewed and addressed at interim meetings throughout the year if necessary.

The formal professional review meeting will be arranged with you to discuss:

- details of the objectives for the period of professional review in question;
- an assessment of performance of your role and responsibilities against these objectives;
- an assessment of performance of your role and responsibilities against your job description;
- an assessment of your professional development needs and identification of any action that should be taken to address them; and
- a discussion about career progression and development.

The assessment of performance and of professional development needs will inform the planning process for the following period of professional review.

Transition to capability

Where concerns are highlighted as a result of the performance review process, they will usually be raised informally in the first instance and support and training offered. However, if this does not lead to the required improvement or if the concerns are sufficiently serious, they will be addressed under the Capability Procedure.

7. PROFESSIONAL REVIEW POLICY – SUPPORT STAFF

Your performance will be reviewed on a regular basis throughout your employment. However, in each year you will have a meeting with your Head of Department or line manager to formally consider your performance during the preceding year and to agree on future work objectives to assist both you and the School to improve work performance and to assist the School to achieve our objectives. One further objective of the appraisal interview is to identify any particular training needs you may have to assist your future development.

You will be given a copy of the appraisal form prior to the meeting and you are encouraged to discuss in an open and honest manner any issues which you believe need to be discussed. You and your Head of Department or line manager should complete the appraisal form during the course of the meeting. After the meeting, you will be given a copy which you should review and sign if you are satisfied it accurately reflects the discussions. You will retain a copy and the completed copy will be placed on your personnel file.

8. DISCIPLINARY PROCEDURE

The Staff Code of Conduct and the Disciplinary Procedure, with which all employees have a responsibility to familiarise themselves, are designed to promote fairness and consistency in the treatment of all employees and to assist the school to function effectively.

This procedure will apply to any disciplinary situation which includes misconduct and cases of poor performance that result from misconduct. It is not contractual but applies to all employees (save for those in their first two years of service) who should familiarise themselves with its provisions. Performance issues that do not relate to misconduct will be dealt with in accordance with the Capability Procedure. However, the two procedures may be run in parallel at first in order to investigate the underlying cause of the concern.

The Staff Code of Conduct sets standards of required conduct at work.

This Disciplinary Procedure is designed to ensure that these standards are adhered to and provides a fair method of dealing with any alleged failures to observe them. The procedure does not preclude minor disciplinary situations from being dealt with informally.

In cases other than gross misconduct or in the first two years of employment (as noted above), an employee whose conduct does not meet the standards will normally first be counselled in an attempt to achieve the required improvement. However, the School reserves the right to commence the procedure at any stage if the circumstances warrant such action.

No disciplinary action will be taken until the case has been investigated and the employee has had the opportunity to respond to the allegations in accordance with the procedure set out below. All disciplinary situations will be dealt with without unreasonable delay.

In the event of absence of any of those involved, except for the employee who is the subject of the procedure, a deputy may take their place provided that this will not jeopardise the likelihood of a fair outcome.

Confidentiality

Our aim is to deal with disciplinary matters sensitively and with due respect for the privacy of any individuals involved. All employees must treat as confidential any information communicated to them in connection with an investigation or disciplinary matter.

An employee, and anyone accompanying them (including witnesses), must not make electronic recordings of any meetings or hearings conducted under this procedure.

Employees will normally be told the names of any witnesses whose evidence is relevant to disciplinary proceedings against them, unless the witnesses have not consented to the disclosure of their identity or evidence, or we believe that a witness' identity should remain confidential.

Criminal Allegations

Where an employee's conduct is the subject of a criminal investigation, charge or conviction we will investigate the facts before deciding whether to take formal disciplinary action.

Subject to the receipt of external advice, we will not normally wait for the outcome of any criminal prosecution before deciding what action, if any, to take. Where an employee is unable or has been advised not to attend a disciplinary hearing or say anything about a pending criminal matter, we may have to take a decision based on the available evidence.

A criminal investigation, charge or conviction relating to conduct outside work may be treated as a disciplinary matter if we consider that it is relevant to an employee's employment.

Suspension

Where an employee is accused of an act of serious or gross misconduct, or where the circumstance otherwise warrants it, after careful consideration he/she may be suspended from work on full pay pending the outcome of the disciplinary procedure. Such suspension is not a form of disciplinary action and does not imply that any decision has already been made about the allegations.

Where appropriate, during any disciplinary investigation or suspension, the Head will appoint a senior member of staff, who is not involved in the disciplinary procedure, to provide guidance and support to the member of staff under investigation or suspension.

Formal Disciplinary Procedure

Investigation

When a disciplinary situation arises a senior member of staff will, as soon as reasonably practicable, carry out an investigation into the matter. The purpose of an investigation is for the School to establish a fair and balanced view of the facts relating to any disciplinary allegations, before deciding whether to proceed with a disciplinary meeting. Where there is a lack of appropriate resource within the School, or the nature or complexity of the allegation requires it, an independent investigator may be appointed. The investigation will be confined to establishing the facts and gathering any relevant documentation. Where necessary, the investigating officer will obtain statements from any relevant individuals. An investigatory meeting with the employee may take place if considered appropriate by the investigating officer. Employees do not have the right to bring a companion to an investigatory meeting.

Notification

If, as a result of the investigation, it is decided that there is a disciplinary case to answer, the employee will be invited to attend a disciplinary meeting.

The employee will be informed in writing of the allegations, the basis for those allegations, and the possible range of sanctions if we decide after the disciplinary meeting that the allegations are substantiated. Where appropriate, the employee will be provided with a summary of relevant information and copies of any relevant documents gathered during the investigation which will be used at the disciplinary meeting.

Where either party intends to call any relevant witnesses at the disciplinary meeting, advance notice of their intention to do so must be given.

Disciplinary Meeting

A disciplinary meeting will be conducted by the Head (and/or an appropriate senior member(s) of staff appointed by them, who has had no prior involvement).

The employee may be accompanied by a trade union representative or colleague if desired. A companion may make representations, ask questions, and sum up an employee's case, but will not be allowed to answer questions on an employee's behalf. An employee must tell the individual conducting the meeting who his/her chosen companion is, in good time before the meeting.

The employee and their companion should make every effort to attend the disciplinary meeting. If the employee fails to attend the disciplinary meeting this will usually be rearranged once, but should they fail to attend the rearranged meeting then a decision may be reached in their absence.

At the disciplinary meeting we will go through the allegations and the evidence that has been gathered. The employee will be given the full opportunity to explain the matter and respond to the allegations.

A note taker will usually be present but will not be involved in the decision making process.

We may adjourn the disciplinary meeting if we need to carry out any further investigations. The employee will be given a reasonable opportunity to consider any new information obtained before the meeting is reconvened.

If, following the disciplinary meeting, it is decided that disciplinary action is warranted, the employee will be advised of the decision in writing and will specify the details of:

- the failure to meet the required standard;
- any action required by the employee to remedy the situation;
- any relevant review period /duration of warning and the consequences of continued or subsequent failure to reach and sustain the required standard of performance or conduct; and/or
- the right of appeal.

Disciplinary Sanctions

If disciplinary action is warranted, one of the sanctions below may be issued. A sanction may be imposed at any level including summary dismissal depending on the circumstances.

- **Written Warning**
In the case of a first act of misconduct, or a repetition of earlier minor offences or a failure to improve, the employee will be given a written warning, setting out the precise nature of the offence, the likely consequences of further offences and specifying, if appropriate, the improvement required and over what period.
A first written warning will normally remain in force for twelve months and a copy of the warning will be kept on the employee's personnel record.
- **Final Written Warning**
In the case of a sufficiently serious offence, or a repetition of earlier offences the employee will be given a final written warning, setting out the precise nature of the offence, the likely consequences of further offences and specifying, if appropriate, the improvement required and over what period. This may include a statement that any recurrence or no improvement may lead to a dismissal or to some other action short of dismissal.
A final written warning will normally remain in force for twelve months and a copy of the final written warning will be kept on the employee's personnel record. In exceptional cases, depending upon the seriousness and nature of the behaviour, misconduct or infringement, the period for which the final written warning remains in force may be longer.
- **Dismissal**
This stage will normally result from continued failure by the employee to act on previous warnings or an act of gross misconduct. In the case of gross misconduct, the employee will normally be dismissed without notice or payment in lieu of notice. If the decision to dismiss is made the employee will be informed in writing of the reason for dismissal, the date on which the contract between the parties will terminate and the appropriate period of notice.

Alternatives to Dismissal

In exceptional circumstances, the following actions short of dismissal may be considered as an alternative to dismissal:

- a period of suspension without pay;
- demotion; or

- transfer.

These sanctions may be used in conjunction with a written warning.

Gross Misconduct

In exceptional circumstances, employees may be dismissed without notice if it has been established, after investigation and after hearing the employee's explanation at a disciplinary meeting, that there has been an act which constitutes gross misconduct. Misconduct committed outside of work may, depending on the circumstances, amount to gross misconduct.

Examples of actions which constitute gross misconduct include (but are not limited to):

- gross insubordination;
- serious breach of health and safety rules;
- serious breach of the School email and internet use policy;
- theft or fraud from either the School or co-workers or deliberate damage to School property or that of co-workers;
- being under the influence of drink or illegal drugs at work;
- disorderly or threatening conduct on school premises;
- contravention of the equal opportunities and discrimination policy;
- negligence resulting in serious loss, damage, or injury;
- assault or attempted assault;
- falsification of records;
- conviction on a criminal charge;
- acceptance of a police caution;
- breach of School policies or procedures;
- bullying, discrimination, victimisation or harassment of colleagues, pupils or parents;
- abuse or suspected abuse of your position of trust in relation to pupils at the School; or
- bringing the School into disrepute.

Appeals

If an employee feels that the disciplinary action taken against them is wrong or unjust, they may appeal against the decision within five working days of receipt of the written decision. Such appeals are to be made in writing to the Head.

The appeal hearing will be convened as soon as is reasonably practicable and will give an employee written notice of the date, time, and place of the appeal hearing. The appeal hearing will be held by the Head or Director of Finance & Operations, or a governor or panel of up to three governors (who have had no prior involvement). The Head or DFO will not hear the appeal if they have held the disciplinary meeting.

The appeal hearing may be a complete re-hearing of the matter or it may be a review of the fairness of the original decision in the light of the procedure that was followed and any new information that may have come to light. This decision will be at our discretion depending on the circumstances of the case. In any event, the appeal will be dealt with as impartially as possible.

Where new evidence arises prior to or during the appeal, we may need to carry out further investigation. The employee will be given access to any relevant new information or evidence and will have the opportunity to consider this before the hearing and make representations.

The employee will have the right to be accompanied at any appeal hearing by a colleague or trade union representative.

The employee will be informed in writing of the decision of the appeal hearing as soon as is reasonably practicable following the conclusion of the hearing. The outcome may be that:

- the original decision is confirmed;
- the original decision is revoked; or
- a lesser penalty is issued.

Such decision will be final and there will be no further right of appeal.

In the event of an unsuccessful appeal against a decision to dismiss the original dismissal date shall stand. However, if an employee's appeal is successful, they will be reinstated with no loss of continuity or pay.

Record Keeping

A copy of all formal warnings will be retained on an employee's personnel file and in accordance with the School's Staff Privacy Policy and policies on data retention but will be considered spent after the period specified in the warning.

9. CAPABILITY PROCEDURE

This procedure applies where a member of staff is failing to carry out their responsibilities or duties in a satisfactory manner, due to a lack of ability, experience or qualifications or on health grounds.

This procedure aims to ensure fairness and consistency throughout the School and provides for warnings to be given for failure to meet our standards of job performance. The procedure is non-contractual in nature, but applies to all members of staff except that this procedure will not apply during the first two years of employment. All members of staff should familiarise themselves with its provisions.

Most performance improvement procedures will follow the course set out below. However, we may vary the process to suit individual circumstances; such a variation will not amount to a breach of this procedure. The procedure will be invoked when performance issues arise or are identified either following an appraisal process or otherwise.

The School will normally address performance informally, and offer appropriate training and support to an employee before progressing under this procedure.

The procedures set out in this document aim to ensure that there is:

- Openness and awareness for staff when they are not meeting the required levels of performance.
- A means of monitoring performance and establishing performance criteria.
- A degree of consistency in how staff are given opportunities to attain satisfactory levels of performance.
- Assistance in identifying the most appropriate form(s) of support and providing that support

The School will consider what training and support it can give the employee to help them meet the performance requirements.

Confidentiality

Our aim is to deal with performance matters sensitively and with due respect for the privacy of the individuals involved. All employees must treat as confidential any information communicated to them in connection with a matter which is subject to this Capability Procedure.

An employee, and anyone accompanying them, must not make electronic recordings of any meetings or hearings conducted under this procedure.

Suspension

Where you are accused of an act of serious or gross negligence, you may be suspended from work, on full pay and benefits, pending the outcome of the capability or disciplinary procedure. Such suspension does not imply that any decision has already been made in relation to this procedure or the disciplinary procedure.

Where appropriate, during any investigation or suspension, the Head will appoint a senior member of staff, who is not involved in the capability or disciplinary procedure, to provide guidance and support to the member of staff under investigation or suspension.

Formal Meeting

If we consider that it is necessary to invoke the formal capability procedure, we will inform you in writing. In so doing, we will give you reasonable notice of a capability meeting and set out details of the alleged shortfall or failure in performance, together with any evidence relied upon if practicable and available.

At all stages of the procedure, you will be allowed to attend a capability meeting with a colleague or a trade union official as a representative and you will be given an opportunity to state your case. Your companion may make representations ask questions, and sum up your case, but will not be allowed to answer questions on your behalf. You must tell the manager conducting the meeting who your chosen companion is, in good time before the meeting. You must take all reasonable steps to attend the hearing. If you fail to attend the meeting this will usually be rearranged once, but should you fail to attend the rearranged meeting then a decision may be reached in your absence.

A meeting may be adjourned if we need to gather any further information or give consideration to matters discussed at the meeting. You will be given a reasonable opportunity to consider any new information obtained before the meeting is reconvened.

Following the meeting, we will write to you to confirm our decision. You will also be informed of your right to appeal the decision if you are not satisfied with it.

Appeal

An employee may appeal against a decision within five working days of receipt of the written decision. Such appeals are to be made in writing to the Head.

The appeal meeting will be convened as soon as is reasonably practicable. The appeal meeting will be held by the Head or senior manager, or a Governor or panel of up to three Governors (who have had no prior involvement). The Head or senior manager will not hear the appeal if they held the capability meeting. Where new evidence arises prior to or during the appeal the employee will be given access to any relevant information or evidence and will have the opportunity to make representations. The employee will have the right to be accompanied at any appeal meeting by a colleague or trade union representative. The employee will be informed in writing of the decision of the appeal meeting following the conclusion of the meeting. Such decision will be final. In the event of an unsuccessful appeal against a decision to dismiss the original dismissal date shall stand.

Performance Warnings

Written warning

In the case of serious shortfall, or failure or a repetition of earlier shortfall or failure, you will be given a written warning, setting out the precise nature of the shortfall or failure, the likely consequences of further shortfall or failure and specifying, if appropriate, the improvement required and over what period. Objectives, timescales and measures for the performance improvement should be set. Your Head of Department should offer help with training and supervision as required. A written warning will be kept on your record in accordance with the School's Staff Privacy Notice but will be considered expired after 12 months. Your performance may be appraised, at intervals to be determined by your Head of Department, at any time during this period.

Final written warning

In the case of a further repetition of earlier shortfall or failure, if you still fail to improve or if the shortfall or failure, whilst falling short of gross negligence, is serious enough to warrant only one written warning, you will be given a final written warning setting out the precise nature of the shortfall or failure containing a statement that any recurrence or failure to improve will lead to dismissal or whatever other penalty is considered appropriate and specifying, if appropriate, the improvement required and over what period. A final written warning will be kept on your record in accordance with the School's Staff Privacy Notice but will be considered expired after 12 months. Objectives, timescales and measures for the performance improvement should be set. Your Head of Department should offer help with training and supervision as required. Your conduct and performance will be appraised, at intervals to be determined by your Head of Department, at any time during this period.

Depending upon the seriousness of the matter and all the circumstances, any of the above stages may be omitted.

Dismissal

In the case of gross negligence, or if all the appropriate stages of the warning procedure have been exhausted, you will normally be dismissed.

We reserve the right to consider other possible formal action, including (but without limitation): demotion or transfer; loss of seniority or salary increment; suspension (without pay).

If you are dismissed, you will be provided with a written statement detailing the reasons for dismissal, the date on which employment will terminate and the right of appeal.

Examples

The following are non-exhaustive and non-exclusive examples of the sort of performance shortfalls or failures, which will normally lead to action being taken.

Minor offences (informal oral warning)

- Occasional poor job performance involving sub-standard work or application.

Serious offences (written or final written warning)

- Consistent poor performance or application.
- Failure to improve performance following an appraisal meeting or performance review, within the timescale specified within such a meeting or review.

- Failure to perform duties or roles to an acceptable standard for reasons which it is within your power to rectify.

You should be made aware that if there is no adequate improvement following the issue of warnings, such issues may result in dismissal.

Capability and consistent performance offences (dismissal with notice)

- Incapable and/or unsuitable of performing role or main job functions/duties as set out in job description and which could not be rectified by training or coaching.
- Consistent failure or unable to improve performance to required or reasonable standards or to the level of other members of staff carrying out the same, similar or equivalent work.
- You are unable satisfactorily to do or do not have the qualifications, aptitude and/or ability for the job.

Gross negligence (dismissal without notice)

- In the most serious cases of gross negligence, normally (but not necessarily) resulting in significant financial loss or loss of reputation to the School, where our continued trust and confidence in you has been destroyed as a result, dismissal may be without notice or payment in lieu of notice.

Disabilities

Consideration will be given to whether poor performance may be related to a disability and, if so, whether there are reasonable adjustments that could be made to an employee's working arrangements, including changing their duties or providing additional equipment or training. We may also consider making adjustments to this procedure in appropriate cases.

If you wish to discuss this or inform us of any medical condition you consider relevant, you should contact the Director of Human Resources.

Long term sickness absence

Where an employee's underperformance is as a result of long term sickness absence then the School will always seek medical advice prior to making a decision about an employee's ongoing employment. The School will also consider whether there are any reasonable adjustments which can be made to assist the employee to perform their role. In cases where the School has concerns about the employee's long term ability to perform their job as a result of health grounds the School will normally move to dismissal stage without prior warnings.

Relationship with Disciplinary Procedure

The Capability Procedure is not intended to apply to cases where poor performance results directly from misconduct, in which case the Disciplinary Procedure should normally apply. It may not, however, always be immediately clear whether poor performance results from misconduct or capability and the procedures may, initially, be run in parallel whilst the concerns are being investigated.

You may be dismissed following exhaustion of the formal capability procedure and have no separate right to have the disciplinary procedure followed prior to dismissal, and vice versa.

Live warnings issued under the disciplinary procedure may, if appropriate, be taken into consideration when considering the level of warning to be given under the capability procedure, and vice versa.

Record Keeping

If your performance shortfall or failure is dealt with under the formal capability procedure, a record will be kept of the shortfall or failure, your defence or mitigation, minutes of the capability meeting, the action taken and reasons for it, whether an appeal was lodged, its outcome and any subsequent developments. These records are confidential and will be retained on your personnel file in accordance with the prevailing data protection legislation.

10. GRIEVANCE PROCEDURE

Should an employee at any time have a grievance connected with his or her employment it will be the School's intention to consider and resolve it at the earliest opportunity and to the satisfaction of all concerned wherever possible. The procedure is not contractual but applies to all employees who should familiarise themselves with its provisions. All stages of this process will be dealt with without unreasonable delay.

This Grievance Procedure should not be used to complain about dismissal or disciplinary action. If you are dissatisfied with any disciplinary action, you should submit an appeal under the Disciplinary Procedure.

We operate a separate Whistleblowing Policy to enable employees to report illegal activities, wrongdoing or malpractice. However, where you are directly affected by the matter in question, or where you feel you have been victimised for an act of whistleblowing, you may raise the matter under the Grievance Procedure.

Process

Informal

An employee who has a grievance with any aspect of his or her employment should raise it initially with his or her line manager and the matter will be discussed informally and resolved where possible. If the employee feels unable to speak to their manager, for example, because the complaint concerns him or her, then they should speak informally to a more senior manager or the Director of Human Resources. If this does not resolve the issue, you should follow the formal procedure set out below.

Formal

If a grievance cannot be resolved informally or the employee considers they have not been fairly treated, they may raise their grievance in writing to the Director of Human Resources and it will be treated as a formal grievance.

The written grievance should contain a brief description of the nature of the complaint, including any relevant facts, dates and names of individuals involved. In some situations, we may ask you to provide further information so that we can investigate the grievance properly.

Upon receiving the grievance the Director of HR will appoint an appropriate person to act as the Investigator, who may be the line manager or a person nominated by the line manager, within three working days. If the grievance is against the line manager, a more senior manager will be appointed.

The complainant shall be notified of the name of the Investigator and the date for the initial meeting within five working days of the submission of the written grievance. The complainant will have the right to be accompanied at this meeting by a trade union representative or colleague. At the meeting the complainant will be given the opportunity to explain their grievance, answer questions and suggest how they would like the issue(s) resolved.

Following the meeting it may be necessary for the Investigator to carry out further investigation into the grievance. Any named individuals and/or witnesses to any events may be interviewed.

The employee will be informed in writing of the outcome of the grievance and the reasons for the decision. If any action is to be taken as a result of the grievance, the employee will, where possible, be informed.

The decision will be issued as soon as possible following the conclusion of the meeting. Where the matter needs to be investigated and/or the meeting adjourned, the employee will be given an indication of the likely timescale for receiving a response.

Appeal

If the complainant feels that his or her grievance is not satisfactorily resolved, or feels they have been unfairly treated, he or she may, within five working days of the written decision, appeal in writing to the Head. The Head, or his nominated deputy, shall investigate the appeal.

An appeal hearing will be convened as soon as is reasonable practicable, and will be heard by either the Head, or his nominated deputy, a Governor or a panel of up to three Governors.

At the appeal hearing, the employee may be accompanied by a colleague or a trade union representative of their choice.

Whenever possible, a decision of the appeal and the reasons for it will be given within ten working days of the hearing. This decision will be given in writing and will be final.

Record-keeping

Written grievances will be placed on an employee's personnel file along with any record of any decisions taken and any notes or other documents compiled during the grievance process. These will be retained in accordance with the School's Staff Privacy Notice and policies and procedures on data retention.

11. REFERENCES

It is the School's normal policy to provide references on request unless there is a good reason not to do so. All requests for references should be communicated to the Head or the Director of Human Resources. No reference, whether verbal or written, should be given on behalf of the School by an employee other than the Head or a senior manager in liaison with the Director of Human Resources.

All references are given in confidence. The School, or the recipient, may be required to disclose a reference under certain circumstances, as required or permitted by law.

If members of staff wish to provide character references for colleagues or former employees, they must make it clear that they are doing so purely as a personal acquaintance or friend and not in their capacity as an employee of the School. Under no circumstances must the School's headed paper or a School telephone or email address be used.

Mortgage, rent or legal references will only be given in response to a specific written request and no information will be supplied without your permission.

12. TRAINING AND DEVELOPMENT

Structured training and development at all levels within the School is essential to the efficient and effective operation of the school's support services and the development of the individual.

The School aims to ensure that all employees have the knowledge, skills and experience to meet satisfactorily the required standards of job performance. In order to meet its requirements, the school will provide opportunities for personal development and advancement to those employees with the requisite ability, aspirations and characteristics. The objectives of our CPD programme are as follows:

- To provide an effective induction programme for each individual ensuring an understanding of the School, department and the individual's duties and responsibilities and this will include training/instruction on health and safety and any legal requirements, such as may arise through the charitable status of the school, associated with his or her job.
- To provide introductory and 'on the job' training to enable new employees to reach the required performance standard.
- To identify the current and future training needs of the individuals and match these to cost effective training programmes.
- To provide training to ensure improvements in skills, knowledge and attitude.
- To encourage and support employees to undertake further studies in the areas which are of benefit to themselves and their role in the school.

The performance review process involves departmental heads in reviewing the attributes of their staff with a view to matching them with the School's requirements. The development of individuals is a two - way process; departmental heads will discuss the performance of the individual and provide information on available opportunities, whilst employees will have the responsibility of informing their departmental head of their aspirations and co-operating with actions designed to maintain and improve their abilities. This process supplements the informal observation and contact between the departmental head and the employee.

From time to time the School may pay for you to attend training courses. In consideration of this, the School may ask that you enter into a separate agreement that if your employment terminates after the School has incurred liability for the cost of you doing so you will be liable to repay some or all of the fees, expenses and other costs. If this is case, then you will be informed before you start the course of your liability and an agreement will be drawn up between you and the School.

The School is required to pay into the Apprenticeship Levy and can access funds to pay for certain costs associated with an apprentice's training, assessment and certification. If you wish to make use of the fund you should contact the Director of Finance & Operations for further information.

13 WELLBEING AT WORK POLICY

Purpose and Scope

The school defines wellbeing as the experience of overall health. It encompasses good mental, physical, financial and social health.

We are committed to protecting the health, safety and welfare of our employees, promoting positive mental health for all staff, and tackling the causes of stress and work-related mental ill health. The aim of this policy is to create a workplace culture where staff feel comfortable to talk, seek help and support, and where wellbeing is recognised and embedded into working practices, and regularly monitored and reviewed.

This policy does not form part of any contract of employment or other contract to provide services, and we may amend it at any time. This policy applies to all employees, officers, consultants, self-employed contractors, casual workers, agency workers, volunteers and interns.

Any information that you provide to us about your health will be processed in accordance with our Data Protection Policy and Staff Privacy Notice.

Introduction

The school, as an employer, has a duty to ensure the health, safety and welfare of its staff as far as reasonably practicable. It is also required to have in place measures to mitigate as far as practicable factors that could harm staff physical and mental wellbeing, which includes work-related stress.

Understanding Stress and Mental Health

Stress is the adverse reaction people have to excessive pressures or demands placed on them. Stress is not an illness but, sustained over a period of time, it can lead to mental and/or physical illness.

Mental health is a term to describe our emotional, psychological, and social wellbeing. It affects how we think, feel and act and how we cope with the normal pressures of everyday life. Positive mental health is rarely an absolute state since factors inside and outside work affect mental health, meaning that we move on a spectrum that ranges from being in good to poor mental health.

There is an important distinction between working under pressure and experiencing stress. Certain levels of pressure are acceptable and normal in every job. They can improve performance, enable individuals to meet their full potential and provide a sense of achievement and job satisfaction. However, when pressure becomes excessive it produces stress and undermines mental health.

Pressure outside the workplace, whether the result of unexpected or traumatic events such as accidents, illness, bereavement, family breakdown or financial worried, can result in stress and poor mental health. They can also compound normal workplace pressures.

The school recognises that individuals react to similar situations in different ways and that what triggers stress and poor mental health varies from person to person.

Our Approach to Mental Health in the Workplace

To support our staff, we will consistently endeavour to:

- Promote a culture of open communication by providing both formal and informal channels through which staff can raise concerns.
- Take account of stress and mental wellbeing when planning and allocating workloads. We will provide opportunities to discuss these through our appraisal (and, as appropriate, one-to-one supervision) processes.
- Monitor working hours and overtime to ensure that staff are not overworking and monitor holidays to ensure that staff are using their entitlement.
- Champion good management practices and the importance of maintaining a reasonable “work-life balance”.
- Ensure risk assessments include or specifically address work-related stress.
- Ensure that in any workplace reorganisation or change management processes are designed to minimise uncertainty and stress.
- Implement policies and procedures to address factors that can cause or exacerbate stress so that we can provide a workplace free from harassment, bullying and victimisation and address inappropriate behaviour through disciplinary action.

- Provide training to help all staff understand and recognise the causes of work-related stress and mental ill health, the impact of stress from factors in everyday life and the steps they can take to protect and enhance their own mental wellbeing and that of their colleagues.
- Provide support services such as occupational health, confidential counselling and an employee assistance programme for staff affected, or absent, by reason of stress or mental illness.

Supporting the Implementation of this Policy

The Governors, Head and the SLT will:

- Support steps taken to develop a culture of cooperation, trust and mutual respect within the school;
- Champion good management practices and the establishment of a work ethos within the school which discourages assumptions about long term commitment to working hours of a kind likely to cause stress and which enables employees to maintain reasonable “work-life balance”;
- Promote effective communication and ensure that there are procedures in place for consulting and supporting employees on changes in the school, to management structures and working arrangements;
- Encourage initiatives and events that promote health and wellbeing;
- Treat individuals reporting to them with consideration and dignity, and promote a culture of mutual respect in the teams they manage. They will not permit unacceptable behaviour and will take decisive action when issues are brought to their attention;
- Attend training as appropriate in order to increase their awareness of the causes and effects of work-related stress;
- Encourage their staff to participate in events and initiatives undertaken by the school to promote wellbeing; and
- Take appropriate action where performance by a member of staff may cause stress to their colleagues.

Managers

All line managers have a responsibility to recognise potential issues of work-related stress or mental ill health in the staff they manage. They will be given training to support them in this and should seek advice from a member of the senior management team if they have concerns. All managers should provide support to staff by working with the senior management team and through making appropriate referrals to the Director of HR.

In particular, managers must:

- Promote a culture of open communication.
- Effectively plan and provide feedback on performance.
- Ensure that staff receive necessary training.
- Monitor workloads and reallocate work where practicable and necessary.
- Ensure that staff understand the standards of behaviour expected of them and others, and act on behaviour that falls below those standards.
- Ensure there are arrangements in place to support individuals experiencing stress and refer them to the HR where appropriate.

All staff

All staff should ensure that they are familiar with this policy and act in accordance with its aims and objectives. Staff should plan and organise their work to meet personal and organisational objectives and cooperate with support, advice and guidance that may be offered by line manager or the senior management team. Anyone who experiences, or is aware of, a situation that may result in work-related

stress or undermine mental wellbeing at work should speak to the Director of HR. Staff should treat colleagues and all other persons with whom they interact during the course of their work with consideration, respect and dignity.

Addressing Work-Related Stress and Mental Ill Health

If you believe you are suffering from work-related stress or mental ill health, you should discuss this with the Director of HR or your line manager in the first instance. You are also strongly advised to access the additional support services referred to in this policy.

Once an issue affecting your health comes to the attention of your line manager or HR, we will discuss with you what steps can be taken to address that issue.

Those steps may include any of the following:

- A review of your current job role, responsibilities, workload and/or working hours. Adjustments may be agreed to these, on a temporary basis and subject to further review, where appropriate.
- Where it appears that stress has been caused by bullying or harassment, investigation under our Disciplinary and/or Grievance Procedures.
- Referral to medical advice, treatment and/or a medical report via occupational health and/or any specialist or GP who has been treating you.
- If you are on sickness absence, discussion of an appropriate return to work plan. Our sickness absence policies and procedures may be applied.

Absence Due to Stress or Mental Ill Health

If you are absent due to work-related stress or mental ill health, you should follow the sickness absence reporting procedure contained in your contract of employment and/or our Sickness Absence Policy. In cases of prolonged or repeated absence it may be necessary to apply the procedure set out in our Absence Management Procedure.

Confidentiality

Information about your wellbeing (including your mental and physical health) is highly sensitive. Every member of staff is responsible for observing the high level of confidentiality that is required when dealing with information about stress or mental health whether they are supporting a colleague or because they are otherwise involved in the operation of a workplace policy or procedure.

A breach of confidentiality may give rise to disciplinary action.

However, there are occasions when information regarding your wellbeing will need to be shared with third parties. For example:

- Where steps need to be taken to address work-related stress and mental ill health such as reallocating work within a team.
- Where medical advice is required on how to support a member of staff, address issues raised by work-related stress or address issues raised by mental ill health.
- Where allegations or harassment, bullying or other misconduct require a disciplinary investigation or proceedings to take place.
- Where a member of staff presents an immediate danger to themselves or others.

In these circumstances, wherever possible, matters will be discussed with the member of staff concerned before any action is taken.

Protection for those Reporting Stress or Assisting with an Investigation

Staff who report that they are suffering from work-related stress or mental ill health, who support a colleague in making such a report or who participate in any investigation connected with this policy in good faith will be protected from any form of intimidation or victimisation.

If you feel you have been subjected to any such intimidation or victimisation, you should seek support from your line manager in the first instance. You may also raise a complaint in accordance with our Grievance Procedure.

If, after investigation, you are found to have provided false information in bad faith, you will be subject to appropriate action under our Disciplinary Procedure.

Support

If you feel stressed at work and/or need support with your wellbeing, please contact your line manager or HR. If you believe that you would benefit from adjustments or other support, you should contact your line manager in the first instance. If you feel unable to do so, you should contact the Director of HR. They may then do a risk assessment to understand more about how your symptoms might affect you at work and the adjustments you may need. The reasonable adjustments we can make will depend on individual circumstances and the nature of your role.

We also have services in place to assist staff who may be suffering from stress or poor mental health, which are as follows:

- Counselling

Through the School's Optimise Health Plan (Simplyhealth) counselling can be provided through a helpline service which includes telephone counselling and up to six face-to-face counselling sessions. This will be a confidential, independent service using professionally qualified counsellors.

- Mediation

A mediation service can be accessed via ACAS in order to assist staff to return to normal working relationships. Where this service may be appropriate, the Director of HR will discuss with the staff affected by the situation.

- Teacher Support Network

The Teacher Support Network is a group of independent charities and a social enterprise that provides practical and emotional support to staff in the education sector and their families. Information, support and coaching is offered to all staff. The Teacher Support Network provides over 1000 factsheets covering a wide range of issues including money advice, how to cope with bereavement, mental health, diet and nutrition and how to manage stress. To access the free support line, staff can call 08000 562 561, or for more information go to <http://teachersupport.info/>.

- Occupational Health

Immanuel College has access to the Harrow Health Care Occupational Health Providers. Referral to this service will be via the Human Resources Department, most commonly following pre-employment health questionnaires, advice on return-to-work plans and for conditions which may be covered by the Disability Discrimination Act.

- Wellbeing Survey

GoVox is an on-line mental health wellbeing tool. Each term staff will be invited to complete a simple on-line “check in” to see how they are doing and help ensure effective support is given to the right people at the right time.

- Wellbeing Initiatives

The School offer a variety of sessions to all include including yoga, mindfulness, health awareness talks and access to the on-site fitness suite.

Help and information can also be obtained from various third-party organisations and charities, such as:

- Mind – www.mind.org.uk/0300 123 3393 - Mind is a mental health charity with various forms of support available.
- Samaritans – www.samaritans.org/0800 116 123 - Samaritans is a charity offering a free and confidential helpline that is available 24 hours a day, 365/6 days a year.

14.0 MENOPAUSE POLICY

About this policy

We are committed to supporting staff affected by the menopause. We recognise that many members of staff will experience the menopause and that, for some, the menopause will have an adverse impact on their working lives.

The purpose of this policy is to:

- raise awareness of the menopause and its impact in the workplace;
- encourage open conversations between line managers and staff; and
- direct staff to relevant advice, support and assistance.

This policy does not form part of any contract of employment, and we may amend it at any time.

Any information provided to us about your health will be processed in accordance with our Data Protection Policy. We recognise that this data is sensitive and will handle it in a confidential manner.

This policy should be read in conjunction with the Equal Opportunities Policy, Wellbeing at Work Policy, Flexible Working Policy, Dignity at Work, sickness absence policies and Data Protection Policy.

What is the menopause?

The menopause is a natural stage of life which marks the end of an individual’s menstrual cycles due to hormonal changes. As menopausal symptoms are typically experienced for several years, it is best described as a “transition” rather than a one-off event. All women will experience the menopause at some point during their life, but it can also impact trans and non-binary people who may not identify as female.

Menopause is preceded by the perimenopause, which is the phase leading up to the menopause, during which the body’s hormone levels start to change in preparation for the menopause. Perimenopause can also last several years and can involve similar symptoms to menopause itself. For the purpose of this policy, any reference to the menopause includes the perimenopause.

Most of those who experience the menopause will do so between the ages of 45 and 55. However, some start experiencing symptoms much earlier and others later.

The menopause can cause a wide range of physical and psychological symptoms that can last for several years. Symptoms can include, but are not limited to, fatigue, sleeplessness, hot flushes, memory loss or poor concentration, headaches, muscle and joint pains, painful periods, irregular periods and/or periods

can become light or heavy, weight gain, night sweats, depression and anxiety. The majority of those going through the menopause will experience some symptoms, although everyone is different, and symptoms can fluctuate and be felt to varying degrees. This policy is not intended to create a “one-size fits all” approach. It is focussed on highlighting all of the different ways that we can support our staff tailored to their individual circumstances.

Open and honest conversations

The menopause is often not spoken about as freely as some other physical illness or mental health conditions.

The menopause is not just an issue for women. All staff should be aware of the menopause so that they can support those experiencing it or otherwise affected by it. Managers, in particular, have an important role to play in ensuring that anyone experiencing menopausal symptoms gets the same support and understanding as if they had any other health condition.

We encourage an environment in which colleagues can have open conversations about the menopause. We expect all staff to be supportive of colleagues who may be affected by the menopause in the workplace.

Anyone affected by the menopause should feel confident to talk to their line manager or HR about their symptoms and the support they may need to reduce the difficulties the menopause can cause them at work.

Line manager should be ready to have open conversations with staff about the menopause and what support is available. These conversations should be treated sensitively, and any information provided, should be handled confidentially and in accordance with our Data Protection Policy and Staff Privacy Notice.

Risk assessments

We are committed to ensuring the health and safety of all our staff and will consider any aspects of the working environment that may worsen menopausal symptoms. This may include identifying and addressing specific risks to the health and wellbeing of those experiencing the menopause.

Recruitment and selection

The school will ensure that the recruitment process does not disadvantage menopausal applicants and that those involved in making selection decisions do not discriminate on the grounds of age, disability, gender reassignment or sex.

Promotion or training

The school will ensure that appointments for promotion and training opportunities will not discriminate against those experiencing menopausal symptoms.

Absence from work

Menopause-related time off will be managed and recorded in accordance with the school’s sickness absence policies. This means that any absence associated with an employee’s menopausal symptoms will be treated in the same way as other sickness absence, with the same sick pay and leave entitlements.

Support and adjustments

Whilst many who experience the menopause are able to carry on their working lives as normal, we recognise that others may benefit from adjustments to their working conditions to mitigate the impact of

the menopause symptoms on their work. These are likely to be temporary changes while staff go through the menopause transition.

If you believe that you would benefit from adjustments or other support, you should speak to your line manager in the first instance. If you feel unable to do so, you should contact HR. They may then do a risk assessment to understand more about how your menopausal symptoms might affect you at work and the adjustments you may need. The reasonable adjustments we can make will depend on individual circumstances and the nature of your role.

Physical adjustments could include temperature control, provision of electric fans or access to rest facilities. Depending on individual and business needs, adjustments such as flexible working may be considered. We may also consider more frequent rest breaks or changes to work allocation. These are examples only and not an exhaustive list.

We may encourage you to go to your GP for support, if you have not done so already or we may ask for your consent to be referred for an occupational health assessment by a doctor nominated by us or seek medical advice from your GP to better understand any adjustments and other support that may help alleviate symptoms affecting you at work.

External resources

If you need additional support, you have access to our confidential employee support helpline through Simplyhealth.

There are charities and other support groups who offer information and support about the menopause, including the following:

- Menopause Matters – www.menopausematters.co.uk – independent website providing information about symptoms and treatment options;
- Women’s Health Concern – www.womens-health-concern.org – the patient arm of the British Menopause Society; and
- The British Menopause Society – www.thebms.org.uk – a specialist authority for menopause and post productive health in the UK.

The NHS provides an overview of the menopause. You can read more at <https://www.nhs.uk/conditions/menopause/>.

15 RETIREMENT POLICY

Policy Statement

We are proud to employ people of all ages and consider that age diversity is beneficial to the School. We are committed to not discriminating against employees because of age and adhere to the principles set out in our Equal Opportunities Policy.

The School currently has no default retirement age. We acknowledge that retirement is a matter of choice for individuals and will not pressurise employees into resigning because they have reached or are approaching a certain age. However, we will review whether a fixed retirement age may become necessary for particular roles from time to time.

It may be that for certain posts within the School, a default retirement age is necessary. If this is the case, it will be specified in your contract of employment or notified to you in writing. From time to time, we will review whether any fixed retirement age remains necessary and will let you know if we consider this needs to change.

Employees are free to retire whenever they choose. Employees may wish to ask the School to consider alternative roles or working patterns, which may be agreed solely at the School's discretion. If eligible, they may make a formal request to work flexibly in accordance with the Flexible Working Policy.

Purpose of the policy

This policy aims to create a framework for workplace discussions, enabling you to express your preferences and expectations with regard to retirement and enabling us to plan for our business.

This policy does not form part of your contract of employment and we may amend it from time to time as we consider appropriate.

Discussing your future plans

You or your manager or Head of Department may want to discuss your short, medium and long-term plans, as the need arises. For example, a promotion opportunity may arise, or, if your circumstances change, you may want a different working pattern or to stop work altogether. We need to plan ahead, and so may indicate to staff from time to time that it would be helpful to know what their plans are. There is no obligation for us or you to hold workplace discussions about your future plans, but it may be mutually beneficial to do so.

We will not make generalised assumptions that performance will decline with age, whether due to competence or health issues. Regardless of age, if we think there are problems with your performance or ill-health, these will be dealt with in the usual way, through the Capability Procedure and Absence Management Procedures (as applicable).

If a workplace discussion takes place for the purposes above, we will aim to make it as informal as possible.

During any workplace discussion:

- we will not assume that you want to retire just because you are approaching a certain age, such as state pension age; and
- we will not make discriminatory comments, suggesting that you should retire due to age.

If you indicate that you are thinking of retiring, you are free to change your mind at any time until you have given notice to terminate your employment.

Your employment or promotion prospects will not be prejudiced because you have expressed an interest in retiring or changing work patterns.

If you express an interest in moving to a more flexible working pattern or changing role, we will confirm that this is what you want before any action is taken which could affect your employment, such as a change to your role or responsibilities. Alternatively, you may wish to make a request to change your working arrangements under our Flexible Working Policy.

Giving notice of retirement

If you have decided to retire, we would appreciate as much notice as possible. In any event you must give the School at least the notice you are obliged to give under your contract of employment.

Pension Arrangements

If you decide to retire or would like the School to consider alternative working patterns, you should take pension advice from your pension provider or a pension adviser. The School cannot give advice on the effect on your pension of either retirement or of amending your hours of work.

16. TRADE UNIONS

The School does not recognise a Trade Union as having representative rights and relies upon the existing management structure for communication between employee and employer.

SECTION G – FAMILY FRIENDLY LEAVE ENTITLEMENTS

1. MATERNITY LEAVE AND PAY

Maternity Leave

All pregnant employees regardless of length of service or hours worked are entitled to take up to 52 weeks' maternity leave, of which 26 weeks is Ordinary Maternity Leave and 26 weeks is Additional Maternity Leave. Additional Maternity Leave follows Ordinary Maternity Leave and there can be no gap between the two.

All pregnant employees must take a minimum of 2 weeks' maternity leave immediately following the birth. This is compulsory maternity leave.

You may start your maternity leave any time from the 11th week before the expected week of childbirth (EWC), provided that you notify the School by the 15th week before the EWC, of:-

- the fact that you are pregnant;
- the date of the EWC;
- the intended start date of maternity leave;

and submit a Form MAT B1 which is a certificate from your GP or midwife confirming the EWC.

The School will reply to you within 28 days to inform you of the date by which you are expected to return to work if you take your full leave entitlement.

You can change the start date of your maternity leave providing you give the School 28 days' notice. If it is not reasonable practicable to give this much notice, for example if the baby is born early and leave must start early, then you do not have to give the above notice but should give the School as much notice as possible.

Maternity leave cannot start any earlier than 11 weeks before the EWC, unless the baby is born early and maternity leave starts automatically.

A pregnancy related illness during or after the 4th week before the EWC automatically triggers maternity leave.

Statutory Maternity Pay (SMP)

To qualify for SMP you must:

- be pregnant and have reached the start of the 11th week before the EWC or have had your baby by then;
- have been continuously employed for at least 26 weeks by the end of the Qualifying Week (which is the 15th week before the EWC);
- have had normal weekly earnings at a rate not less than the lower earnings limit for National Insurance contributions for a period of 8 weeks immediately preceding the Qualifying Week;
- have stopped actually working for the School;
- give 28 days' advance notice of your absence and submit Form MATB1.

The SMP period lasts for a maximum of 39 weeks.

There is no distinction between part-time and full-time employees for SMP purposes.

If you are entitled to SMP, you will receive 9/10ths of your usual salary for the first 6 weeks and the current weekly SMP rate, from time to time in force, for the remaining period, (usually 33 weeks) subject to the usual deductions.

If you earn less than the weekly SMP rate, you will receive SMP at 9/10ths of your salary for the whole 39 week period.

If you are entitled to maternity leave, you will be able to receive SMP for the 39 weeks that you are away from work, unless you return to work earlier in which case your entitlement to SMP will stop on your return.

If you do not qualify for SMP, you may be entitled to the Maternity Allowance which is payable by the Department for Work and Pensions.

Enhanced Maternity Pay

You will be entitled to EMP if you are on maternity leave and meet the requirements for entitlement to SMP, and in addition, that you make yourself available for work for a period of 13 weeks, which may include a period of school holiday, following the end of your maternity leave period. If you do not meet this condition, the Governors of the School shall require you to refund the sum of the difference between your SMP entitlement and the sums paid to you as EMP. The Governors may use their discretion not to exercise this condition.

EMP is paid as follows:

- Full pay during the first four weeks of OML;
- 9/10 of salary during the next 2 weeks of OML;
- Half pay plus SMP for the next 12 weeks of OML;
- SMP only for the final 21 weeks of OML.

Please note that any further maternity leave is unpaid.

Return to Work

If you wish return to work before the end of the full 52 weeks' maternity leave, you must give the School at least 8 weeks' notice of your intention to return to work early. If you decide you would like to change the date of your return to work, you can do so providing you give the School at least 8 weeks' notice.

If you do not wish to return to work following your maternity leave you should provide the School with sufficient notice, and at least the amount of notice required by your contract of employment. If you confirm that you will not return to work after having the baby, you will still be entitled to 39 weeks' SMP if you qualify.

Maternity returnees are entitled to any salary increases or enhanced benefits that are introduced in their absence.

"Keeping in Touch Days"

During the maternity leave period the School may make reasonable contact with you. The School will keep you informed of promotion opportunities or information relevant to your job.

During the maternity leave period, by agreement with the School you may do up to ten days' work. These are known as Keeping in Touch days. You will be paid for any Keeping in Touch Days at a rate agreed with the School, in addition to any SMP. The type of work you may carry out will be a matter to be agreed between you and the School, and may include attending training or team meetings. Keeping in Touch days may not take place within two weeks after the baby is born.

Keeping in Touch days are not compulsory, and you will not suffer any consequence if you decline the offer of a Keeping in Touch day. Similarly, you do not have a right to Keeping in Touch days and the School is under no obligation to agree to a Keeping in Touch day.

2. ANTENATAL APPOINTMENTS POLICY

Time off for pregnant women

All pregnant employees (and some agency workers) are entitled to paid time off work to attend antenatal appointments. Please confirm your appointment times with your Line Manager or Head of Department giving as much notice as possible. You will need to complete a Special Leave form in the normal way and may be asked for a copy of your appointment card or text message.

Parent craft classes or relaxation classes should be attended out of core working hours wherever possible (unless they are on medical advice). Where this is not possible please discuss with the Director of Human Resources giving as much notice as possible

Time off for accompanying a pregnant woman: eligibility

You may take unpaid time off to accompany a pregnant woman to an antenatal appointment if you have a "qualifying relationship" with the woman or the child. This means that either:

- you are the baby's father;
- you are the pregnant woman's spouse, civil partner or are living with her in an enduring family relationship and she is not your sister, mother, grandmother, aunt or niece; or
- you are one of the intended parents in a surrogacy arrangement and expect to obtain a parental order in respect of the child.

Time off for accompanying a pregnant woman: how to book time off

Please give us as much notice of the appointment as possible using the Special Leave system. You must provide us with a signed statement providing the date and time of the appointment and confirming:

- that you meet one of the eligibility criteria set out above;

- that the purpose of the time off is to accompany the pregnant woman to an antenatal appointment; and
- that the appointment has been made on the advice of a registered medical practitioner, registered midwife or registered nurse.

Time off for accompanying a pregnant woman: amount of time off

You have the right to take time off to accompany a pregnant woman to up to two antenatal appointments in relation to each pregnancy.

You must not take more than six and a half hours off for each appointment, including travel and waiting time.

Time off to attend these appointments is unpaid.

Further time off for antenatal appointments is in the School's absolute discretion.

Agency workers

If you are an agency worker, the rights set out in this policy only apply to you once you have worked in the same role with us for at least 12 continuous weeks (which may include more than one assignment). For further details, please contact the Director of Human Resources.

Adoption

For details of the entitlement to time off for adoption appointments, please contact the Director of Human Resources.

3. PATERNITY LEAVE AND PAY

If you are the biological father of a child, or the husband, civil partner or partner of the mother, or in any case have parental responsibility for a child's upbringing, you may be entitled to paternity leave.

You will only be entitled to paternity leave if you have worked continuously for the School for 26 weeks leading into the 15th week before the baby is due.

Paternity Leave

If you are eligible, you can take 2 weeks' paternity leave. To claim entitlement to paternity leave you will need to give the School notice, in the form of a certificate which can be obtained from the Bursary, by no later than 28 days' prior to each period of leave or sooner if possible. Providing false information on a certificate in order to claim paternity leave will be a disciplinary offence.

Paternity leave must be taken within 52 weeks of the birth (or, if a child is born before the first day of the EWC, counting of the 52-week period does not start until the first day of the EWC). You can take a maximum of 2 weeks' leave, either one single week or two consecutive or non consecutive weeks, but not odd days. A maximum of two weeks' paternity leave is permitted per pregnancy, regardless of how many children are born.

You can change your mind about the date on which you want your period(s) of paternity leave to start providing you tell the School at least 28 days in advance. If you are unable to give 28 days' notice, you should give the School as much notice as possible.

Paternity Pay

If you take paternity leave in accordance with this policy, you will be eligible for Statutory Paternity Pay (SPP) provided your weekly earnings are over the lower earnings limit for National Insurance purposes.

If you are entitled to receive SPP, you will receive the current weekly rate from time to time in force or 90% of your average weekly earnings, whichever is the lower.

An employee who is not entitled to SPP may be entitled to Income Support from the Department of Work and Pensions.

General

Normal terms and conditions of employment continue during paternity leave except for terms relating to salary.

There are a number of other related areas such as shared parental leave, ordinary parental leave, time off for dependants and the right to request flexible working. Please see separate policies in this Handbook for details.

You are entitled to return to the same job following paternity leave.

4 SHARED PARENTAL LEAVE

About this policy

This policy outlines the arrangements for shared parental leave and pay in relation to the birth of a child.

This policy applies to employees. It does not apply to agency workers or self-employed contractors. It should be read in conjunction with related areas such as maternity leave, adoption leave, parental leave, time off for dependants and flexible working. Please see separate policies for details.

This policy does not form part of any employee's contract of employment and may be amended at any time.

Frequently used terms

The definitions in this paragraph apply in this policy.

Expected week of childbirth (EWC): the week, beginning on a Sunday, in which the doctor or midwife expects your child to be born.

Parent: One of two people who will share the main responsibility for the child's upbringing (and who may be either the mother, the father, or the mother's partner if not the father).

Partner: spouse, civil partner or someone living with another person in an enduring family relationship, but not a sibling, child, parent, grandparent, grandchild, aunt, uncle, niece or nephew.

Qualifying Week: the fifteenth week before the expected week of childbirth.

What is shared parental leave?

Shared parental leave (SPL) is a form of leave available to working parents following the birth of a child.

SPL allows parents to take up to 52 weeks' leave in total on the birth of a child. They may be able to take this leave at the same time or at different times.

Entitlement to SPL

You are entitled to SPL in relation to the birth of a child if:

- you are the child's mother, and share the main responsibility for the care of the child with the child's father (or your partner, if the father is not your partner);
- you are the child's father and share the main responsibility for the care of the child with the child's mother; or
- you are the mother's partner and share the main responsibility for the care of the child with the mother (where the child's father does not share the main responsibility with the mother).

The following conditions must also be fulfilled:

- you must have at least 26 weeks' continuous employment with the School by the end of the Qualifying Week, and still be employed by the School in the week before the leave is to be taken;
- the other parent must have worked (in an employed or self-employed capacity) in at least 26 of the 66 weeks before the EWC and had average weekly earnings of at least £30 during 13 of those weeks; and
- you and the other parent must give the necessary statutory notices and declarations as summarised below, including notice to end any maternity leave, statutory maternity pay (SMP) or maternity allowance (MA) periods.

The total amount of SPL available is 52 weeks, less the weeks spent by the child's mother on maternity leave (or the weeks in which the mother has been in receipt of SMP or MA if she is not entitled to maternity leave).

If you are the mother you cannot start SPL until after the compulsory maternity leave period, which lasts until two weeks after birth.

If you are the child's father or the mother's partner, you should consider using your two weeks' paternity leave before taking SPL. Once you start SPL you will lose any untaken paternity leave entitlement. SPL entitlement is additional to your paternity leave entitlement.

Opting in to shared parental leave and pay

Not less than eight weeks before the date you intend your SPL to start, you must give the Director of Human Resources a written opt-in notice giving:

- your name and the name of the other parent;
- if you are the child's mother, the start and end dates of your maternity leave;
- if you are the child's father or the mother's partner, the start and end dates of the mother's maternity leave, or if she is not entitled to maternity leave, the start and end dates of any SMP or MA period;
- the total SPL available, which is 52 weeks minus the number of weeks' maternity leave, SMP or MA period taken or to be taken;
- how much of that will be allocated to you and how much to the other parent. (You can change the allocation by giving us a further written notice, and you do not have to use your full allocation);
- if you are claiming statutory shared parental pay (ShPP), the total ShPP available, which is 39 weeks minus the number of weeks of the SMP or MA period taken or to be taken;
- how much of that will be allocated to you and how much to the other parent. (You can change the allocation by giving the Director of Human Resources a further written notice, and you do not have to use your full allocation);
- an indication of the pattern of leave you are thinking of taking, including suggested start and end dates for each period of leave. This indication will not be binding at this stage, but please give as much information as you can about your future intentions; and
- declarations by you and the other parent that you meet the statutory conditions for entitlement to SPL and ShPP.

Ending maternity leave

If you are the child's mother and are still on maternity leave, you must give the Director of Human Resources at least eight weeks' written notice to end your maternity leave (a curtailment notice) before you can take SPL. The notice must state the date your maternity leave will end. You can give the notice before or after you give birth, but you cannot end your maternity leave until at least two weeks after birth.

You must also give the Director of Human Resources, at the same time as the curtailment notice, a notice to opt into the SPL scheme (see above) or a written declaration that the child's father or your partner has given his or her employer an opt-in notice and that you have given the necessary declarations in that notice.

The other parent may be eligible to take SPL from their employer before your maternity leave ends, provided you have given the curtailment notice.

The curtailment notice is usually binding and cannot be revoked. You can only revoke a curtailment notice if maternity leave has not yet ended and one of the following applies:

- if you realise that neither you nor the other parent are in fact eligible for SPL or ShPP, you can revoke the curtailment notice in writing up to eight weeks after it was given;
- if you gave the curtailment notice before giving birth, you can revoke it in writing up to eight weeks after it was given, or up to six weeks after birth, whichever is later; or
- if the other parent has died.

Once you revoke a curtailment notice you cannot submit a second curtailment notice, unless the revocation was given in the circumstances outlined in bullet point two above.

If you are the child's father or the mother's partner, you will only be able to take SPL once the mother has either:

- returned to work;
- given her employer a curtailment notice to end her maternity leave;
- given her employer a curtailment notice to end her SMP (if she is entitled to SMP but not maternity leave); or
- given a curtailment notice to the benefits office to end her MA (if she is not entitled to maternity leave or SMP).

Evidence of entitlement

You must also provide on request:

- A copy of the birth certificate (or if you have not yet obtained a birth certificate, a signed declaration of the child's date and place of birth); and
- The name and address of the other parent's employer (or a declaration that they have no employer).

Notifying us of your SPL dates

Having opted into the SPL system you will need to give a period of leave notice telling the Director of Human Resources the start and end dates of your leave. This can be given at the same time as your opt-in notice, or it can be given later, as long as it is given at least eight weeks before the start of your leave. You must also state in your period of leave notice the dates on which you intend to claim shared parental pay, if applicable.

Continuous Leave

If your period of leave notice gives dates for a single continuous block of SPL you will be entitled to take the leave set out in the notice.

You can give up to three period of leave notices. This may enable you to take up to three separate blocks of shared parental leave. In exceptional circumstances we may agree to accept more than three period of leave notices.

Procedure for requesting split periods of SPL (“Discontinuous Leave”)

In general, a period of leave notice should set out a single continuous block of leave. In those circumstances you will be entitled to take the leave set out in the notice as detailed above.

You may also submit a period of leave notice where the SPL is split into shorter periods (of at least a week) with periods of work in between (“Discontinuous Leave”). We may, in some cases, be willing to consider accommodating a period of Discontinuous Leave but it is best to discuss this with your manager in advance of submitting any formal period of leave notices. This will give the School more time to consider the request and hopefully agree a pattern of leave with you from the start.

You must submit a period of leave notice for Discontinuous Leave, setting out the requested pattern of leave, at least eight weeks before the requested start date. If we are unable to agree to your request straight away, there will be a two-week discussion period. At the end of that period, we will confirm any agreed arrangements in writing. If we have not reached an agreement, you will be entitled to take the full amount of requested SPL as one continuous block, starting on the start date given in your notice (for example, if you requested three separate periods of four weeks each, you will be entitled to one 12-week period of leave). Alternatively, you may:

- choose a new start date (which must be at least eight weeks after your original period of leave notice was given), and tell the Director of Human Resources within five days of the end of the two-week discussion period; or
- withdraw your period of leave notice within two days of the end of the two-week discussion period (in which case it will not be counted and you may submit a new one if you choose).

Changing the dates or cancelling your SPL

You can cancel a period of leave by notifying the Director of Human Resources in writing at least eight weeks before the start date in the period of leave notice.

You can change the dates for a period of leave by giving the Director of Human Resources at least eight weeks' notice before the original start date and the new start date.

You do not need to give eight weeks' notice if you are changing the dates of your SPL because your child has been born earlier than the EWC, where you wanted to start your SPL a certain length of time (but not more than eight weeks) after birth. In such cases please notify the Director of Human Resources in writing of the change as soon as you can.

A notice to cancel or change a period of leave will count as one of your three period of leave notices, unless:

- the variation is a result of your child being born earlier or later than the EWC;
- the variation is at the School's request; or
- we agree otherwise.

Shared parental pay

ShPP of up to 39 weeks (less any weeks of statutory maternity pay or adoption pay claimed by you or the other parent) may be available provided you have at least 26 weeks' continuous employment with the School at the end of the Qualifying Week and your average earnings are not less than the lower earnings limit set by the government each tax year. ShPP is paid at a rate set by the government each year.

Other terms during shared parental leave

Your terms and conditions of employment remain in force during SPL, except for the terms relating to pay.

Keeping in touch

We may make reasonable contact with you from time to time during your SPL although we will keep this to a minimum. This may include contacting you to discuss arrangements for your return to work.

You may ask or be asked to work (including attending training) on up to 20 "keeping-in-touch" days (KIT days) during your SPL. This is in addition to any KIT days that you may have taken during maternity leave. KIT days are not compulsory and must be discussed and agreed with your line manager.

You will be paid for any KIT day at a rate agreed with the School, in addition to any ShPP.

Returning to work

If you want to end a period of SPL early, you must give the Director of Human Resources eight weeks' prior notice of the return date. It is helpful if you give this notice in writing.

If you want to extend your SPL you must submit a new period of leave notice at least eight weeks before the date you were due to return to work, assuming you still have SPL entitlement remaining and have not already submitted three period of leave notices. If you are unable to request more SPL you may be able to request annual leave or ordinary parental leave, which will be subject to business need.

You are normally entitled to return to work in the position you held before starting SPL, and on the same terms of employment. However, if it is not reasonably practicable for us to allow you to return into the same position, we may give you another suitable and appropriate job on terms and conditions that are not less favourable, but only in the following circumstances:

- if your SPL and any maternity or paternity leave you have taken adds up to more than 26 weeks in total (whether or not taken consecutively); or
- if you took SPL consecutively with more than four weeks of ordinary parental leave (under our Parental Leave Policy).

If you want to change your hours or other working arrangements on return from SPL, you should make a request under our Flexible Working Policy. It is helpful if such requests are made as early as possible.

If you decide you do not want to return to work you should give notice of resignation in accordance with your contract.

5. ADOPTION LEAVE AND PAY

The School follows the statutory provisions for adoption leave and pay, including in relation to attendance at adoption appointments. Information concerning adoption leave and pay entitlements may be obtained from the Director of Human Resources.

6. TIME OFF FOR DEPENDANTS

Using the Special Leave system, you are entitled to take a reasonable period of time off work to deal with an unexpected disruption in your care arrangements or an emergency involving a dependant. This policy does not apply where you need to take planned time off or provide longer-term care for a dependant.

This may include, but is not limited to circumstances in which;

- a dependant falls ill, gives birth, or has been injured or assaulted;
- you need to make longer-term care arrangements for a dependant who is ill or injured;
- you need to take action in consequence of the death of a dependant;
- you need to deal with an unexpected disruption, termination or breakdown in care arrangements e.g. such as a child minder falling ill or a nursery closure; and/or
- you need to deal with an unexpected incident involving your child during school hours.

A **dependant** is:

- your spouse, civil partner, child or parent; or
- a person who lives with you as part of your family. It does not include tenants or boarders living in the family home or someone who lives in the household as an employee or pets.

In case of illness or injury or where care arrangements break down, a dependant may also be someone who reasonably relies on you for assistance, for example an aunt who lives nearby who you look after outside work falls unexpectedly ill.

In the event of an emergency or unexpected disruption in care arrangements involving a dependant you are entitled to a reasonable amount of time off. For most cases 1 or 2 days should be sufficient to deal with the problem.

There is no limit on the number of times which you can be absent from work under this right.

Any time off under this right is unpaid.

On the first day of absence you must inform your line manager, Human Resources and staffabsence@immanuelcollege.co.uk before 8.00am or as soon as possible of the reason for your absence and if possible, the likely length of its duration.

Upon return to work you will be required to complete a Special Leave form available from the Human Resources Department for absence recording.

Abuse of this right will be dealt with in accordance with the School's disciplinary procedure.

7. CARERS LEAVE

Carers Leave is available to employees who have a dependant with a long-term care need.

A **dependant** for the purposes of this policy is:

- the employee's spouse, civil partner, parent or child;
- a person who lives in the same household as the employee, but who is not their tenant, lodger, boarder or employee; or
- anyone else who reasonably relies on the employee to provide or arrange care.

A dependant of an employee has a **long-term care** need if:

- they have an illness or injury (whether physical or mental) that requires, or is likely to require, care for more than three months;
- they have a disability for the purposes of the Equality Act 2010; or
- they require care for a reason connected with their old age.

Employees may take up to one week of unpaid carers leave in any 12-month period. The leave may be taken in half days, full days or a week block. Notice of intention to take leave must be in writing giving the earlier of:

- 3 days' notice; or
- at least twice the amount of notice than the period of leave requested.

The School may postpone the leave if it would cause disruption to the business and will give notice of the postponement the earlier of:

- 7 days after the employee gave notice; or
- Before the leave is due to begin.

The School will explain why it is necessary to postpone the leave and allow employees to take it within one month of the start date of the original leave request.

7. PARENTAL LEAVE

Staff with one year's continuous service and parental responsibility for a child (including adopted children) under the age of 18 are entitled to take parental leave. This should be distinguished from shared parental leave which is dealt with separately under the Shared Parental Leave Policy.

You have responsibility for a child if you are the biological or adoptive parent or have legal parental responsibility in some other way, for example, under a court order.

If eligible, you are entitled to a total of 18 weeks' leave. If twins are born, then each parent is entitled to 18 weeks' leave for each child.

You must give at least 21 days' written notice of your intention to take parental leave. If you wish to start parental leave immediately on the birth of a child, you must give notice at least 21 days before the expected week of childbirth. If you wish to start parental leave immediately on having a child placed with you for adoption, you should give notice at least 21 days before the expected week of placement, or if this is not possible, give as much notice as you can.

You have the right to take the leave until the child's 18th birthday.

The leave is unpaid.

Parental leave may only be taken in blocks or multiples of 1 week, up to a maximum of 4 weeks' leave in a year. Parents of disabled children can take leave in blocks or multiple blocks of 1 day.

The School may postpone leave for up to 6 months where the School considers that the employee's absence would be unduly disruptive. The School cannot postpone leave when an employee gives notice to take it immediately after the child is born or placed with the family for adoption or if a postponement of the requested leave would result in the leave being taken after the child's 18th birthday.

Employees will remain employed whilst on parental leave and will be entitled to receive all their normal benefits (other than pay).

You must tell us of any parental leave you have taken while working for another employer as this counts towards your 18-week entitlement.

The School may ask for evidence from an employee regarding parental leave entitlement (such as birth certificate, adoption or matching certificate, parental responsibility agreement or court order).

8. OTHER LEAVE

The School will recognise other statutory rights to take paid time off work, for example:

- Recognised union and accredited safety representatives may take reasonable time off to attend to their duties and undergo training.
- Employees under notice of redundancy, who have at least two years' service, may take reasonable time off to seek work or arrange training.

The holders of certain public offices may have the statutory right to take reasonable unpaid time off to fulfil their duties and the School recognises such rights.

The School may also, at its discretion, allow time off work in other circumstances, including time off to attend court as a witness, to carry out jury service and study leave. If you need to take time off work for any reason you should speak to the Director of Human Resources as far in advance as possible.

Employees should schedule appointments for the doctor, dentist etc outside of School hours wherever possible. Where this is not possible, they should be arranged at the start or the end of the working day to minimise disruption. Advance permission to attend appointments during working hours should be obtained using the Special Leave Form.

9. COMPASSIONATE LEAVE

Bereavement Leave

A member of staff can request up to five days' bereavement leave with pay upon the death of a close relative. Each request will be considered sympathetically and fairly and discussed with the member of staff. Where there is a need for additional time off, for example, where extensive travel is required to attend the funeral, this should be discussed with the Director of Human Resources

Time off to Attend a Funeral

Time off will be granted, usually up to one day paid leave, to allow a member of staff attend the funeral of a family member or someone with whom they have a close personal relationship.

Compassionate Leave

Staff may request compassionate leave for extreme personal circumstances such as when an immediate family member or person with whom they have a close relationship is diagnosed with a serious or terminal illness, a marital breakdown, or breakdown of a similar relationship, when there is major damage to their home e.g. by fire, flood, burglary. Each case will be considered sympathetically and carefully and any leave granted may be paid/unpaid or a combination.

10. PARENTAL BEREAVEMENT LEAVE

In addition to the leave above, the School complies with the statutory requirements in respect of parental bereavement leave.

All employed bereaved parents who lose a child below the age of 18 (or experience a still birth after 24 weeks of pregnancy) have a statutory right to take up to two weeks' leave. There is no minimum service requirement and the two weeks' leave will not impact upon existing rights to leave or pay.

For the purpose of this leave, a "bereaved parent" includes parents and primary carers (such as adopters, foster parents, intended parents under a surrogacy arrangement, guardians and those classed as "kinship carers", who may be close relatives or family friends that have assumed responsibility for looking after a child in the absence of parents).

Leave

Parental bereavement leave can be one week, two consecutive weeks, or two separate weeks. It can be taken at any time within the first 56 weeks of the date of the child's death.

In the first eight weeks (56 days) after the child's death there is no need to give advance notice to take parental bereavement leave. Please notify the Director of Human Resources as soon as you can on the day you want your leave to start.

To take parental bereavement leave more than eight weeks after the death of a child, please try to give at least one week's written notice.

Pay

Eligible parents with at least 26 weeks' continuous service who have weekly average earnings over the lower earnings limit will also be entitled to Statutory Parental Bereavement Pay (SPBP), paid at the statutory rate, or 90% of average weekly earnings where this is lower.

11. FLEXIBLE WORKING POLICY

Introduction

We are committed to providing equality of opportunity in employment and to developing working practices and policies that support a work-life balance. This Flexible Working Policy gives employees an opportunity to formally request a change to their working pattern in accordance with the statutory procedure for such requests.

The law does not provide an *automatic* right to work flexibly as there may be circumstances when the School is unable to accommodate the employee's desired work pattern. However, the policy and procedure set out below aims to facilitate a period of discussion between the parties and encourage both the employee and the School to consider flexible working patterns.

No one who makes a request for flexible working will be subjected to any detriment or lose any career development opportunities as a result.

Prior to making a request we rely on you to think carefully about your desired working pattern and the implications for both you and the School when making an application. In return, the School will follow a specific procedure to ensure that all requests are given full consideration and facilitated unless they cannot be accommodated for business or operational reasons.

Eligibility

In order to make a request for flexible working you must:

- be an employee (as opposed to an agency or contract worker);
- not have made two flexible working requests during the last 12 months (which includes requests that have been withdrawn); and
- not have an ongoing request to work flexibly yet to be concluded.

Employees can apply for flexible working from their first day in a job. This is known as “making a statutory application”.

Scope of a Request

You will be able to request:

- a change to the hours or days you work;
- a change to the times when you are required to work; and/or
- to change your place of work.

This covers changes to working patterns such as annualised hours, compressed hours, flexitime, home working, job-sharing, self-rostering, shift working, staggered hours and term-time working.

Applications for a change in working pattern need not always require a significant alteration. For example, you may simply wish to start work half an hour later to take your child to school and make up the time later in the day.

Procedure

You can make two applications within a 12-month.

An accepted application will mean a **permanent** change to your own terms and conditions of employment. Therefore, it will be important that, before making an application, you give careful consideration to making the request and any financial implications a change in your working pattern might have on you if the new arrangements involve a drop in salary. It would be sensible to discuss flexible working informally with your line manager before submitting a formal request.

The procedure for submitting a formal request will be as follows:

1. Any employee interested in flexible working should complete the flexible working request form annexed to the policy and present it to the Head/Director of HR.
2. Your application should be submitted in good time and ideally at least two months before you would like the changes to take effect. The application should:
 - a. State that it is a flexible working request;
 - b. Explain the reasons for your request, especially if you think the School's Equal Opportunities Policy may be relevant, for example, if your request concerns childcare or other family commitments, religious or cultural requirements, or adjustments because of a disability;
 - c. Provide as much information as you can about your current and desired working pattern (including working days, hours and start and finish times) and give the date from which you want the changes to take effect;

d. Identify the effect the changes to your working pattern will have on the work that you do, that of your colleagues and on service delivery. If you have any suggestions about dealing with any potentially negative effects, please include these in your written application; and

e. Provide confirmation that you meet the eligibility criteria set out above, including the dates of any previous formal requests for flexible working.

3. If it is felt that your request can be granted immediately, then a meeting may not be necessary. We will inform you of this in writing. Otherwise, we will arrange to meet with you to discuss the request as soon as possible, normally within 14 days. This will provide us with the opportunity to discuss the request. It will also provide an opportunity to consider other alternative working patterns should there be problems in accommodating the desired work pattern outlined in your application. You may, if you wish, bring a colleague to the meeting. We will try to arrange the meeting at a time and place that is convenient to everyone. If it is not possible to meet in person, we may discuss the request with you by telephone.

The meeting will be used to discuss the working arrangements you have requested. You will be able to explain how the arrangements will accommodate your needs. You will also be able to discuss what impact your proposed working arrangements will have on your work and that of your colleagues. If it is felt it may not be possible to accommodate your request, discussion at the meeting also provides an opportunity to explore possible alternative working arrangements.

4. We will consider your request carefully against the following criteria:

- burden of additional cost
- inability to reorganise work amongst existing staff
- detrimental effect on our ability to meet customer demands
- inability to recruit additional staff
- detrimental impact on quality or performance
- insufficiency of work during the periods you want to work; and
- planned structural changes.

5. We will notify you of the decision as soon as possible, usually within 14 days of the meeting. We will write to you to either agree to a new work pattern and a start date; or to provide clear business ground(s) as to why your application cannot be accepted and the reasons why the ground(s) apply in the circumstances. We will also remind you of your right of appeal against the decision. If we need to take further action before notifying you of our final decision, we will let you know at this time and try to agree a timescale with you. This may be necessary, for instance, if we cannot agree to your initial request, but a compromise may be possible which we need to discuss with you further.

6 We will aim to complete the procedure within no more than two months from the date on which you submit the formal request. There may be exceptional occasions when this will not be possible. In such an instance, we will seek to agree an extension of time with you and confirm this in writing.

7 In some circumstances, we may agree to offer you the new working arrangements on a trial basis. This will give you and the School the opportunity to review the working arrangements and decide whether they should be made permanent.

8 You have the right to appeal the decision within 14 days of it being notified to you. Any appeal should be made in writing to the Head, setting out the reasons and grounds for your appeal. The Head will arrange a meeting with you, usually within 14 days of receiving notice of your appeal, to consider your appeal. You can be accompanied by a colleague at the appeal meeting if you wish. You will be given a final decision in writing as soon as possible, usually within 14 days of the appeal meeting, giving detailed reasons for the decision. If it is felt that your appeal can be granted immediately, then an appeal meeting may not be necessary. The decision of the appeal will be final.

You may withdraw your request at any time before it is granted. If you do choose to withdraw the request, you will not be eligible to submit a further request for a further twelve months from the date of your original request.

It is important that you communicate with us about your request and attend meetings to discuss it. If you repeatedly fail to attend meetings or respond to communications, the School has the right to assume that you have withdrawn your request, and may write to you to confirm this fact. This will mean that you cannot make another request for flexible working arrangements for a further year.

Where an employee works either part time or a flexible working pattern, pay and benefits will be calculated on a pro-rata basis.

Annex – Request for Flexible Working

FLEXIBLE WORKING REQUEST FORM

Name	
Job title	
Employed from	

I would like to apply to work a flexible working pattern that is different to my current pattern under my right provided under section 80F of the Employment Rights Act 1996. I confirm that I meet each of the eligibility criteria as follows:

- I am an employee (as opposed to an agency or contract worker);
- I have not already made two flexible working requests during the last 12 months (which includes requests that have been withdrawn); and
- I do not have an ongoing request to work flexibly yet to be concluded.

Date of any previous request to work flexibly under this right:
--

Describe your current working pattern (days/hours/times worked):

Describe the working pattern you would like to work in the future (days/hours/times worked):

Describe the effects these changes may have on the department/school and how these effects could be dealt with:
--

Describe any benefits associated with the proposed change from a school perspective:

Is this request being made as a reasonable adjustment to address a disability? Yes/No

If yes, please give details:

I would like this working pattern to commence from:	Date:
---	-------

Signed

Date

SECTION H – HOLIDAY AND SICKNESS ABSENCE

1. HOLIDAYS FOR SUPPORT STAFF

The holiday year is 1st September to 31st August (inclusive).

Holidays must be taken in the year in which entitlement arises and cannot be carried forward to future years. Any holiday not taken by the end of the holiday year will be lost (unless you have been prevented taking it in the relevant holiday year by one of the following: a period of sickness absence or statutory maternity, paternity, adoption, shared parental, parental or parental bereavement leave. In cases of sickness absence, carry-over is limited to four weeks' holiday per year less any leave taken during the holiday year that has just ended. Any such carried over holiday which is not taken within eighteen months of the end of the relevant holiday year will be lost.

You are entitled to the leave entitlement as set out in your contract of employment or any subsequent agreement.

Depending on your position you may not be required to work during the allocated School holidays but your basic entitlement to holiday will nevertheless remain that as set out within your contract.

If your employment commences or terminates part way through the holiday year, the entitlement to holidays during that year will be assessed on a pro-rata basis. The School may make deductions from your final salary in respect of any holiday taken in excess of entitlement.

A day's pay for the purpose of calculating holiday or other leave will be calculated on the basis set out in your contract of employment.

We may require you to take (or not to take) holiday on particular dates, including during your notice period.

You must obtain the prior written permission of your line manager before committing yourself to travel bookings or any alternative positive arrangements. Please give as much notice as possible of holiday requests to allow planning of work schedules and rotas, where necessary. You should not normally plan to take more than 2 weeks at any one time. A longer period requires your Manager's agreement and will only be granted in special circumstances. Holidays must be requested three weeks in advance and should be taken during the normal School holidays or at such other times as are convenient for the School.

You may not take annual holiday until after the successful completion of your probation, other than at the discretion of your line manager. However, your holiday entitlement is calculated from when you join the School.

All staff will be required to attend staff training days at such time during the school holidays as is reasonably required by the School, you will not receive any additional payment in respect of this.

In certain circumstances you may be required to undertake some work during the school holidays for example to assist on external examination results days and in respect of pupil recruitment processes or to co-operate with disciplinary, competency and/or grievance procedures. You will not receive any additional payment in respect of this.

2. HOLIDAYS FOR TEACHING STAFF

Annual Holidays

Teachers are not usually required to work during school holiday periods (the dates of which are available within the School calendar), except as detailed in individual contracts of employment.

Nevertheless, your basic holiday entitlement shall be that as detailed within your contract of employment.

Public Holidays

Where a public holiday falls within the School term (the dates of which are available within the School calendar) and the School is working, you will be required to work and will not be entitled to a day off in lieu.

In certain circumstances you may be required to undertake some work during the school holidays for example to assist on external examination results days and in respect of pupil recruitment processes or to cooperate with disciplinary, competency and/or grievance procedures. We will always endeavour to provide you with reasonable advance notice of any requirement to work during school holiday periods.

All staff will be required to attend staff training days at such time during the school holidays as is reasonably required by the School, you will not receive any additional payment in respect of this.

3. SICKNESS NOTIFICATION AND CERTIFICATION

Staff requiring sick leave must inform their manager and send an email to staff absence by 8:00am on the first day of absence or as soon as possible afterwards, using the email staffabsence@immanuelcollege.co.uk. If they are unable to make the call themselves, they should ask a dependant/relative/friend to do so.

Absences of up to seven calendar days may be self-certified but beyond seven calendar days a fit note must be provided. In the event of a protracted illness further fit notes will be required on a regular basis to cover the entire period of absence.

You should expect to be contacted during your absence by your line manager or a member of the Human Resources Department to discuss your health and wellbeing, expected length of continued absence from work and your expected return date and any work-related matters that require attention in your absence. Such contact is intended to provide reassurance and will be kept to a reasonable minimum. If you have any concerns while absent on sick leave, whether about the reason for your absence or your ability to return to work, you should feel free to contact the Director of Human Resources at any time.

If your doctor provides a fit note stating that you "may be fit for work" you should inform the Director of Human Resources immediately. We will discuss with you any additional measures that may be needed to facilitate your return to work, taking account of your doctor's advice. This may take place at a return-to-work interview (see below). If appropriate measures cannot be taken, you will remain on sick leave and we will set a date to review the situation.

Where we are concerned about the reason for absence, or frequent short-term absence, we may require a medical certificate for each absence regardless of duration. In such circumstances, we will cover any costs incurred in obtaining such medical certificates, for absences of a week or less, on production of a doctor's invoice or receipt.

4. RETURN TO WORK INTERVIEWS

If you have been absent on sick leave for more than five days we will arrange for you to have a return-to-work interview. This enables us to confirm the details of your absence. It also gives you the opportunity to raise any concerns or questions you may have, and to bring any relevant matters to our attention.

Where your doctor has provided a certificate stating that you "may be fit for work" we will usually hold a return-to-work interview to discuss any additional measures that may be needed to facilitate your return to work, taking account of your doctor's advice.

5. MEDICAL EXAMINATIONS

The School reserves the right to require you at any time to have a medical examination with a medical professional of its own choice and at its own expense. The purpose of such medical examinations are to determine whether there are any matters which might impair your ability to perform your duties. You will be asked to agree that any report produced in connection with any such examination may be disclosed to us and that we may discuss the contents of the report with the relevant medical professional.

The School reserves the right to submit an employee for examination by the school medical officer/occupational health practitioner at any time and in particular, but not limited to, the following circumstances.

- Before or after resuming work following an accident due to an industrial accident.
- During or after a prolonged or regular absence due to illness.
- Prior to transferring to another occupation within the school.
- In order to comply with statutory regulations; or
- At the request of management when there is doubt regarding the validity of periods of self-certified absence.

6. SICK PAY

You may be entitled to Statutory Sick Pay (SSP) if you satisfy the relevant statutory requirements. For the purpose of calculating your entitlement to SSP qualifying days are those days on which you are normally required to work. The rate of SSP is set by the government in April each year. No SSP is payable for the first three consecutive days of absence. It starts on the fourth day of absence and may be payable for up to 28 weeks.

Subject to compliance with the provisions within your contract of employment and the provisions of the relevant sickness policy, you may be entitled to occupational sick pay as set out within your contract of employment.

The School at all times reserves the right to withhold or discontinue payment of School sickness benefit at its discretion:

- If it is satisfied that there is/has been abuse or misrepresentation;
- If injury from an accident at work was caused by the employee's own misconduct;
- If an employee has failed to follow the school's absence rules and procedures; or

- If, in the opinion of the employee's doctor or the school medical officer/occupational health practitioner, the employee behaves in a manner likely to delay recovery.

The School reserves the right to change the provisions of the School sick pay scheme at any time and in particular if there are alterations to the State scheme or to the statutory sick pay scheme.

The School's sick pay scheme does not affect any entitlement an employee may have to receive SSP for the same period of sickness absence, although any sick pay you receive from the School shall be inclusive of any SSP due to you.

Employees excluded or transferred from SSP must claim all social security benefits to which they are entitled as such benefits will be deducted from School sick pay, including benefits for dependants where applicable.

Should the School (when completing the school's absence report with the employee on return) not authorise payment, deduction of monies already paid for the period concerned will be made at the next convenient pay period. Should SSP be part of this payment the matter will be discussed between the employee's manager and the Head before action is taken.

7. UNAUTHORISED ABSENCE

Absence from work without authorised leave or adequate explanation is a breach of discipline and may lead to disciplinary action. Unauthorised absence will be unpaid and the School reserves the right to make deductions from salary in respect of such absence on the basis of a day's pay calculated as set out in your contract of employment.

8. MONITORING AND ABSENCE MANAGEMENT PROCEDURE

Levels of absence need to be contained because, not only is everybody's work important, but persistent absences place an undue load on your colleagues. Absence is monitored on a regular basis. Nevertheless, the school's approach as an employer, in cases of ill health, will always be one of sympathy, compassion and understanding.

We may apply the following procedure whenever we consider it necessary, including, for example, if you:

- have been absent due to illness on a number of occasions;
- have discussed matters at a return to work interview that require investigation; and/or
- have been absent for more than five days.

Stage 1: First Sickness Absence Meeting

In the first instance you will be invited to a meeting with your Head of Department and/or the Director of Human Resources. The purposes of this first meeting may include:

- discussing the reasons for your absence;
- if you are on long term absence, determining how long the absence is likely to last;
- if you have been absent on a number of occasions, determining the likelihood of further absences;
- considering whether medical advice is required;
- considering what, if any, measures might improve your health and/or attendance; and
- agreeing a way forward, action to be taken and a timescale for review.

Stage 2: Further Sickness Absence Meetings

Depending on the matters discussed at the first meeting and the extent to which attendance improves, a further meeting or meetings may be necessary.

The purposes of further meeting(s) may include:

- Discussing the reasons for and impact of your ongoing absence(s).
- Where you are on long-term sickness absence, discussing how long your absence is likely to last.
- Where you have been absent on several occasions, discussing the likelihood of further absences.
- If it has not been obtained, considering whether medical advice is required. If it has been obtained, considering the advice that has been given and whether further advice is required.
- Considering your ability to return to/remain in your job in view both of your capabilities and the School's needs and any adjustments that can reasonably be made to your job to enable you to do so.
- Considering possible redeployment opportunities and whether any adjustments can reasonably be made to assist in redeploying you.
- Where you are able to return from long-term sick leave, whether this is to your job or a redeployed job, agreeing a return-to-work programme.
- If it is considered that you are unlikely to be able to return to work from long-term absence, whether there are any benefits for which you should be considered.
- Agreeing a way forward, action that will be taken and a timescale for review and/or a further meeting(s). This may, depending on the steps we have already taken, include warning you that you are at risk of dismissal.

Stage 3: Final Sickness Absence Meeting

Where you have been warned that you are at risk of dismissal, we may invite you to a meeting under the third stage of the absence management procedure.

The purposes of the meeting will be:

- To review the meetings that have taken place and matters discussed with you.
- Where you remain on long-term sickness absence, to consider whether there have been any changes since the last meeting under stage two of the procedure, either as regards your possible return to work or opportunities for return or redeployment.
- To consider any further matters that you wish to raise.
- To consider whether there is a reasonable likelihood of you returning to work or achieving the desired level of attendance in a reasonable time.
- To consider the possible termination of your employment.

Any termination on grounds of ill health will normally be with full notice or payment in lieu of notice.

Arrangements for sickness absence meetings

Unless it is impractical to do so, we will give you written notice of the date, time and place of a sickness absence meeting. We will put any concerns about your sickness absence and the basis for those concerns in writing or otherwise advise you why the meeting is being called. A reasonable opportunity for you to consider this information before a meeting will be provided.

The meeting(s) will be conducted by a manager and/or the Director of HR. You may bring a trade union representative or colleague to any meeting or appeal meeting under this procedure. You must give your companions details to the manager conducting the meeting, in good time before the meeting is due to take place.

You must take all reasonable steps to attend a meeting. Failure to do so without good reason may be treated as misconduct. If you or your companion are unable to attend at the time specified, you should immediately inform the manager who is conducting the meeting who will seek to agree an alternative time.

Confirmation of any decision made at a meeting, the reasons for it, and of the right of appeal will be given to you in writing as soon as possible following a sickness absence meeting.

If, at any time, it is considered that you may have taken or are taking sickness absence when you are not genuinely unwell, the matter may instead be dealt with under our Disciplinary Procedure.

The full circumstances of the employee's situation will be considered. Those with a serious illness or disability will continue to be treated sympathetically in accordance with the School's policies.

Where the School's doctor finds that an employee is incapable of continuing with their duties on a permanent basis, because of ill health, the School will endeavour to offer redeployment, subject to vacancies and suitability for alternative work. However, this may not always be possible and, when all possible, practical alternative options have been explored, termination of service on the grounds of ill health or incapability will be considered.

Appeals

You may appeal against the outcome of any stage of this procedure and you may bring a trade union representative or colleague to an appeal meeting.

An appeal should be made in writing, stating the full grounds of appeal, to the Head within five working days of the date on which the decision was sent to you.

An appeal meeting will be convened as soon as it reasonably practicable.

You will be provided with written details of any new information which comes to light before an appeal meeting. You will also be given a reasonable opportunity to consider this information before the meeting.

Where practicable, an appeal meeting will be conducted by a manager senior to the individual who conducted the sickness absence meeting(s).

The final decision will be confirmed in writing, as soon as possible after the appeal meeting. There will be no further right of appeal.

In cases of termination of employment on ill health grounds, the date of termination will not be delayed pending the outcome of an appeal. However, if the appeal is successful, the decision will be revoked with no loss of continuity or pay.

SECTION I - HEALTH AND SAFETY AT WORK

1. POLICY STATEMENT

Immanuel College places the greatest importance on health and safety matters and undertakes to conduct its operations in such a way as to ensure the health and safety of all its pupils, employees, visitors and the general public.

To this end, the School will endeavour to create and develop a working environment in which there is an awareness of the vital importance of health and safety and which encourages all employees to participate in developing and practising safe working methods and to have regard for the welfare of themselves and others.

A comprehensive health and safety policy document covering the organisation and arrangements for meeting the specific needs of the school, both generally and for individual departments, is available on staff shared drive and within the Health & Safety portal.

Employees have a responsibility to do all they can to prevent an injury to themselves, their colleagues and others affected by their actions or omissions at work and cooperate with the School on matters of health, safety and welfare. They must familiarise themselves with, and conform to, the School's Health and Safety policies, procedures and rules.

We are confident that all employees will comply with their obligation to act in a safe manner and will fully co-operate with the School's Governing Body in matters of health, safety and welfare.

2. RESPONSIBILITY FOR HEALTH AND SAFETY

The individual responsible for health and safety at work in the School is the Director of Finance & Operations. He will ensure so far as is reasonably practicable, that the School's policy on health and safety at work is effectively implemented.

The health and safety responsibilities cover the maintenance of safety records, accident investigations, assessments and inspections. They will familiarise themselves with all relevant health and safety legislation and take expert advice if required.

In the absence of the Director of Finance & Operations, the responsibilities for health and safety at work will be assumed by the Estates Manager.

3. MANAGEMENT AND SUPERVISION

All those with responsibility for the management or supervision of staff will promote positive attitudes towards health and safety. They must ensure that the tasks carried out by their subordinates are performed with the utmost regard for the health and safety of all involved.

Those with a management or supervisory role will:

- ensure that on joining the School all new employees are fully familiar with health and safety matters appropriate to their duties including accident reporting, emergency procedures, fire precautions, code of safe conduct and the location of first aid boxes

- provide adequate information, instruction, training and supervision to ensure the health and safety of employees and pupils
- ensure that all staff are familiar with the School's health and safety at work policy
- co-operate with and participate in the investigation of all accidents and conduct of assessments and inspections
- ensure the maintenance of good housekeeping standards
- review the safe operation of all work equipment
- within their area of authority, regularly inspect the workplace with regard to the suitability of equipment provided for the health and safety of employees, check work methods and practices to ensure safe systems of work and inspect arrangements for the use, handling, storing and transport of articles and substances
- carry out Risk Assessments within their departments and maintain a record of their findings

4. ALL STAFF

Employees have a responsibility to do all they can to prevent an injury to themselves, their colleagues and others affected by their actions or omissions at work and co-operate with the School on matters of health, safety and welfare. They must familiarise themselves with, and conform to, the health and safety at work policy, School procedures and rules.

5. HEALTH AND SAFETY COMMITTEE

The Health and Safety Committee will be responsible for co-ordinating the implementation of the health and safety at work policy and will keep under review measures taken to ensure the health and safety of employees with the objective of promoting co-operation between the management and employees.

The health and safety committee will:

- review statistics with a view to recommending corrective action
- examine safety audits, inspections and assessments
- consider legislation, reports and information in order to determine necessary action
- keep a watch on the effectiveness of rules, systems of work, training and communication

7. FIRST AID AND ACCIDENT REPORTING

First Aid

First Aid boxes are available and are looked after by the School Nurse and/or First Aid Officer, who are the predominant people responsible for taking control in the event of an accident or injury.

Accident Reporting

- All accidents, however minor, must be reported to the School Nurse/Front Office who will complete an accident report form (near misses, potential hazards and any damage must be reported immediately).
- All accidents (near misses, potential hazards and damage) will be investigated by the department head who will be responsible for ensuring that corrective action is taken where appropriate to prevent a recurrence.
- The Director of Finance & Operations responsible for health and safety will notify the appropriate authorities when necessary.

8. EMERGENCY PROCEDURES

Discovering a Fire or Other Emergency

- **THE PRIORITY IN THE EVENT OF A FIRE IS THE SAFE AND RAPID EVACUATION OF PUPILS AND STAFF**
- If you see signs of a fire or other emergency which could place employees or pupils in danger, **SOUND THE ALARM.**
- **IF SAFE TO DO SO**, attempt to control the fire or other emergency, with assistance if available. **Never** put yourself at risk even with the smallest fire (or other emergency). **Never** attempt to move burning objects
- Ensure that the appropriate emergency services are summoned. **DIAL 999** and state clearly the address where the fire is.

Evacuation Procedures

- On hearing the alarm, or if instructed, switch off any central control switches and/or switch off any equipment on which you may be working.
- **IF SAFE TO DO SO**, close windows and doors and secure cash and confidential documents. If closed doors feel warm, **DO NOT OPEN THEM.**
- Leave the building by the nearest available exit. Do not use lifts. Ensure that any visitors you have also leave the building. **DO NOT RUN. DO NOT COLLECT PERSONAL BELONGINGS.**

If You Are Cut Off by a Fire

- Close the door, using clothing etc to block any gaps.
- Go to the window and attract attention.
- If the room becomes smoky, stay low – it is easier to breathe.
- If the window is jammed, break it; remove jagged glass from the lower sill and cover it using clothing etc.
- If appropriate get out feet first and (if not on the ground floor) lower yourself to the full length of your arms before dropping.

- Make your way to your evacuation assembly point on the All Weather Pitch and report to the fire warden.
- **DO NOT HINDER ROADWAYS AND ROUTES** that may be used by emergency vehicles.
- **DO NOT RETURN TO THE BUILDING** until the all clear has been given and until instructed by your fire warden.
- Never assume the evacuation is a drill.

9. FIRE PRECAUTIONS

Potential fire risks need not be dangerous provided that some simple but important precautions are observed by all employees.

- Memorise the evacuation procedure, your emergency exit and assembly point in case of fire.
- Familiarise yourself with the position of fire-fighting equipment and the correct method of operation of extinguishers and never interfere with, or misuse, the fire equipment.
- Keep fire exits, routes and access to fire-fighting equipment clear of any obstructions; do not wedge fire doors open.
- Keep your working area free of waste as far as possible and in particular those areas which are not easily accessible, e.g. under desks, behind radiators etc. Keep all combustible materials a safe distance from heating appliances and do not place anything on heaters.
- There is to be **NO SMOKING** on the premises.
- If you see anything which may be a fire hazard, correct it yourself if easy and safe to do so, or report it immediately.

10. CODE OF SAFE CONDUCT

- Conform to the health and safety at work policy, all health and safety rules and signs, fire precautions and emergency procedures.
- Ensure that you understand and follow the safe operation of your duties; ask if you do not understand any aspect of these.
- Report all accidents, near misses, potential hazards and damage immediately.
- In the event that personal protective equipment or clothing is provided, it must be used and properly looked after.
- Do not interfere with or misuse anything provided for the health and safety of employees.
- Do not act in a way that could endanger yourself or others; do not play practical jokes.
- Do not run, especially on stairs or steps. Use handrails; never read while walking.
- Keep your work area tidy and clear of obstructions; do not leave things lying around.

- Clean up any spilt liquids, tracked in rain etc. immediately.
- In the event of your being called upon to handle bulky or heavy objects, only lift or move what you can easily manage; always bend your knees and keep your back straight – take the stress in your legs, not your back. **GET ASSISTANCE** if in doubt. Do not overreach; do not climb on anything not meant for the purpose; use a ladder, ensuring that it is good condition.
- Electrical equipment is regularly checked and is normally safe when properly used, **BUT**:
 - never touch electrical equipment with wet hands
 - always disconnect electrical equipment before moving it
 - never attempt electrical repairs unless authorised
 - always keep electrical supply cables and wires away from wet areas or from where they could be walked over etc.
 - always switch off equipment if not in use; disconnect from the mains outside normal working hours unless instructed otherwise
- Information on any specific hazards and precautions (e.g. COSHH, DSE) will be issued as appropriate and is available from the executive responsible for health and safety. Training in dealing with hazards will be conducted as appropriate.

11. DISPLAY SCREEN EQUIPMENT

- Adapt the furniture to fit your body. The lower back needs support; adjust the backrest if necessary. Place feet flat on the floor or use a footrest and use a document holder if necessary.
- Adjust the VDU to increase your comfort. The top should be just below eye level. Contrast and brightness may be adjusted for your individual preference. Position the VDU at a 90° angle to windows if possible.
- Dim the lights or adjust blinds/curtains if necessary but do not make the room too dark.
- Avoid wearing light coloured clothing which can reflect light on to the screen.
- Look into the distance periodically – at something at least 20 feet away.
- Vary your routine. Take a few minutes away at regular intervals to organise materials or files or to deliver completed work.
- Do some stretching exercises during the day (neck, shoulder, back, wrists, hands and fingers)

12. INFORMATION AND TRAINING

New Employees

On joining the school, all employees will be informed of the general health and safety aspects of their employment and of any specific information appropriate to them.

All Employees

All employees will be informed about, and trained in, health and safety matters including exposure to any identified risks. Such information and training will be given in the event of there being a change in circumstances affecting health and safety, and otherwise will be adapted and repeated periodically where appropriate.

13. RISK ASSESSMENT

Regular and systematic inspections and risk assessments of all potential hazardous substances and work activities will be made by, or under the authority of, the executive responsible for health and safety and will take into account all the relevant legislation, guidance and codes of practice. Specialist advice will be obtained as required and the risk assessment will be reviewed periodically and at any other time as required by legislation. The significant findings will be recorded and appropriate preventative and/or protective measures taken as necessary to comply with legislation.

14. TEMPORARY STAFF, CONTRACTORS AND VISITORS

Temporary staff, contractors and visitors will be required to conform to all health and safety requirements whilst on the school's premises. They will EITHER be accompanied by a responsible permanent employee at all times OR will be issued with the relevant rules, procedures and specific hazard information on back of security badge.

15. OCCUPATIONAL HEALTH

It is the School's policy to protect its employees as far as practicable from any health risk which may arise from work or the working environment by:

- Developing occupational health procedures and ensuring that policies are current and relate to the School's needs.
- Providing pre-employment screening.
- Establishing and maintaining appropriate standards for health and hygiene relevant to each employee.
- Identifying possible health hazards within the working environment.
- Advising on the prevention of occupationally induced health problems with a view to improving employee health and performance.
- Providing an efficient first aid service.

16. SMOKING

This is a non-smoking site.

Smoking constitutes a fire hazard and can be unpleasant and dangerous for the smoker and colleagues.

Smoking on the premises (in any form, including the smoking of e-cigarettes) is against the Staff Code of Conduct and therefore an offender will be subject to the disciplinary procedures.

Employees discovered smoking in an area where there is a particular fire risk will be liable to dismissal without notice.

SECTION J - ANTI-CORRUPTION AND BRIBERY POLICY

Introduction

It is the School's policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery. The School will comply with the Bribery Act 2010 (the Act), in respect of our conduct both at home and abroad.

The purpose of this policy is to:

- a. set out the School's responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and
- b. provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and/or a fine. As an employer, if we fail to prevent bribery or are found to have taken part in corruption, the School could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

In this policy, **third party** means any individual or organisation you come into contact with during the course of your work for us, and includes actual and prospective pupils and parents, suppliers, business contacts, agents, advisers, and government and public bodies including their advisors, representatives and officials, politicians and political parties.

Who is covered by the policy?

This policy applies to all individuals working for the School at all levels (whether permanent, fixed-term or temporary, paid or unpaid), and includes Governors, volunteers, peripatetic staff, agents or any other person associated with us (collectively referred to as **workers** in this policy).

What are bribery and corruption?

A bribe is an inducement or reward offered, promised or provided in order to gain any business or personal advantage. An "advantage" includes money, gifts, loans, fees, hospitality, services, discounts, the award of a contract of anything else of value.

Corruption is the abuse of an entrusted power or position for private gain.

The following are examples of circumstances in which offences under the Act may occur:

- An IT Company providing services to the School offers you a free I-Pad as an incentive for renewing its contract for services.
- A Ski Company tendering for a contract with the School to facilitate a School trip offers to accommodate your children on the trip free of charge.
- To request or offer a reduction in school fees at another school in return for an expectation that the member of staff would induce other families to accept places at the other school.

Accepting any of the above offers may amount to an offence under the Act.

Gifts and hospitality

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties.

The giving or receipt of gifts or hospitality is not prohibited, if the following requirements are met:

- it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- it complies with local law;
- it is given in the School's name, not in your name;
- it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- it is appropriate in the circumstances. For example, in the UK it is customary for small gifts to be given at Christmas time;
- taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time;
- it is given openly, not secretly; and
- gifts should not be offered to, or accepted from, government officials or representatives without the prior approval of the Director of Finance & Operations or the Head.

From time to time parents or pupils may offer you gifts on an individual basis as a demonstration of their gratitude for the work you have done on their behalf, and this is perfectly legitimate. However, in some contexts such gifts could be construed as an improper inducement to, for instance, accord preferential treatment in the future. Consequently, it is necessary for the School to have rules applying to such gifts. These are as follows.

- Any gifts of cash or other monetary equivalent (e.g. vouchers) of whatever value, or any other gifts of a value of £100 or over, should be reported to the Head via email. They should be donated to the School or School's nominated charity. The parent should be thanked for their gift and informed that it is being donated to the School or School's nominated charity.
- If you receive a gift from a group of parents, then the maximum value that can be accepted will be based on an average of £25 per pupil.
- You may retain gifts received from suppliers if they are token work-related items e.g. pens, notepads, flash drives, desk calendars or diaries. Any other gifts should be politely refused or donated to the School or School's nominated charity. In either case the Head should be notified by email, and if the gift is being donated to charity then the giver of the gift should be told that this is the case.
- You may retain any other gifts of a value of up to £100.

What is not acceptable?

It is not acceptable for you (or someone on your behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that an advantage for the School will be received, or to reward an advantage already received;
- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;

- accept payment from a third party that you know or suspect is offered with the expectation that it will obtain an advantage for them;
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by the School in return;
- threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy.

Donations

The School only makes charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made in the School's name or on behalf of the School without the prior approval of the Head.

Your responsibilities

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

The School could be held liable for failing to prevent bribery if a person associated with it commits an offence under the Act. You must notify the Head as soon as possible if you believe or suspect that a breach of this policy has occurred, or may occur in the future, or if you consider that you have been offered any inducement or reward with a view to obtaining a business or personal advantage.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

Record-keeping

The School keeps financial records and has appropriate internal controls in place which will evidence the business reason for making payments to third parties.

All employees must make their line manager aware and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.

You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with the School's expenses policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

How to raise a concern

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. Concerns should be reported by following the procedure set out in our Whistleblowing Policy.

Protection

Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. The School aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

The School is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should use the School's Grievance Procedure.

Training and communication

Training on this policy forms part of the induction process for all new workers. All existing workers will receive regular, relevant training on how to implement and adhere to this policy.

SECTION K - ANTI-FRAUD POLICY

Introduction

The School is committed to the prevention of fraud and the promotion of an anti-fraud culture. We operate a zero-tolerance attitude to fraud and require staff to act honestly and with integrity at all times, and to report all reasonable suspicions of fraud.

Fraud may occur internally or externally and may be perpetrated by staff, consultants, suppliers or contractors, individually or in collusion with others.

We will investigate all instances of actual, attempted and suspected fraud committed by staff, consultants, suppliers and other third parties and will seek to recover funds and assets lost through fraud. Perpetrators will be subject to disciplinary and/or legal action.

The purpose of this policy is to set out your responsibilities with regard to fraud prevention, what to do if you suspect fraud and the action that will be taken by management.

This policy is endorsed and supported by the Head and the Chair of Governors.

Who is covered by the policy?

This policy applies to all individuals working for the School at all levels (whether permanent, fixed-term or temporary), and includes Governors, volunteers, agents or any other person associated with us (collectively referred to as “staff” in this policy).

Definition of fraud

The term ‘fraud’ is commonly used to describe the use of deception to deprive, disadvantage or cause loss to another person or party. This can include theft, the misuse of funds or other resources or more complicated crimes such as false accounting and the supply of false information.

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

The School has established procedures to encourage staff to report actual, attempted or suspected fraud and/or other forms of illegal activity without fear of reprisal.

Key responsibilities

The Director of Finance & Operations is responsible for:

- Developing, implementing and maintaining adequate systems of internal control to prevent and detect fraud.
- Regularly reviewing the School’s anti-fraud policy and compliance to ensure it remains effective and relevant to the needs of the business.
- Investigating all allegations of fraud and commencing disciplinary and/or legal action where appropriate.
- Reporting to the Treasurer on all aspects of fraud risk management.

Managers are responsible for:

- Familiarising themselves with the types of fraud and dishonesty that might occur within their departments or areas of work.
- Monitoring compliance with internal controls and agreed policies and procedures.
- Notifying the Director of Finance & Operations (or other specified person) of any indications of fraudulent activity.

Staff are responsible for:

- Ensuring that the School's reputation and assets are protected against fraud.
- Reporting known or suspected fraud.
- Assisting in the investigation of suspected fraud.

Reporting suspicions

Staff must report concerns about actual, attempted or suspected fraud to their line manager or the Director of Finance & Operations.

Staff should not attempt to investigate any fraud themselves.

The Public Interest Disclosure Act 1998 protects employees who raise concerns about certain matters of public interest in good faith. Staff can obtain free independent advice from the charity Protect on 020 3117 2520.

A copy of the School's Whistleblowing Policy can be found in Section E of this Handbook.