



Culford

Employees Employment Handbook

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Principles

This employment handbook contains all employment policies for Culford School and 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, a number of principles have been adopted to;

- promote use of the knowledge, skill and experience of all employees to benefit the school
- reflect a sensitivity to the attitudes and views of all employees
- offer opportunities for personal development in alignment with the needs of the school
- provide pay and benefits that are fair and competitive for the individual job.
- deal with all employees with good faith and honesty.
- promote high standards of occupational health and safety.

1. School Facilities and Amenities

1.1 Catering Services

Lunch may be obtained from the dining hall between 12.20 onwards by staff employed on the premises and entitled to a lunch break, when kitchens are open and providing meals.

1.2 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. All members of staff are advised to have their valuable property items insured against loss or damage. Valuables should not be brought to work and you should keep essential belongings with you, secured in a locker or in a safe place. Lost and found property should be reported immediately to reception. Staff car parking is available in the following locations:

- In front of Culford Hall
- Preparatory and Pre-Preparatory school car parks
- Storey car park
- Sports Centre car park and hockey overflow carpark
- Car park at the rear of the kitchens

Vehicles must not be parked in any place within the school grounds other than those listed above, and must not be parked in a way that could restrict access for emergency vehicles or cause inconvenience to others. Vehicles should be driven with great care on the school site and due regard must be paid to notices displayed in this respect, to other traffic and to pedestrians. The speed limit throughout school grounds is 15 mph, and this should be observed at all times.

Vehicles, including estate vehicles, must be driven on roads at all times. Cars and vans must not be driven on grassed areas, sports pitches or fields unless there is an overriding duty to do so. There should never be a need to drive on lawns and grass verges. Culford's beautiful setting is maintained only by the hard work of the Gardens and Grounds team; please do nothing to spoil that work.

1.3 Use of the Sports Centre

Membership of the sports centre is available to members of staff. Application forms are available on the intranet or from the Sports Centre. The school has a well-equipped and modern Sports and Tennis Centre, which includes a multi-purpose sports hall, a fitness suite, strength and conditioning suite, a dance/aerobics studio, and swimming pool. The Tennis Centre provides undercover playing facilities for all the year round. Staff may join the Sports & Tennis Centre and receive free use of the gym, swimming pool or the indoor tennis facilities, details of which are available from the Sports Centre reception.

2. General

2.1 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.

Teachers pensions

All teachers are automatically enrolled in the Teachers' Pension Scheme. Under current Treasury policy, contributions attract immediate tax relief. The school will not make a contribution to any other pension plan. If you wish to opt out then you must inform the Finance Department in writing. Full details are available from the Finance Department.

Pensions for Support Staff

All support staff are auto-enrolled to the Pensions Trust scheme. Under current Treasury policy, contributions attract immediate tax relief. The school will not make a contribution to any other pension plan. If you wish to opt out then you must follow the procedures laid out in the auto-enrolment letters you receive from the school. Full details are available from the Finance Department.

2.2 School Fee Remission

Employees who have children who are eligible to attend the school and who have satisfied the entry criteria as set out in the schools admission 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.

Fee remission is as follows

- 50% per child up to a maximum of three children
- Pro-rata for part time staff
- Discount value up to a maximum value of 50% of the employees gross wage

2.3 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 work outside the school, whether paid or unpaid, which in the reasonable view of the Headmaster or the Finance & Operations Director, might conflict with the school's interests or the efficient discharge of your duties, consent of the Headmaster or the Finance & Operations Director is to be obtained.

2.4 Right of Search

The school retains the right to carry out searches of employees and their property, including vehicles, whilst on school premises or business. Searches may be random and need not imply suspicion of wrongdoing. If a search is requested, if practicable, you will have the right to be accompanied by a third party who is on the premises at the time of the search or at any further questioning that takes place. You may be asked to remove the contents of your pockets, bags, vehicle etc. You do have the right to refuse to be searched, but refusal to agree may result in further action being taken. The school reserves the right to call in the Police at any time.

2.5 Change of Terms

The Methodist Independent Schools Education Trust (MIST) is the employer of all staff at Culford School. MIST delegates the responsibility for the appointment and employment practices in relation to staff and volunteers to the Governing Body of Culford. 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, your contract of employment usually takes precedence. The school reserves the right to vary this handbook at any time and will endeavour to give one months' notice of the variation.

2.6 Expenses

The School will refund pre-authorised expenses incurred by staff wholly and exclusively on school business according to the following principles

- Employees should neither gain nor lose.
- Reimbursement will be made in accordance with the requirements of HMRC and the school's auditors.
- The school will not pay for general allowances, such as meal allowances. Receipts must be produced for all expenditure.
- Purchases should, whenever possible, be made via a purchase order from the Finance Department, negating the need for employees to purchase materials using their own funds.
- The reimbursement of expenses must be authorised by the employees line manager and by the Finance & Operations Director
- The Finance & Operations Director reserves the right not to reimburse for expenses not pre-authorised or deemed inappropriate or not the best value for money.

2.7 Travel

You may be expected to use your own vehicle for business purposes and will be paid travelling expenses at the current rate. You are required to properly maintain your car and ensure it is fully insured, taxed and have a current MOT Certificate if applicable. If you use your vehicle for business purposes, you must have business use specified on your insurance policy. An expenses claim can be made if a private car is used on school business by members of staff. Mileage rates are as recommended by HM Revenue & Customs. Mileage will be based on the return distance travelled, less your normal commuting travel. Unless otherwise agreed rail travel should be agreed in advance with your line manager.

School pupils should not be carried in private vehicles unless agreed in advance with the Deputy Head and the parents of the pupil. A vehicle check should be undertaken by the driver and pupils must remain in the rear of the vehicle. For further information, please see the School Trips Policy.

The school will reimburse the reasonable cost of food and accommodation on the production of receipts if agreed in advance.

Payment of travel expenses for attending an interview for employment at Culford

Travel expenses can be paid after an applicant attends an interview if the travel distance is greater than four hours or approximately 200 miles. If expenses are applicable, they will be paid on request, on the following basis:

- Mileage will be paid at the HMRC recommended rate, currently 45p per mile at 01 April 2018
- If travel is by train or bus, then the cost of standard class travel will be met, on the production of a receipt for the travel. The cost of a taxi transfer from the Bury St Edmunds will also be met if travelling by train.

The cost of an overnight stay will only be met in exceptional circumstances and will need to be authorised by the Finance & Operations Director or Headmaster.

Exceptional circumstances include:

- Travel distances greater than eight hours or approximately 400 miles.
- Travelling from overseas.

Relocation

When deemed necessary, the school will consider paying relocation expenses for employees who have to move house to take up their appointment at the school. This policy normally applies only to teaching staff required to live in school accommodation for the furtherance of their duties. Any such claims must be agreed with the Headmaster prior to appointment.

2.8 Accommodation for Staff

Some accommodation may be available to staff on site. In recompense for this benefit, staff are expected to help with extra duties, as appropriate. It is to be noted that non-resident staff are also expected to help with the life of a boarding school. The protocol for changes of staff accommodation are as follows:

The Headmaster allocates accommodation. The Executive agree any budget and works to be done to the accommodation. The Headmaster or other member of the Executive communicates the above to the individual moving. The Finance & Operations Director adds any works to the schedule and agrees a precise date of move with the member of staff in writing. A member of the Operations Department will meet any new occupant to hand over keys, explain matters such as the location of fuse boxes, stopcocks and the like, and ensure that the accommodation is fully presentable, clean and with fittings in good working order. The state of the accommodation will be agreed and recorded on a standard form.

Where staff are moving to another or moving out of school property, the Headmaster or other member of the Executive will give notice to the individual and a moving date will be agreed with the Finance & Operations Director at an appropriate time after notice is given. A member of the Operations Department will meet the departing member of staff at an agreed time to receive keys and inspect the property. He or she will raise any issues about the state of the accommodation with the member of staff and record them on a standard form.

Staff are responsible for keeping school accommodation in clean, decent order and should report any defects in a timely fashion. When leaving accommodation, occupants should ensure that it is in a presentable state. Occupants are expected to deep clean all areas, toilets, baths, ovens and fridges; fill holes from pictures and mirrors; and clean all carpets thoroughly. While normal wear is to be expected, the occupant will be required to pay for additional cleaning or damage. This will include pet odours or flea infestations, where they will be expected to meet the consequential cost of rectifying the problem.

Accommodation currently offers varying degrees of furniture and fittings. The Finance & Operations Director is responsible for improving facilities and will consider accommodation before new staff move in.

All staff who live on site must sign an agreement for service occupancy before moving into the property.

2.9 House Staff: Spouses, Partners and Young Adults

Spouses and partners of House Staff within accommodation on site who are not employed by the School do not have specific job descriptions. However, there is an individual written agreement between the school and any person over 16 not employed by the school but living in staff accommodation, for example as members of staff households. This specifies the terms of their accommodation, guidance on contact with boarders, their responsibilities to supervise their visitors, and notice that accommodation may cease to be provided if there is evidence that they are unsuitable to have regular contact with children. They must also be required to notify an unrelated designated senior member of staff if they are charged with, or convicted of, any offence. In addition, all adults over 16 are required to have an Enhanced Disclosure and Barring Service check conducted. The Senior Housemaster is responsible for the quality control of this policy.

Guests

Permission for guests to stay overnight in school accommodation in the Boarding Houses is at the discretion of the Headmaster or the Finance & Operations Director. It is the responsibility of colleagues to notify the Finance & Operations Director and their Housemaster/mistress in advance; if there are any concerns then the Finance & Operations Director in consultation with the Housemaster/mistress will make the Headmaster aware.

Staff accommodation away from the Boarding Houses is not subject to prior permission, but in any case, no guest should be left unsupervised with possible access to pupils under any circumstances, and a regular guest must have written authorisation from the Headmaster and a DBS check.

2.10 Telephones and Audio Equipment

The school will reimburse all employees for the cost of business calls on the production of receipts. Use of personal mobile phones should be kept to essential or work related calls only during working hours. The use of the school's telephones for personal calls is restricted to reasonable use only. All school calls are itemised and usage is monitored for financial budgeting purposes. For this reason any high usage calls or high repetition numbers are identified. Any abuse of this privilege could result in it being withdrawn.

Personal radios, music players, portable audio equipment or the wearing of earphones are not allowed during working hours without prior permission.

2.11 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, and where membership is clearly in the interests of the school. Where the school makes payment for subscriptions, this is considered a taxable benefit by HMRC and will be included on a P11D. Requests for reimbursement of subscriptions must be made to the Finance & Operations Director.

3. Regulatory Requirements and Obligations

3.1 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 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, plus other specific safeguarding issues, for example, county lines, so-called 'honour based violence', child sexual exploitation, forced marriage, female genital mutilation, radicalisation and bullying, including cyberbullying.
- A copy of the School's Child Protection (Safeguarding) Policy including the Staff Behaviour Policy; and the School Whistleblowing Policy; which will provide staff with the contact details of the School's Designated Safeguarding Lead and Deputy Safeguarding Leads, plus information on the School's procedures for reporting abuse and allegations of abuse.
- Part One of the statutory 'Keeping Children Safe in Education' guidance which all staff must read. All senior members of staff and those staff working directly with children will also be required to read Annex A of Keeping Children Safe in Education in addition to Part One.

All staff and volunteers are required to attend regular refresher training in line with advice from the School's local safeguarding children's board. In addition, all staff receive safeguarding and child protection updates regularly, but at least termly, to provide them with relevant skills and knowledge to safeguard children effectively. The Designated Safeguarding Lead and the Deputy 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 persons 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. All staff will receive a weekly training email designed to support training and awareness of child protection and safeguarding at Culford School.

3.2 Disqualification under the Childcare Act 2006

The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulation 2018 ('the 2018 regulations') made under section 75 of the Childcare Act 2006 sets out circumstances in which an individual will be disqualified from providing relevant childcare provision to children under 8 years of age or be directly concerned in the management of such provision.

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.

http://www.legislation.gov.uk/uksi/2018/794/pdfs/uksi_20180794_en.pdf

but the highlights are as follows:

- inclusion on the Disclosure and Barring Service (DBS) Children's Barred List
- 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 2018 regulations (note that regulation 4 also refers to offences that are listed in other pieces of legislation)

- certain orders made in relation to the care of children which are referred to in regulation 4 and listed at Schedule 1 of the 2018 regulations
- refusal or cancellation of registration relating to childcare (except if the refusal or cancellation of registration is in respect of registration with a child minder agency or the sole reason for refusal or cancellation is failure to pay a prescribed fee under the 2006 act (regulation 4(1) of the 2018 regulations)), or children's homes, or being prohibited from private fostering, as specified in paragraph 17 of Schedule 1 of the 2018 regulations
- being found to have committed an offence overseas, which would constitute an offence regarding disqualification under the 2018 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 years - 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 responsible for managing either the early or later years provision in that setting. We are required to use our judgement to determine who is covered.

Staff who are not employed to directly provide childcare, are not covered by the legislation. Similarly, most staff who are only occasionally engaged and are not regularly required to work in relevant childcare will not automatically come within the scope of the legislation. In general individuals undertaking the following roles would normally be excluded; caretakers; cleaners; drivers; transport escorts; catering staff; office staff.

School governors and proprietors are not covered by the legislation, unless they volunteer to work in relevant childcare on a regular basis, or they are directly concerned with the day-to-day management of such provision.

Disqualification by Association

Under 'the 2018 regulations', we are no longer required to ask you about any members of your household in relation to disqualification by association. We will continue to follow our robust safer recruitment procedures.

Disclosure of Circumstances Impacting on your Suitability to Work with Children

You must inform the Headmaster or Finance & Operations Director immediately of any circumstance that may impact on your suitability to work with children including where relationships, and associations both within and outside of the workplace (including online) that may have implications for the safeguarding of children in School;

Any failure to disclose such information may be treated as a disciplinary matter in accordance with the Schools 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 Designated Safeguarding Lead, the Headmaster or the Compliance Officer.

3.3 Data Protection Policy

This policy applies to the personal information of job applicants and current and former staff, including employees, workers, volunteers, apprentices and contractors (collectively referred to as “staff” for the purposes of this Policy).

Staff should refer to the School's [privacy notices](#) and, where appropriate, to its other relevant policies including in relation to the use of internet, email and communications, social media, information security, image, data retention and bring your own device (BYOD), which contain further information regarding the protection of personal information in those contexts.

We will review and update this policy in accordance with our data protection obligations. It does not form part of any employee's contract of employment and we may amend, update or supplement it from time to time.

You must read this policy because it gives important information about:

- the data protection principles with which the School must comply;
- your data protection obligations;
- what is meant by personal information (or data) and sensitive personal information (or data);
- how we gather, use and (ultimately) delete personal information and sensitive personal information in accordance with the data protection principles;
- where more detailed privacy information can be found, e.g. about the personal information we gather and use about you, how it is used, stored and transferred, for what purposes, the steps taken to keep that information secure and for how long it is kept;
- your rights and obligations in relation to data protection; and
- the consequences of failure to comply with this policy.

It is important that you read and understand this policy.

Introduction

The School obtains, keeps and uses personal information (also referred to as data) about job applicants and about current and former employees, workers, contractors, volunteers and apprentices for a number specific lawful purposes, as set out in the School's Staff Privacy Notice which can be found in this staff handbook or at www.culford.co.uk.

We also obtain, keep and use personal information about pupils, their families, governors, alumni and suppliers of the School. The detail relating to how we collect and process that information is set out within our separate privacy notices which can be found www.culford.co.uk.

This policy sets out how we comply with our data protection obligations and seek to protect personal information relating to our workforce. Its purpose is also to ensure that staff understand and comply with the rules governing the collection, use and deletion of personal information to which they may have access in the course of their work.

The Compliance Officer is responsible as the Data Protection Lead for data protection compliance within the School. If you have any questions or comments about the content of this policy or if you need further information, you should contact the Compliance Officer.

Definitions

The following definitions shall apply to this policy:

“**GDPR**” means General Data Protection Regulations

“**criminal records information**” means personal information relating to criminal convictions and offences, allegations, proceedings, and related security measures;

“data breach” means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal information;

“data subject” means the individual to whom the personal information relates;

“personal information” (sometimes known as personal data) means information relating to an individual who can be identified (directly or indirectly) from that information;

“processing information” means obtaining, recording, organising, storing, amending, retrieving, disclosing and/or destroying information, or using or doing anything with it;

“pseudonymised” means the process by which personal information is processed in such a way that it cannot be used to identify an individual without the use of additional information, which is kept separately and subject to technical and organisational measures to ensure that the personal information cannot be attributed to an identifiable individual; and

“sensitive personal information” (sometimes known as ‘special categories of personal data’ or ‘sensitive personal data’) means personal information about an individual’s race, ethnic origin, political opinions, religious or philosophical beliefs, trade union membership (or non-membership), genetics information, biometric information (where used to identify an individual) and information concerning an individual’s health, sex life or sexual orientation.

Data Protection Principles

The School will comply with the following data protection principles when processing personal information:

- we will process personal information lawfully, fairly and in a transparent manner;
- we will collect personal information for specified, explicit and legitimate purposes only, and will not process it in a way that is incompatible with those legitimate purposes;
- we will only process the personal information that is adequate, relevant and necessary for the relevant purposes;
- we will keep accurate and up to date personal information, and take reasonable steps to ensure that inaccurate personal information is deleted or corrected without delay;
- we will keep personal information for no longer than is necessary for the purposes for which the information is processed; and
- we will take appropriate technical and organisational measures to ensure that personal information is kept secure and protected against unauthorised or unlawful processing, and against accidental loss, destruction or damage.

Basis for processing personal information

In relation to any processing activity we will, before the processing starts for the first time and then regularly while it continues:

- review the purposes of the particular processing activity, and select the most appropriate lawful basis (or bases) for that processing, i.e.:
 - that the data subject has consented to the processing;
 - that the processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
 - that the processing is necessary for compliance with a legal obligation to which the School is subject;
 - that the processing is necessary for the protection of the vital interests of the data subject or another natural person;
 - that the processing is necessary for the performance of a task carried out in the public interest or exercise of official authority; or

- that the processing is necessary for the purposes of legitimate interests of the School or a third party, except where those interests are overridden by the interests of fundamental rights and freedoms of the data subject.
- except where the processing is based on consent, satisfy ourselves that the processing is necessary for the purpose of the relevant lawful basis (i.e. that there is no other reasonable way to achieve that purpose);
- document our decision as to which lawful basis applies, to help demonstrate our compliance with the data protection principles;
- include information about both the purposes of the processing and the lawful basis for it in our relevant privacy notice(s);
- where sensitive personal information is processed, also identify a lawful special condition for processing that information (see 'Sensitive Personal Information' section below), and document it; and
- where criminal offence information is processed, also identify a lawful condition for processing that information, and document it.

When determining whether the School's legitimate interests are the most appropriate basis for lawful processing, we will:

- conduct a legitimate interests assessment (LIA) and keep a record of it, to ensure that we can justify our decision;
- if the LIA identifies a significant privacy impact, consider whether we also need to conduct a data protection impact assessment (DPIA);
- keep the LIA under review, and repeat it if circumstances change; and
- include information about our legitimate interests in our relevant privacy notice(s).

Sensitive Personal Information

The School may from time to time need to process sensitive personal information. We will only process sensitive personal information if:

- we have a lawful basis for doing so as set out above, e.g. it is necessary for the performance of the employment contract, to comply with the School's legal obligations or for the purposes of the School's legitimate interests; and
- one of the special conditions for processing sensitive personal information applies, e.g.:
 - the data subject has given explicit consent;
 - the processing is necessary for the purposes of exercising the employment law rights or obligations of the School or the data subject;
 - the processing is necessary to protect the data subject's vital interests, and the data subject is physically incapable of giving consent;
 -
 - processing relates to personal data which is manifestly made public by the data subject;
 - the processing is necessary for the establishment, exercise or defence of legal claims; or
 - the processing is necessary for reasons of substantial public interest.

Before processing any sensitive personal information, staff must notify the Compliance Officer of the proposed processing, in order that they may assess whether the processing complies with the criteria noted above.

Sensitive personal information will not be processed until:

- the assessment referred to above has taken place; and
- the individual has been properly informed (by way of a privacy notice or otherwise) of the nature of the processing, the purposes for which it is being carried out and the legal basis for it.

The School's privacy notices set out the types of sensitive personal information that the School processes, what it is used for and the lawful basis for the processing.

Criminal Information's Records

Criminal records information will be processed in accordance with the School's safer recruitment procedures. For further information in this contact the Compliance Officer.

Data Protection Impact Assessment (DPIA)

Where processing is likely to result in a high risk to an individual's data protection rights (e.g. where the School is planning to use a new form of technology), we will, before commencing the processing, carry out a DPIA to assess:

- whether the processing is necessary and proportionate in relation to its purpose;
- the risks to individuals; and
- what measures can be put in place to address those risks and protect personal information.

Before any new form of technology is introduced, the manager responsible should contact the Compliance Officer in order that a DPIA can be carried out.

Documentation and Records

We will keep written records of processing activities which are high risk, i.e. which may result in a risk to individuals' rights and freedoms or involve sensitive personal information or criminal records information, including:

- the purposes of the processing;
- a description of the categories of individuals and categories of personal data;
- categories of recipients of personal data;
- where possible, retention schedules; and
- where possible, a description of technical and organisational security measures.

If we process sensitive personal information or criminal records information, we will keep written records of:

- the relevant purpose(s) for which the processing takes place, including (where required) why it is necessary for that purpose;
- the lawful basis for our processing; and
- whether we retain and erase the personal information in accordance with our policy document and, if not, the reasons for not following our policy.

We will conduct regular reviews of the personal information we process and update our documentation accordingly.

Privacy Notices

The School and Culford Foundation 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.

Individual Rights

You have a number of rights in relation to your personal information which are set out within the Staff Privacy Notice which can be found in this staff handbook or at www.culford.co.uk. If you wish to exercise any of these rights, please contact the Compliance Officer.

Individual Obligations

Individuals are responsible for helping the School keep their personal information up to date. You should let the Finance Department know if the information you have provided to the School changes, for example if you move house or change details of the bank or building society account to which you are paid.

You may have access to the personal information of other members of staff, pupils, parents, suppliers, contractors and governors of the School in the course of your employment or engagement. If so, the School expects you to help meet its data protection obligations to those individuals. For example, you should be aware that they also enjoy the rights set out above.

If you have access to personal information, you must:

- only access the personal information that you have authority to access, and only for authorised purposes;
- only allow other staff to access personal information if they have appropriate authorisation;
- only allow individuals who are not School staff to access personal information if you have specific authority to do so;
- keep personal information secure (e.g. by complying with rules on access to premises, computer access, password protection and secure file storage and destruction and other precautions set out in the School's Use of ICT policy and acceptable use Policy);
- not remove personal information, or devices containing personal information (or which can be used to access it), from the School's premises unless appropriate security measures are in place (such as pseudonymisation, encryption or password protection) to secure the information and the device; and
- not store personal information on local drives or on personal devices, and comply with the School's Bring Your Own Device to Work Policy.

You should contact [the DPO OR [insert job title or department]] if you are concerned or suspect that one of the following has taken place (or is taking place or likely to take place):

- processing of personal data without a lawful basis for its processing or, in the case of sensitive personal information, without one of the conditions set out above under the heading 'Sensitive Personal Information' being met;
- any data breach as set out under the heading 'Data Breaches' below;
- access to personal information without the proper authorisation;
- personal information not kept or deleted securely;
- removal of personal information, or devices containing personal information (or which can be used to access it), from the School's premises without appropriate security measures being in place; or
- any other breach of this Policy or of any of the data protection principles set out under the heading 'Data Protection Principles' above.

Failure to comply with the above obligations could result in disciplinary action being taken.

Information Security

The School will use appropriate technical and organisational measures in accordance with the School's policies to keep personal information secure, and in particular to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage.

These may include:

- making sure that, where possible, personal information is pseudonymised or encrypted;

- ensuring the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- ensuring that, in the event of a physical or technical incident, availability and access to personal information can be restored in a timely manner; and
- a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

Where the School uses external organisations to process personal information on its behalf, additional security arrangements need to be implemented in contracts with those organisations to safeguard the security of personal information. In particular, contracts with external organisations must provide that:

- the organisation may act only on the written instructions of the School;
- those processing the data are subject to a duty of confidence;
- appropriate measures are taken to ensure the security of processing;
- sub-contractors are only engaged with the prior consent of the School and under a written contract;
- the organisation will assist the School in providing subject access and allowing individuals to exercise their rights under the GDPR;
- the organisation will assist the School in meeting its GDPR obligations in relation to the security of processing, the notification of data breaches and data protection impact assessments;
- the organisation will delete or return all personal information to the School as requested at the end of the contract; and
- the organisation will submit to audits and inspections, provide the School with whatever information it needs to ensure that they are both meeting their data protection obligations, and tell the School immediately if it is asked to do something infringing data protection law.

Before any new agreement involving the processing of personal information by an external organisation is entered into, or an existing agreement is altered, the relevant staff must seek approval of its terms by the Compliance Officer and the Head of IT Services.

Storage and Retention of Personal Information

Personal information (and sensitive personal information) should not be retained for any longer than necessary. The length of time over which data should be retained will depend upon the circumstances, including the reasons why the personal information was obtained. Staff should follow the School's retention policy which sets out the relevant retention period, or the criteria that should be used to determine the retention period. Where there is any uncertainty, staff should consult the Compliance Officer.

Personal information (and sensitive personal information) that is no longer required will be deleted permanently from our information systems and any hard copies will be destroyed securely. We may retain personal data for archiving purposes where it is necessary to do so in the public interest, for scientific or historical research purposes or statistical purposes subject to appropriate safeguards being put in place to protect the rights and freedoms of the data subject.

Data Breaches

A data breach may take many different forms, for example:

- loss or theft of data or equipment on which personal information is stored;
- unauthorised access to or use of personal information either by a member of staff or third party;
- loss of data resulting from an equipment or systems (including hardware and software) failure;
- human error, such as accidental deletion or alteration of data;
- unforeseen circumstances, such as a fire or flood;

- deliberate attacks on IT systems, such as hacking, viruses or phishing scams; and
- ‘blagging’ offences, where information is obtained by deceiving the organisation which holds it.

If you become aware of a data breach, you must report it to the Compliance Officer and Head of IT Services as soon as possible. Failure to comply with this obligation could result in disciplinary action being taken.

The School will:

- make the required report of a data breach to the Information Commissioner’s Office without undue delay and, where possible within 72 hours of becoming aware of it, if it is likely to result in a risk to the rights and freedoms of individuals; and
- notify the affected individuals, if a data breach is likely to result in a high risk to their rights and freedoms and notification is required by law.

International Transfers

The School may transfer personal information outside the European Economic Area (EEA) (which comprises the countries in the European Union and Iceland, Liechtenstein and Norway) on the basis that that country, territory or organisation is designated as having an adequate level of protection and that the organisation receiving the information has provided adequate safeguards by way of contractual data protection clauses and where possible compliance with an approved code of conduct.

Training

The School will ensure that staff are adequately trained regarding their data protection responsibilities. Individuals whose roles require regular access to personal information, or who are responsible for implementing this policy or responding to subject access requests under this policy, will receive additional training to help them understand their duties and how to comply with them.

Consequences of failure to comply

The School takes compliance with this policy very seriously. Failure to comply with the policy:

- puts at risk the individuals whose personal information is being processed;
- carries the risk of significant civil and criminal sanctions for the individual and the School; and
- may, in some circumstances, amount to a criminal offence by the individual.

Because of the importance of this policy, an employee’s failure to comply with any requirement of it may lead to disciplinary action under our procedures, and this action may result in dismissal for gross misconduct. If a non-employee breaches this policy, they may have their contract terminated with immediate effect.

If you have any questions or concerns about anything in this policy, do not hesitate to contact the Compliance Officer.

3.4 Staff Privacy Notice

In the course of your employment, engagement or other basis of work undertaken for the school, we will collect, use and hold (“process”) personal data relating to you as a member of our staff. 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

Academic and other staff, contractors, itinerant teachers, 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. It also applies to governors / trustees / directors.

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

About this document

This 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, including:

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

Please note that your contract with the school, including any document or policy forming a part of your contractual obligations to the school, may in particular be relevant to and supplement the information in this Staff Privacy Notice, to the extent that it will contain details of obligations or rights of the school under contract with you which may require the use of your personal data. However, this Staff Privacy Notice is the primary document applicable to 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 collect 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, etc.; and
- from third parties, for example the Disclosure and Barring Service (DBS) and referees (including your previous or current employers or school), 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 appraisals;
- in the course of fulfilling your employment (or equivalent) duties more generally, including by filling reports or records, 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 or film recordings 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;
- financial information, including:
 - your bank account number(s), name(s) and sort code(s) (used for paying your salary 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-taxed 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);
- 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);
- 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 bases for processing your personal data, how that data is used and whom it is shared with;

(i) 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, we use your personal data for the following:

- 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;
- 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 appraisals;
- 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.

(ii) 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, we 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;
- to safeguard pupils' 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.

(iii) 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, we use your personal data for the following:

- to meet our legal obligations (for example, relating to child welfare, social protection, diversity, equality, and gender pay gap monitoring, employment, 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.

(iv) Special categories of data

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 for the reasons set out below.

We will process this data on the basis that such processing is necessary to carry out obligations and exercise rights (both yours and ours) in relation to your employment.

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;
- 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 and our obligations as an employer;
- categories of your personal data which are relevant to investigating complaints made by you or others, for example concerning discrimination, bullying or harassment;
- data about any criminal convictions or offences committed by you, for example when conducting criminal background checks with the DBS, 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 some function in the substantial public interest, including the safeguarding of children or vulnerable people, or as part of a process designed to protect others from malpractice, incompetence or unfitness in a role (or to establish the truth of any such allegations); or
- it is necessary for the establishment, exercise or defence of legal claims, such as where any person has brought a claim or serious complaint against us or you.

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 (eg 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 relevant authorities and agencies such as the Department for Education, NCTL, the ICO, Charity Commission and the local authority;
- 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 trading trust, or we are reconstituting or setting up some ;
- 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.

How long your information is kept

Personal data relating to unsuccessful job applicants is deleted within 3 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).

For employees, subject to any other notices that we may provide to you, we may retain your personal data for a period of 7 years after your contract of employment (or equivalent agreement) 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. Please see our Retention of Records policy.

Your rights

Please see our 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.

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 should contact the School's Compliance Officer Compliance@culford.co.uk or raise the matter through the grievance procedure detailed in this handbook.

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.

4. Communications and Information

4.1 Communications

The school strongly believes in effective communication of information to all employees. The school also values the comments and ideas of staff. In order to be truly effective, the full commitment of everyone within the school is essential. A number of committees and other structures exist to organise the school and senior management encourages a reverse flow of routine information through these channels.

Weekly SHOUT meetings take place every Monday at 10:00 for members of the Senior Common Room. The minutes are published on ISAMS. The Common Room Forum exists to facilitate effective communication via the Officers of the Common Room or in person with senior colleagues and decision makers. The Headmaster operates an open door policy each morning between 08.45 and 09.30. In addition, his policy is that colleagues should never wait more than 48 hours for a personal appointment with him. The school does not recognise any Trades Union as having representative rights and relies upon the existing management structure for communication between employee and employer.

Prep school hold staff briefings fortnightly (or more frequently if required) on a Friday at 13:00. Additionally, there are up to five Saturday morning Common Room meetings during the year at 0900-1200.

Support staff can communicate via their line manager to the Operations Meeting and may departments hold their own SHOUT. Alternatively appointments can be made with the Finance & Operations Director and staff should not have to wait more than 48 hours for a personal appointment with her.

It is the school policy to keep all employees as informed as is practicable about future developments. For this purpose briefing meetings take place termly for all staff and will be arranged as and when appropriate. Equally it is hoped that all employees will want to contribute ideas to the beneficial development of the school and its employees.

Notice boards within the Common Room and other areas throughout the school provide information of general interest as well as on specific issues relating to the school. Details of any internal vacancies may from time to time be displayed on these notice boards or via the school's intranet. You should look at notice boards regularly to ensure that you do not miss any valuable information.

Communicating and consulting on matters of health, safety and welfare are vital elements in the management of Health and Safety at the school. Health and Safety matters will be issued to employees via email or through inset days. The Compliance Officer works closely with all employees across the school where detailed information or training is required. The Health and Safety Committee meets each term and any matters Common Room or support staff would like to be discussed will be added to the agenda vis their line manager.

Notwithstanding the more structured communications systems, effective communications depend ultimately upon mutual trust and respect on a day to day basis to promote positive relationships and to avoid conflict. Your prime source of information about your job or the school is your manager. It is part of your manager's job to inform, answer questions and listen to constructive opinions, comments and suggestions. Your sustained support and co-operation is encouraged and will produce better relationships and an amicable working environment.

4.2 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 school'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 or the anonymity is waived by the teacher. 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 Headmaster 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.

4.3 Whistleblowing Policy

Culford School has adopted a policy and procedures for whistleblowing for reporting malpractice and also child protection concerns, to provide clear guidance for all employees and volunteers on when it is necessary to raise concerns and how to do so.

Its aim is to support the schools culture of being open, transparent and providing a safe environment where all employees and volunteers feel able to speak up. The Public Disclosure Act 1998 prevents you from suffering a detriment or having your contract terminated for whistleblowing and we take seriously any concerns which you may raise under this legislation and encourage you to follow these procedures.

Malpractice covered by this 'public interest disclosure' includes fraud, health and safety, environmental damage, criminal offences, miscarriages of justice and failures to comply with legal obligations, inappropriate behaviour, covering up malpractice and unethical conduct.

This procedure is separate from the School's procedures regarding grievances. Employees should not use the whistleblowing procedure to raise grievances about their personal employment situation. This procedure is to enable all employees to express a legitimate concern regarding suspected malpractice within the school.

We encourage you to use the procedure if you are concerned about any malpractice at work.

However if the procedure has not been invoked in good faith then it will make you liable to immediate termination of employment or such lesser disciplinary sanction as may be appropriate in the circumstances.

Employees and volunteers who wish to raise a concern under this procedure for malpractice are entitled to have the matter treated confidentially by the school. The complainant's name will not be disclosed to the alleged perpetrator of malpractice without the complainant's prior approval, as far as possible. It may be appropriate in the interests of confidentiality that concerns are raised orally rather than in writing, although all employees and volunteers are encouraged to express their concern in writing wherever possible. If there is evidence of criminal activity then the Police will in all cases be informed.

When does the whistleblowing policy apply?

In consideration of MIST's Whistleblowing Policy, this policy may apply in the following circumstances;

Malpractice

- Manipulation of accounting records and finances
- Inappropriate use of the schools assets or funds(including MIST assets or funds)
- Decision –making for personal gain
- Criminal activity

- Abuse of position
- Fraud and deceit
- Serious breaches of procedure which may advantage a particular party or actions likely to bring the reputation of the School, MIST or the Methodist Church into question

Child Protection

- Serious breaches of Safeguarding Policy and procedures
- Poor or unsafe practice in relation to the handling or recording of safeguarding concerns

This list is not exhaustive and should an employee or volunteer be uncertain whether this policy is applicable, they should seek advice from the Headmaster. If the matter is related to concerns about the headmaster then advice should be sought from the Chair of Governors. If there is alleged wrong doing in relation to a member of the School's Governing Body the staff member can contact MIST General Secretary.

How to Whistleblow

In all non-safeguarding matters employees and volunteers should decide who is the most appropriate person to deal with their concern;

- Line Manager
- Member of the Senior Leadership Team
- Headmaster
- Chair of Governor
- MIST General Secretary

Under the Public Interest Disclosure Act 1998, there are circumstances where an employee or volunteer may be entitled to raise a concern directly with an external body where the employee 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.

Child Protection and Whistleblowing

Any employee or volunteer, who has a concern about a child, should follow the School Safeguarding Policy.

[Child Protection \(Safeguarding\) 2018-19](#)

If you feel a child is not being made safe, that child protection arrangements within the school are inadequate, concerns about the school's practices or if the behaviour of colleagues or others which may put a child at risk of abuse or serious harm should be reported to the Designated Safeguarding Lead (DSL) or a Deputy Safeguarding Lead (DPSL). Concerns can also be reported to the Headmaster or the Safeguarding Governor.

In the case of possible serious harm, the police should be informed. Anybody can make a referral directly to **Children's Services to Customer First 0808 800 4005.**

Concerns about any employee or volunteer should be reported to the Headmaster who will refer it immediately to the Chair of Governors, the Safeguarding Governor and the Local Authority Designated Officer (LADO).

Concerns about the Headmaster should be reported to the Chair of Governors who must inform MIST General Secretary. Concerns about a member of the Governing Body should be reported directly to MIST General Secretary.

If staff feel unable to raise the issue with the School or MIST and/ or feel their genuine concerns are not being addressed; they can contact an external support organisation such as the **NSPCC whistleblowing helpline (Tel: 0800 028 0285 or email help@nscpp.org.uk)**

How is whistleblowing managed?

Any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued. The employee or volunteers making the allegation will be kept informed of progress and, whenever possible and subject to third party rights, will be informed of the resolution.

In case of any doubt staff, the Headmaster or Governors can seek advice from Public Concern at Work, the independent whistleblowing charity, who can offer a confidential helpline.

If an employee or volunteer has been dismissed or removed as a result of a referral the school will inform the DBS.

If a teacher has been guilty of professional misconduct then the NCTL will be made aware. In Pre-Prep any allegations will be reported to Ofsted as soon as possible and within 14 days.

Important Contacts

LADO	0300 1232044	LADOCentral@suffolk.gcsx.gov.uk
General Secretary of MIST (020 7935 3723)		gensec@methodist.org.uk
MIST Safeguarding Lead		eastonb@methodistchurch.org.uk
MIST Independent Safeguarding Consultant		carolyn.eyre@btinternet.com
School Chair of Governors	Steven Abbott	C/o R.Penkethman@culford.co.uk
School Safeguarding Governor	Patricia Abbott	C/o R.Penkethman@culford.co.uk
Public Concern at Work (020 7404 6609)		whistle@pcaw.co.uk

Useful links

[MIST Whistleblowing Policy](#)

[Child Protection \(Safeguarding\) Policy 2018-19](#)

[Keeping Children Safe in Education](#)

[The Public Interest Disclosure Act 1988](#)

[Public Concern at Work](#)

4.4 Information Communication Technologies (ICT Policies)

Overview

ICT in the 21st Century is an essential resource to support learning and teaching, as well as playing an important role in the everyday lives of children, young people and adults. Consequently, schools need to build in the use of these technologies in order to arm our young people with the skills to access life-long learning and employment. Information and Communications Technology covers a wide range of resources including web-based and mobile learning.

It is also important to recognise the constant and fast paced evolution of ICT within our society as a whole. The internet technologies children and young people are using both inside and outside of the classroom are wide-ranging. Whilst exciting and beneficial both in and out of the context of education, much ICT, particularly web-based resources, are not consistently policed. All users need to be aware of the range of risks associated with the use of these Internet technologies.

At Culford School, we understand the responsibility to educate our pupils on eSafety issues; teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the internet and related technologies, in and beyond the context of the classroom.

The school community captures, processes, stores and shares personal data on pupils, staff, parents and third parties to help them conduct their day-to-day activities. This personal data could be used by another person or criminal organisation to cause harm or distress to an individual. The loss of personal data may result in data breach, which may result in non-compliance with current data protection laws. This may also leave the School or a member of the School Community exposed to negative media coverage, and potentially damage the reputation of the School.

Everybody in the school has a shared responsibility to secure any information whether personal and /or special category used in their day to day professional duties and even staff not directly involved in data handling should be made aware of the risks and threats and how to minimise them. Both this policy and the Acceptable Use Policy Agreements are inclusive of both fixed and mobile internet technologies provided by the school, and technologies owned by pupils and staff, but brought onto school premises.

Safety

The Headmaster and Board of Governors have ultimate responsibility to ensure that eSafety policy and practices are embedded and monitored in the school. Culford School has a named eSafety co-ordinator who reports directly to the member of senior leadership team with responsibility for eSafety within each school. It is the role of the eSafety co-ordinator to keep abreast of current issues and guidance and brief the school leadership team appropriately.

This policy, supported by the School's Acceptable Use Policy Agreements for staff and pupils and its Data Protection Policies are designed to protect the interests and safety of the whole school community. It is linked to other school policies including child protection, health and safety, behaviour/pupil discipline and PSHE.

The School provides opportunities within a range of curriculum areas to teach about eSafety. Educating pupils on the dangers of technologies that maybe encountered outside school is done informally when opportunities arise and as part of the eSafety curriculum.

Pupils are made aware of the relevant legislation when using the internet. They are taught about copyright and respecting other people on the internet. Pupils are made aware of the impact of Cyberbullying and know how to seek help if they are affected by any form of online bullying. Pupils are also made aware of where to seek advice or help if they experience problems when

using the internet and related technologies. Pupils are taught to critically evaluate materials and learn good searching skills through the curriculum.

Teachers receive regular information and training on eSafety issues. Details of eSafety staff training are available from the member of senior leadership team responsible for staff development.

All new staff receive information on the school's Acceptable Use Policy Agreement as part of their induction. All staff are made aware of individual responsibilities relating to the safeguarding of children within the context of eSafety and know what to do in the event of misuse of technology by any member of the school community. All teachers are encouraged to incorporate eSafety activities and awareness within their curriculum areas.

Incidents

Some internet activity is illegal and is banned from school and all other ICT systems. Other activities are banned and could lead to criminal prosecution. There are however a range of activities which may be legal but are inappropriate in a school context, either because of the age of the users or the nature of those activities. School policy restricts certain internet usage as follows:

Uploading, downloading, possessing or transmitting material that falls under the following headings, including the attempt to so do:	Acceptable	Unacceptable	Illegal
child sexual abuse images			✓
illegal acts under child protection, obscenity, computer misuse or fraud legislation			✓
adult material that potentially breaches the Obscene Publications Act			✓
criminally racist material in UK			✓
Pornography		✓	
any kind of discrimination		✓	
racial or religious hatred or threatening behaviour			✓
information which may be offensive or bring the		✓	
using school systems to run a private business		✓	
attempting to bypass the filtering or other safeguards employed by Culford		✓	
commercial software or any copyrighted materials without the necessary permissions			✓
revealing or publicising confidential or proprietary information		✓	
creating or propagating computer viruses or other harmful files		✓	
high volume network traffic that causes network congestion and hinders work		✓	
on-line gaming (educational)	✓		
on-line gaming (non-educational) or gambling		✓	
on-line shopping / commerce	✓		
file sharing (educational)	✓		
file sharing (non-educational)		✓	
use of social networking and video broadcasting sites e.g. YouTube, Skype	✓		

Responding to incidents of misuse

It is hoped that all members of the school community will be responsible users of ICT, who understand and follow this policy. However, there may be times when infringements of the policy

could take place, through careless or irresponsible use, or deliberate misuse. If any apparent or actual misuse appears to have occurred the protocol below should be followed:

- Save all evidence, do not shutdown or logoff the device, secure and isolate the device.
- If appropriate arrange suspension of the user account with IT Services.
- If the incident involves a member of staff do not approach that member of staff directly.
- If the incident involves a pupil / child record any facts and do not ask any leading questions.
- If the incident is deemed to be a child protection issue contact the Designated Safeguarding Lead.
- If not contact the Head of IT Services or Head of ICT and inform a Deputy Head.
- Ensure a full record has been taken of events.

Email

The use of email is an essential means of communication for both staff and pupils. In the context of Culford School, email should not be considered private. Educationally, email can also offer significant benefits. All users need to understand how to style an email in relation to good network etiquette.

Managing email

The School gives all staff and pupils their own email account to use for all school business as a work based tool. This minimises the risk of receiving unsolicited or malicious emails and avoids the risk of personal information being revealed. It is the responsibility of each account holder to keep their password secure. For the safety and security of users and recipients, all mail is filtered and logged; if necessary email histories can be traced. The school email account must be used for all school business. The school automatically adds a standard disclaimer to all email correspondence, and under no circumstances should staff contact pupils, parents or conduct any school business using personal email addresses.

Pupils may only use school approved accounts on the school system and only for educational purposes. The forwarding of chain letters is not permitted. All pupil email users are expected to adhere to the generally accepted rules of netiquette particularly in relation to the use of appropriate language and not revealing any personal details about themselves or others in email communication, or arrange to meet anyone without specific permission. Pupils must immediately tell a teacher or trusted adult if they receive an offensive email. Staff must inform their line manager.

However you access your school email, all the school email policies apply. The use of internet based webmail except Culford Outlook Web Access services for sending, reading or receiving business related email is not permitted. All emails should be written and checked carefully before sending, in the same way as a letter written on school headed paper.

Sending emails

If emailing personal, confidential, classified or special category data to external third parties or agencies, refer to the relevant section below.

Use your own school email account so that you are clearly identified as the originator of a message. If you are required to send an email from someone else's account, always use the 'Delegation' or 'send as' facility so that you are identified as the sender. Keep the number and relevance of email recipients, particularly those being copied, to the minimum necessary and appropriate. Do not send or forward attachments unnecessarily. Whenever possible, send the location path to the shared drive rather than sending attachments. An outgoing email greater than five megabytes (including any attachments) is likely to be stopped automatically. This size limit also applies to incoming email.

Receiving emails

Check your email regularly. Activate your 'out-of-office' notification when away for extended periods. Use the 'Delegation' facility within your email software so that your email can be handled by someone else while you are not at work. Never open attachments from an untrusted source; consult IT Services first. Do not use the email systems to store attachments; detach and save business related work to the appropriate drive/folder. The automatic deletion of emails is not allowed.

Emailing Personal, Special Category, Confidential or Classified Information

Assess whether the information can be transmitted by other secure means before using email; emailing confidential data is not recommended and should be avoided wherever possible. The use of Internet based webmail services for sending email containing special category information is not permitted. Where your conclusion is that email must be used to transmit such data exercise caution when sending the email and always follow these checks before releasing the email:

- Verify the details, including accurate email address, of any intended recipient
- Verify the details of a requestor before responding to email requests for information
- Do not copy or forward the email to any more recipients than is absolutely necessary
- Do not send the information to anybody whose details you have been unable to verify
- Where possible send the information as an encrypted document attached to an email
- Provide the encryption key or password by separate contact; preferably by telephone
- Do not identify such information in the subject line of any email
- Request confirmation of safe receipt.

Internet Access

The internet is an invaluable resource for education, business and social interaction, but also a potential risk to young and vulnerable people. All use of the Culford network for internet usage is logged and the logs are randomly but regularly monitored. Whenever any inappropriate use is detected it will be followed up.

Managing the Internet

Staff will preview any recommended sites before use and if Internet research is set for prep, specific sites will be suggested that have previously been checked by the teacher. All users must observe software copyright at all times. It is illegal to copy or distribute school software or illegal software from other sources and all users must observe copyright of materials from electronic resources.

Users must not post personal, special category, confidential or classified information or disseminate such information in any way that may compromise its intended restricted audience; nor reveal names of colleagues, pupils, parents or third parties or any other confidential information acquired through your position at Culford. On-line gambling or gaming is not allowed. It is at the Headmasters' discretion what internet activities are permissible for staff and pupils and how this is disseminated.

School internet access is controlled through a web filtering appliance. Culford School is aware of its responsibility when monitoring staff communication under current legislation and takes into account; The General Data Protection Regulation, the UK Data Protection Bill, The Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000, Regulation of Investigatory Powers Act 2000, Human Rights Act 1998. Staff and pupils are aware that school based email and internet activity can be monitored and explored further if required. The school does not allow pupils access to internet logs. The school uses management control tools for controlling and monitoring workstations.

If staff or pupils discover an unsuitable site the incident must be reported immediately to a teacher who will then follow eSafety procedures as necessary. It is the responsibility of the school, by delegation to the IT Services, to ensure that Anti-virus protection is installed and kept up-to-date on all school machines. Pupils and Staff using personal removable media are

responsible for measures to protect against viruses, for example making sure that additional systems used have up-to-date virus protection software. It is not the school's responsibility or IT Services to install or maintain virus protection on personal systems.

Pupils and staff are not permitted to download programs on school based technologies without seeking prior permission from IT Services. If there are any issues related to viruses or anti-virus software, IT Services should be informed through Service Desk.

Personal or Special Category Information

Users must ensure that any School information accessed from your own PC or removable media equipment is kept secure and that computers are left locked to prevent unauthorised access. That any personal, special category, confidential and classified information disclosed or shared with others is accurate; that it is not disclosed to any unauthorised person; and that it does not compromise its intended restricted audience.

Users must ensure the security of any personal, special category, confidential and classified information sent or copied to others. They may only download personal data from systems if expressly authorised to do so by their manager and must keep their screen display out of direct view of any third parties when accessing personal, special category, confidential or classified information. Copies of such data must be securely stored and disposed of after use.

All files containing personal, special category, confidential or classified data must be encrypted wherever possible and hard drives from machines no longer in service must be removed and stored securely or wiped clean. All redundant ICT equipment must be returned to IT Services and will be disposed of in accordance with Waste Electrical and Electronic Equipment (WEEE) directive and Data Protection Laws.

Safe Use of Images, Video and Sound Recordings

Digital images are easy to capture, reproduce and publish and, therefore, misuse. We must remember that it is not always appropriate to take or store images of any member of the school community or public, without first seeking consent and considering the appropriateness.

Culford likes to share our pupils' achievements with the Culford community and beyond through our termly newsletters, press releases, social media, prospectuses and on our website. One of the most enjoyable and effective ways of doing this is by the use of photographs. However, we take very seriously the issue of child safety in connection with the use of images of children in the public domain. Whilst their involvement may be motivating for pupils, and good for the School, we naturally have a duty of care to our pupils and are concerned that we should use photographs with the appropriate consent.

In line with government guidelines, pupils will remain unidentifiable in Culford promotional publications such as our prospectuses. While we tend not to include pupils' full names alongside the images in newsletters and with photographs issued to the media, if the story is about one particular pupil's achievement, for example, it is clearly impossible for the pupil/s to remain anonymous. Parents are sent a letter when their child joins Culford which asks them to complete and return a reply form if they object to the use of images of their children in the public domain.

This consent is considered valid for the entire period that the child attends this school unless there is a change in the child's circumstances where consent could be an issue. Consent may withdraw permission at any time by contacting the school.

Staff are not permitted to use personal digital equipment, such as mobile phones and cameras, to record pupils, this includes when on field trips. However with the express permission of the Headmaster, images, video or sound can be taken provided they are transferred immediately and solely to the School's network and deleted from the staff device.

Pupils should not use personal digital equipment to record others, including when on field trips. However, pupils may record images, video or sound of others with the express permission of a member of staff, providing the material is not inappropriate and is not used inappropriately. Pupils must not take, use, share, publish or distribute images, video or sound of others without their permission.

Storage of images, video and sound recordings

Recordings of children must be stored on the school's network and nowhere else. Rights of access to this material are restricted to staff and pupils as appropriate and material no longer required will be deleted from the network at the earliest opportunity.

The school uses CCTV for security and safety. The only people with access to this are the Head of IT Services, School Caretakers, the ICT Network technicians; and Sports and Tennis Centre Staff who monitor the CCTV cameras attached to and inside that building. Notification of CCTV use is displayed at the front of the school.

The School operates a dedicated live video streaming service from two courts in the tennis dome. These recordings capture pupils and staff in the area during lessons. Access to this service is restricted and access addresses changed monthly. The school does not have any other webcams on site and additional projects must be managed through the IT Manager. Misuse of webcams by any member of the school community will result in sanctions.

Conferencing

Skype and other similar services can be used by pupils outside the normal working day to contact parents and guardians. Skype and other similar services should not be used during the working day by pupils and should be turned off. Skype and other similar services should not be used as an instant messaging application. Pupils should not make contact with or accept approaches from unknown individuals or organisations. Skype and other similar services usernames must be marked as private and not included in the global search.

School ICT Equipment

Users are responsible for any activity undertaken on school ICT equipment provided to them. Culford School keeps a record of ICT equipment issued to staff. All ICT equipment must be kept physically secure. Users must save data on a frequent basis. Individuals are responsible for the backup and restoration of any data that is not held on the school's network drive. Personal or special category data should not be stored on the local drives of laptops or desktop PCs or in the shared drive of the schools IT system. Individuals are responsible for any information accessed from their own equipment and must ensure it is kept secure, and that no personal, special category, confidential or classified information is disclosed to any unauthorised person.

Visitors must not plug their hardware into school network points but must be directed to IT Services if network access is required. Unauthorised access or modifications to computer equipment, programs, files or data is an offence under the Computer Misuse Act 1990. On termination of employment all ICT equipment must be returned to IT Services.

Portable & Mobile ICT Equipment

All activities carried out on School systems and hardware will be monitored in accordance with the general policy for school ICT equipment. School data must be stored on the school's network, and not kept solely on mobile equipment. Personal data should be encrypted where possible and the devices have password protection enabled and used. Equipment must be kept physically secure. When travelling by car, best practice is to place the laptop in the boot of your car before starting your journey. Devices should not be left in vehicles unattended overnight or for long periods of time. Never leave the device in view and make sure the vehicle is secure. Staff must never use a hand-held mobile phone whilst driving a vehicle.

Users should synchronise all locally stored data with the central school network server on a frequent basis. Portable and mobile equipment must be made available as necessary for anti-virus updates and software installations, patches or upgrades and the installation of any applications or software must only be authorised, fully licensed and installed by IT Services. Portable or mobile ICT equipment must not be left unattended and, wherever possible, must be kept out of sight. It must be transported in its protective case if supplied.

Users must report the loss of any school mobile device to the Head of IT Services immediately because the school remains responsible for all costs until the mobile device is reported lost or stolen. School SIM cards must only be used in school provided mobile phones unless authorized by the Head of IT Services. Staff may have to reimburse Culford School for the cost of any personal use of equipment.

Mobile Technologies

Many emerging technologies offer new opportunities for teaching and learning. Mobile devices often offer internet access and thus open up risk and misuse associated with communication and internet use. Emerging technologies will be examined for educational benefit and the risk assessed before use in school is allowed. Culford School will manage the use of these devices so that users exploit them appropriately.

The school allows staff to bring in personal mobile phones and devices for their own use.

Pupils are allowed to bring personal mobile devices to the Senior School but must not use them for personal purposes within lesson time. At all times the device must be switched onto silent. Prep and Pre-Prep pupils must leave their personal mobile devices in the designated areas in Cadogan House or the School office. Pupils' personal mobile devices may be used for educational purposes, when authorized by the member of staff responsible. The device user must always ask the prior permission of the bill payer.

The school is not responsible for the loss, damage or theft of any personal mobile device.

The sending of inappropriate digital messages between any members of the school community is not allowed and permission must be sought before any image, video or sound recordings are made on these devices of any member of the school community.

Users bringing personal devices into school must ensure there is no inappropriate or illegal content on the device.

Managing Social Networking

Social networking sites, if used responsibly both outside and within an educational context can provide easy to use, creative, collaborative and free facilities. However there are issues regarding the appropriateness of some content, contact, culture and commercialism. Users must think carefully about the way that information can be added and removed by all users, including themselves, from these sites. At present, the school endeavours to deny access to social networking sites to pupils within school during the working day.

Users must be cautious about the information given by others on sites, for example users not being who they say they are. Users should not place images of themselves on such sites owing to the difficulty of removal once online. Users must avoid giving out personal details which may identify them or where they are. Users must always set and maintain profiles on such sites to maximum privacy and deny access to unknown individuals. Users must be wary about publishing specific and detailed private thoughts online. Users must report any incidents of online bullying to the school.

Staff may only create or use social networking tools to communicate with pupils using a Culford approved platform or other system approved by the Headmaster and made known to the IT Manager.

Telephone Services

School telephones are available in term time for all School business, but only for local or UK calls. Anyone requiring calls outside the UK must see the Head of IT Services. The school has two mobile phones which are usable in Europe. They are available from the School Office for use on school trips. Be aware that the laws of slander apply to telephone calls. Whilst a telephone call may seem to have a temporary and private existence it still qualifies as admissible evidence in slander law cases.

Monitoring

Authorised ICT staff may inspect any ICT equipment owned or leased by the School, and devices owned by pupils that have been used to access the Culford school network, at any time without prior notice. Authorised ICT staff may monitor, intercept, access, inspect, record and disclose telephone calls, emails, instant messaging, internet/intranet use and any other electronic communications (data, voice or image) involving its employees or pupils without consent, to the extent permitted by law. This may be to confirm or obtain School business related information; to confirm or investigate compliance with School policies, standards and procedures; to ensure the effective operation of School ICT; for quality control or training purposes; to comply with a Subject Access Request under Data Protection Laws, or to prevent or detect crime.

Authorised ICT staff may, without prior notice, access the email or voicemail account where applicable, of someone who is absent in order to deal with any business-related issues retained on that account.

All monitoring, surveillance or investigative activities are conducted by authorised staff and comply with Data Protection Laws, the Human Rights Act 1998, the Regulation of Investigatory Powers Act 2000 (RIPA) and the Lawful Business Practice Regulations 2000. Personal communications using School ICT may be unavoidably included in any business communications that are monitored, intercepted or recorded.

Breaches

A breach or suspected breach of policy by a School employee, contractor or pupil may result in the temporary or permanent withdrawal of ICT hardware, software or services from the offending individual. Any breach is grounds for disciplinary action. Breaches may also lead to criminal or civil proceedings.

Any security breaches or attempts, lost or stolen equipment or data, unauthorised use or suspected misuse of ICT, virus notifications, unsolicited emails, and all other policy non-compliance must be immediately reported to the school's IT Manager or Compliance Officer.

Computer Viruses

All files downloaded from the Internet or received via email will be automatically checked for viruses. However, files on removable media must be checked for any viruses using school provided anti-virus software before using them. Users must never interfere with any anti-virus software installed on school equipment. In the case of a suspected virus, users must stop using the equipment and contact IT Services immediately. The IT Services department will be responsible for advising users of what actions to take.

Data Protection and Security

All staff must follow the School's policies and procedures in relation to the management of personal data which have been written in line with current data protection laws. A large amount of pupil, parent, employee and third party data is held on electronic systems such as the school server, various cloud base systems apps or personal laptops, mobile phones and USB's.

Under General Data Protection Regulations, individuals have the right to request access to the information the school holds about them, Subject Access Request (SAR). This request must be responded to no longer than one month after the request was made. It is important that staff understand how to recognise a Subject Access Request and the school policies on responding to it. All SAR's must go through the Compliance Officer.

Full Data Protection Policies can be found in Moodle/Support/Data Protection. The Schools Data Protection Lead is the Compliance Officer who is available for support or to answer any queries you may have about data protection.

New software or apps

All new software or apps for school use must be made known to the IT Manager before purchase has taken place. This is to comply with data protection laws. The IT Manager will liaise with the Schools' Data Protection Lead to ensure any data impact assessments, data sharing agreements and data mapping has been carried out before the final purchase of the system.

Security

The School gives relevant staff access to its Management Information System, with a unique ID and password. It is the responsibility of users to keep passwords secure. Staff must be aware of their responsibility when accessing school data. Staff have access to relevant guidance within the Culford ICT Policy, including the Acceptable Use Policy Agreement. Staff must keep all school related data secure, especially all personal, special category, confidential or classified data.

Anyone expecting or sending a confidential or special category fax, should use the Safe Haven Fax procedure:

- Ensure the recipient knows the fax is being sent and that it will be collected at the other end.
- Send the front sheet through first and check that it has been received by the correct recipient.
- Add the rest of the document to the fax and press the redial button.
- Don't leave while transmitting; wait for the original to process and remove it from the fax machine.
- Wait for confirmation of successful transmission.
- Confirm whether it is appropriate to fax to another colleague if they are not there to receive it.
- Use only the minimum information and anonymise where possible.

Passwords

Staff and pupils must always use their own personal passwords to access computer based services and enter them each time they logon. Passwords should not be saved in any automated logon procedures. Staff and pupils should change temporary passwords at first logon and change passwords whenever there is any indication of possible system or password compromise. Passwords should not be recorded on paper or in an unprotected file. Personal passwords should only be disclosed to authorised ICT support staff when necessary, and never to anyone else. All personal passwords that have been disclosed should be changed once the requirement is finished. Passwords should contain a minimum of six characters and be difficult to guess. Staff and pupils who think their password may have been compromised or someone else has become aware of it should report this to IT Services.

User ID and passwords for staff and pupils who have left the school are removed within 24 hours.

Password security is essential for staff. Staff must have secure passwords which are not shared with anyone. The pupils are expected to keep their passwords secret and not to share with others, particularly their friends. Pupils are not allowed to deliberately access on-line materials or files on the school network, of their peers, teachers or others. Staff must be aware of their individual responsibilities to protect the security and confidentiality of school networks, MIS

systems and the Learning Platform, including ensuring that passwords are not shared and are changed periodically. Individual users must also make sure that workstations are not left unattended and are locked. Due consideration should be given when logging into the Learning Platform to the browser/cache options for a shared or private computer.

All staff and pupils are expected to comply with password policies at all times

Remote Access

Individual users are responsible for all activity via any of the Culford School remote access facilities. Only equipment with an appropriate level of security for remote access should be used; not, for example, equipment provided in a publically used internet café. To prevent unauthorised access to School systems, users must keep all information such as logon IDs and passwords confidential and not disclose them to anyone. They should avoid writing down or otherwise recording any network access information. Any such information that is written down must be kept in a secure place and disguised so that no other person will be able to identify what it is.

Staff and pupils must protect School information and data at all times, including any printed material produced while using the remote access facility. Particular care must be taken when access is from a non-School environment.

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 employ or as a consequence of it. This will become the absolute property of the school except as otherwise stated by statute. When you leave the school you will return all databases and other information held by you whether developed or maintained by you during the course of your employment with the school.

Communications with the Media

Any member of staff approached by the media should contact the Headmaster's Office as soon as possible or, in his absence a member of the Executive.

Staff should not pass comment to any form of medium on any matter without prior express approval. All responses and comments to the Press are to be approved by the Headmaster, or, in his absence, by the Executive. All communication with the media should be carried out in a courteous and professional manner and calls and emails from the media should be returned promptly by those authorised to do so.

All press releases and Social Media are co-ordinated by the Marketing department. If colleagues wish to promote an event, achievement or activity they should contact the Marketing Department who will be pleased to advise and assist.

All representatives of the media visiting Culford should be accompanied by a member of staff at all times. Press photographers and news broadcasters do not have a right to take pictures or film anywhere on school grounds as it is private property. Any member of staff who sees anyone taking photographs or filming without a school chaperone should report this to reception and to the Marketing Department immediately.

Any member of staff approached by an individual or an organisation seeking information held by the school about themselves or any other person must pass that request, and the reason, to the Headmaster's Office. Staff should not pass comment on individual or release any information without prior express approval from the Headmaster.

Social Media

The creation and moderation of **all** Culford's social media channels is done by the Marketing Department. This includes forums, discussion groups and blogs as well as the mainstream social

channels such as Facebook, Twitter, YouTube, Pinterest, Flickr, Snapchat, Instagram, LinkedIn etc.

We are keen for staff to engage with the school's social Media Activities, but they must only do so through the Marketing Department who will ensure messaging is effectively deployed on the correct platforms.

In addition to this staff may not engage with the School's Social Media as identifiable representatives of Culford. This means that **you must not:**

- Post comments or other content as an official representative of Culford.
- Respond to positive or negative comments regarding the school. Should you come across comments or other postings that are of interest or concern, you should forward them to the Marketing Department who will handle matters.
- Make references to you being a member of Culford's staff while on Social Media. This includes things such as Social Media biographies and the use of 'Culford' in the naming of any blog, forum or instant messaging accounts. Making reference to your position is permitted on professional networking sites such as LinkedIn.
- Post official Culford footage, images or other media, particularly when children can be seen, on any Social Media Platform.
- Tag any Culford pupil on Social Media. Tagging increases an images profile in internet searches and makes identification possible.
- **You must not accept or solicit friendship or follow requests from current pupils or engage with them directly on Social Media. If asked to engage with alumni (former pupils) on social media you should ensure that the Foundation and Marketing Department are aware, to protect your own position.**

Other digital Communications

Employees must refrain from engaging in unsolicited digital dialogue with unknown third parties via email, instant messaging or text. Despite everyone's best efforts unsolicited communications do come through and you should delete or ignore these. If you are in doubt about the genuine nature of any digital communication that you receive to your school email address, please refer to the Head of IT Services. Should a request come through from a journalist from any medium you must forward it to the Headmaster's Office.

Breach of the Social Media 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 employee 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 log in details so far as this is consistent with the right of an individual to private and family life.

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

5. Personnel Issues

5.1 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.

5.2 Equal Opportunities and Discrimination

Culford School 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 ensure fair and equitable treatment in relation to admission and assessment of students.

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.

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.

Existing procedures are reviewed and examined to ensure they are not discriminatory in their operation

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 taken into account.

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.

Appointments will be confirmed on receipt of satisfactory references and DBS checks (and in the absence of prohibition orders) and/or medical report and/or satisfactory completion of a probationary period.

Gender Pay Gap Reporting

Methodist Independent School Trust (MIST) as the employer of Culford staff are required to publish an annual report containing data on the schools gender pay gap. The data is provided by the Finance and Operation Director to MIST and the report is published on their website.

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 your Head of Department to discuss any reasonable adjustments that would help overcome or minimise the difficulty. Your Head of Department 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 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 Finance & Operations Director.

5.3 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 also 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);
- 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 the Finance and Operations Director who can provide confidential advice and assistance in resolving the issue formally or informally.

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

We will investigate complaints in a timely and confidential manner. The investigation will be conducted by someone with appropriate experience and no prior involvement in the complaint, where possible. Details of the investigation and the names of the person making the complaint and the person accused must only be disclosed on a "need to know" basis. We will consider whether any steps are necessary to manage any ongoing relationship between you and the person accused during the investigation.

Once the investigation is complete, we will inform you of our decision. If 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 [position]}. If the matter is not remedied you should raise it formally using our Grievance Procedure or this procedure if appropriate.

We offer access to confidential counselling, which is available on request for anyone affected by, or accused of, bullying or harassment. The details can be obtained in confidence from the Finance and Operations Director.

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.

5.4 Code of Conduct for Employees

Introduction

As with all employers, the school has a legal obligation to advise its employees of any disciplinary rules which apply. Notwithstanding this, we have attempted to keep such rules to a minimum to demonstrate trust and confidence that normal standards of behaviour will be maintained through self-discipline and good manners, 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.

Alcohol and Illegal Drugs

Consumption of alcohol or illegal drugs is not generally permitted on site nor must employees be under the influence of alcohol or drugs when on site. The only exceptions are school events at which the Headmaster has agreed that alcohol may be served to guests. Employees attending such events are at work, however, and must drink in moderation.

Acceptable Use Policy Agreement (Staff)

ICT (including data) and the related technologies such as e-mail, the internet and mobile devices are an expected part of our daily working life in school. This policy is designed to ensure that all staff are aware of their professional responsibilities when using any form of ICT. All staff are expected to sign this policy and adhere at all times to its contents. Any concerns or clarification should be discussed with The Head of ICT Services or Head of ICT.

- I will only use the school's email / Internet / Intranet / Learning Platform and any related technologies for professional purposes or for uses deemed 'reasonable' by the Head or Governing Body.
- I will comply with the ICT system security and not disclose any passwords provided to me by the school or other related authorities. I may be held responsible for any transmissions from my network account.
- I will ensure that all electronic communications with pupils and staff are compatible with my professional role.
- I will not damage, move, disable, or otherwise harm the operation of ICT equipment, or intentionally waste resources. I will also protect ICT equipment from spillages.
- I will check files brought in on removable media (such as memory sticks, CDs, flash drives etc.) with antivirus software and only use them if they are found to be clean of viruses.
- I will not give out my own personal details, such as mobile phone number, personal e-mail address and social networking identities to pupils.
- I will not attempt to bypass the internet filtering system or modify other ICT equipment settings.
- I will only use the approved, secure e-mail system(s) for any school business.
- I will ensure that personal data (such as data held on MIS software) is kept secure and is used appropriately, whether in school, taken off the school premises or accessed remotely.
- I will not install any hardware or software without permission of The Head of ICT Services.

- I will not browse, download, upload or distribute any material that could be considered offensive, illegal or discriminatory.
- Images of pupils and/ or staff will only be taken, stored and used for professional purposes in line with school policy and with consent of the parent, guardian or staff member. Images will not be distributed outside the school network without the permission of the parent/ guardian or member of staff.
- I understand that all my use of the Internet and other related technologies can be monitored and logged and can be made available, on request, to my Line Manager or the Headmaster.
- I will respect copyright and intellectual property rights.
- I will ensure that my online activity, both in school and outside school, will not bring my professional role into disrepute.
- I will support and promote the school's ICT policy and help pupils to be safe and responsible in their use of ICT and related technologies.
- I understand this forms part of the terms and conditions set out in my contract of employment.
- I understand and agree with the information set out in the Media and Information Release Policy.

Staff Acceptable Use Policy Agreement

ICT including the internet, learning platforms, e-mail and mobile technologies have become an important part of learning at Culford School. We expect all staff to be safe and responsible when using any ICT.

Staff are expected to read, sign and follow the terms of the agreement. Any concerns or explanation can be discussed with the Head of ICT Services or Head of ICT.

Collections and Gambling

The school's Methodist heritage means that gambling is not permitted except in specific circumstances. If you wish to make a charitable collection, collect donations, request sponsorship, or sell raffle tickets on the school's premises, you must seek prior authorisation from a member of the Executive. Furthermore, you must seek authorisation from a member of the Executive if you wish to organise a sweepstake or lottery syndicate.

Environmental and Waste Management

The school is committed minimising the impact of its activities on the environment. We maintain a policy of minimum waste which is essential to the cost-effective and efficient running of all our operations. All staff are expected to promote this policy by taking extra care during normal duties by avoiding unnecessary or extravagant use of services, time, energy, etc. The school has an environment committee to highlight areas where the school can improve in waste management and

The school is committed to ensuring the health, safety and welfare of its employees and contractors who are involved in waste disposal and of others who may be affected by waste materials which result from its work.

Conflict Of Interest

Employees have an obligation to act in the best interests of the school and in accordance with its terms and conditions of employment and the school trading terms. All stakeholders have similar obligations. Conflicts of interest may arise where an individual's personal or family interests and/or loyalties conflict with those of the school. The aim of this policy is to protect both the organisation and the individuals involved from any appearance of impropriety. Accordingly, employees must declare their interests and involvement to any such connection. Any gifts or hospitality received in connection with their role must also be declared to the Finance & Operations Director.

Mobility and Flexibility

Due to the demands and nature of the school, employees should be prepared to transfer upon request between departments either temporarily or permanently, to undertake work of a different nature, providing it is reasonable and safe to do so and the employee is adequately trained.

Personal Appearance

We regularly receive visits from parents, potential parents and others, and naturally wish to convey an impression of efficiency and organisation. Employees are required to look clean and tidy in appearance. Your personal appearance must be consistent with the professional image of the school. Some departments are required to wear a uniform that is supplied by the school. If you are required to wear a uniform, it is the employees responsibility to ensure that uniform is cleaned regularly and kept in good condition.

Dress Code - Members of Common Room

Suits or jackets and ties are an expected requirement for men at work. Women's dress should be of an equivalent level of formality and, in particular, low cut tops and overly short skirts are not acceptable. Tops should cover the chest fully and skirts sit no higher than just above the knee. Teachers of both genders should recognise that they are role models for pupils whose own dress we expect to be decorous, modest and unrevealing. Teachers should not wear casual, gym or beach wear to work. This includes track suits, sweat-shirts, casual or sports t-shirts or shorts, combat trousers, jogging bottoms, denim, or leggings (unless you are teaching physical education, in which case you should dress accordingly).

The three most formal occasions in the School year are Speech Day, the Carol Service and Remembrance Service when gowns and hoods are also worn, as well as at the Headmaster's end of term Assembly. Attendance on all occasions is compulsory for all members of Common Room.

Dress Code - Support Staff

For office based staff, suits or jackets and ties are an expected requirement for men at work and women's dress should be of an equivalent level of formality and, in particular, low cut tops and overly short skirts are not acceptable. Tops should cover the chest fully and skirts sit no higher than just above the knee. Staff of both genders should recognise that they are representatives of the school and dress accordingly.

During non-term times, the dress code is relaxed for office based staff. However, it should be appropriate to the role employed in and take consideration of other visitors on site such as lettings groups. Gym or beach wear is not considered appropriate wear.

Non office staff should dress according to the needs of the role they are employed in. Where roles are supplied with a uniform, these must be worn during working hours on site, including non term times. If a particular role requires the wearing of safety equipment, these must be worn and failure to wear the correct safety equipment may result in disciplinary action.

Security

All visitors are required to report to Reception desks in either the Main school, Preparatory school or Pre-Preparatory school. All employees are reminded that security, and particularly child safety, are the business of everyone. If you see a stranger without a security pass, please ask their business and direct them to the appropriate office. Any unusual or suspicious behaviour should be reported to a member of the Executive immediately.

You must not remove any school documents from the site nor take any photographs without due permission. The school reserves the right to search the outer clothing, bags, lockers and vehicles etc. of employees whilst on site. The employee may have a colleague in attendance on such rare occasions.

Smoking

It is a legal requirement that all work places and public buildings are non-smoking, therefore all school premises and vehicles are strictly no smoking areas. The school is also responsible for the health, safety and welfare of its employees at work and is therefore concerned both that its employees should be aware of the risks associated with smoking and, more importantly, to protect non-smokers from risks to their health and discomfort caused by exposure to tobacco smoke. In view of these concerns the school is a non-smoking site. Because school-age children are prone to suggestion and influenced by appearances, and because the appearance of smoking also detracts from the professional appearance our staff should have in front of pupils and visitors we include e-cigarettes and other such devices in this policy and no smoking is allowed inside buildings anywhere on site. This policy also applies to visitors and non-employees entering the building. This policy has been developed whilst respecting the rights of smokers.

5.5 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.

5.6 Appraisals

The performance review process involves reviewing the attributes of staff to match them to the school's requirements. An appraisal or performance review contributes to the school's overall performance management system by providing a structured opportunity for reviewing past performance, planning new performance objectives and agreeing personal training and development plans that link to the school's overall strategy. These are designed to provide an opportunity to discuss your performance, set targets and identify any training requirements.

The development of individuals is a two way process; heads of department discuss the performance of the individual and provide information on available opportunities, whilst employees have the responsibility of informing their head of department 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 head of department and the employee. You will be expected to take part in the school's supervision, appraisal systems or performance reviews as and when required.

Appraisal & Pay Policy for Common Room

The Aim of Appraisal

Appraisal seeks to maintain and enhance the quality of education offered to pupils; and maintain and enhance the professional standards and development of teachers to their own benefit. It seeks to do this by:

- supporting and motivating teachers by recognising their achievements
- improving the quality of teaching and learning by building on good practice
- encouraging colleagues to reflect upon their performance
- enhancing strengths and supporting areas for development
- supporting professional development through career planning and INSET

Key Features of Appraisal

- Appraisal is annual and is clear and easy to understand
- Appraisal is intended to be supportive, positive and non-threatening
- Appraisal is not used for disciplinary purposes
- Appraisal may lead to recommendations for training and development
- Appraisal supplies key performance indicators for performance related pay

The Aims of this Policy

This policy aims to support teachers by:

- Explaining clearly the purpose and procedures of the appraisal system
- Explaining clearly how performance objectives are set, evaluated and reported

- Explaining clearly the basis upon which pay decisions are made
- Recognising and rewarding consistently excellent performance
- Ensuring that appraisal and pay decisions are managed in a fair and transparent way

It also seeks, therefore, support pupils and the school by:

- Supporting the recruitment and retention of high-quality teachers
- Improving the quality of teaching and learning at Culford over time

The Background

Pay structures changed in maintained schools in 2013. Amongst other things pay progression is not based on length of service but linked to performance; and schools are able to increase individual teachers' pay at different rates based on performance. Culford moved away from pay scales to remain competitive in appointing the best teachers and to allow performance pay to exist for the best teachers within our Common Room.

In maintained schools pay scales, thresholds and upper pay scales may still be used by Heads to mark the progress of teachers. We have no need for such bureaucracy. Progress in terms of pay can be measured simply through annual increases awarded to base salaries.

Appraisal

Four Core Performance Objectives apply to all teachers:

1. Teachers are expected to: exhibit consistently high levels of knowledge, skill and professional expertise in the classroom; have a thorough knowledge of their subject; maintain detailed schemes of work, lesson plans and mark books; be aware of relevant curriculum developments.

Teaching is expected to: enable swift progress and foster application and good behaviour; provide for different needs including SEN, EAL, and G&T; make use of appropriate resources and methods.

Learning is expected to reflect this through evidence of: organisational, reasoning skills, and other appropriate skills including ICT; independent and co-operative learning together with application and perseverance; appropriate volume, standard and presentation of work; enjoyment of the subject and its delivery.

2. All teachers are expected to exhibit consistently high levels of commitment to the school's broader educational aims, taking part and showing commitment to the tutorial system including boarding duties as required; the activities programme as required.
3. In dealings with pupils and parents teachers are expected to exhibit consistently high levels of professional expertise. They are expected to be: supportive of the school's ethos and policies; prepared to give freely of their time and energy as a professional.
4. All teachers are expected to show commitment to their own professional development, keeping abreast of current practice with regard to: teaching, tutoring, pastoral care and boarding; contributions to activities; administrative or other responsibilities.

The Appraisal and Pay Cycle

All teachers are expected to meet the core performance objectives set out in the Appraisal Policy. These, together with any individual objectives, are the basis of the teacher's annual appraisal. This gives a simple, transparent system in which all are clear how all are judged.

Performance will be assessed against performance objectives to a level consistent with what should reasonably be expected of a teacher in the relevant role and at the relevant stage of their career. Throughout the academic year the Heads and Deputy Heads in each school will monitor

performance of teachers against these performance objectives, acting as an appraisal team. The team will use its professional judgement when appraising performance.

It is the responsibility of the appraisal team to:

- Provide positive feedback whenever possible. This may be simple oral praise or a more formal note of thanks. The team will keep records of all such feedback.
- Provide corrective oral or written feedback if performance seems lacking. The team will keep records of all such feedback.

It is the responsibility of teachers to:

- Ensure that the team recognises good performance by drawing matters to its attention if recognition has not been forthcoming. The team will keep records of its response to having matters drawn to its attention.
- Ensure that the team understand any emerging difficulties before corrective feedback has to be issued. The team will keep records of all such difficulties and of its attempts to support the teacher.

Corrective feedback will not be recorded for the purposes of competency or discipline procedures. A separate formal investigation into such matters must be held. Corrective feedback is always intended to be positive, enabling the teacher to meet their performance objectives and receive due recognition for doing so.

Performance Objectives in Appraisal

The four core performance objectives are to be used in all appraisals and the work of all teachers is judged against them annually. They consist of an objective, a statement of intent and several key performance indicators. For example:

Objective	All teachers are expected to exhibit consistently high levels of knowledge, skill and professional expertise in the classroom.
Intent	The teacher should:
KPI	Demonstrate a thorough knowledge of their subject
KPI	Maintain detailed schemes of work, lesson plans and mark books
KPI	Be aware of relevant curriculum developments

Additional, separate individual performance objectives may be set where necessary to support teachers in their personal or career development. These should also have an objective, a statement of intent and at least one KPI. For example:

Objective	You are seeking to develop your pastoral career.
Intent	You should:
KPI	Attend the BSA Boarding Conference
KPI	Shadow both Housemasters, interviewing them and discussing differing styles of leadership and management
KPI	Visit two other boarding schools of your choice to learn from pastoral structures there

Such individual objectives will be discussed with the teacher prior to being set, with clear agreement as to why these areas of development are being set. There should be an agreed plan as to how any objective will be met, including relevant training and support.

Individual performance objectives should be specific, measurable and achievable. They may be stretching, but not unrealistic. One or two objectives will usually be enough; more will prevent proper focus and progress. KPIs should also be relevant, realistic and limited in number. They should reinforce the core objective not add new elements to it.

Evidence to be used for Appraisal

Evidence may be drawn from: classroom observations; inspection of relevant documents including schemes of work, lesson plans, mark books and pupils' work; examination performance in relation to pupils' ability; other relevant documents; discussion with the teacher and pastoral and extra-curricular line-managers.

Format of Appraisal

The Heads and Deputy Heads form the appraisal team in each school and are responsible for the bulk of the process. In the Pre-Prep school the Head conducts appraisals, but will seek support or advice as necessary. The team will observe at least two lessons for every colleague. Heads of Department will also do at least one lesson observation to contribute to the process. Observations will usually be unannounced as what is being considered is normal teaching practice, not a specially prepared lesson designed to impress the appraiser.

Heads of Department will also be consulted about other areas where they believe a colleague's strengths or needs for development deserve to be highlighted. Work and mark book scrutiny will be undertaken by the appraisal team. They may ask the Head of Department to comment on such matters. Relevant House staff will be consulted as to tutorial and pastoral responsibilities. The colleague's contribution to the activities programme will also be assessed.

Following this the team will discuss the evidence and complete the appraisal form. The relevant Head will use the completed form to write an appraisal report. All teachers will receive a report which assesses their performance by the end of the academic year. Good communication throughout the year should ensure that the report contains no surprises.

The report will not be overly formal or cumbersome, but will be a letter from the Head written in clear prose setting out the achievements of the teacher and offering praise where due. It may also record difficulties and areas where support might need to be given to the teacher in the next cycle, or where setting individual performance objectives may help the teacher.

5.7 Linking Pay to Performance

Performance-related pay enables schools to recognise and reward a teacher's performance through an increase in pay. It can act as an incentive for continuous improvement.

The appraisal system is the key to this working. It should be a supportive, developmental process that ensures that all teachers have the skills and support they need to carry out their role effectively. It should help teachers continue to improve their professional practice throughout their careers. Culford has a clear and simple appraisal system.

Meeting performance objectives need not necessarily mean that a teacher is awarded a pay increase. It is important to understand that meeting all performance objectives is a normal requirement of professional teachers.

Progress in terms of pay is intended to recognise those teachers who consistently and clearly exceed expectations, helping Culford to achieve better standards of teaching and learning for its pupils.

A teacher who has made good progress but not quite achieved a very challenging objective may have made a more significant contribution to standards than a teacher who met in full a less stretching objective. Similarly, a teacher may have achieved all their objectives but only just met, or possibly failed to meet, all of the relevant standards that Culford expects. Flexibility must exist, so that the right decisions are taken for individuals; not decisions that most closely align to a series of ticks in boxes.

The Heads of each school act as a Remuneration Committee to discuss pay awards. A suitably qualified Governor will be in attendance. The Remuneration Committee will meet annually in

June or early July after all appraisal reports have been written. It does not set increases; it recommends priorities for awards. The Governor in attendance will not express views on the performance of teachers or on remuneration. The role of the Governor is to ensure that decisions taken by the Heads appear fair, reasonable and based upon objective evidence. The Governor in question will also be responsible for equality monitoring and will report any emerging concerns over process or fairness to the Board of Governors.

The Board of Governors sets the teaching salaries budget for the following year in June or August. The Headmaster and the Finance Director will reflect Remuneration Committee's priorities within the budget, producing final percentage or absolute awards. The Headmaster will write to all teachers in late August or early September confirming individual pay awards.

Further Notes on Appraisal and Pay

The policy above is designed to be as clear and brief as possible. These further notes are designed to ensure its inherent fairness and its fair application.

The Equality Act 2010

Employers must not directly or indirectly discriminate against anyone because of a relevant protected characteristic. If a school chose not to give a female teacher a pay rise because she was pregnant, that would be direct discrimination. Indirect discrimination could occur if the school's pay policy, though applied equally to all, might disadvantage a particular group.

This pay policy does not, and pay awards will not, discriminate against teachers on grounds of their protected characteristics. Part-time and fixed-term teachers will not be treated less favourably than others. Any colleague who believes that this policy may discriminate, intentionally or unintentionally, directly or indirectly, against them or others, should raise their concerns with the Headmaster in the first instance. Teachers have the right to be supported in raising their concerns, by a colleague, friend or union representative.

Equality monitoring is the most effective and efficient method of identifying potential inequality. Individual pay decisions in any one year may be taken in line with policy. However, looked at over a number of years, it may become apparent that a bias is emerging. This may or may not indicate some form of inequality. To provide impartial equality monitoring, a suitably qualified Governor will review pay awards and their patterns annually.

Appeals against Appraisals and Pay Awards

Teachers have the right to raise formal appeals if they believe that:

- Their Appraisal Report failed to take proper account of relevant evidence
- Their Appraisal Report took account of irrelevant or inaccurate evidence
- The Headmaster incorrectly applied the school's pay policy
- The process showed bias or unlawfully discriminated against the teacher.

The process follows the same model as any other complaint or grievance. The teacher should explain which of the grounds for appeal given above applies and write to the relevant Head seeking informal discussion to attempt to resolve matters. The teacher should write within a week of receiving the appraisal report and wherever possible the Head should meet the teacher and discuss matters within three days of receipt of the letter.

If still dissatisfied, the teacher should make a formal representation to the Headmaster. Where the teacher is dissatisfied with an original decision of the Headmaster, the matter will escalate immediately to the appeal level set out below. The complaint to the Headmaster may be made before or after any pay award, but should be no later than one week after the date of any pay award letter. The teacher should submit a formal written statement setting down in writing his or her grounds for continued dissatisfaction.

The teacher will be given the opportunity to make representations, including presenting evidence and asking questions, at a formal meeting with the Headmaster and colleagues involved in the teachers' appraisal. The teacher may be accompanied by a friend, colleague or union representative. The Headmaster will give his written judgement on the matter within five working days of the meeting.

If still dissatisfied the teacher may seek a formal appeal hearing with a panel of governors, which will be set up in accordance with the school's current grievance policy. The teacher and the Headmaster will have the opportunity to present their evidence and call witnesses, and to question each other. If the matter is one in which the grievance is against an original decision of the Headmaster himself, the panel will be chaired by the Chairman of Governors. The panel's decision is final and there is no further recourse to the general grievance procedure.

Pay Progression Based on Performance

A number of approaches have been suggested in the state sector. The Culford approach is that:

1. Teachers are eligible for a share of the overall increase in the salaries budget.
2. Individual settlements will be based upon:
 - a. the appraisal cycle;
 - b. consideration of market forces;
 - c. the need to recruit or retain teachers with particular skills and attributes.
3. There is no expectation that every salary must rise.
4. There is no notional cap on any annual increase for a teacher.
5. There is no notional cap on any teacher's overall salary.

5.8 Support Staff Appraisal

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 the He Finance & Operations Director 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 the Finance & Operations Director 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.

5.9 Pay Thresholds and Threshold Applications

All support staff roles are paid at the market rates for each particular role and no pay scales are used. If a colleague feels that a pay award is appropriate, application should be made in the first instance, directly to their line manager. The line manager will assess the application and pass their recommendation together with a copy of this request to the Operations and Finance Director for budgeting and authorisation. Applications for the following September should be made, for budgeting purposes, between the start of the autumn terms and the start of the spring half-term in the year preceding; any changes will ordinarily take effect at the start of the next academic year. No more than one application may be made in any academic year.

5.10 Advance Pay and Loans

This policy applies to all permanent full-time or part-time employees, and temporary employees who have contracts that span more than one year may also be included. It applies to all eligible employees without discrimination against protected characteristics, rank or position. The policy covers employees receiving a portion of their pay before their next normal payday or being granted a loan. It does not include any money paid to the employee for relocation or work-related expenses.

Culford is not obliged to pay employees in advance or to give loans. We may choose to do so if employees have legitimate reasons. Employees should have a legitimate reason to ask for advance pay, usually an unexpected or unavoidable occurrence such as family or personal emergencies. Culford may make payments on behalf of the employee when applicable (e.g. utility, credit card or mortgage bill) instead of giving them the pay advance directly.

Employees can ask for a pay advance or loan if they: have completed their probation period; have not taken any other company-sponsored loan; have not asked for a pay advance or loan in the past six months.

Advance Pay and Loan Terms

The minimum advance or loan amount is half the employees' monthly net pay. The maximum amount is normally three times the employees' monthly net pay. If employees need a larger or more frequent advance or loan, they should discuss that with the Finance and Operations Director. Executive may make exceptions on a case-by-case basis.

Culford will deduct the amount of the advance pay or loan from an employee's future pay. This may mean deducting the full amount the next month, or deducting instalments over a number of months. All advance pay or loans must be repaid in full within twelve months. Culford will not charge any administrative fees or interest for such advances or loans.

If an employee resigns or is terminated before they repay their advance or loan, Culford will deduct the balance from their final pay. Any amount remaining thereafter will be pursued as a debt and interest will accrue at the standard rate.

Advance Pay and Loan Agreements

Employees who want to request advance pay or a loan should ask for the Finance and Operations Director for an official form. They must indicate their reasons, state the amount of money they want to receive and sign to accept this policy's terms.

The completed form should be submitted to the Finance and Operations Director. If the advance or loan is less than one month's net pay and where it meets the policy criteria, the Finance and Operations Director may approve and sign the application. If the advance or loan is more than one month's pay, the Finance and Operations Director and the Headmaster will review the application. Where the advance or loan is substantial in nature or goes beyond normal limits, it will be put before the Chairman of Finance Committee for approval.

A copy of the signed form will be given to the employee, put onto the employee's HR file and given to payroll for monthly deductions. The Finance Department will arrange a bank transfer within two days of approval.

If the request is denied, the Finance and Operations Director will inform the employee within one business day.

5.11 Disciplinary Procedure

The 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 also poor performance (in conjunction with the capability procedure). 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. The code of conduct sets standards of required conduct at work.

The 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 year or two of employment (as noted above), an employee whose conduct or performance 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.

Suspension

Where an employee is accused of an act of serious or gross misconduct, or where the circumstance otherwise warrant 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.

Where appropriate, during any disciplinary investigation or suspension, the Head or the Finance and Operations Director 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 the HR Officer, or a senior member of staff, will, as soon as reasonably practicable, carry out an investigation into the matter. 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.

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 nature of the complaint and where appropriate, will be provided with copies of any written evidence gathered during the investigation.

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 either; the Head, the Finance & Operations Director, or the HR Officer (or an appropriate senior member of staff appointed by them, who has no prior involvement). The employee may be accompanied by a trade union representative or colleague if desired. The employee and their companion should make every effort to attend the disciplinary meeting. In the event that 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.

The employee will be given the full opportunity at the disciplinary meeting 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.

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
- the right of appeal

In the event that 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 under performance, 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.

Final Written Warning

In the case of a sufficiently serious offence or under performance, 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.

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:

- suspension without pay
- demotion
- transfer

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.

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
- contravention of the alcohol and drug policy, or knowingly allowing a resident of your Culford occupancy agreement address to contravene this policy
- 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 or harassment of colleagues, pupils or parents
- abuse or suspected abuse of your position of trust in relation to pupils at the School
- bringing the School into disrepute
- abuse or suspected abuse of your position of trust in order to adversely influence or radicalise pupils, parents or colleagues with extremist views, ideology or membership to groups

Appeals

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

The appeal hearing will be convened as soon as is reasonably practicable. The appeal hearing will be held by the Head or the Finance & Operations Director, or a Governor or panel of up to three Governors (who have had no prior involvement). The Head or the Finance & Operations Director will not hear the appeal if they held the disciplinary 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 hearing by a colleague or trade union representative. The employee will be informed in writing of the decision of the appeal hearing following the conclusion of the hearing. Such decision will be final. In the event of an unsuccessful appeal against a decision to dismiss the original dismissal date shall stand.

Record Keeping

A copy of all formal warnings will be retained on an employee's personal file but will be considered spent after a period of twelve months.

5.12 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 2 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.

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. Where appropriate, during any investigation or suspension, the Head or the Finance & Operations Director 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 Hearing

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 hearing 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 hearing with a colleague or a trade union official as a representative and you will be given an opportunity to state your case.

You must take all reasonable steps to attend the hearing. In the event that you fail to attend the hearing this will usually be rearranged once, but should you fail to attend the rearranged hearing then a decision may be reached in your absence.

Following the hearing, 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 Finance & Operations Director.

The appeal hearing will be convened as soon as is reasonably practicable. The appeal hearing will be held by the Head or the Finance & Operations Director, or a Governor or panel of up to three Governors (who have had no prior involvement). The Head or the Finance & Operations Director 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 hearing by a colleague or trade union representative. The employee will be informed in writing of the decision of the appeal hearing following the conclusion of the hearing. Such decision will be final. In the event of an unsuccessful appeal against a decision to dismiss the original dismissal date shall stand.

If your performance shortfall or failure is dealt with under the formal performance improvement procedure, a record will be kept of the shortfall or failure, your defence or mitigation, minutes of the capability hearing, 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 personal file in accordance with the Data Protection Act 1998.

5.13 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 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 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 of 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.

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 performance improvement procedure and have no separate right to have the disciplinary procedure followed prior to dismissal.

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 performance improvement procedure, and vice versa.

5.14 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.

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.

Formal

If no satisfactory resolution is possible or the employee considers they have not been fairly treated, they may raise it in writing to the Head of Department and it will be treated as a formal grievance.

When an employee raises a formal grievance a meeting will be arranged as soon as possible. At the meeting the employee will have the opportunity to explain their grievance and how they think it may be resolved. Depending on the circumstances, the meeting may be adjourned in order for an investigation to take place. 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.

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

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 employee 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 Headmaster or the Finance & Operations Director.

An appeal hearing will be convened as soon as is reasonable practicable, and will be heard by either the Head, the Finance & Operations Director, 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.

5.15 References

All requests for references should be communicated to the Head or the Finance & Operations Director. No reference should be given on behalf of the School by an employee other than through the Headmasters Office or the Finance Office.

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.

5.16 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 the Training and Development Policy 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.

5.17 Retirement Policy Policy Statement

The School currently has no default retirement age applying to all staff although this will be reviewed from time to time by the School to reflect our business needs. We acknowledge that retirement is a matter of choice for individuals.

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. We will review whether any fixed retirement age remains necessary from time to time and will let you know if we consider this needs to change.

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

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.

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 actually 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.

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 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.

5.18 Safeguarding and Couple – MIST Principles

Schools, like any other organisation, are communities and particularly where there is a residential component to school provision it is relatively common for couples to be employed. There are many positive aspects to this, including modelling of positive and co-operative adult relationships, increasing the sense of 'family' in the school community and from an employment perspective increasing the attractiveness of a role which entails working outside of the usual 9-5 for a wider potential workforce. It is also likely that there will be occasions on which intimate relationships are formed with colleagues, raising broadly similar issues as with established couples.

It is usual for organisations to have procedures that address the potential conflicts of interest that might arise from employing couples (for example where one partner has management responsibility for another – see below) but less common for the specific potential safeguarding issues to be addressed. The purpose of this paper is to provide some key principles for addressing those safeguarding issues. It should be read in conjunction with other relevant policies relating to employing relatives or those in relationships, for example those addressing recruitment and management issues (e.g. safer recruitment) where they exist. The reason for providing principles rather than guidance or policy is that the context in which they will be applied – legislation, regulations and guidance will change over time, and it is therefore intended that the principles are adapted and applied in the context of prevailing requirements.

This document is linked to expectations and standards of behaviour contained in each school's

code of conduct and the relevant financial regulations regarding close personal relationships and financial transactions. From 1st September 2012 teachers are also required to observe the Teacher Standards 2012 to uphold public trust in the profession and maintain high standards of ethics and behaviour, within and outside school.

The expectations in relation to standards of behaviour relating to close personal relationships at work also extends to cover relationships with contractors, sub-contractors, consultants, staff seconded from other organisations, agency workers, volunteers and work experience placements or those tendering for work with a school.

School workplaces are complex. They feature professional relationships where some parties are more powerful than others, because of their management or supervisory or other status. Some people also have more power because of the informal influence that they have over colleagues. Sometimes this power can consciously or subconsciously influence the actions of colleagues to either their advantage and/or the disadvantage of the school community. Relationships in the workplace become even more complex when strong personal feelings are present.

It is recognised that there will inevitably be close personal relationships (defined below) at work, including those that already exist and those that develop during the course of employment/work with the school. Whilst not all such close personal relationships raise issues of conflict of interest, this is not always the case. These principles are intended to ensure that whatever relationships exist or develop, children's safeguarding remains a priority and that in the event of a conflict of interest between a personal relationship and acting on a potential safeguarding issue that it is clearly understood by all that safeguarding must be the absolute priority. It is not being suggested that individual employees would allow themselves to be influenced by personal relationships, however, it is sound operational policy to avoid circumstances in which such practice might be alleged or inferred. By observing these principles it is more likely that suggestions of bias, favouritism, prejudice or potential for breach of confidentiality can be minimised.

This document therefore sets out MIST's approach and expectations regarding responding to safeguarding concerns where there are close personal relationships at work and aims to assist school leadership teams and governing bodies to work sensitively with volunteers, governors, staff and job applicants to identify and resolve potential conflicts of interest as they relate to safeguarding which may arise as a result of a close personal relationship at work.

They are also intended to ensure that all employees feel confident of receiving fair treatment without the fear that a close personal relationship will influence their or other employees' treatment or broader working relationships. The same provisions should allow effective management of those occasions when close personal relationships break down, or end, so allowing both parties to maintain a professional working relationship with each other.

Definitions

For the purpose of these principles the definition of a close personal relationship includes, but is not exclusive to:

- married/civil partnership/co-habiting;
- sexual/romantic partner;
- children, parents, siblings, grandparents, grandchildren, aunts, uncles, nieces, nephews and cousins (blood relative/relative, in-law/step relationship, foster or adoptive relation);
- close personal friend.

Relationships and Safeguarding Issues

Organisations charged with the care and welfare of children and young people generally share a commitment to high standards of safeguarding practice. Sadly a common feature of serious case reviews and inquiries into cases involving inappropriate behaviour or abuse by staff is that, whilst it is rare for colleagues to be aware of abuse and not report it, there are commonly a range of other concerns about the individuals behaviour which if disclosed to a manager might have curtailed or

even prevented abuse occurring. Indeed the single most common theme or recommendation from a recent review of 20 serious case reviews and inquiries into cases involving abuse by staff related to the importance of management & staff understanding and implementing their safeguarding arrangements.

Unsurprisingly raising a possibly unsubstantiated concern about a colleague is a challenging prospect. In his review of events surrounding the abuse of scores of pupils at an independent school in London by teacher William Vahey, barrister Hugh Davies comments that "...human nature and the culture of the (teaching) profession is such that reports may ...not be made". Enabling that reporting to take place is a shared responsibility by all staff, crucially mediated by the school's leadership team and the culture they establish.

However, even for the most ethical and scrupulous individual, reporting such concerns when they relate to someone who is not only a colleague but also with whom they are in a relationship is an extremely difficult proposition. It is also a possibility that few people would consider either when applying for a role where that may be a possibility (for example being employed with a spouse or partner in the same school) or when embarking on an intimate relationship with a colleague.

Viewed objectively it is apparent that as a professional each employee has an overriding duty of care to the children they are responsible for and that their professional responsibilities in relation to safeguarding must take precedence over personal considerations. However, it is also important to acknowledge that doing so is likely to be unusually challenging.

Difficult though it is to countenance the notion that a staff member's associates may pose a risk to pupils it is not unreasonable. Staff have a duty to inform the school if they are disqualified under the Child Care Act 2006, if they provide childcare (under 8 years old)/ EYFS setting at school. This can be self-declared by staff and will be recorded by the school.

Staff also have a duty to inform the school of any household member who live on the same premises as boarders are disqualified under the Child Care Act 2006.

Professionals working with children and young people have a statutory responsibility to report any child protection or safeguarding concerns in line with Keeping Children Safe in Education (DfE, September 2019), Working together to safeguard children (DfE 2018) and the Safeguarding Vulnerable Groups Act 2006 (as amended by the Protection of Freedoms Act 2012). In addition, professionals are required to follow the relevant Suffolk Safeguarding Partnership procedures in relation to any concerns / allegations relating to the behavior or suitability of an adult who works with children.

There is no simple response that can alleviate the inevitable tension if such a circumstance arises. However to make that challenging task more manageable this document is intended to serve a number of purposes:

- Draw attention to the issue as one which needs to be discussed at recruitment stage where a couple, or the partner of an existing member of staff, is recruited
- By virtue of this expectation being articulated here it is possible for the implications of their situation to be considered by staff already in post well in advance of such a situation possibly arising
- It is possible that this document highlights for a member of staff that they have not exercised their responsibilities in relation to a safeguarding issue, in which case this should be a prompt to do so now
- It should place this issue on the agenda for the school's Governors to consider as one which requires attention and oversight
- Prompt Heads and DSLs to consider the need to use the arrangements for confidential reporting which should be in place for these circumstances in their school i.e. that it should be a routine procedure that if the concern is:
 - a) being expressed by someone who is in a relationship with the person they are concerned

- about, or
- b) if it is about someone in an organisationally powerful relationship or
 - c) someone in a relationship with such an individual (e.g. the Head's partner)

6. Family Friendly Leave Entitlement

6.1 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.

Contractual Maternity Pay

To qualify for Contractual Maternity Pay 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.

You will receive:

- 6 weeks full pay (90% is at higher rate Statutory Maternity Pay (SMP))
- 12 weeks half pay (50 %) plus SMP* (lower rate SMP)
- 21 weeks SMP (lower rate SMP)
- Remaining 13 weeks maternity leave unpaid

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

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 Maternity Allowance which is payable by the Department for Work and Pensions.

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.

Maternity Allowance

If a pregnant mother does not qualify for statutory or contractual maternity pay, they may be entitled to Maternity Allowance. This is paid by Jobcentre Plus for up to 39 weeks. To qualify, they must have been employed or self-employed for 26 weeks out of the 66 weeks before the expected week of childbirth. A claim can be made for maternity allowance once the mother has reached 26 weeks of pregnancy, although payments cannot begin until 11 weeks before the baby is due.

Generally, to qualify for Maternity Allowance a pregnant mother, in the 66 weeks before the baby is due must have:

- been employed or self-employed for at least 26 weeks (these need not be consecutive weeks)
- earned at least £30 a week, on average, over any 13 of those 26 weeks.

The rate at which Maternity Allowance is paid is dependent on whether the mother has made National Insurance contributions in the 13 weeks they have relied on for qualification.

There may be other circumstances in which an amount of maternity allowance can be claimed. For more information on the wider range of options for claiming Maternity Allowance and benefits as a new parent visit [GOV.UK - Maternity Allowance](https://www.gov.uk/maternity-allowance).

Annual leave during maternity leave

An employee continues to accrue all of their paid annual leave (including bank holidays where applicable) while on maternity leave. It is important to note that annual leave cannot be taken at the same time as maternity leave.

Return to Work

If you wish to 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.

6.2 Time off for Antenatal Appointments

All pregnant employees are entitled to paid time off to attend antenatal appointments. Please confirm your appointment times with your Line Manager or Head of Department giving as much notice as possible. You may be asked for your appointment card.

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 your Line Manager or Head of Department 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. 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

6.3 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 the Finance & Operations Director, by no later than the 15th week before the baby is due. Providing false information on a certificate in order to claim paternity leave will be a disciplinary offence.

Paternity leave must be taken within 56 days of the birth (or, if the birth is early, any time between birth and 56 days after the date the baby is due). You can take either one week or two weeks, but not odd days. If two weeks are taken they must be consecutive. 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 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 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.

6.4 Shared Paternity 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, ordinary 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 it 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, Contractual Maternity Pay (CMP) 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 CMP, 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 Finance and Operations Director, 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, CMP, 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 Finance and Operations Director 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 Finance and Operations Director 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 Finance and Operations Director 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 Finance and Operations Director 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 periods 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 periods 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 Finance and Operations Director 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 Finance and Operations Director 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 Finance and Operations Director 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 Finance and Operations Director 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 periods 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 Finance and Operations Director 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.

6.5 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 Finance Office.

6.6 Time Off for Dependants

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 may include, but is not limited to;

- If a dependant falls ill or has been injured or assaulted;
- To deal with an unexpected disruption or breakdown in care arrangements e.g. when the child minder or nurse fails to turn up;
- To deal with an incident involving your child during school hours.

A dependant is your husband, wife, child or parent or someone 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.

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 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 an internal time off form provided by the Finance & Operations Director for absence recording.

Abuse of this right will be dealt with in accordance with the School's disciplinary procedure.

6.7 Ordinary Parental Leave

Staff with one year's service and a child (including adopted children) under the age of 18 are entitled to take ordinary parental leave.

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 ordinary parental leave. You have the right to take the leave until the child's 18th birthday. The leave is unpaid.

Ordinary 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 ordinary parental leave and will be entitled to receive all their normal benefits (other than pay).

The School may ask for evidence from an employee regarding ordinary parental leave entitlement

6.8 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, study leave. If you need to take time off work for any reason you should speak to the Finance & Operations Director or the Head 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 from the employee's line manager.

6.9 Sabbaticals

The Governors have agreed that Culford should be able to offer Sabbaticals to its full-time members of Common Room, as a privilege not a right. A teacher may apply for a sabbatical after

he or she has been a full-time member of Common Room for a minimum of seven years. Each sabbatical may last for up to one term during which time the teacher will remain on full pay. The teacher concerned is welcome to ask for unpaid leave of absence for additional terms but there is no guarantee that this will be given. The teacher is expected to remain at Culford for a further two years beyond completion of the sabbatical.

On the whole, sabbaticals will be given to members of Common Room mid-career. Members of Common Room must assume that they will not be eligible for two sabbaticals during their career at Culford, however long. The sabbatical will be expected to be used positively in a way that would benefit both the individual and directly or indirectly the School and a written report must be submitted to the Governors following it. No more than one sabbatical per academic year will be granted.

A formal written request should be made to the Headmaster setting out the benefits to the individual and to the School at least two terms before leave is required. If the Headmaster approves and satisfactory cover arrangements can be made, he will recommend the request to the Governors for approval.

6.10 Compassionate Leave

Compassionate leave will be granted to all employees following the death of an immediate family member which is defined as parents, children, spouse, siblings, grandparents and grandchildren. Up to 3 days paid compassionate leave may be taken in respect of the death of an immediate family member. Additional time off or time off for family members who do not fall within the definition above is given at the sole discretion of the Head or Finance & Operations Director. The Head or the Finance & Operations Director must approve any compassionate leave in advance, whenever possible.

6.11 Flexible Working Policy

This Flexible Working Policy gives all 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 discussion and encourage both the employee and the School to consider flexible working patterns.

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);
- have worked for the School continuously for 26 weeks at the date the application is made; and
- not have made a formal request to work flexibly during the last twelve months.

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 their child to school and make up the time later in the day.

Procedure

You will only be able to make one application within a 12-month period and 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 is encouraged 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 submit an application in writing to your line manager.
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) Be dated.
 - c) 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;
 - d) Provide as much information as you can about your current and desired working pattern and give the date from which you want the changes to take effect;
 - e) 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
 - f) Provide confirmation that you meet the eligibility criteria set out above.
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 28 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.
4. We will consider your request carefully against the following criteria:
 - a) In the order received
 - b) burden of additional cost
 - c) inability to reorganise work amongst existing staff
 - d) detrimental effect on our ability to meet customer demands
 - e) inability to recruit additional staff
 - f) detrimental impact on quality or performance
 - g) will there be enough work to do during the periods you want to work?
 - h) 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 three 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 Headmaster or the Finance & Operations Director setting out the reasons and grounds for your appeal. The Headmaster or the Finance & Operations Director 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.

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.

7. Holidays and Sickness Absence

7.1 Holidays for Support Staff

The holiday year is 1st September to 31st August.

Holidays must be taken in the year in which entitlement arises and cannot be carried forward to future years.

Your contract of employment will set out your holiday entitlement. Where a public holiday falls within the School term and the School is working you may be required to work.

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 above.

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.

You may be required to take annual leave in periods where the school shuts down. This is usually during the Christmas period

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.

You must obtain the prior written permission of your line manager before committing yourself to bookings or any alternative positive arrangements. 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.

7.2 Holidays for teaching staff

All teachers work to the term dates as laid down by the Headmaster and no Bank Holidays are recognised during term time. Outside term time teachers are generally free to take holidays as they please. They should note, however, that their contract provides that the Headmaster may ask them to do duties that are reasonable given their roles. This may include but is not limited to: academic, adventure, activity and sporting events and tours organised for pupils; attendance at training days or specific events such as exam results days.

Whilst such trips, events and activities will usually involve only staff directly involved in that facet of school life, the Headmaster has the right to require any colleague to undertake such duties as necessary. It may be that someone is required of a particular gender; or to deputise for an absent colleague, for example. The Headmaster will always seek to ask for volunteers and to give all reasonable notice. Costs ascribable to colleagues having to cancel or rearrange personal commitments will usually be met by the school. In extremis, however, the safety of pupils and reputation of the school will come first. Colleagues refusing to undertake such requirements may be subject to disciplinary measures.

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.

7.3 Sickness Notification and Certification

If you are away from work for any reason including medical appointments, sickness, holiday, etc. this must be approved by a Deputy Head, for common room staff, or by your line manager for a member of the support staff, before the absence occurs. If you leave school premises, even for a short while, you must notify someone in authority. If you have to take absence without notice you must follow the Absence Policy.

Absence, for any reason whatsoever, lasting seven calendar days or less must be supported by a signed Self-Certification of absence. This must be completed as soon as practicably possible or upon your return to work and signed by a Deputy Head. It is important to give as much information as possible including the first and last date of your absence, the reason for absence and whether or not you consulted a doctor.

Absences of up to seven calendar days may be self-certified but beyond seven calendar days a doctor's certificate must be provided. In the event of a protracted illness further doctor's certificates will be required on a regular basis to cover the entire period of absence. Statement of Fitness for Work (Fit Note – MED3). Previously your doctor has either said you should refrain from work or you need not refrain from work. The Fit Note aims to focus on what you may be able to do at work rather than what you cannot do. However, the Fit Note is not binding and ultimately it will be the school's decision on how to act. Therefore if the doctor's suggestions are not practicable within the workplace for any reason, you will be considered unfit for work and you will receive your entitlement to sick pay.

7.4 Return to work Interviews

We may request you attend a return-to-work interview with your line manager which 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.

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 and accordingly you will give such authority as is required for the School's nominated medical professional to disclose to the School the findings.

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.
- At the request of management when there is doubt regarding the validity of periods of self-certified absence.

7.5 Sick Pay

Sick pay is subject to compliance with the provisions within your contract of employment and the provisions of this policy.

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
- 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.

All statutory sick pay payments will be deducted from the School's sick pay. 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 employee's manager (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 or the Finance & Operations Director before action is taken.

7.6 Unauthorised Absence

Absence from work without 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.

7.7 Monitoring and Absence Management Policy

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. With this in mind, absence is monitored on a regular basis by Managers. Nevertheless, the school's approach as an employer, in cases of ill health, will always be one of sympathy, compassion and understanding.

- Any staff whose frequency or length of absence is at an unacceptable level (whether certified or not) will be interviewed by their Manager and, if necessary, the Finance & Operations Director.
- Such a review, where the record warrants it, may result in a further review over a given period over which a substantial improvement will be sought.
- Failure to attain and sustain the standard required, without justifiable reason, could result in disciplinary action being taken in accordance with the school's disciplinary procedure.
- Staff with persistent health problems may be referred by the Finance & Operations Director to the school's medical officer or another medical adviser who will advise on the current state of their health and make the necessary recommendations regarding it.
- The school's medical officer will also offer advice to the employee and will, if necessary and with the employee's agreement, liaise with the employee's own doctor.
- The full circumstances of the employee's situation will be taken into account. 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.

8. Health and Safety at Work

A copy of the school health and safety policy can be found in:

<T:\Health and Safety\Culford School Health and Safety Policy V5.2 2019.pdf>

8.1 Responsibility for Health and Safety

Statutory Duty Holders

THE GOVERNORS

- Have full responsibility for the health and safety within the school.
- Their primary objective is to provide a safe and healthy working and academic environment for employees and students, and to ensure that school operations do not adversely affect other people i.e. visitors, contractors and the public.
- They will regularly review (at minimum annually) and monitor the effectiveness of this policy and will revise it where necessary.
- They will ensure that any changes in this policy or decisions made which might affect others are communicated to all employees and students where appropriate.

Responsible Person

THE HEADMASTER

The Headmaster will be responsible to the Governors for the implementation of and compliance with this policy. He will:

- Constantly monitor the effectiveness of the policy as regards both academic and non-academic work and report back to the Governors as appropriate.
- Consult with the Finance & Operations Director, the Nominated Person for Health and Safety and the schools External Health and Safety Adviser on changes which may be required to the policy.
- Ensure the co-operation and compliance of staff at all levels and that they are fully aware of and understand their responsibilities.
- Ensure adequate time and resources are available to fulfil these responsibilities.
- Take steps to ensure that any changes in the curriculum or changes in systems of work on the domestic side are considered for their health and safety implications.

Appointed Responsible Person(s)

FINANCE & OPERATIONS DIRECTOR

On a day-to-day basis the Headmaster delegates implementation of this policy to the Finance & Operations Director with assistance from the Nominated Person for Health and Safety (Compliance Officer). In particular she will:

- Monitor the effectiveness of this policy and report back to the Headmaster as appropriate.
- Take responsibility for ensuring that all relevant health and safety information is communicated to the school in a timely and appropriate manner.
- Secure a chair for the health and safety committee meetings and attend.
- Ensure that there is appropriate liaison with the school's Independent Health and Safety Advisor and ensure that their services are used efficiently.
- Take responsibility for ensuring that all hazards and risks for the schools operations are identified, assessed and controlled through the schools risk assessment process.
- Ensure that active monitoring of health and safety is carried out on a regular basis through the schools safety inspection schedule.
- Take responsibility for the safe operation for all administrative, estates and domestic staff.
- Ensure that all preventative maintenance contracts are maintained and in date.

- Where individual employees with specific responsibilities are identified in this policy, ensure that they are given the necessary resources, training and time to fulfil these.
- Ensure that there is an adequate process for the reporting, recording and investigation of accidents, incidents, near misses and property damage.
- Ensure that adequate finance and resources are made available for the administration and maintenance of health and safety for the school.
- Ensure that external groups or individuals using the school facilities are made aware of the hazards and risks presented by school operations.
- Ensure that there is an appropriate procedure for the selection and control of contractors employed to work on the school site and that work is inspected and monitored.

Day today Responsible Person

The Responsible Person delegates some of the day to day duties to the Compliance Officer and Operations Manager.

All Staff and Pupils

HEADS OF DEPARTMENTS

The Heads of Departments will be responsible to the Headmaster for the following:

- Ensuring that his/her department is run in accordance with the requirements of this policy and that all teachers and associated staff under their control understand and comply with these requirements and their responsibilities.
- Promoting and establishing a good health and safety culture throughout their groups.
- Communicating any health and safety issues or concerns to the Finance & Operations Director including any accidents, incidents, near misses or damage.
- Undertaking regular inspections and monitoring of their areas to ensure good health and safety standards are maintained.
- Ensuring adequate supervision for pupils both inside school, during normal teaching activities, and also on school external trips and visits.
- Identifying the hazards and risk associated with their areas and operations and making adequate assessment through the schools risk assessment process.

Each department will have a Health and Safety Folder specific to that department. The contents of the folder will depend on the activities carried out in that department. As a result, higher risk department folders will contain more information than low risk departments. Contents of the folders will include:

- A copy of the school health and safety policy.
- Department specific policies where necessary (higher risk departments)
- A copy of relevant risk assessments.
- Copies of department safety inspections.
- Copies of training records.
- Departmental fire procedures
- Names of first aiders in the department.
- Any other department specific health and safety information.

TECHNICIANS

They will be responsible to the Heads of Department as appropriate for the following:

- Isolating gas supplies at the end of each teaching day.
- Safe storage and security of all hazardous and highly flammable substances which may be used in the department.
- Ensuring that all activities and services are made safe during an emergency.
- Ensuring that a sufficient number of fire extinguishers appropriate to the fire hazard are available within or close to the prep rooms and stores.

SUPPORT MANAGERS - Maintenance, Grounds and Gardens.

Managers of these functions will be responsible to the Finance & Operations Director for the safe running of their activities.

They will be responsible for ensuring that:

- There is adequate supervision of all activities so that the work is carried out to a high standard of safety.
- Their staff have appropriate training according to their job specification.
- The hazards and risks of the work are identified, assessed, controlled and communicated through the schools risk assessment process. This will include assessment of exposure to hazardous substances under the COSHH Regulations.
- All staff under their control follow documented safe systems of work.
- All plant and equipment is maintained, used appropriately and all staff are trained.
- Any accident, incident, near miss or property damage is reported to the Finance & Operations Director and that an investigation is carried out to identify cause and any remedial action required.

OUTSOURCED SUPPORT MANAGERS – Catering and Cleaning

Catering and cleaning is outsourced at Culford School to Elior.

They will be responsible for ensuring that:

- There is adequate supervision of all activities so that the work is carried out to a high standard of safety.
- Their staff have appropriate training according to their job specification.
- The hazards and risks of the work are identified, assessed, controlled and communicated through the schools risk assessment process. This will include assessment of exposure to hazardous substances under the COSHH Regulations.
- All staff under their control follow documented safe systems of work.
- All plant and equipment is maintained, used appropriately and all staff are trained.
- Any accident, incident, near miss or property damage is reported to the Finance & Operations Director and that an investigation is carried out to identify cause and any remedial action required.

EMPLOYEES

All school employees will:

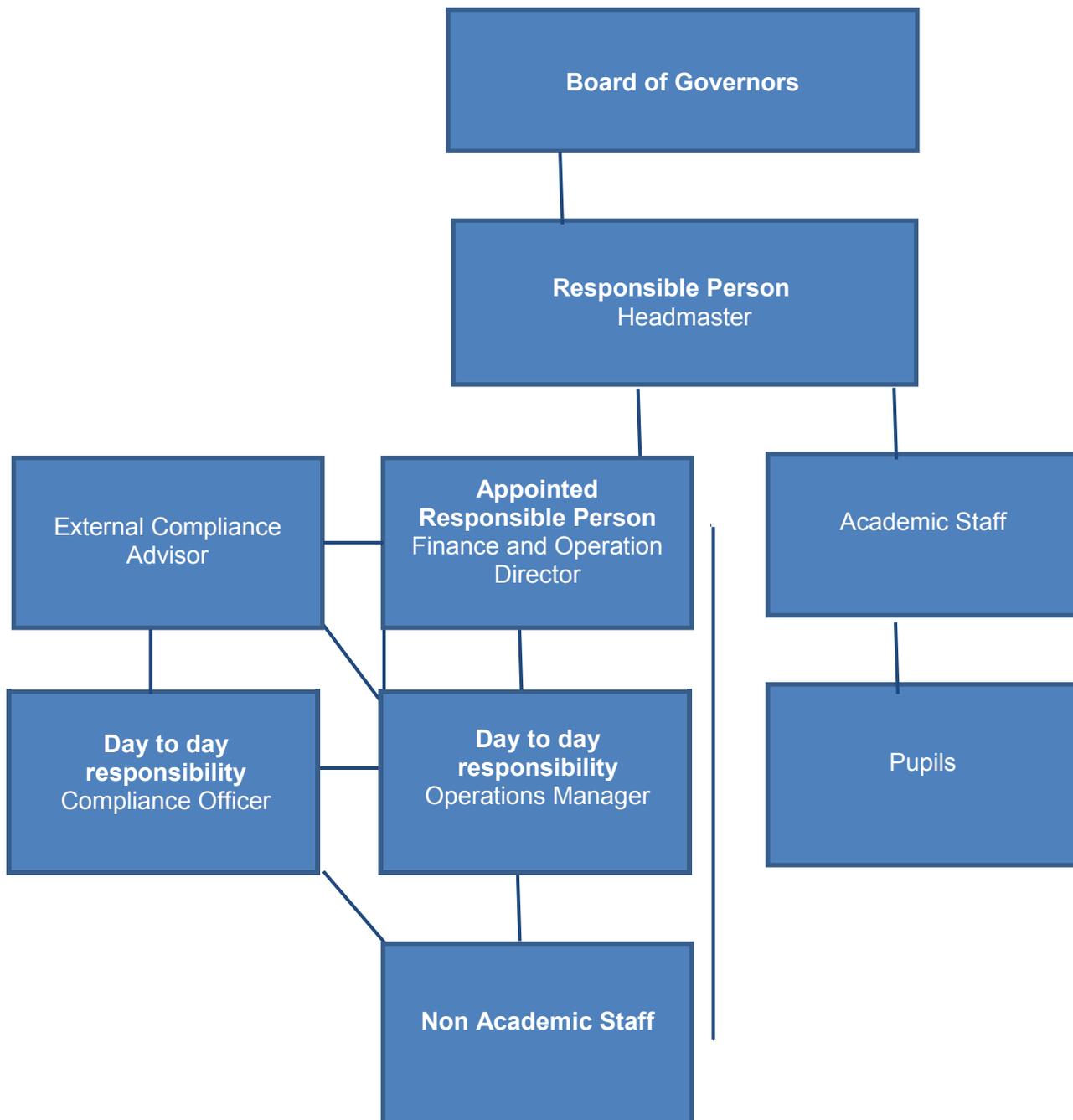
- Take reasonable care for the health and safety of themselves and other persons who may be affected by their actions or omissions at work.
- Co-operate with Management over Health and Safety matters.
- Not recklessly interfere with or misuse anything provided in the interest of health and safety.
- Use equipment provided in the interest of health and safety e.g. personal protective equipment.
- Report any work situation which presents a serious and immediate danger to health and safety including accidents, incidents, near misses and property damage.

PUPILS

Pupils are expected to:

- Exercise personal responsibility for their safety and that of their classmates.
- Exercise standards of dress consistent with safety and/or hygiene.
- Observe all the safety rules of the school and in particular, the instructions of teaching staff given in an emergency.
- Use and not wilfully misuse, neglect or interfere with things provided for their safety.

PUPILS AND PARENTS ARE TO BE MADE AWARE OF THE CONTENTS OF THIS SECTION OF THE DOCUMENT.



8.2 Health and Safety Committee

The Health and Safety Committee will be chaired by the Compliance Officer and will meet once per term, although members may call an emergency meeting should circumstance dictate. Members represent employees and management will consult them to enable them to be fully effective. Members will investigate potential hazards and dangers, examine the causes of accidents, investigate complaints and consider general matters affecting health, safety and welfare and take forward these matters; they will carry out periodic inspections of the workplace, and follow up notifiable accidents, occurrences and diseases; and they will attend health and safety committee meetings.

The main task of the Health and Safety Committee is to monitor compliance with and propose revisions to the school Health and Safety Policy. The Committee is responsible for:

- Reviewing: the legal obligations of management and employees; safety rules and regulations; the safety of current equipment and procedures; first aid arrangements and fire precautions
- Developing and implementing: programmes for training; rules for new equipment and procedures
- Investigating potential hazards and accidents and developing an inspection programme
- Establishing requirements for protective equipment and clothing
- Recommending measures to improve Health and Safety at work

You are encouraged to raise any concerns with its members, or with your manager.

8.3 First Aid and Accident Reporting

All injuries, disease, damage and/or 'near-miss' resulting from incidents related to Culford Schools operations, however minor, will be reported.

The school will provide adequate first aid provision in accordance with the Department for Education and Skills Guidance on First Aid for Schools and the Health and Safety (First Aid) Regulations.

- A 'First Aid Needs Assessment' will be undertaken to ensure that adequate first aid cover is provided for all areas of the school and associated activities.
- The First Aid Trainer holds a list of persons responsible for first aid within the school.
- The school nurse holds a list of the location of first aid boxes within the school.
- The school nurse in association with First Aiders checks and replenishes the first aid boxes.
- The school first aid room is located in the Medical Centre.
- All appointed First Aiders within the school hold a current Health and Safety First Aid at Work Certificate or Emergency First Aid Certificate which has been approved by the Health and Safety Executive.
- Qualified First Aiders have updated training every three years.
- Detailed information of the schools management of first aid, emergency procedures and medical conditions can be found in the **Emergency and Medical Policies Handbook**

All accidents and near misses should be reported to the Compliance Officer on the school's Accident/Injury/Incident Report Form. In their absence this should be reported to the Finance & Operations Director.

In line with our RIDDOR (2015) responsibilities we will report via the HSE website (0845 3009923, <http://www.riddor.gov.uk>) the following work related health and safety incidents: Deaths, major injuries (limb fractures, amputations, burns etc.), injuries resulting in absence from work greater than seven days (not counting the day of the incident but including weekends and rest days) and certain occupational diseases.

8.4 Emergency Procedures

A situation counts as an emergency when pupils and/or colleagues are or have been in danger. This may be as a consequence of terrorism, an accident or serious health risks. Throughout this section, the Headmaster refers, in his absence, to the Deputy Heads, or the person appointed by the Headmaster to stand-in when both he and both Deputies are away.

Full details of the schools emergency procedures can be found in Emergency and Medical Policies Handbook.

All comments to the press and any press releases are to be handled by the Headmaster. No one else is to comment. Take the person's details and say you will inform the Headmaster who will be in contact as soon as he can. The message must be conveyed to the Headmaster or his office as soon as possible orally and in writing.

If the emergency occurs on site the Headmaster must be informed as soon as possible and the appropriate emergency services called. Ideally, as someone telephones the services, another person will go to find or telephone the Headmaster. If in doubt, call the emergency service first. Also, use common sense about informing the Medical Centre. It is the Headmaster's duty to keep the Chair of Governors informed at all times during an emergency.

A Common Room meeting will be called as soon as possible at a time fixed by the Headmaster. The Headmaster will contact Housemasters/mistresses. The Deputy Heads will contact Academic Heads of Department who will contact department members. The Heads of the Preparatory School and the Pre-Preparatory School must refer all press to the Headmaster of the Senior School. If the incident affects more than one school, the Heads will agree a joint policy. The Operations and Finance Director will advise the Headmaster on which non-teaching staff should be called to a separate meeting and should have a system to call them together. The Headmaster will address this meeting so that the same information is given to all to avoid misinformation. No one may talk to the press.

The Headmaster will personally contact all parents whose children may have been injured. If children are killed he will consult with the police over who should inform the parents concerned. If a great many pupils are injured the Headmaster will decide who should contact the parents; almost certainly Housemasters/mistresses. In an event such as a minibus crash, the parents of those not injured or killed must be informed as soon as possible. Again this will be done by the Headmaster or by the Housemasters/mistresses as instructed by him.

All Housemasters/mistresses must keep the school office informed of parental changes of address and phone numbers. The office will ensure that information on ISAMS is updated immediately. The school office must always be able to mail the whole school within four hours of being instructed to do so.

The Headmaster will arrange to address the school as soon as possible. If the emergency occurs during the working day pupils will be called to Centenary Hall via their classes, the teachers having been informed by the Deputy Heads and such secretaries as are available, visiting each classroom as quickly as possible. If the emergency occurs overnight registration will be used to contact pupils and the Headmaster will address the school at an agreed time. If an emergency occurs in the evening the Headmaster may or may not have a meeting of all the boarders; it will be his responsibility to call all the boarding Housemasters/mistresses and arrange the meeting.

In the event of a member of Common Room being injured in an accident or dying the Chaplain will take over his or her lessons for the time being. It is essential that normal school routines carry on as far as is possible. Obviously all members of Common Room can offer support and counselling, but none more so than the Chaplain. Once the initial crisis is over the Headmaster and the Chaplain will decide on how best to cope with the school as a whole. The School Counsellor will also play an important role.

8.5 Fire Precautions

The school is committed to maintain suitable fire safety standards to meet requirements of the Regulatory Reform (fire safety) Order 2005.

Plans will be put in place to ensure an effective fire safety management system focusing on:

- Fire safety prevention, including routine inspection, auditing and testing, regular maintenance, and training.
- Suitable maintenance of the detection and alarm system. All boarding houses have detection systems to an L2 category (minimum).
- Escape routes are clear, escape doors are operable and design is compliant to the latest British standards. Fire evacuations will be simulated on a termly basis and appropriately recorded.

- Building compartmentation is suitably checked and not breached.
- The school welcomes the local fire service for familiarisation visits. Where applicable, appropriate fire extinguishing devices are available.

Visitors and contractors will receive fire safety information pertaining to the fire evacuation process.

Fire risk assessments will be reviewed annually.

Fire procedures are listed as follows:

IF YOU DISCOVER A FIRE

1. Operate the nearest fire alarm call point immediately.
2. If a member of staff, attempt to put out the fire with a suitable extinguisher, provided you are trained and it is safe to do so. **Under no circumstances are students to attempt to put out a fire.**

ON HEARING THE FIRE ALARM

3. Leave the building by the nearest exit. Do not run.
4. Close all doors and windows behind you.
5. Report to the person in charge at the designated assembly point.
6. The senior member of staff will telephone Reception to call the Fire and Rescue Service '9-999'. Failure to make contact would require a direct call to the Fire and Rescue Service.

Do not stop to collect personal belongings. Do not re-enter the building until instructed to do so. Do not use the buildings lifts.

8.6 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.

8.7 Display Screen Equipment

It is the Policy of the School to comply with the Health and Safety (Display Screen Equipment) Regulations. These Regulations apply to those who use Display Screen Equipment (DSE) for a significant amount of their working day.

For the purpose of this policy, a DSE User will be classified as any person that works with DSE for five or more hours per day or could spend more than two hours working with DSE without a break.

In order to ensure that all employees who works with DSE understand how to set up their workstation and use their equipment correctly they are given appropriate training.

A checklist is available for employees to use to help them set up their workstations correctly and minimise the risks.

Where problems are identified, a more detailed assessment will be carried out and advice on the necessary control measures provided.

DSE Users will be offered a free eye sight test for working with DSE equipment and if necessary, Culford School will pay for any glasses that are required to work with DSE. It should be noted that Culford School will only pay for glasses with standard lenses and frames.

- 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)

8.8 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. Training will be conducted during working hours.

8.9 Risk Assessment

There are activities undertaken by Culford School that require risk assessments to ensure that safety control measures are adequate.

Risk assessments will be reviewed annually, after a significant incident, in the event of legislation changes, or when there has been any change to personnel, location, event, activity or equipment.

All risk assessments are required to be saved in the following location and not to be stored on local drives. <T:\Health and Safety\Risk Assessments>.

The Compliance Officer is there to support and advise when writing your risk assessment.

Those affected by the outcome of the risk assessments are informed of any necessary preventative and protective measures.

Risk assessments are required for any third party activities and are required before work or an activity commences.

Please refer to the Schools Health and Safety Policy for the risk assessment procedure.

8.10 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 an identification badge that will distinguish between those with DBS clearance and those without.

It is the responsibility of the organising employee to send contractors the schools Contractors Code of Conduct before they attend site. This will ensure contractors are familiar with the school Health and Safety procedures, regulatory requirements and safeguarding measures.

<T:\Health and Safety\Contractors\Contractors Code of Conduct>

8.11 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 Health Surveillance where it has been identified under Health and Safety Regulations that it is required.
- 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.
- Ensuring that occupational health provisions are within, and assist, school health and safety policies and that they comply with all relevant legal and statutory obligations.

It should be noted that the occupational health service, including health surveillance of individual employees at work, is complementary to, and not a substitute for, the relationship between the employee and the National Health Service/General Practitioner.

9. 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, 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 if we 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.

Who is covered by this 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 workers in this policy).

What is Bribery?

A bribe is an inducement or reward offered, promised or provided in order to gain any business or personal advantage.

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 identified above may amount to an offence under the Act.

9.1 Gifts and Hospitality

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.

The expectation is that all staff will conduct themselves with integrity, impartiality and honesty at all times. Staff should maintain high standards of propriety and professionalism. This includes avoiding laying themselves open to suspicion of dishonesty and not putting themselves in a position of conflict between their official duty and private interest. Staff should be aware that gifts and hospitality, offered by contractors, suppliers, service providers, pupils, parents and others,

might place an employee in a vulnerable position, even when offered, and accepted, in innocence.

Staff should not accept any gift, reward or hospitality as an inducement for either doing something or not doing something in their official capacity. Individuals may accept modest gifts, as refusal could cause offence. Unsolicited gifts of a substantial nature should be refused with a polite explanation that the school's rules do not allow their acceptance. It is accepted that refusal of a gift may sometimes cause offence. If a member of staff has any doubts about whether to refuse an offer of a gift, it is important to consult with a member of the Executive.

For the avoidance of doubt gifts up to a value of £25 need not be declared; gifts with a value beyond that must be. Any gift of a value exceeding £100 should be refused. Staff must record any gifts accepted in the central register maintained by the Finance Department. Any queries about the contents of the register should be directed to the Finance & Operations Director.

A member of staff may sometimes receive conventional hospitality. This may include attending, in an official capacity, a social event organised by another body for promotional or influential purpose. Particular care should be taken when offered any form of hospitality or gift from a person or organisation that has, or is hoping to have, a contractual relationship with the school.

There will be circumstances where it is appropriate to provide gifts or hospitality. Where this is deemed necessary, prior approval should be obtained from the relevant member of the Executive.

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.

9.2 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 Finance and Operation Director or 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 Finance & Operations Director or 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.

How to Raise 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.

10. MODERN SLAVERY

Culford School has regard to the Modern Slavery Statement and Policy of The Methodist Independent Schools Trust (MIST). MIST has a zero-tolerance approach to modern slavery and is committed to eradicating modern slavery from all parts of MIST's operations and to ensuring that it does not take place in MIST's supply chains.

MIST's full Modern Slavery Statement and Policy can be found at <https://www.methodistschools.org.uk/governance-management/methodist-independent-schools-trust>