



## SENse Learning Policies

This policy document is made accessible to all Parents, Students, Local Authorities, Schools and SENse Learning Associates.

Person responsible for ensuring that these policies are implemented and reviewed in line with the review dates: Lucy McMann, Managing Director

Policies reviewed: **September2023** Next Review date: **September2024**

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# 1. Safeguarding Policy

## 1.1 Introduction and Purpose

This is the shortened Safeguarding and Prevent Policy for SENse Learning. The full policy can be found as a separate document. The policy is followed by all members of the Organisation and promoted by those in the position of leadership within the Organisation. SENse Learning recognises that it has an explicit duty to safeguard and protect children, young people and adults at risk from abuse as defined in the Children's Act 2004, section 175 of the Education Act 2002, Working Together to Safeguard Children 2018, Keeping Children Safe in Education 2022 (DfE) and the Prevent Duty as outlined in the Counter-Terrorism and Security Act 2015.

SENse Learning knows that being a young person makes them vulnerable to abuse by adults. The purpose of this policy is to make sure that the actions of any adult in the context of the work carried out by the organisation are transparent and safeguard and promote the welfare of all young people.

Safeguarding looks at preventative action and covers the full range of measures in place to protect children, young people and adults at risk from potential dangers, including the safer recruitment of staff, and is therefore a preventative approach.

The term 'safeguarding' is defined by the Children's Act 1989 and The third Joint Chief Inspectors Report on Arrangements to Safeguard Children (2008) as:

*'The process of protecting children from abuse or neglect, preventing impairment of their health and development, and ensuring they are growing up in circumstances consistent with the provision of safe and effective care that enables children to have optimum life chances and enter adulthood successfully.'*

## 1.2 Roles and Responsibilities

Designated Safeguarding Lead – Lucy McMann (Managing Director of SENse Learning)/  
Jenni Griffiths (Safeguarding Lead)

Deputy DSL's – Lucy McCully (Welfare), Sian Byrne (Pathways Manager), Jacqueline Lawrence (Reintegration Lead), Kathryn Burgon-Watson (EOTAS and Complex Needs Lead) and Michelle Batchelor (Assessment Lead)

Independent Safeguarding Advisor – Paul Noke

## 1.3 Procedures

- All staff and Associates have yearly safeguarding training
- Associates and staff know it's their responsibility to report and record
- Associates and staff know they have a duty to report to the DSL's within the organisation
- Associates know that to report they have to fill out a safeguarding concern on LearnTrek which immediately comes through to the DSL's. They know if they feel a child or young person is at risk of immediate harm to call Jenni Griffiths or Lucy McCully or one of the deputies if they cannot get through to them.
- The DSL's have undergone the correct training and know the procedures for reporting a concern. They are aware of the different Local Authority Threshold documents
- The Organisation knows it is their responsibility to keep all children and young people safeguarded and knows their duty in reporting a concern to the relevant bodies

## 2. Admissions Policy

### 2.1 Introduction & Purpose

This policy is the Admissions Policy for SENse Learning which will be followed by all members of the Organisation and promoted by those in the position of leadership within the Organisation. This policy will be applied to all referrals to SENse Learning.

### 2.2 Policy Principles and Values

- The Organisation will provide highly specialised and flexible education programmes to children and young people with additional needs ranging from complex autism including PDA and/or social communication needs to developmental trauma/attachment disorder, ADHD and clinical anxiety or related mental health issues
- Although the Organisation can work with some challenging behaviour, in some instances we may deem that we cannot risk assess safe provision for a young person with physically challenging behaviour including the use of weapons.
- The Organisation does not provide any level of personal care and, although all Associates receive paediatric First Aid training, Associates are not formally medically trained
- The Organisation will provide a bespoke package for children and young people from the age of 5 up to the age of 25 with an EHCP who are out of school or struggling to attend school or NEET (if over 16)
- The Organisation can only provide up to 15 hours per week of provision for children under the age of 18. For young people over the age of 18, we can provide up to 25 hours per week of provision, this is because we are not a registered school.
- The Organisation will form professional working relationships with all children and young people as well as their families.
- The Organisation will continue to discuss and plan appropriate next steps and long term outcomes to support future transitions.
- The Organisation will be open and honest in the communication with families and the local authority if we believe a child or young person's needs could be better met elsewhere.
- The Organisation will treat all applicants equally regardless of race, religion, gender, disability, sexual orientation, background or any other factors.
- The Organisation may utilise a waiting list should the provision be full.
- The Organisation may refuse an offer of provision if we feel we cannot meet a child or young person's needs safely within the provision.

### 2.3 Procedures

A formal referral can be made through the LA and/or a school. A referral of interest can be made through a parent or carer but will then be taken up directly with the allocated case worker within the local authority. Once a referral form is submitted, together with the EHCP, an assessment process takes place:

1. The referral details and EHCP are reviewed by the Leadership team.
2. An initial assessment is made on whether we can meet need.
3. If we feel we can meet the need, we will contact parents / carers to arrange a home visit. A risk assessment and student plan will be written in this meeting as part of the assessment process.
4. A final decision will then be made on whether we can meet need unless more information is required
5. If an offer of provision is made, a costing provision map will be sent to the case worker and/or school. If agreed, Associates will then be allocated, and we will endeavour to start the following term, if not before.
6. A welcome booklet and transition timetable are sent to parents / carers in advance of working with the young person.

If you feel we could meet your child or student's needs please contact our Referrals Team to make a referral – [referrals@sense-learning.com](mailto:referrals@sense-learning.com)

Once a referral has been made to the Organisation, and provision has been agreed by the Local Authority or school, we have an average turnaround time of a term between provision being agreed and sessions starting. We prioritise the matching of Associates to students, as our provision is built on forming strong, professional relationships with the young people that we work with. Our turnaround times may take us longer if we feel we are waiting for the right Associate to work with the young person in question.

We endeavour to be as flexible as possible for our students, and accommodate the requests for specific times, and criteria for the team working with the student. However, at times this can hinder our matching process and cause delays. Our common session start times are 09:00/09:30 and 12:00-13:00. If we have difficulty matching Associates to a student, we may consult with the parents/carers again about the requirements. In some instances, we may need to consult with the Local Authority again to discuss how realistic provision is.

We are not a registered school and cannot offer full time provision, therefore all of our students must have an on roll school or be formally stated as EOTAS on their EHCP. At the point that a referral is made into SENse Learning, we need to know the young person's named on roll provision or if they are EOTAS.

Should a young person be 'off-rolled' whilst they are receiving SENse Learning provision, the Local Authority will have a full term (14 weeks) to ensure the young person gains another on roll provision or is formally marked as EOTAS, before SENse Learning will have to end provision.

When a young person's SENse Learning provision comes to an end, SENse Learning will send all relevant paperwork for the young person to their next provision, as soon as possible. If the young person has safeguarding paperwork that needs to be transferred, this will be hand delivered. If the young person does not have a next provision named, this paperwork will be handed to the Local Authority.

## 3. Behaviour and Physical Intervention Policy

### 3.1 Introduction & Purpose

SENse Learning is committed to creating an environment where each student feels safe, secure and their needs are met through a bespoke and individualised package. We aim to empower students to achieve their full potential in a safe and secure culture.

We believe that all behaviour is communicating an unmet need and work on the principles of CPI (Crisis Prevention Institute, previously MAPA). All staff and Associates are trained according to CPI content by fully trained and insured instructors (Sophie Amos, Debi Daisley and Sian Byrne).

### 3.2 Policy Principles & Values

#### SENse Learning aims to ensure that:

- Every student feels safe, listened to, valued and has an input into their individual package
- All Associates and staff working with students are trained in CPI and have access to the Behaviours Lead (Sophie Amos)
- This behaviour policy has been read and understood by all Associates and staff
- All teams work with families to ensure that a holistic approach is created for the students in sessions and at home.

#### The purpose of this policy is to:

- Recognize the various levels of behaviour (classified through CPI) and corresponding team approaches
- Support Associates and staff to manage situations appropriately
- Ensure that all Associates and staff working with young people are using consistent approaches for our young people.

#### Roles and Responsibilities:

- Behaviour Lead – Sophie Amos (Operational Director)
- CPI Instructors – Sian Byrne & Debi Daisley

### 3.3 Procedures

#### Levels of behaviour:

SENse Learning categorises behaviour into four levels: anxiety, defensive, risk taking and tension reduction. Please see below for examples of each behaviour. We strongly believe that each level of behaviour has a team approach which directly impacts on the behaviour, this can be a positive impact (de-escalation) or a negative impact (escalation). All Associates and staff should always aim to deescalate behaviours as soon as they arise. All behaviour is a communication of an unmet need and so will only escalate if we do not meet the need presented.

Behaviour Levels	Behaviour you may see	How would you respond?
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Anxiety	Withdrawal	Allow time to calm Gentle encouragement Offer choices
Defensive	Shouting, swearing, arguing	Give specific options Be directive
Risk behaviour – a risk to a human being	Running into a road, self-harm, threatening with a weapon	Possible use of safety interventions
Tension reduction	Crying, apologizing, wanting physical comfort	Therapeutic rapport Positive touch - if appropriate to the student

### **Safety interventions (physical restraint)**

SENse Learning Associates and staff will only use safety interventions (restraint) when there is a high level of risk to the young person, member of staff or the public. In this instance we would use proportionate force to ensure safety (physical holds). Physically restraining a young person can have serious risks associated with it such as bruising, respiratory damage, cardiovascular damage, bone or articular damage, psychosocial effects, re-traumatization for the young person. The risk to the young person, Associate or public must be higher than the risk of the above for the young people.

If the risk is high enough to use safety interventions, then only CPI trained staff / Associates will do this for the minimum time needed. Staff / Associates will never hurt or injure a student in any way to gain control of a situation. The hold will be stopped at the earliest opportunity.

If a young person has been held, staff and Associates must ensure they call the office to complete a safety intervention form. This is shared with Leadership, Local Authority and parents/carers.

Parent/carers must be informed of this at the earliest possible opportunity including the length of time the young person was held, how the young person was held and the reasoning behind the need for a safety intervention to be used.

### **Responsibilities of Associates / staff when in sessions regarding risk behaviours**

If Associates are working in a home where a parent or carer is present, risk-taking behaviours must be managed by the parent or carers. Associates are expected to end the session and come away from the student if a high-risk threat is being presented. Associates must inform parent/carers that they intend to leave, they must stay until the parent/carers can take over. If it is not safe to stay with the student, the police must be called to safely manage the situation.

## 4. Positive Touch Policy

### 4.1 Introduction & Purpose

This policy is the Positive Touch Policy for SENse Learning which will be followed by all members of the Organisation and promoted by those in the position of leadership within the Organisation. This policy will be applied to all students and SENse Learning Associates.

### 4.2 Policy Principles & Values

- There can be positive physical contact between Associates and students. This is not physical contact that, in any way, seeks to establish authority over a student, but that which provides comfort; eases distress and signals care as would be expected between good parents and their children.
- Touch can be an important part of care and can give welcome reassurance or comfort to the student.

### 4.3 Procedures

- Associates must bear in mind that even perfectly innocent actions can sometimes be misconstrued and must therefore conduct themselves accordingly.
- Associates should therefore respond to students in a way that gives expression to any appropriate level of care, and to provide comfort to ease a students' distress whilst at the same time protecting against the physical contact being misinterpreted by the student.
- If any Associate, at any time, thinks that an action may have been misinterpreted, or may lead to a complaint, they need to feel confident to self-report so that the matter can be recorded fully, and the manager can assist any debrief with the student and their parents which may be necessary.
- Any form of physical contact that a reasonable person would judge to be a conscious, self-aware, reasonable and a justifiable act is acceptable. Associates are advised to ensure their actions are acceptable to the student.
- A high proportion of students with emotional and behavioural difficulties may have experienced sexual and/or physical abuse. Associates need to ensure that any physical contact is not misinterpreted.
- If, at any time, a student demonstrates verbally or otherwise that they are not comfortable with physical contact, where appropriate Associates should respect this.
- Physical contact should never be secretive, or for the gratification of the Associate and in any way that may be considered indecent, or represent a misuse of authority.
- Associates need to be aware that different cultural factors may apply.
- Age and maturity factors should be considered in deciding appropriate physical contact.
- Where an Associate feels that it would be inappropriate to respond to a student seeking physical contact, the reasons for denying this should be explained to the student, and the student should be comforted verbally as necessary.
- The issue of personal contact in general, should be raised in interviews and induction training for Associates and discussed in staff development and supervision.
- Students should be given advice and guidance with regard to socially appropriate/inappropriate times/places/situations to seek physical comfort where necessary.
- Any personal care or restrictive physical intervention should be carried out in line with the students' individual learning plan and risk assessment which are approved by parents and management.



## 5. Lone Working Policy

### Introduction & Purpose

This policy is the Lone Working Policy for SENse Learning which will be followed by all members of the Organisation and promoted by those in the position of leadership within the Organisation. This policy will be applied to all students and SENse Learning Associates.

### 5.1 Policy Principles & Values

- The organisation understands it has a duty to keep all Associates and students safe when completing work for SENse Learning.
- The organisation recognises that lone working has risks associated
- The Organisation recognises that some students require 2:1 staffing whilst other students require 1:1
- 1:1 working introduces risks into the setting which must be managed appropriately
- The Lone Working Policy should be read alongside the Safeguarding Policy and Keeping Children Safe in Education

### 5.2 Procedures

- A member of SENse Learning home visit team will have completed a pre visit to all homes and settings Associates work in.
- All homes and session locations will be risk assessed to ensure safety for all.
- All associates will be trained in lone working and safety measures involved in this type of role.
- If any associate feels uncomfortable or unsafe in a home or a working location they will end the session immediately and report this to Pathway Leads, Pathway Manager or a Director.
- The Organisation will ensure any 1:1 working is agreed by parents or carers and a Director or Pathway Lead, these arrangements and agreements will be documented in the student's individual learning plan
- The Organisation will ensure that all Associates have a clear enhanced DBS check and barred list check before working 1:1 with any student (this is the case for all Associates but is particularly important for 1:1 working)
- The Organisation will only approve 1:1 working for a student where it is in line with parental preference and where the student does not have any history of physically unsafe behaviour, if a student who is working 1:1 begins to display unsafe behaviour then this should be immediately reviewed and the student will need to be moved onto a programme with 2:1 staffing
- The Organisation requires all Associates to raise any concerns with the Directors or Pathway Leads at the earliest opportunity
- The Organisation requires all Associates to always follow the staff code of conduct

## 6. Anti-Bullying Policy

### 6.1 Introduction & Purpose

This policy is the Anti-Bullying Policy for SENse Learning which will be followed by all members of the Organisation and promoted by those in the position of leadership within the Organisation. This policy will be applied to all students and SENse Learning Associates.

### 6.2 Policy Principles & Values

- The Organisation is committed to developing an anti-bullying culture where the bullying of adults and students is not tolerated in any form.
- The Organisation defines bullying as “behaviour by an individual or group, repeated over time that intentionally hurts another individual either physically or emotionally” (DfE ‘Preventing and Tackling Bullying’, July 2017)
- The Organisation recognises bullying as a form of peer-on-peer abuse. It can be emotionally abusive and can cause severe and adverse effects on children’s emotional development.
- The Organisation recognises that all forms of bullying, especially if left unaddressed, can have devastating effect on individuals; it can create a barrier to learning and have serious consequences for mental wellbeing.
- By effectively preventing and tackling bullying, SENse Learning can help to create a safe and disciplined environment, where students are able to learn and fulfil their potential.

### 6.3 Procedures

- The Organisation will monitor and review the anti-bullying policy and practice on a regular basis.
- The Organisation supports Associates to promote positive relationships to help prevent bullying.
- The Organisation will intervene by identifying and tackling bullying behaviour appropriately and promptly.
- The Organisation will ensure our students are aware that bullying concerns will be dealt with sensitively and effectively; that everyone should feel safe to learn and abide by the anti bullying policy.
- The Organisation recognises the potential impact of bullying on the wider family of those affected so will work in partnership with parents or carers regarding all reported bullying concerns and will seek to keep them informed at all stages.
- The Organisation will deal promptly with grievances regarding the Organisations response to bullying in line with our Complaints policy.
- The Organisation will utilise support from the LA and other relevant organisations where appropriate.
- The Organisation will support students and Associates who have been bullied and those who have perpetrated bullying.
- The Organisation will create and support an inclusive environment which promotes a culture of mutual respect, consideration and care for others, which will be upheld by all.
- The Organisation will openly discuss differences between people that could motivate bullying, such as: children with different family situations, looked after children or those with caring responsibilities, religion, ethnicity, disability, gender, sexuality or appearance related difference.
- The Organisation will take the following steps when responding to all incidents of bullying reported to SENse Learning:
  - The Organisation will provide appropriate support for the person being bullied – making sure they are not at risk of immediate harm and will involve them in any decision making, as appropriate.
  - The DSL, or another member of the leadership team, will interview all parties involved.

- The DSL will be informed of all bullying issues where there are safeguarding concerns.
- The Organisation will speak with and inform other Associates, where appropriate.
- The Organisation will ensure parents or carers are kept informed about the concern and action taken, as appropriate and inline with child protection and GDPR.
- If necessary, other agencies may be consulted or involved, such as the police, if a criminal offence has been committed, or other local services including early help or children's social care, if a student is felt to be at risk of significant harm.
- A clear and precise account of bullying incidents will be recorded by the Organisation in accordance with existing procedures. This will include recording appropriate details regarding decisions and action taken.

• The Organisation will take the following steps when responding to all cyberbullying concerns reported to SENSe Learning:

- The Organisation will act as soon as an incident has been reported or identified.
- The Organisation will provide appropriate support for the person who has been cyberbullied and work with the person who has carried out the bullying to ensure that it does not happen again.
- The Organisation will encourage the person being bullied to keep any evidence of the bullying activity to assist any investigation.
- The Organisation will take all available steps where possible to identify the person responsible.

This may include:

- Looking at the use of the school systems
  - Identifying and interviewing possible witnesses
  - Contacting the service provider and the police, if necessary
- The Organisation will work with the individuals and online service providers to prevent the incident from spreading and assist in removing offensive or upsetting material from circulation. This may include:
    - Support reports to a service provider to remove content if those involved are unable to be identified or if those involved refuse to or are unable to delete content.
    - Requesting the deletion of locally-held content and content posted online if this is deemed appropriate by the Directors.
  - Ensure that sanctions are applied to the person responsible for the cyberbullying; the Organisation will take steps to change the attitude and behaviour of the bully, as well as ensuring access to any additional help that they may need.
  - The Organisation will inform the police if a criminal offence has been committed.
  - The Organisation will provide information to Associates and students regarding steps they can take to protect themselves online. This may include:
    - Advising those targeted not to retaliate or reply
    - Providing advice on blocking or removing people from contact lists
    - Helping those involved to think carefully about what private information they may have in the public domain

## 7. Curriculum Policy

### 7.1 Introduction & Purpose

This policy is the Curriculum Policy for SENse Learning which will be followed by all members of the Organisation and promoted by those in the position of leadership within the Organisation. This policy will be applied to all students and SENse Learning Associates.

### 7.2 Policy Principles & Values

- The Organisation aims to provide a bespoke and individualised learning programme to all students who access SENse Learning provision as part of their education
- The Organisation sets targets based on the WILL (wellbeing, interaction, learning and life skills) framework, the student's EHCP and their learning interests and needs
- The Organisation offers NCFE Functional Skills Qualifications from Entry Level 1 – Level 2, in English, Maths and ICT, as well as ASDAN Lifeskills Challenge, Short Courses and Arts Award Discover and Explore levels
- Post 16 students' provision will have greater emphasis on career research and guidance, work experience opportunities and developing independent living skills
- The Organisation offers the WILL Framework that also covers non-academic learning; social skills, anxiety management, social communication programmes and independent living skills. This is closely linked to the four areas of the EHCP
- The Organisation plans creatively and bases learning tasks, where possible, on the student's interests

### 7.3 Procedures

- Once an Associate has formed a trusting professional relationship with a student, the Associate will baseline against the Functional Skills Curriculum or Pre-Functional Expanded Curriculum which encompasses some aspects of the National Curriculum
- Case Leads/Associates will also baseline against our own WILL (wellbeing, interaction, learning and life skills) framework which encompasses the holistic offer
- The Case Lead will then write individual targets for each of the areas in the WILL Framework including appropriate academic targets from either of the above curriculum, which will be based on the EHCP and the personalised programme
- The Case Lead and Associates working with the student will plan creatively for learning objectives linked to their targets
- Targets are reviewed half termly and a report sent home to parents or carers, on-roll school (if appropriate) and LA Caseworker
- If students are on a pathway to achieve a Functional Skills qualification, decisions around when this will take place during the year will be made between the student, parent/carer, Case Lead and the Associates
- Timetables will be individualised and may change termly as the student settles and their needs change
- Sensory strategies and time for sensory regulation will be embedded into the student's curriculum
- Associates are observed throughout the year by Case Leads or a member of the Leadership Team. They will write the observation up and suggest next steps, all of which will be fed back to the Associates.

*SENse Learning wants every student to reach their full potential on a pathway that suits their social, emotional and learning needs.*

## 8. Assessment and Accreditation Policy

### 8.1 Introduction & Purpose

This policy is the Assessment and Accreditation Policy for SENse Learning which will be followed by all members of the Organisation and promoted by those in the position of leadership within the Organisation. This policy will be applied to all students and SENse Learning Associates.

### 8.2 Policy Principles & Values

- The Organisation aims to provide all students with the skills needed to access a wide range of opportunities and experiences
- The Organisation aims to prepare all students for a fulfilling adulthood
- The Organisation will provide an appropriate level of progress and challenge, both in academic learning and in personal and social development
- The Organisation understands that the complex needs of the students mean their tolerance of demands placed on them can fluctuate from day to day or several times a day
- The Organisation believes it is important to maintain a balance between each student's learning needs and their emotional wellbeing
- The Organisation will support students to access qualifications through careful preparation and implement processes to manage student's anxieties around this

### 8.3 Procedures

- Once an Associate has got to know the student and they have built a trusting professional relationship, the Associate will baseline against the Functional Skills Curriculum, Pre Functional Curriculum, and our own designed WILL Framework
- The Case Lead will then write targets which will be based around the EHCP and the personalised programme
- The Case Lead and Associates working with the student will plan creatively for learning objectives linked to their targets.
- The Organisation can offer Functional Skills qualifications in English, Maths and ICT; Entry Level 1, 2 and 3 and Level 1 and Level 2 through NCFE. Students can take these assessments in their homes or Training Centre. Students will be registered and then will complete during the next assessment window
- If students are unsuccessful with their exams, they will be offered the chance to resit. More information on NCFE can be found in our NCFE policy
- The Organisation is not a registered centre for GCSE examinations, SATs or A-Levels. In order for students to take these, they would need to be on an Outreach programme and attending a school for part of their timetable
- Parents will receive reports which, if appropriate, will detail termly levels and progress made.

## 9. NCFE Policy including Exam Administration

### 9.1 Introduction & Purpose

This policy is the NCFE Policy including Exam Administration for SENSE Learning which will be followed by all members of the Organisation and promoted by those in the position of leadership within the Organisation. This policy will be applied to all students and SENSE Learning Associates. This policy covers the Functional Skills offer which is subject to scrutiny and enforcement by NCFE.

This policy forms part of a suite of policies, all of which are designed to;

1. Protect students who are registered with the Organisation
2. Minimise the risk of an adverse effect occurring
3. Help ensure Associates and students comply with all relevant legislation and guidance from NCFE

### 9.2 Policy Principles & Values

- The Organisation will abide by and follow the NCFE guidelines
- The Organisation wants every student to have the opportunity to gain a qualification through SENSE Learning
- The Organisation believes that GCSE is not the only route to be able to show a good level of understanding and skill in English and Maths
- The Organisation will teach students the necessary elements of the Functional Curriculum they will need to not only gain a qualification but apply their knowledge and understanding in real life situations
- The Organisation will administer exams correctly

### 9.3 Procedures

- There is an appointed Qualifications Coordinator (Hazel Groves – [hazel.groves@senselearning.com](mailto:hazel.groves@senselearning.com)) who is the first point of call for NCFE matters including suspected malpractice/maladministration.
- The Qualifications Coordinator reports directly to the Directors and is appointed to ensure SENSE Learning adheres to all NCFE regulations for controlled assessments
- It is the responsibility of all Case Leads, Specialist Teachers and Education Mentors to report any NCFE matters in accordance with this policy
- The Organisation can offer Functional Skills qualifications in English and Maths. Entry Level 1, 2 and 3 and Level 1 and Level 2 through NCFE, as well as Digital Functional Skills E3 & L1. Students can take these assessments in their homes or in an appropriate private space. Students will be registered and will complete the assessment when ready.
- If students are unsuccessful with their exams, they will be offered the chance to resit

#### 9.3.1 Administration

The administration and implementation of the Functional Skills offer is the responsibility of the Qualifications Co-ordinator (Hazel Groves), who reports directly to The Pathway Manager (Sian Bryne) and NCFE via our External Quality Assurer.

It is the Organisation's aim that all secondary school aged students will leave us with an English and Maths qualification appropriate to their level.

The following steps will be taken for approving and registering students for Functional Skills qualifications:

1. Students are identified as suitable for the Functional Skills qualifications after starting with SENse Learning by their Specialist Teachers and through discussions with the Case Lead
2. Students will be registered throughout the academic year for appropriate NCFE assessments when the Case Lead feels the student is ready - both emotionally and in academic terms

### **9.3.2 Exam Procedures**

Functional Skills assessments can be paper-based or taken online, depending on the needs of the young person. For this purpose, SENse Learning maintains and supplies student laptops. The assessments can be taken in the students home or at another agreed suitable location with invigilation (for Level 1 and 2) being carried out by Case Leads or another appropriate Associate.

## **9.4 Recognition of Prior Learning and Credit Accumulation and Transfer Policy**

### **9.4.1 Overview**

This document combines the Recognition of Prior Learning (RPL) and Credit Accumulation and Transfer (CAT) Policy. CAT is the process of utilising learner units or qualifications that have previously been recognised and certified. RPL, in contrast, relates to learners providing evidence of prior learning that has not been formally acknowledged. At this time, it is recognised that CAT is not applicable to the qualifications we currently offer at SENse Learning, but may be relevant in the future.

### **9.4.2 Rationale or Purpose**

This Policy has been written to reflect the requirements of the Ofqual's General Conditions of Recognition. It aims to be open, transparent and clear in its purpose, scope and implementation. Any Centre applying this policy with their learners may approach us to discuss their own requirements or challenge any decisions made by the Awarding Organisation.

### **9.4.3 Policy Statement**

The policy will ensure that SENse Learning is clear on what does and does not constitute acceptable RPL and CAT.

### **9.4.4 Scope**

This policy will apply to all Learners who come to SENse Learning with relevant and specific prior certified Learning.

### **9.4.5 Roles/Responsibilities**

Compliance with this policy lies with each student team in collaboration with the Qualifications Co-ordinator and any interpretations or clarifications required will be supplied by the Quality Assurance team. In the event of a dispute this team will also give the final resolution having sought advice for the centre's allocated External Quality Assessor.

## **9.5 Defining Credit Accumulation and Transfer (CAT)**

CAT should be considered as a separate process to RPL as CAT applies to learning that has been previously certified for a different regulated qualification or from a different Awarding Organisation on the same framework (RQF or QCF). This is to prevent a learner from having to unnecessarily repeat previous learning.

Where a learner has already achieved a unit with credit, we will recognise that prior learning and will allow the credit to be transferred onto a new qualification, provided that the units have the same Ofqual reference number.

### **9.5.1 Defining Recognition of Prior Learning**

Recognition of Prior Learning (RPL) was formerly known as APL (Accreditation of Prior Learning) and is defined as 'a method of recognising previous learning or attainment to meet current requirement' or 'a method of assessment leading to the award of credit that considers whether learners can demonstrate that they can meet the assessment requirements for a unit through knowledge, behaviours, skills and understanding they already possess and so may not need to develop these through a course of learning'.

## **9.6 Applying Recognition of Prior Learning**

RPL can demonstrate competence or achievement within a unit or qualification. Through the RPL process, evidence of a learner's previous achievement (learning) is assessed against the assessment criteria of a unit.

Evidence used by learners must be current and valid and meet the assessment criteria of the qualification, and evidence must be reliable, whereby centres consistently arrive at equivalent assessment decisions.

Evidence obtained through RPL must therefore meet the same rigorous quality criteria that other assessment methods must conform to. It remains the role of Assessors (Specialist Teachers/Case Leads) and quality assurance staff to ensure that evidence is:

### Valid:

Does the evidence genuinely demonstrate that the demands of the assessment criteria have been met? For RPL, currency of evidence will be of particular concern. Does, for example, the evidence meet current practice requirements?

### Authentic:

This involves consideration of whether the evidence being assessed is genuinely the work of the learner. For example, the evidence may have been produced by somebody else, or may be the result of the work of a team. In the latter case, this would be acceptable if the assessment criteria was related to team / joint working, but not if it was being used as evidence of an activity which should have been carried out individually.

### Sufficient:

There must be enough evidence to fully meet the requirements of the assessment criteria, or assessment criteria being considered. If there is insufficient evidence to fully meet requirements, then evidence obtained through RPL must be complemented by evidence gained through other suitable assessment method(s) before requirements can be said to have been met.

### Reliable:

The evidence obtained through RPL should be such that an Assessor would arrive at the same assessment decision, were the assessment to be repeated.

### **9.6.1 Outcomes of RPL**



If individuals can produce relevant evidence that meets assessment criteria requirements then, recognition can be given for their existing knowledge, understanding or skills.

If an individual can meet all the learning outcomes and assessment criteria in a unit, then they can claim credit for that unit solely on the basis of their RPL achievement.

If however, evidence from RPL is only sufficient to cover one or more assessment criteria, or to partly meet the need of an assessment criteria, then additional assessment methods should be employed to generate the sufficient evidence required to make a safe assessment decision.

Knowledge, skills, behaviours and understanding must be current for RPL to be used and subject leads within centres must decide if prior learning is up to date for the relevant sector and subject areas. Centres may use questioning or other acceptable assessment strategies to check the depth and significance of prior learning. Assessment decisions based on RPL must be made by centre staff with suitable occupational competence and subject expertise. Acknowledging evidence of previous learning is considered to be part of the internal assessment process and any decisions must be made clear to External Quality Assurers.

The centre must ensure that:

- It is carried out by designated staff with relevant levels of expertise to meet the requirements of the assessment strategy/guidance for the qualification concerned. The methods of assessment used will be determined by the assessment strategy for the qualification being assessed but might, for example, include:
- Examination of documents,
- Expert testimony
- Reflective accounts
- Professional discussion.

The RPL assessment should be carried out as an entire process. This means that the Assessor should:

- Plan with the learner
- Make a formal assessment decision
- Feedback assessment decisions to the learner, confirming decision and giving guidance on the available options
- Maintain appropriate records
- Ensure that learners are aware of their right to access the appeals process should they feel the assessment decision was unfair

- The assessor must ensure that all assessment criteria being claimed are covered and that records of assessment are maintained in the usual way. The process must be subject to the same quality assurance requirements as any other assessment method.

Examples of RPL evidence:

- Relevant documents, testimonies or reflections mapped across to the qualifications assessment criteria
- Job descriptions or performance management feedback showing that the learner already has the suitable and current skills, knowledge and behaviours within the unit
- Learners have evidence of recent prior study which meets assessment criteria of the current programme of study being undertaken in full
- RPL must be included on the appropriate sampling plan as an assessment method as appropriate and subject to internal quality assurance (IQA).

Circumstances when prior learning will not be recognised:

- Learning that is similar to assessment criteria but which has been met at a level lower than the current programme of study being undertaken by the learner
- Prior learning that is not current in meeting the qualification
- Prior learning that has been referred by an Assessor
- Prior learning that has not been assessed by an Assessor.

## **9.7 Applying Credit Accumulation and Transfer (CAT)**

Credit accumulation and transfer (CAT) is the system by which learners can accumulate and transfer credits over a period of time, in differing locations and contexts, in order to gain qualifications.

Credit transfer is the process of using credit(s) awarded in the context of one qualification or awarded by a different awarding organisation towards the achievement requirements of another qualification.

CAT is therefore the term used to describe the system which supports credit transfer. Credit transfer gives recognition to the fact that some units are the same, irrespective of the fact that they appear in different qualifications. This recognition promotes progression within and between industries and avoids unnecessary duplication of learning. Credit transfer is relevant where a unit in a qualification is the same (include unit/qualification assessment number) as a unit in another qualification.

A practical example of credit transfer would be a learner who achieves an award which is comprised of units 'A, B & C' transferring their credits to progress towards a certificate comprised of 'A, B, C, D and E'. In this case the units in the award have been nested in the certificate enabling the recognition of the previously achieved units.

If on the other hand a learner registered for the Certificate containing units 'A, B, C, D and E' without having done the award, but then withdrew from their programme of learning after completing only 'A, B & C', they could transfer their credits and consequently obtain the Award.

This policy will be reviewed annually by the Quality Assurance team at Head Office.

## **9.8 Malpractice**

For the purpose of this policy, 'malpractice' is defined as:

Any act, or failure to act, that threatens or compromises the integrity of the assessment process or the validity of courses and their certification. This includes: maladministration and the failure to maintain appropriate records or systems; the deliberate falsification of records or documents for any reason connected to the award of certificates; deliberate acts of plagiarism or other academic misconduct; and/or actions that compromise the reputation or authority of SENse Learning, its management and employees. SENse Learning will investigate all relevant cases of suspected malpractice and where appropriate will advise the awarding body for the certificates, accepting that in certain circumstances the awarding body may take action of its own, including imposing sanctions.

### **9.8.1 Malpractice by students**

All incidents of suspected malpractice will be fully investigated, where there are sufficient grounds to do

so.

### **9.8.2 Malpractice by a SENse Learning Associate**

All incidents of suspected malpractice will be fully investigated, where there are sufficient grounds to do so.

### **9.8.3 Possible malpractice sanctions**

Following an investigation, if a case of malpractice is upheld, SENse Learning may impose sanctions or other penalties on the individual(s) concerned. Where relevant we will report the matter to the awarding body, and the awarding body may impose one or more sanctions upon the individual(s) concerned. Any sanctions imposed will reflect the seriousness of the malpractice that has occurred.

A list of example sanctions that may be applied to a student, Associate, invigilator, or other officer who has had a case of malpractice upheld against them can be found in appendix 3.

Please note that:

- a) this list is not exhaustive and other sanctions may be applied on a case-by-case basis
- b) where the malpractice affects the examination performance, the awarding body may impose sanctions of its own

### **9.8.4 Reporting a suspected case of malpractice**

This process is applied to all SENse Learning Associates, students, invigilators, and other Centre staff, and to any reporting of malpractice by a third party or individual who wishes to remain anonymous.

Any case of suspected malpractice should be reported in the first instance to the Case Lead or the Director.

A written report should then be sent to the person identified above, clearly identifying the factual information, including statements from other individuals involved and/or affected, any evidence obtained, and the actions that have been taken in relation to the incident. If this report is directed at the Case Lead please report to the Director instead. If the report is directed at the Managing Director (Lucy McMann) then report to the Operational Director (Sophie Amos), if the report is directed to both Directors then report to the Qualifications Co-ordinator (Hazel Groves) who will liaise with the External Quality Assessor from the awarding body.

Suspected malpractice must be reported as soon as possible to the person identified above, and at the latest within two working days from its discovery. Where the suspected malpractice has taken place in an examination, the incident is reported urgently, and the appropriate steps taken as specified by SENse Learning and the awarding body.

Wherever possible, and provided other students are not disrupted by doing so, a student suspected of malpractice should be warned immediately that their actions may constitute malpractice, and that a report will be made to the centre management.

In cases of suspected malpractice the report made to the person identified above should include as much information as possible, including the following:

- a) date, time and place the alleged malpractice took place, if known
- b) the name of the centre staff, or other persons involved

- c) a description of the suspected malpractice; and
- d) any available supporting evidence

### **9.8.5 Administering suspected cases of malpractice**

SENse Learning will investigate each case of suspected or reported malpractice relating to our Functional Skills offer, to ascertain whether malpractice has occurred. The investigation will aim to establish the full facts and circumstances. We will promptly take all reasonable steps to prevent any adverse effect that may arise as a result of the malpractice or to mitigate any adverse effect, as far as possible, and to correct it to make sure that any action necessary to maintain the integrity of qualifications and reputation is taken.

SENse Learning will acknowledge all reports of suspected malpractice within 24 hours. All the parties involved in the case will then be contacted within 3 working days of receipt of the report detailing the suspected malpractice. We may also contact other individuals who may be able to provide evidence relevant to the case.

The individual(s) concerned will be informed of the following:

1. That an investigation is going to take place, and the grounds for that investigation
2. Details of all relevant timescales, and dates, where known
3. That they have a right to respond by providing a personal written response relating to suspected malpractice (within 3 working days of the date of that letter)
4. That, if malpractice is considered proven, sanction may be imposed either by SENse Learning or by the awarding body, reflecting the seriousness of the case
5. That, if found guilty, they have the right to appeal the decision
6. That the Organisation has a duty to inform the awarding body and other relevant authorities/regulators, but only after time for the appeal has passed or the appeal process has been completed. This may also include informing the police if the law has been broken and to comply with any appropriate legislation

Where more than one individual is contacted regarding a case of suspected malpractice, for example in a case involving suspected collusion, we will contact each individual separately, and will not reveal personal data to any third party unless necessary for the purpose of the investigation.

The individual has a right to appeal against a malpractice outcome if they believe that the policy or procedure has not been followed properly or has been implemented to their detriment.

Records of all malpractice cases and their outcomes are maintained by the Organisation for a period of at least five years and are subject to regular monitoring and review.

## **9.9 Conflict of Interest Policy**

### **9.9.1 Policy statement**

For the purpose of this policy, a conflict of interest is defined as a situation in which an individual, or organization has, or may be perceived to have –

*“Competing interests or loyalties which could lead to a potentially subjective, biased, or corrupt decision being made by that individual or organization”*

SENse Learning recognize and encourage the promotion of building successful business and external

relationships. In doing so, we are mindful that there may be situations when a perceived or potential conflict of interest may arise and that we have a duty to identify, manage and mitigate potential conflicts of interest. As such where a potential conflict may be identified we will follow the procedure outlined in this document.

### **9.9.2 Purpose and scope**

This policy sets out the responsibilities of all individuals, in line with their contract of employment, in supporting us to meet the requirements set out by our regulatory bodies. This includes but is not limited to NCFE and ASDAN. This policy and associated procedure support us in ensuring that working relationships with colleagues, partners and customers do not conflict with our requirement to engage in business relationships in a legal, transparent, ethical and responsible manner.

SENse Learning recognizes that conflicts of interest may arise that could lead to individuals making decisions, or appearing to make decisions, which are based on personal interest and not the interest of the organization or what is ethically correct.

This policy applies to all individuals working for or on behalf of SENse learning, including all employees and associates at all locations and at all levels including external contractors, suppliers, Associates, or any other person associated with us.

This policy extends to all of SENse's dealings and transactions in all counties in which it or its Associates operate. This policy covers conflicts of interest for SENse Learning and supports specific awarding conflicts of interest procedures that relate to potential learner-centric conflicts, such as teaching and assessment delivery.

### **9.9.3 Process**

#### **Risk Management in relation to conflicts of interest**

Assessing the risks to SENse Learning arising from potential conflicts of interest is part of SENse Learning's ongoing risk management process. Identified conflicts of interest are mitigated as far as possible and are monitored as part of the overall risk management and internal quality control processes.

Reviews of our conflicts of interest policy and procedures are undertaken as part of our external quality review and accountability process. All existing and foreseeable conflicts of interest will be identified and monitored in line with this procedure and escalated to the Operational Director where appropriate.

### **9.9.4 Role specifics**

#### **Directors**

Directors are responsible for ensuring this policy is complied with throughout and across the organization, including their personal compliance. Within the area of teaching and assessment delivery they are responsible for reporting any identified or potential conflicts of interest to the Qualifications Co-ordinator.

The Qualifications Co-ordinator will then evaluate the risks to SENse Learning and keep documentation relating to this, including any findings and decisions by the directors, in case it is required by our external awarding bodies.

#### **Case Leads**

All Case Leads are responsible for ensuring this document is complied with by associates within their student teams.

### **9.9.5 Management of Conflict of interests**

All Directors and Case Leads receiving information on actual or potential conflicts of interest will ensure that potential conflicts not causing a significant risk to the business are appropriately recorded,

monitored and managed. Conflicts, or potential conflicts, that may pose a significant risk to the business must be escalated in confidence to the Qualifications Co-ordinator and Operational Director in order that appropriate steps may be taken to minimize any risks and where possible resolve the issue.

### **Colleagues**

No colleague or Associate of SENse Learning shall provide or accept preferential treatment to or from any other colleague or Associate of SENse Learning where such a transaction may adversely affect the business, learners, centres or other relevant parties. Such actions may also be construed as bribery and may be subject to criminal prosecution. To assist us in managing significant risks with regards to potential conflicts of interest, individuals must tell us about any relevant risk and/or issue in relation to a conflict or potential conflict that has come to their attention. We appreciate that they may wish to do so in confidence and are asked to refer to our whistleblowing policy for more information.

Any person employed by or acting on behalf of SENse Learning is personally responsible for ensuring that they adhere to the policy and procedures in this document. If colleagues have a query relating to conflicts of interest which is not included in this policy, they must refer the matter to their immediate line manager in the first instance or the Operational Director.

If a conflict of interest arises, or it is anticipated that one may arise, colleagues must inform their line manager or the Operational Director in protection of the business and individuals. If there is any doubt whether an activity represents a conflict of interest, the matter should be raised in this way, in order that an objective assessment may be made.

All potential conflicts of interest which relate directly to the colleague themselves, once discussed with their line manager, must be recorded by the line manager and passed to the Operational Director to be kept in the colleague/Associates file. The record must contain information on how the conflict of interest will be managed. Conflicts of interest relating to another individual will be recorded by the line manager and kept on file.

### **Monitoring**

The business management team and Qualifications Co-ordinator will periodically monitor the processes in place for dealing with conflicts of interest. Monitoring may typically cover:

- A review of any risk assessments undertaken in the assessment of potential conflicts of interest.
- A review of training, with specific relation to teaching and assessment delivery
- A review of any Conflicts of Interest on file.

## **9.10 Appeals against our decision or an Award**

### **9.10.1 Appealing our decision or action**

A person may appeal our decision relating to any action to be taken against a learner or family following an investigation into malpractice. As outlined, we refer to such actions, where they are punitive, as sanctions. Please see our Complaints Policy for further details.

To appeal against a sanction, you should submit a report as to why you believe that an appeal should be considered, together with any supporting evidence. Please note that appeal applications without supporting evidence may not be accepted. Your report should include the following:

1. Your name(s)
2. The date of the assessment
3. The date(s) you or the learners received notification of our assessment decision
4. The full nature of the appeal (e.g. what you are appealing, a decision/award, why you are appealing)

and your evidence for it)  
5. Your name and signature

Please email or post your completed report and any supporting evidence to the centre at the address in section 9.13 as soon as possible. The latest time we will accept an appeal is 30 working days from the date we informed you about our original decision.

If at any point you, or your student, or families wish to be legally represented in relation to any aspect of an appeal, this must be discussed with us. We reserve the right to also be legally represented.

### **9.10.2 Appealing an Award**

Where assessments are completed on-screen and externally marked by NCFE, appeals should be raised directly with them via our External Quality Assurer.

In the case of Functional Skills Entry Level assessments, and Functional Skills Speaking, Listening and Communicating components, which are internally assessed, an appeal may be raised as outlined above.

Where the appeal is against an internal assessment our Internal Quality Assurer will make all assessment reports and evidence available to be reviewed, and we will seek advice from our awarding body and our associated External Quality Assurer.

### **9.10.3 How an appeal is dealt with**

If we agree your appeal should be heard, we will arrange a meeting consisting of a Director and an independent person to review the case and to make a decision based on the evidence presented, including any evidence you submit to support your appeal. The Panel will consider how appropriate the original sanction/Award was in light of the evidence presented; any readily available regulators' advice on similar matters and any readily available awarding precedents.

The Panel may decide that:

1. The appeal is unfounded, or
2. The sanction imposed, or assessment fail is unreasonable and/or disproportionate, in which case the level of sanction must be reviewed, and/or
3. The Organisation did not apply procedures consistently, properly, or fairly, in which case the relevant procedure(s) must be appropriately applied

The Organisation will let you know of this outcome from the appeal within one working day of the decision being made.

The panel's decision is final and will complete SENse Learning appeals procedures. No further appeal will be accepted.

Where your appeal relates to our actions or decision regarding a regulated qualification and you remain dissatisfied, you may contact our awarding body who would require evidence that you have fully exhausted our internal appeals procedure.

### **9.11 Withdrawal policy**

SENse Learning is committed to providing support for all students to achieve their qualifications in a timely manner. We expect all students to complete their assessments when they are ready and able. This may be a complete qualification, or components of one, depending on the nature of the students' difficulties and the length of time they are at our provision.

If a student leaves the provision and has not completed any assessment components, they will be formally withdrawn from the qualification at the beginning of the next half term.

Where a student has achieved some components of their Functional Skills in English and is moving on from SENse Learning, we will work to obtain documentation from NCFE, such as a results slip or certificate, to prove achievement. This student will be partially certified, but not have achieved the full qualification.

Where a student is moving on to another educational provision, we will work with them to get the students achievements recognised by their awarding organisation, if different from NCFE.

Once a student has achieved their qualification and the certificate has been received, the student is not required to be withdrawn from the qualification. The qualification is complete.

The withdrawal of any students from a Functional Skills Qualification is the responsibility of the Qualifications Co-ordinator. This will take place once informed by the appropriate Case Lead that they have moved on from our provision.

## **9.12 Mandatory disclosure and confidentiality**

### **9.12.1 Mandatory disclosure**

It is imperative that in awarding the integrity of the Functional Skills offer is maintained; for example, by ensuring learners who are awarded a certificate have a legitimate right to that certificate.

The Qualifications Regulator has outlined some specific conditions that the Organisation must meet to protect the integrity of regulated qualifications across the awarding community. This included the requirement that where certain things are identified (such as malpractice), or certain actions taken (such as when sanctions are applied) the Regulators must be informed.

### **9.12.2 Confidentiality**

The Organisation may need to access confidential information. The Organisation will ensure that such information is kept secure and only used for the purposes of the investigation and in line with relevant data protection legislation. The Organisation will not normally disclose the information to third parties unless required to do so, e.g. to our Regulators and/or the Police or other relevant and/or Statutory Bodies.

## **9.13 Contact details**

If you have any queries about the contents of this section of the policy please contact the NCFE team:

Qualifications Co-ordinator – Hazel Groves – [hazel.groves@sense-learning.com](mailto:hazel.groves@sense-learning.com)

Pathways Manager – Sian Bryne – [sian.bryne@sense-learning.com](mailto:sian.bryne@sense-learning.com)

Operational Director – Sophie Amos – [sophie.amos@sense-learning.com](mailto:sophie.amos@sense-learning.com)

SENse Learning, Unit 2, The Forge Offices, Staplefield, RH17 6ET 01444 400896



## 10 E-Safety Policy

### 10.12 Introduction & Purpose

This policy is the E-Safety Policy for SENse Learning which will be followed by all members of the Organisation and promoted by those in the position of leadership within the Organisation. This policy will be applied to all students and SENse Learning Associates.

### 10.13 Policy Principles & Values

- The Organisation will ensure that all students and SENse Learning Associates will feel comfortable, confident and safe with us
  - The Organisation will give all students the skills to access a wide range of real world opportunities
  - The Organisation will help each other learn how to keep ourselves and others safe •
- The Organisation will prepare all students and young people for adult life
- The Organisation recognises that the use of mobile technology including mobile phones and tablets is essential in supporting our Associates to do their work safely and efficiently and our students to learn effectively
  - The Organisation recognises that the use of this technology introduces risk to the setting and that must be managed appropriately

### 10.14 Procedures

- The Organisation will provide Associates with mobile phones and in some cases laptops to use for work purposes
- The Organisation will ensure training and guidance one-safety is comprehensive, up-to-date and shared with Associates, families and students
- The Organisation will use well known and highly recommended providers for our internet based services
- Associates will use SENse Learning email devices to communicate with students and their families or use the Whatsapp groups which are monitored by the Directors
- The Organisation will use Egress when sending documentation outside of the Organisation
- The Organisation will use passwords to protect documents that will be stored online and all our devices
- The Organisation will use initials instead of full name in documents that will be stored online
- The Organisation will ensure that all students are supervised when using ICT/the internet
- The Organisation will ensure Associates only use work mobile devices for SENse Learning purposes
- The Organisation will only use personal mobile phones when necessary, following the guidance in the Associates handbook
- Under no circumstances should Associate's store photographs or data about students on personal devices
- Any photos should be shared using the dedicated photos Whatsapp group which is deleted every evening
- Wherever practical the Whatsapp group, monitored by the Case Leads and Leadership, should be used to communicate with parents or carers
- In some instances, students might be part of a Whatsapp group through work phones only, if deemed appropriate by a Case Lead
- Associates must notify a Director immediately if a student makes contact with them over email/text
- Associates must always supervise students when they are online or using mobile technology, making sure that anything a student is accessing online or on an electronic device whilst in their care is appropriate for their age and level of understanding (this includes films, images, video games etc.) and

remove anything that is not appropriate and/or raise their concerns with a Director at the earliest opportunity

#### **10.14.1 Online E-Safety Education for our Students**

The Organisation will make e-safety a key part of the curriculum for all students, and the curriculum will be delivered whilst focusing on these core areas:

- Self-image and identity
- Online relationships
- Online reputation
- Managing online information
- Health, wellbeing and lifestyle
- Privacy and security
- Copyright and ownership
- Online bullying

The curriculum aims to support and broaden the provision of e-safety education, so that it is empowering, builds resilience and creates positive culture shift. The objectives promote the development of safe and appropriate long-term behaviours, and support educators in shaping the culture within their setting and beyond.

This policy has been informed by the following documents:

- Teaching Online Safety in Schools – DfE
- UK Council for Internet Safety
- The Education People
- Statutory guidance on personal, social, health and economic (PSHE) education Education Act (1996)
- Learning and Skills Act (2000)
- Equality Act (2010)
- Keeping Children Safe in Education (2022)
- Statutory guidance overview: Alternative Provision (2013)
- Childnet
- Internet Matters
- Natterhub

The Organisation's e-safety curriculum aims to:

- Be broad, balanced and taught without bias
- Be relevant to modern society, particularly in linking these topics to e-safety
- Be relevant to each individual learner and delivered in an age appropriate and sensitive manner
- Provide a learning atmosphere where students feel safe, relaxed and confident to engage in discussions
- Delivered without bias and in line with legal responsibilities. Topics will be presented using a variety of views and beliefs so that students are able to form their own, informed opinions whilst respecting others may have different opinions
- Delivered through the taught curriculum, and through all aspects of daily life, including through discussions that arise at any time
- Delivered by open teaching students what 'slang' words mean and that some are offensive and offering a replacement word (where appropriate)

Case Leads are responsible for:

- Implementing 'Education for a connected world – 2020 Edition' UK Council for Internet Safety Framework

- Ensuring that the e-safety curriculum is taught consistently to all students
- Monitoring the effectiveness of the e-safety policy

Teachers and Education Mentors are responsible for:

- Using the 'Education for a connected world – 2020 Edition' UK Council
- Internet Safety framework to deliver the e-safety curriculum to all students in a sensitive way
- Ensuring their E-safety education delivery is in line with the E-safety policy
- Modelling positive attitudes to e-safety
- Responding to the needs of individual students
- Planning and delivering e-safety lessons and activities that are suited to the learning styles, interest, and individual needs of each student
- Monitoring student's progress

## 11. Personal, Social, Health and Economic Education Policy (PSHE)

### 11.1 Introduction & Purpose

This policy is the PSHE Policy for SENse Learning which will be followed by all members of the Organisation and promoted by those in the position of leadership within the Organisation. This policy will be applied to all students and SENse Learning Associates.

### 11.2 Policy Principles & Values

- The Organisation is committed to offering all students broad, balanced, stimulating and relevant curriculum regardless of their background, culture or ability
- The Organisation values each student for who they are
- The Organisation will work to actively promote the importance of tolerance, cooperation, courage, determination, friendship and respect

### 11.3 Procedures

- Case Leads are responsible for:
  - Implementing PSHE education planning framework for students with SEN
  - Ensuring that PSHE is taught consistently to all students
  - Monitoring the effectiveness of the PSHE policy
- Teachers and Education Mentor's are responsible for:
  - Using the PSHE education planning framework for students with SEN and delivering it in a sensitive way
  - Ensuring PSHE delivery is in line with the PSHE policy
  - Modelling positive attitudes to PSHE
  - Responding and delivering PSHE lessons and activities that are suited to the learning styles, interest, and individual needs of each student
  - Monitoring progress

This policy uses the Planning Framework as a guide to create a flexible curriculum. Learning will be regularly re-visited and consolidated, focusing upon the quality of learning rather than quantity of 'topics' covered

- The Framework is organised into six sections across all four key stages
  - Self-awareness
  - Self-care, support and safety
  - Managing feelings
  - Changing and growing
  - Healthy lifestyle
  - The world I live in
- Using the Planning Framework for students with SEN, opportunities will be presented to students (wherever possible) to:
  - Experience taking and sharing responsibility
  - Feel positive about themselves and others
  - Reflect on their perceptions and experiences
  - Develop the understanding, language, communication skills and strategies required to exercise personal autonomy
  - Carry out or take part in daily personal living routines
  - Make real decisions (with support where necessary so they can act upon them)

- Take part in group activities and make contributions
- Develop and maintain positive relationships and interactions with others
- Recognise and celebrate their achievements and success

- The Organisation will recognize and embrace the diverse nature of the SENse Learning community
- The Organisation will value and celebrate student's religious, ethnic and cultural diversity
- The intersection between the PSHE/RSE curriculum and student's own belief systems will be kept in mind and explored in a sensitive and inclusive way. Sessions will create space to challenge stereotypes and discrimination and present students with accurate information based on the law
- The Organisation will be respectful of how students choose to identify themselves, understanding their sexual orientation and gender identity may be emerging
- The Organisation will ensure personal beliefs and attitudes will not influence the teaching of the PSHE/RSE curriculum
- The Organisation will understand that PSHE/RSE topics might feel personally relevant to students in ways that the Organisation does not initially know. All topics should be discussed in a respectful, sensitive way
- Where any questions or content raise safeguarding concerns, it will be referred to the Designated Safeguarding Lead, as per the Safeguarding Policy
- The Organisation will respect that students have a right to privacy, when discussing gender and/or sexual identity. The Organisation will ask the student, who, if anyone, knows this information and who they are comfortable with it being shared to. If a student asks for certain people not to be told, this is their right. It is best practice to have at least one other key staff member who is informed so safety and welfare can be monitored, with the student's consent
- The Organisation understands that a student being lesbian, gay, bisexual, trans or exploring their gender identity does not in itself constitute a safeguarding concern, nor is it something the student's parents or carers need to be informed of. Students will be encouraged to share in their own time.

- This policy has been informed by the following documents:

- Statutory guidance on personal, social, health and economic (PSHE) education
- PSHE education planning framework for pupils with SEND
- SEND Code of Practice (2014)
- Education Act (1996)
- Learning and Skills Act (2000)
- Equality Act (2010)
- Keeping Children Safe in Education (2023)
- Statutory guidance overview: Alternative provision (2013)

- The Organisation's PSHE curriculum aims to:

- Be broad, balanced and taught without bias
- Offer the opportunity, if possible, for a student to speak with a staff member of a different gender if the student asks

- Be relevant to modern society, particularly in linking these topics to e-safety
- Be relevant to each individual learner and delivered in an age appropriate and sensitive manner
- Provide a learning atmosphere where students feel safe, relaxed and confident to engage in discussions
- Be delivered without bias and in line with legal responsibilities. Topics will be presented using a variety of views and beliefs so that students are able to form their own, informed opinions whilst respecting others may have different opinions

- Be delivered through the taught curriculum, and through all aspects of daily life, including through discussions that arise at any time
- Be delivered by openly teaching students what 'slang' words mean and offering a replacement word (where appropriate) and that some are offensive
- Be delivered using correct terminology when teaching
- Be delivered using medically correct terms for genitalia, for example vulva, vagina, penis and testicles.

This is an approach endorsed by OFSTED

- Be delivered using inclusive language (such as partner instead of boyfriend/girlfriend)

## 12. Relationships and Sex Education Policy (RSE)

### 12.1 Introduction & Purpose

This policy is the RSE Policy for SENse Learning which will be followed by all members of the Organisation and promoted by those in the position of leadership within the Organisation. This policy will be applied to all students and SENse Learning Associates.

### 12.2 Policy Principles & Values

- The Organisation wants our students to understand how to keep themselves safe in the world
- The Organisation wants our students to understand how to have a healthy physical and mental wellbeing
- The Organisation wants our students to be able to voice their opinions and feelings and feel empowered to express their wishes including understanding consent
- The Organisation wants our students to feel safe and happy within the relationships in their life
- The Organisations wants our students to be able to have the potential to live independent fulfilling lives
- The Organisation aims for all our students to be educated in the subject of relationships and sex so they can understand their own and other's health and wellbeing whilst building their self-efficacy
- The Organisation aims to provide students with a safe space to discuss real-life issues. Students will be taught about their rights and responsibilities in this context, including the subject of consent and the laws around sex and sexual acts
- The curriculum promotes safe, equal, caring and enjoyable relationships and encourages honest conversations that are free of shame or judgement
- The curriculum will foster gender and LGBT+ equality by celebrating difference and diversity and encouraging a positive sense of inclusiveness

### 12.3 Procedures

- Case Leads are responsible for:
  - Ensuring that RSE is taught consistently to all students
  - Managing requests from parents/carers to withdraw students from any aspect of the RSE curriculum
  - Monitoring the effectiveness of the RSE policy
- Teachers and LSAs are responsible for:
  - Delivering RSE to all students in a sensitive way
  - Ensuring their RSE delivery is in line with safe and effective practice guidelines
  - Modelling positive attitudes towards RSE
  - Responding to the needs of individual students
  - Planning and delivering RSE lessons and activities that are suited to the learning styles, interests, and individual needs of each student they teach
  - Monitoring student's progress
  - Understanding this policy is relevant not just in RSE lessons but at any time they are dealing with a student
- RSE is defined as learning about the emotional, social and physical aspects of growing up, relationships, sex, human sexuality and sexual health. The aim of RSE is to equip children and young people with the information, skills and values to have safe, fulfilling and enjoyable relationships, and to take responsibility for their sexual health and wellbeing
- The Organisation will recognize and embrace the diverse nature of the SENse Learning community; valuing and celebrating student's religious, ethnic and cultural diversity. The intersection between the

RSE curriculum and student's own belief systems will be kept in mind and explored in a sensitive and inclusive way. The RSE sessions will create space to challenge stereotypes and discrimination and present students with accurate information based on the law

- The Organisation will be respectful of how students choose to identify themselves, understanding that their sexual orientation and gender identity may be emerging
  - The Organisation will ensure all personal beliefs and attitudes will not influence the teaching of the RSE curriculum
  - The Organisation will keep in mind that the RSE topics might feel personally relevant to students in ways that we do not initially know. All topics should be discussed in a respectful, sensitive way
  - Where any questions or content raise safeguarding concerns, Associates will refer to the Designated Safeguarding Lead as per the Safeguarding Policy
  - The Organisation understands that students have the right to privacy and so should ask them who, if anyone, knows this information and who they are comfortable sharing it with. If a student asks for certain people not to be told, including their family, friends or other Associates then this is their right. It is best practice to have at least one other key staff member who is informed so their safety and welfare can be monitored, this should be done with the student's consent
  - The Organisation understands that a student being lesbian, gay, bisexual, trans or exploring their gender identity does not in itself constitute a safeguarding concern, nor is it something the student's parents or carers must be informed of. Students will be encouraged to share this information with their parents/carers in their own time
  - The Organisation aims to ensure all students are getting access to the statutory components of RSE, whether this be through SENse Learning sessions, in their on-roll schools or with other providers
  - Parents/carers **do not have the right** to withdraw their children from statutory relationships education, health education or the science curriculum
  - Parents/carers **do have the right** to withdraw their children from the non-statutory/non-science components of sex education within RSE whilst they are at a school or educational provision
  - To make a withdrawal request from the non-statutory components, parents/carers must speak to their Case Lead. The Case Lead will then explore the concerns and any potential impact on students. If parents/carers still wish to progress with their withdrawal request, they must make this in writing to SENse Learning Leadership Team. Once a student has been withdrawn, they cannot take part in sex education until the request for withdrawal has been removed
  - When a request is made for the Organisation not to teach the statutory components of RSE, there will be a discussion about where the student will access this learning. If this is covered by the on-roll school or another educational provider then this will be allowed. Where a student would otherwise not get the statutory components of the RSE education, this will be discussed with parents/carers and agree a way forward that ensures them access to this learning
- 
- The Organisation's RSE curriculum is informed by the 'Twelve Principles of Good Quality SRE (2017)' and is an identifiable part of our personal, social, health and economic (PSHE) education curriculum, which has planned, timetabled lessons across all the Key Stages
    - Is taught by appropriately trained staff members in RSE/PSHE
    - Works in partnership with parents and carers, informing them about what their children will be learning and about how they can contribute at home
    - Delivers lessons where students feel safe and encourages their participation by using a variety of teaching approaches with opportunities to develop critical thinking and relationship skills
    - Is based on reliable sources of information, including about the law and legal rights, and distinguishes between fact and opinion
    - Promotes safe, equal, caring and enjoyable relationships and discusses real-life issues appropriate to the age and stage of students, including friendships, families, consent, relationship abuse, sexual exploitation and safe relationships online
    - Gives a positive view of human sexuality, with honest and medically accurate information, so that



students can learn about their bodies and sexual and reproductive health in ways that are appropriate to their age and maturity

- Gives students opportunities to reflect on values and influences (such as from peers, media, faith and culture) that may shape their attitudes to relationships and sex, and nurtures respect for different views
- Includes learning about how to get help and treatment from sources such as the school nurses and other health and advice services, including reliable information online
- Fosters gender equality and LGBT+ equality and challenges all forms of discrimination in RSE lessons and in everyday life
- Meets the needs of all students with their diverse experiences – including those with special educational needs and disabilities
- Seeks students' views about RSE so that teaching can be made relevant to their real lives and assessed and adapted as their needs change

• The Organisation RSE curriculum aims to:

- Be broad and balanced and taught without bias
- Be relevant to modern society, particularly in linking these topics to RSE
- Be relevant to each student, taking into consideration their own needs and ability to understand the content
- Be delivered in an age appropriate and sensitive manner by Teachers and EM's
- Provide a learning atmosphere where students feel safe and relaxed, and where they feel confident to engage in discussions around potentially sensitive subjects and themes
- Provide a space where questions can be dealt with honestly and sensitively in an age-appropriate way
- Delivered in individual students' teams which are mainly 1:1 or 2:1 staff to student ratios. This might include mixed-gender teaching/student teams, and the suitability of the person teaching will be discussed and considered within each team before commencing any direct teaching. If a student asks to speak to a staff member of a different gender, then this will be passed on to the Case Lead who will assess if this arrangement is possible
- Delivered without bias and in line with legal responsibilities such as those contained within the Equality Act (2010). Topics will be presented using a variety of views and beliefs so that students are able to form their own, informed opinions but also respect others that may have different opinions
- Delivered through the taught curriculum but also through all aspects of daily life including through discussions that arise at any time during a session
- Delivered by openly teaching students what 'slang' words mean and that some are offensive and offering a replacement word (where appropriate)
- Use correct terminology as this is deemed good practice and avoiding the use of any slang when teaching
- Use medically correct terms for genitalia, for example, vulva, vagina, penis and testicles. This is an approach endorsed by OFSTED
- Use inclusive language (such as partner instead of boyfriend/girlfriend)
- Consider what content is best to be taught for each student based on their current needs, understanding, age and stage

## 13. Health, Safety and Risk Management Policy

### 13.1 Introduction & Purpose

This policy is the Health, Safety and Risk Management Policy for SENSE Learning which will be followed by all members of the Organisation and promoted by those in the position of leadership within the Organisation. This policy will be applied to all students and SENSE Learning Associates.

### 13.2 Policy Principles & Values

- The Organisation will help others learn how to keep ourselves and others safe
- The Organisation will prepare students for adult life
- The Organisation recognises the students who access SENSE Learning often display challenging behaviour related to their needs
- The Organisation recognises that it is not possible to avoid all risk, but we have a duty of care to students and Associates to plan for and manage foreseeable risks including those related to behaviour

### 13.3 Procedures

- The Organisation will conduct a risk assessment for each student, identifying likely causes of challenging behaviour, the risks this may pose, and the strategies for managing the risk. These will be reviewed termly and updated if necessary
- Associates will follow the Lone Working Policy
- The Organisation will conduct a risk assessment for all activities outside of the students home, control the risks identified and monitor this, checking them termly and updating them where necessary
- Associates will use the student team WhatsApp groups to confirm their location when taking their students outside of the home for activities. Associates will enable the trackers on their work phones during sessions
- The Organisation will ensure that all Associates have had the necessary training to complete their work safely
- The Organisation will maintain appropriate staffing ratios based on each individual student's need
- The Organisation will have emergency evacuation plans and critical incident plans which are reviewed and checked and reviewed termly and updated if necessary
- The Organisation may sometimes have accidents where students, Associates or others are injured. These should be recorded as soon as possible on the online accident form (within 24 hours). This form should then be emailed to a Director where it will be checked, numbered and entered into the accident book and a copy sent to the student's parents or carers
- In the case of a head injury or major injury, we will call the parents or carers to inform them of what has happened and that we are monitoring the student. The parent or carer can then make an informed decision as to whether or not they would rather collect the student.
- Should an injury require medical assistance, we will call the emergency services first and then inform parents/carers as soon as possible.

## 14. First Aid Policy

### 14.1 Introduction and Purpose

This policy is the First Aid Policy for SENse Learning which will be followed by all members of the Organisation and promoted by those in the position of leadership within the Organisation. This policy will be applied to all students and SENse Learning Associates.

### 14.2 Policy Principles and Values

- The Organisation aims to ensure the health and safety of all Associates, students and visitors
- The Organisation aims to ensure that all Associates are aware of their responsibilities with regards to health and safety
- The Organisation aims to provide a framework for responding to an incident, recording and reporting the outcomes

### 14.3 Procedures

#### *Legislation*

This policy is based on advice from the Department for Education on first aid in schools, health and safety in schools and actions for schools during the coronavirus outbreak, and the following legislation:

- The Health and Safety (First Aid) Regulations 1981, which states that employers must provide adequate and appropriate equipment and facilities to enable first aid to be administered to employees, and qualified first aid personnel
- The Management of Health and Safety at Work Regulations 1992, which require employers to make an assessment of the risks to the health and safety of their employees
- The Management of Health and Safety at Work Regulations 1999, which require employers to carry out risk assessments, make arrangements to implement necessary measures, and arrange for appropriate information and training
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013, which state that some accidents must be reported to the Health and Safety Executive (HSE), and set out the timeframe for this and how long records of such accidents must be kept
- Social Security (Claims and Payments) Regulations 1979, which set out rules on the retention of accident records
- The Education (Independent School Standards) Regulations 2014, which require that suitable space is provided to cater for the medical and therapy needs of pupils

#### *Roles and Responsibilities*

We have appointed Associates who are responsible for

- Taking charge when someone is injured or becomes ill
- Ensuring there is an adequate supply of medical materials in first aid kits, and replenishing the contents of these kits
- Ensuring that an ambulance or other professional medical help is summoned when appropriate
- Acting as first responders to any incidents; they will assess the situation where there is an injured or ill person, and provide immediate and appropriate treatment
- Sending students home to recover, where necessary
- Filling in an accident report on the same day, or as soon as is reasonably possible, after an incident
- Keeping their contact details up to date

All Associates are responsible for

- Ensuring they follow first aid procedures
- Ensuring they attend their First Aid training
- Completing accident reports for all accidents they attend to
- Informing Head Office of any specific health conditions or first aid needs

### *First Aid Procedures*

In-home procedures where a parent or carer is present -

- The first aid trained Associate will assess the seriousness of the injury and inform the parents/guardians of their conclusions
- Provide first aid treatment where the parent/guardian asks them to, or the parent/guardian is unable to
- The first aid trained Associate will assess the injury and decide if further assistance is needed from a colleague or the emergency services. They will remain on scene until help arrives.
- The first aid trained Associate will also decide whether the injured person should be moved or placed in a recovery position
- The First Aid trained Associate will complete an accident report form on the same day or as soon as is reasonably practicable after an incident resulting in an injury

A typical first aid kit (kept in Head Office, Training Centre, and Associates vehicles) in our provision will include the following items. These kits will be replaced every 3 years.

- A leaflet with general first aid advice
- Regular and large bandages
- Eye pad bandages
- Triangular bandages
- Adhesive tape
- Safety pins
- Disposable gloves
- Antiseptic wipes
- Plasters of assorted size
- Scissors
- Cold compresses
- Burns dressings

### *Record keeping and recording*

- An accident form will be completed by the Associate on the same day or as soon as possible after an accident/incident resulting in an injury
- As much detail as possible should be supplied when reporting an accident ensuring all boxes of the SENse Learning accident form on the shared G-Drive is filled in fully
- A copy of the accident report form will also be kept within SENse Learning's records.
- Records held in the first aid and accident book will be retained by the school for a minimum of 3 years,

in accordance with regulation 25 of the Social Security (Claims and Payments) Regulations 1979, and then securely disposed of.

- The Health and Safety Trained Member of Leadership: Linda Sampson will keep a record of any accident which results in a reportable injury, disease, or dangerous occurrence as defined in the RIDDOR 2013 legislation (regulations 4, 5, 6 and 7).
- The Health and Safety Trained Member of Leadership: Linda Sampson will report these to the Managing Director as soon as is reasonably practicable and in any event within 10 days of the incident.

Reportable injuries, diseases or dangerous occurrences include:

- Death
  - Specified injuries, which are:
    - Fractures, other than to fingers, thumbs, and toes
    - Amputations
    - Any injury likely to lead to permanent loss of sight or reduction in sight
    - Any crush injury to the head or torso causing damage to the brain or internal organs
    - Serious burns(including scalding)
    - Any scalding requiring hospital treatment
    - Any loss of consciousness caused by head injury or asphyxia
    - Any other injury arising from working in an enclosed space which leads to hypothermia or heat-induced illness, or requires resuscitation or admittance to hospital for more than 24 hours
  - Injuries where an Associate is away from work or unable to perform their normal work duties for more than 7 consecutive days (not including the day of the incident)
  - Where an accident leads to someone being taken to hospital
  - Near-miss events that do not result in an injury but could have done. Examples of near-miss events including, but are not limited to:
    - The collapse or failure of load-bearing parts of lifts or lifting equipment
    - The accidental release of a biological agent likely to cause severe human illness
    - The accidental release or escape of any substance that may cause a serious injury or damage to health
    - An electrical short circuit or overload causing a fire or explosion
- The Associate will inform parents or carers of any accident or injury sustained by a student, and any first aid treatment given, on the same day, or as soon as reasonably possible

### *Training*

- All Associates that work with students are expected to undertake first aid training
- All first aiders must have completed a training course, and must hold a valid certificate of competence to show this. SENse Learning will keep a register of all trained first aiders, what training they have received and when this is valid until.
- Associates are expected to renew their first aid training every three years.

## 15. Supporting Students with Medical Conditions Policy

### 15.1 Introduction and Purpose

This Policy is the Supporting Students with Medical Conditions policy for SENse Learning which will be followed by all members of the Organisation and promoted by those in the position of leadership within the Organisation. This policy will be applied to all students and SENse Learning Associates.

### 15.2 Policy Principles and Values

- The Organisation aims to ensure that all students, Associates, parents, and carers understand how SENse Learning supports students with medical conditions
- Students with medical conditions are properly supported to allow them to access the same education and opportunities as other students, including SENse Learning educational trips and activities
- The Organisation will ensure that Associates are suitably trained
- The Organisation will ensure that Associates are aware of student's conditions, where appropriate
- The Organisation will develop and monitor individual healthcare plans (IHPs).

### 15.3 Procedures

#### *Legislation and statutory responsibilities*

This policy takes into account the requirements under Section 100 of the Children and Families Act 2014, to ensure there are arrangements in place for supporting pupils with medical conditions. It is also based on the Department for Education's statutory guidance on [supporting pupils with medical conditions at SENse Learning](#).

#### *Responsibilities*

- The Organisation will ensure that all Associates are aware of this policy and understand their role in its implementation
- The Organisation will ensure that there is sufficient number of trained Associates available to implement this policy and deliver against all individual healthcare plans (IHPs), including in contingency and emergency situations
- Ensure that all Associates who need to know are aware of a student's condition
- Work with other providers and on-roll SENse Learning to create and implement IHPs
- Make sure that Associates are appropriately insured and aware that they are insured to support students in this way
- Ensure that systems are in place for obtaining information about a student's medical needs and that this information is kept up to date

#### *Associates*

- Supporting students with medical conditions during their session time is not the sole responsibility of one person. Any Associate may be asked to provide support to students with medical conditions, although they will not be required to do so. This includes the administration of medicines
- Associates who take on the responsibility of supporting students with medical conditions will receive sufficient and suitable training, and will achieve the necessary level of competency before doing so

- Associates will take into account the needs of students with medical conditions that they support. All Associates will know what to do and respond accordingly when they become aware that a student with a medical condition needs help

#### *Parents/ carers*

- Parents/carers will provide the Organisation with sufficient and up-to-date information about their child's medical needs
- Parents/carers will be involved in the development and review of their child's IHP and may be involved in its drafting
- Parents/carers will carry out any action they have agreed to as part of the implementation of the IHP, e.g., provide medicines and equipment, and ensure they or another nominated adult are contactable at all times

#### *Students*

- Students with medical conditions will often be best placed to provide information about how their condition affects them
- Students will be fully involved in discussions about their medical support needs and contribute as much as possible to the development of their IHPs. They are also expected to comply with their IHPs

#### *Other Healthcare professionals*

- Healthcare professionals, such as GPs and pediatrician's, will liaise with SENse Learning where necessary at the parent's request. They may also provide advice on developing IHP's

#### *Being notified that a student has a medical condition*

- When the Organisation is notified that a student has a medical condition by the parent or carer, the Case Lead will liaise with parents/carers to decide whether the student requires an IHP.
- The Organisation will make every effort to ensure that arrangements are put into place within two weeks, or by the beginning of the relevant term for students that are new to the Organisation

#### *Individual Healthcare plans*

- Case Leads oversee IHPs for individual students
- Plans will be reviewed at least annually, or earlier if there is evidence that the student's needs have changed.
- Plans will be developed with the student's best interest in mind and will set out:
  - What needs to be done
  - When
  - By whom
- Not all students with medical conditions will require an IHP.
- It will be agreed with a healthcare professional and the parents when an IHP would be inappropriate or disproportionate. This will be based on evidence. If there is no consensus, parents/carers will make the final decision.
- Plans will be drawn up in partnership with the Organisation, parents/carers and a relevant

healthcare professional, such as the student's medical specialist or paediatrician, who can best advise on the student's specific needs. The student will be involved wherever appropriate.

- IHPs will be linked to, or become part of, any EHC plan.
- The level of detail in the plan will depend on the complexity of the student's condition and how much support is needed. The Case Lead will consider the following when deciding what information to record on IHPs:
  - The medical condition, its triggers, signs, symptoms, and treatments
  - The pupil's resulting needs, including medication (dose, side effects and storage) and other treatments, time, facilities, equipment, testing, access to food and drink where this is used to manage their condition, dietary requirements, and environmental issues e.g., crowded corridors, travel time between lessons.
  - Specific support for the pupil's educational, social, and emotional needs. For example, how absences will be managed, requirements for extra time to complete exams, use of the rest periods or additional support in catching up with lessons, counselling sessions.
  - The level of support needed, including in emergencies. If a pupil is self-managing their medication, this will be clearly stated with appropriate arrangements for monitoring.
  - Who will provide this support, their training needs, expectations of the role.
  - Who in SENse Learning needs to be aware of the pupil's condition and the support required.
  - Arrangements for written permission from parents and the Case Lead for medication to be administered by an Associate or self-administered by the pupil during SENse Learning sessions.
  - Separate arrangements or procedures required for SENse Learning trips or other SENse Learning activities outside of the normal SENse Learning timetable that will ensure the pupil can participate e.g., risk assessment.
  - Where confidentiality issues are raised by the parent/pupil, the designated individuals to be entrusted with information about the pupil's condition.
  - What to do in an emergency, including who to contact and contingency arrangements

### *Managing medicines*

- Prescription and non-prescription medicines will only be administered at SENse Learning:
  - When it would be detrimental to the student's health and attendance not to do so
  - and**
  - Where we have parents/carers written consent
- **The only exception to this is where the medicine has been prescribed to the student without the knowledge of parents**
- Students under 16 will not be given medicine containing aspirin unless prescribed by a doctor
- Anyone giving a student any medication (for example, for pain relief) will first check maximum dosages and when the previous dosage was taken. Parents will always be informed.
- The Organisation will only accept prescribed medicines that are:
  - In-date
  - Labelled
  - Provided in the original container, as dispensed by the pharmacist, and include instructions for administration, dosage, and storage
- The Organisation will accept insulin that is inside an insulin pen or pump rather than its original



container, but it must be in date

- All medicines will be stored safely. Students will be informed about where their medicines are at all times and be able to access them immediately. Medicines and devices such as asthma inhalers, blood glucose testing metres and adrenaline will always be readily available to students and not locked away
- Medicines will be returned to parents to arrange for safe disposal when no longer required

### *Controlled drugs*

- Controlled drugs are prescription medicines that are controlled under the Misuse of Drugs Regulations 2001 and subsequent amendments, such as morphine or methadone.
- A student who has been prescribed a controlled drug may have it in their possession if they are competent to do so, but they must not pass it to another pupil to use. Where a student is in the Student Centre the controlled drugs will be kept in a secure cupboard and only named associates have access.
- Controlled drugs will be easily accessible in an emergency and a record of any doses used and the amount held will be kept.

### *Students managing their own needs*

- Students who are competent will be encouraged to take responsibility for managing their own medicines and procedures. This will be discussed with parents, and it will be reflected in their IHP's
- Students will be allowed to carry their own medicines and relevant devices wherever possible. Associates will not force a student to take a medicine or carry out a necessary procedure if they refuse, but will follow the procedure agreed in the IHP and inform parents so that an alternative option can be considered, if necessary

### *Unacceptable practice*

- The Organisation will use their discretion and judge each case individually with reference to the students IHP, but it is generally not acceptable to:
  - Prevent students from easily accessing their inhalers and medication, and administering their medication when and where necessary
  - Assume that every student with the same condition requires the same Treatment
  - Ignore the views of the student or their parents
  - Ignore medical evidence or opinion (although this may be challenged)
  - Send students with medical conditions home frequently for reasons associated with their medical condition or prevent them from staying for normal activities, including lunch, unless this is specified in their IHP
  - Penalise students for their attendance record if their absences are related to their medical condition, e.g. hospital appointments
  - Prevent students from drinking, eating or taking toilet or other breaks whenever they need to in order to manage their medical condition effectively
  - Administer, or ask students to administer, medicine in the toilet

### *Emergency procedures*

- Associates will follow the Organisation's normal emergency procedures. All student's IHPs will clearly set out what constitutes an emergency and will explain what to do

- If a student needs to be taken to hospital, Associates will stay with the student until the parent/carer arrives, or accompany the student to hospital by ambulance

### *Training*

- Associates who are responsible for supporting students with medical needs will receive suitable and sufficient training to do so
- The training will be identified during the development or review of the IHPs. Associates who provide support to students with medical conditions will be included in meetings where this is discussed
- The relevant healthcare professionals will lead on identifying the type and level of training required and will agree this with the student's Case Lead. Training will be kept up to date.
- Training will:
  - Be sufficient to ensure that Associates are competent and have confidence in their ability to support the students
  - Fulfil the requirements in the IHPs
  - Help Associates to have an understanding of the specific medical conditions they are being asked to deal with, their implications and preventative measures
- Healthcare professionals will provide confirmation of the proficiency of Associates in a medical procedure, or in providing medication

### *Record keeping*

- The Organisation will ensure that written records are kept of all medicine administered to students for as long as these students are at SENse Learning. Parents will be informed if their child has been unwell at SENse Learning
- IHP's are kept in a readily accessible place within the student's shared drive folder, which all Associates are aware of

## 16. Bodily Fluid Spillage Policy

### 16.1 Introduction & Purpose

This policy is the Bodily Fluid Spillage Policy for SENse Learning which will be followed by all members of the Organisation and promoted by those in the position of leadership within the Organisation. This policy will be applied to all students, SENse Learning Associates and all visitors to the Training Centre.

### 16.2 Policy Principles & Values

- The Organisation understands that blood and body fluids may contain viruses or bacteria capable of causing disease
- The Organisation understands the vital need to protect individuals from the risk of cross infection
- The Organisation will work to minimise the risk of transmission of infection
- The Organisation will practice and promote good personal hygiene

### 16.3 Procedures

- The initial clean up of the situation should be carried out by the person(s) who is at the scene of the incident
- Associates should wear disposable gloves before cleaning any spillage
- Associates should place absorbent towels over the affected area and allow the spill to absorb. Wipe up the spill using these towels and place in a bin (which has a bin liner)
- The bin that has the soiled paper towels in, needs to be tied up, double bagged and put in an outside bin
- Use a disposable cleaning kit to clean the area – continue to wear disposable gloves
- Any article of clothing that has been contaminated with the spill should be wiped clean and then put in a plastic bag and tied up to be taken home
- If the area needs a more thorough clean, it must be cordoned off and a cleaner must be called to deep clean the area
- For exposure to blood or body fluids in another individuals' mouths – do not swallow
  - Rinse mouth out several times
  - Report the incident to a member of the Senior Leadership Team
  - If necessary, take further advice from NHS Direct
  - An accident form will need to be completed and it may need to be reported to RIDDOR
- Associates are instructed to cover open wounds with waterproof dressings
- Any Associate who has a skin condition on their hands, arms, or face, e.g. Eczema, psoriasis or dermatitis is advised to avoid contact with bodily fluids

## 17. Equal Opportunities and Diversity Policy

### 17.1 Introduction & Purpose

This policy is the Equal Opportunities and Diversity Policy for SENse Learning which will be followed by all members of the Organisation and promoted by those in the position of leadership within the Organisation. This policy will be applied to all students and SENse Learning Associates. This policy meets the requirements of the Equality Act 2010. This Act replaced all previous equality legislation such as the Race Relations Act, the Disability Discrimination Act and the Sex Discrimination Act.

### 17.2 Policy Principles & Values

- The Organisation will adhere to the requirements of the Equality Act 2010 by not discriminating against students, Associates, volunteers, or any individual involved in external agencies the Organisation may be working with on the grounds of sex, race, disability, religion, belief, or sexual orientation
- The Organisation will not discriminate against:
  - Pregnant people or new mothers
  - Associates, students, or volunteers undergoing gender re-assignment
  - Students due to the behaviour of their parents/carers/siblings
- When recruiting Associates, health-related questions will not be asked until after a job offer is made, and then, only if it is necessary for the role
- It is expected that every person in the Organisation will make a positive contribution to this policy, namely:
  - All Associates, whether paid or voluntary
  - All visitors to SENse Learning
  - All students and their families at SENse Learning
- The Organisation will ensure the services it provides are accessible to all and endeavour to positively encourage and benefit people from disadvantaged groups
- The Organisation will support specialist aids and facilities to enable disabled people
- The Organisation will monitor any issues that arise within the Organisation and take appropriate action, fully supporting any person in the Organisation who is faced with prejudice or discrimination
- The Organisation will undertake an annual evaluation process to ensure that the policy is clear, in keeping with current legislation and being adhered to
- The Organisation will treat any breaches of the policy seriously, and regard them as misconduct which may lead to disciplinary proceedings

### 17.3 Procedures

- Stage 1:
  - Any person who experiences, witnesses or is reasonably led to believe that this Equal Opportunities Policy has not been respected, should immediately bring the situation to the attention of a Director. The person responsible for this breach will be reminded of the existence and purpose of this policy, and asked to adhere to the policy
- Stage 2:
  - If the person continues to behave in an unacceptable manner, the matter will be referred to Lucy McMann (Managing Director) who will decide the best course of action. This may result in either a warning being issued or disciplinary

- Stage 3:

- The offending person has the right to appeal. They can write to Lucy Mann. The decision of Lucy Mann will be final.

## 18. Recruitment and Selection Process Policy

### 18.1 Introduction & Purpose

This policy is the Recruitment and Selection Process Policy for SENSE Learning which will be followed by all members of the Organisation and promoted by those in the position of leadership within the Organisation. This policy will be applied to all SENSE Learning Associates and any applicants who apply to positions within SENSE Learning.

### 18.2 Policy Principles & Values

- The Organisation is committed to safeguarding and promoting the welfare of children, young people and vulnerable adults by carrying out the necessary pre-employment checks. This also helps ensure that our recruitment processes are transparent and guard against risks associated with modern slavery and human trafficking
- The Organisation aims to ensure that no applicant receives less favourable treatment on the grounds of race, gender, disability, gender reassignment, age, social class, sexual orientation, religion or belief, marriage and civil partnership, pregnancy and maternity
- The Organisation will always seek to recruit the best candidate for the job. Vacancies will be advertised externally using the most appropriate advertising medium and internally across the Organisation where appropriate. In extenuating circumstances, where there is a proven business case, the Managing Director may waive the requirement to advertise
- Recruitment and selection is a key public relations exercise and should enhance the reputation of the Organisation. All candidates will be treated with respect and courtesy, aiming to ensure that the candidate experience is positive, irrespective of the outcome
- Panel members should not be involved in a recruitment exercise and/or appointment where they are related to an applicant or have a close personal relationship with them outside of work. All Associates are required to declare any familial or close personal relationships with other members of the SENSE Learning team
- The Organisation welcomes applications from people with disabilities and will always seek to ensure that it operates a fair and accessible recruitment and selection process, including making reasonable adjustments where necessary
- The Organisation will ensure that applicants who have lived or worked outside of the UK will undergo the same checks as all other Associates. This includes obtaining an enhanced DBS certificate. The Organisation will also make any further checks deemed appropriate so that any relevant events that occurred outside the UK can be considered. Where this information is not available, the Organisation will seek alternative methods of checking suitability and/or undertake a risk assessment that supports informed decision making on whether to proceed an applicant
- The Organisation can use the TRA Employer's Access Service to make prohibition, direction, restriction and children's barred list checks

### 18.3 Procedures

#### • Section 1: Pre-recruitment process

- Before any recruitment activity, the Organisation will review the job description and person specification to ensure they are up to date and an accurate reflection of what the job entails
- The person specification will relate directly to the job description. Some criteria may be desirable rather than essential and this will be highlighted
- For a new role, the job description and person specification will be created for this role

- The role may be advertised solely internally or externally, some may be advertised both internally and externally. In extenuating circumstances, the Managing Director may waive the need to advertise
- All applicants are required to complete an application form containing questions about their academic and employment history and their suitability for the role.
- Should there be any gaps in employment history, a satisfactory explanation must be provided at interview. A curriculum vitae will not be accepted in place of the completed application form
- Shortlisting will be completed by at least two people to ensure fairness and consistency and prevent bias
- The panel will agree their criteria and evidence for selecting for interview; these should be objective, relevant to the role and measurable, and against the person specification
- The interview panel will scrutinise the application form, reviewing employment history and identifying any gaps, and look to see if the applicant has recently been working abroad

#### • Section 2: Employment offer

- Following the interview, HR will make a conditional job offer to a successful applicant via email. Unsuccessful applicants will also be informed of the outcome via email
- If it is decided to make an offer of employment following the formal interview, any such offer will be conditional on the following:
  - Verification of the applicant's identity and right to work
    - Two satisfactory references- one of which must be from the applicant's most recent employer
    - Receipt of a clear DBS certificate (and a clear overseas check where applicable)
  - Copies of the necessary qualifications (role dependant)
  - For management positions, information about whether the applicant has ever been referred to the Department of Education or is the subject of a direction under section 128 of the Education and Skills Act 2008 which renders them unable or unsuitable to work at an Academy or College

#### • Section 3: DBS Checks

An enhanced DBS check will be carried out for all Associates and staff regardless of job role. SENse Learning will agree to complete payment for all DBS checks carried out. The Enhanced DBS check (Enhanced Disclosure) will show current and spent convictions, cautions, reprimands, and warnings held on the Police National Computer; plus, any relevant and proportionate information held by local police forces as well as a check of the new Children and / or Vulnerable Adults barred lists where requested. The DBS application is made online. Details of the I.D. documents required are confirmed with the individual in advance via email. Information and advice can also be found at [www.gov.uk](http://www.gov.uk). Where an individual applying for a disclosure makes a declaration at the application stage, HR must immediately share this information with the relevant manager. The applicant is responsible for completing the appropriate declarations honestly and accurately as required by the company. Completing the online application form at the pre employment stage and providing the identification required. The Associate is responsible for informing their line manager immediately if they are subject to criminal proceedings. Associates and staff are encouraged to sign up for and maintain registration with the DBS update service. The DBS update service aims to improve the speed of the recruitment process and enable efficient re- checking on a 3-yearly basis.

HR is responsible for undertaking DBS checks at the pre-employment stage, administering the ongoing application process, checking ID documentation and processing checks with the DBS. Updating systems with DBS disclosure information in line with this policy, providing advice on the next steps if a disclosure is made during the application process. Providing advice on the next steps following receipt of a DBS certificate that details disclosures or bars an individual from working with children or vulnerable adults. Escalating concerns to the relevant Managers/Directors, concerns may include Associates continually failing to complete a recheck.

- Section 4: Overseas Checks

Individuals who have lived or worked outside the UK for more than 3 months within the last 10 years must undergo the same checks as all other Associates and staff. This includes obtaining an enhanced DBS certificate (including children's barred list information). In addition, we will make any further checks appropriate so that any relevant events that occurred outside the UK can be considered.

The process for obtaining an overseas criminal record check varies from country to country. Please note that some countries will only allow the individual to make the application, whereas some allow the employer to do this on their behalf.

These checks may include, where available:

- Obtaining a letter (via the applicant) from the professional regulating authority (this is often the Department/Ministry of Education but varies across the world) in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be unsuitable to teach.
- Obtaining a Certificate of Good Conduct (CGC)

Details of how to obtain an overseas criminal record check from the relevant authorities abroad can be found on [www.gov.uk](http://www.gov.uk). This includes information on how to apply and relevant contact details.



## 19. Quality Assurance Policy

### 19.1 Introduction & Purpose

This policy is the Quality Assurance Policy for SENSE Learning which will be followed by all members of the Organisation and promoted by those in the position of leadership within the Organisation. This policy will be applied to all students and SENSE Learning Associates.

### 19.2 Policy Principles & Values

- The Organisation is committed to continuously reviewing and evaluating all practices and procedures to ensure we provide the highest quality of education possible for all our students
- The Organisation believes that every aspect of the educational provision should be held up to scrutiny and that all Associates are accountable to ensuring quality provision for all students

### 19.3 Procedures

The Directors will regularly review and evaluate the Organisation's practice through:

- Monthly Head Office meetings
- Appraisals
- 121 Check ins

Pathway Leads will:

- Have regular meetings with Case Leads
  - Carry out observation visits to student teams
  - Monitor the termly reports that Case Leads produce
  - Regularly monitor all daily student logs
  - Review student tracking documents
- NCFE Coordinator who quality assures on a continued basis including exams and coursework. The organisation has two EQA external visits from NCFE year.

## 20. Complaints (Families)

### 20.1 Introduction & Purpose

This policy is the Complaints Policy for SENse Learning which will be followed by all members of the Organisation and promoted by those in the position of leadership within the Organisation. This policy will be applied to all families of SENse Learning students.

### 20.2 Policy Principles & Values

The Organisation recognises that students who access SENse Learning often have very varied and complex needs and it is essential that communication is effective with families so that we are able to understand and meet these needs.

### 20.3 Procedures

- The Organisation will ensure that families know that they contact us at any time with any concern by emailing [info@sense-learning.com](mailto:info@sense-learning.com) or contacting the office on 01444 400896
- The Organisation endeavours to respond to emails and calls within 24 hours (or 72 hours over the weekend) and offer a meeting to discuss concerns if this is what the family would prefer
- The Organisation always treats all families with respect and courtesy
- The Organisation attends the annual review of the students EHCP
- The Organisation will complete an induction booklet with parents prior to their child starting at SENse Learning, outlining their preferences in a range of circumstances
- The Organisation asks families to show us the same respect and courtesy we show them
- The Organisation asks families to raise any concerns or complaints with us quickly, either by email or telephone, so we can respond as soon as possible (within 24 hours or 72 hours at weekends)
- If a family is unhappy with our response or feel the need to raise their concern with an independent agency, they may choose to contact their Local Authority Case Officer
- If a complaint relates to safeguarding concerns, the family should contact the LADO at their relevant authority

## 21 Data Retention Policy

### 21.1 Introduction & Purpose

This policy is the Data Retention Policy for SENSE Learning which will be followed by all members of the Organisation and promoted by those in the position of leadership within the Organisation. This policy will be applied to all students and SENSE Learning Associates.

### 21.2 Policy Principles & Values

- The Organisation will establish and adhere to standard retention times for categories of information held on the records of job applicants, existing and former employees, workers and contractors
- The Organisation will base the retention times on business need taking into account any relevant professional guidelines and a risk analysis approach
- The Organisation will assess who in the organisation is responsible for the retention of employment and student records
- The Organisation will ensure information is not retained beyond the standard retention times unless there is a sound business reason for doing so
- If possible establish a computerised system which flags information retained for more than a certain period of time as due for review or deletion
- If the Organisation is justified in holding any information on an employee's criminal conviction, we will ensure that the information is deleted once the conviction is spent under the Rehabilitation of Offenders Act 1974
- The Organisation will ensure that records which are to be disposed of are securely and effectively destroyed.
- The Organisation will keep under review the arrangements for dealing with old records to ensure they are securely disposed of and advise anyone holding records of these arrangements for disposal
- The Organisation will never assume that the 'delete' key on a computer-based system necessarily removes a record from the system and we will check that computer records are actually removed
- The Organisation will ensure that computer equipment that has held records is never sold on unless it is certain that the records have been fully removed

### 21.3 Procedures

#### 21.3.1 Types of Contractee/Employee data that we hold

Personnel and training records

These may include:

- Qualifications/references
- Eligibility to work documentation, for example photocopies of passport, visas etc
- Annual assessment reports
- Job history
- Resignation, termination and/or retirement letters
- Disciplinary matters
- Travel and subsistence
- Grievance procedures
- Recruitment records

1. The Organisation will ensure that no recruitment record is held beyond the statutory period in which a claim arising from the recruitment process may be brought unless there is a clear business reason for exceeding this period
2. The Organisation will carefully consider what information contained on an application form is to be transferred to the employee's employment record and we will not retain information that has no bearing on the ongoing employment relationship
3. The Organisation may keep an unsuccessful applicant's data on file in case there are future employment opportunities for which they may be suited. We will ask for consent before we keep data for this purpose and such consent, if given, may be withdrawn at any time

#### Format and location

Most records will be held in electronic format. Please keep us informed if your personal information, such as your home address, changes during your working relationship with us. If you want to review your information that may be subject to change, please contact the HR team – [hr@sense-learning.com](mailto:hr@sense-learning.com)

#### Working Time Regulations 1998

These may include

- Contract hours
- Time sheets/invoices for opted out workers
- Health assessment records for Associates

#### Payroll and wage records

These may include

- Details on overtime
- Rate of pay
- Expenses
- Court orders
- Studentloan plan
- Bank details
- Motor and travel insurances
- Pension and auto-enrolment details

#### Maternity records – if employed

These may include

- Maternity payments
- Dates of maternity leave
- Period without maternity leave
- Maternity certificates showing the expected week of confinement

### **21.3.2 Retention Periods**

Type of employment record	Statutory or Code of Practice reference	Format and location	Retention period
Job applications and interview records of unsuccessful candidates	The Information Commissioner: Employment Practices Code	Paper or electronic	6 months after notifying unsuccessful candidates
Personnel and training records	N/A	Paper or electronic	While employment continues and up to six years after employment ceases
Written particulars of employment, contracts of employment, and changes to terms and conditions	N/A	Paper or electronic	While employment continues and up to six years after employment ceases
Working time opt-out forms	Working Time Regulations 1998 (WTR 1998)	Paper or electronic	Two years from the date on which they were entered into
Records to show compliance with the WTR 1998	WTR 1998	Paper or electronic	Two years after the relevant period
Annual leave records	N/A	Paper or electronic	A minimum of six years. Longer if leave can be carried over from year to year
Payroll and wage records	Finance Act 1998	Paper or electronic	Six years from the financial year end in which payments were made

### 21.3.3 Types of student data that we hold

#### Personal data

This may include

- Name
- Address
- Emergency contact details
- Previous school(s) attended
- Date of birth
- Prior educational attainment
- EHCP information

- Reports from other professionals
- School year
- Photos of students completing activities
- Notes of any safeguarding concerns
- Medical information including diagnoses and allergies

#### **21.3.4 Types of student's parents/legal guardians' data that we hold**

Personal data

This may include

- Name
- Address
- Phone number(s)
- Email address

## 22. Privacy Notice

### 22.1 SENse Learning Policy

The Organisation takes the security and privacy of your data seriously. We need to gather and use information or 'data' about you as part of our business and to manage our relationship with you. We intend to comply with our legal obligations under **the Data Protection Act 2018 (the '2018 Act')** and the **EU General Data Protection Regulation ('GDPR')** in respect of data privacy and security. We have a duty to notify you of the information contained in this policy.

The Organisation asks student's parents and Associates to provide personal information in order to help us provide adequate education and care to our students and to comply with our obligations under our contracts with the LA, Schools and Parents and employment law.

Parents, students, and Associates have the right at any time to ask SENse Learning Limited to provide details of, change or delete the Personal Data that it holds about themselves and/or their child. The table below shows the types of data we can delete and the types of data we are required to retain for regulatory purposes. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO). Full contact details including a helpline number can be found on the Information Commissioner's Office website ([www.ico.org.uk](http://www.ico.org.uk)). This website has further information on your rights and our obligations.

The Organisation has separate privacy notices in place in respect of job applicants, customers, suppliers and other categories of data subject. A copy of these can be obtained from the HR Team.

The Organisation will hold data in accordance with our Data Retention Policy. A copy of this can be obtained from the admin team. We will only hold data for as long as necessary for the purposes for which we collected it.

The Organisation is a '**data controller**' for the purposes of your personal data. This means that we determine the purpose and means of the processing of your personal data.

This policy explains how the organisation will hold and process your information. It explains your rights as a data subject. It also explains your obligations when obtaining, handling, processing, or storing personal data in the course of working for, or on behalf of, the organisation.

This policy does not form part of your contract of employment (or contract for services if relevant) and can be amended by the Company at any time. It is intended that this policy is fully compliant with the 2018 Act and the GDPR. If any conflict arises between those laws and this policy, the organisation intends to comply with the 2018 Act and the GDPR.

### 22.2 Data Protection Principles

Personal data must be processed in accordance with six 'Data Protection Principles'.

It must:

- Be processed fairly, lawfully and transparently
- Be collected and processed only for specified, explicit and legitimate purposes
- Be adequate, relevant and limited to what is necessary for the purposes for which it is processed

- Be accurate and kept up to date. Any inaccurate data must be deleted or rectified without delay
- Not be kept for longer than is necessary for the purposes for which it is processed
- Be processed securely

### 22.2.1 How we define personal data

**‘Personal data’** means information which relates to a living person who can be **identified** from that data (a **‘data subject’**) on its own, or when taken together with other information which is likely to come into our possession. It includes any expression of opinion about the person and an indication of the intentions of us or others, in respect of that person. It does not include anonymized data.

This policy applies to all personal data whether it is stored electronically, on paper or on other materials.

This personal data might be provided to us by you, or someone else (such as a former employer or your doctor), or it could be created by us. It could be provided or created during the recruitment process or during the contract of employment (or services) or after its termination. It could be created by your manager or other colleagues.

The Organisation will collect and use the following types of personal data about you:

- Recruitment information such as your application form and CV, references, qualifications and membership of any professional bodies and details of any pre-employment assessments
- Contact details and date of birth
- Emergency contact details
- Gender
- Marital status and family details
- Information about your contract of employment (or services) including start and end dates of employment, role and location, working hours, details of promotion, salary (including details of previous remuneration), pension, benefits and holiday entitlement
- Bank details and information in relation to your tax status including national insurance number
- Identification documents including passport and driving license and information in relation to your immigration status and right to work for us
- Information relating to disciplinary or grievance investigations and proceedings involving you (whether or not you were the main subject of those proceedings)
- Information relating to your performance and behaviour at work
- Training records
- Electronic information in relation to your use of IT systems/swipe cards/telephone systems
- Your images(whether captured on CCTV, by photograph or video)
- And any other category of personal data which we may notify you of from time to time

### 22.2.2 How we define special category personal data

**‘Special category personal data’** are types of personal data consisting of information as to:

- Your health



- Any criminal convictions and offences

We may hold and use any special category personal data in accordance with the law.

### **22.2.3 How we define processing**

**Processing** means any operation which is performed on personal data such as:

- Collection, recording, organisation, structuring or storage
- Adaption or alteration
- Retrieval, consultation or use
- Disclosure by transmission, dissemination or otherwise making available
- Alignment or combination
- Restriction, destruction or erasure

This includes processing personal data which forms a filing system and any automated processing.

### **22.2.4 How we will process your personal data**

The Organisation will process your personal data (including special category personal data) in accordance with our obligations under the 2018 Act.

The Organisation will use your personal data for:

- Performing the contract of employment (or services) between us
- Complying with any legal obligations
- If it is necessary for our legitimate interests (or for the legitimate interests of someone else). However, we can only do this if your interests and rights do not override ours (or theirs). You have the right to challenge our legitimate interests and require that we stop this processing. See details of your rights below

The Organisation can process your personal data for these purposes without your knowledge or consent. The Organisation will not use your personal data for an unrelated purpose without telling you about it and the legal basis that we intend to rely on for processing it.

If you choose not to provide us with certain personal data you should be aware that we may not be able to carry out certain parts of the contract between us. For example, if you do not provide us with your bank account details we may not be able to pay you. It might also stop us from complying with certain legal obligations and duties which we have such as to pay the right amount of tax to HMRC or to make reasonable adjustments in relation to any disability you may suffer from.

### **22.2.5 Examples of when we might process your personal data**

The Organisation has to process your personal data in various situations during your recruitment, employment, engagement and even following termination of your employment or engagement.

For example:

- To decide whether to employ (or engage) you
- To decide how much to pay you, and the other terms of your contract with us
- To check you have the legal right to work for us
- To carry out the contract between us including where relevant, training and reviewing your performance
- To decide whether to promote you
- To decide whether and how to manage your performance, absence or conduct
- To carry out a disciplinary or grievance investigation or procedure in relation to you or someone else

- To determine whether we need to make reasonable adjustments to your workplace or role because of your disability
- To monitor and protect the health and safety of you, our other staff, customers and third parties
- To pay you and provide pension and other benefits in accordance with the contract between us
- Paying tax and national insurance
- To provide a reference upon request from another employer
- Monitoring compliance by you, us and others with our policies and our contractual obligations
- To comply with employment law, immigration law, health and safety law, tax law and other laws which affect us
- To answer questions from insurers in respect of any insurance policies which relate to you
- Running our business and planning for the future
- The prevention and detection of fraud or other criminal offences
- To defend the Organisation in respect of any investigation or litigation and to comply with any court or tribunal orders for disclosure
- For any other reason which we may notify you of from time to time

The Organisation will only process special categories of your personal data (see above) in certain situations in accordance with the law. For example, we can do so if we have your explicit consent. If we asked for your consent to process a special category of personal data then we would explain the reasons for our request. You do not need to consent and can withdraw consent later if you choose by contacting Kaya Hadley (Business Development Manager).

The Organisation does not need your consent to process special categories of your personal data when we are processing it for the following purposes, which we may do:

- where it is necessary for carrying out rights and obligations under employment law;
- where it is necessary to protect your vital interests or those of another person where you/they are physically or legally incapable of giving consent;
- where you have made the data public;
- where processing is necessary for the establishment, exercise or defence of legal claims; and
- where processing is necessary for the purposes of occupational medicine or for the assessment of your working capacity

The Organisation does not take automated decisions about you using your personal data or use profiling in relation to you.

#### **22.2.6 Sharing your personal data**

Sometimes the Organisation might share your personal data with third-party service providers to carry out our obligations under our contract with you or for our legitimate interests.

The Organisation requires those companies to keep your personal data confidential and secure and to protect it in accordance with the law and our policies. They are only permitted to process your data for the lawful purpose for which it has been shared and in accordance with our instructions.

‘Third Party’ includes third-party service providers(including contractors and designated agents). The following activities are carried out by third-party providers: pensions, benefits provision and the payroll for Republic of Ireland).

The Organisation does not send your personal data outside the European Economic Area. If this changes you will be notified of this and the protections which are in place to protect the security of your data will be explained.

### **22.2.7 How should you process personal data for the Organisation?**

Everyone who works for, or on behalf of, the Organisation has some responsibility for ensuring data is collected, stored and handled appropriately, in line with this policy and the organisation's Data Security and Data Retention Policies.

The Organisation's Data Protection Officer, Kaya Hadley, Business Development Manager, is responsible for reviewing this policy and updating the organisation's data protection responsibilities and any risks in relation to the processing of data. You should direct any questions in relation to this policy or data protection to this person.

You should only access personal data covered by this policy if you need it for the work you do for, or on behalf of the organisation and only if you are authorised to do so. You should only use the data for the specified lawful purpose for which it was obtained.

You should not store any personal data informally.

You should keep personal data secure and not share it with unauthorised people.

You should regularly review and update personal data which you have to deal with for work. This includes telling us if your own contact details change.

You should not make unnecessary copies of personal data and should keep and dispose of any copies securely.

You should use strong passwords.

You should lock your computer screens when not at your desk.

Personal data should be encrypted before being transferred electronically to authorised external contacts. Please refer to the Use of IT and Equipment Policy for further information.

Consider anonymising data or using separate keys/codes so that the data subject cannot be identified.

Do not save personal data to your own personal computers or other devices.

Personal data should never be transferred outside the European Economic Area except in compliance with the law and authorisation of the Data Protection Officer.

You should lock drawers and filing cabinets. Do not leave paper with personal data lying about.

You should not take personal data away from Company's premises without authorisation from your line manager or Data Protection Officer.

Personal data should be shredded and disposed of securely when you have finished with it.

You should ask for help from our Data Protection Officer if you are unsure about data protection or if you notice any areas of data protection or security we can improve upon.

Any deliberate or negligent breach of this policy by you may result in disciplinary action being taken against you in accordance with our disciplinary procedure.

It is a criminal offence to conceal or destroy personal data which is part of a subject access request (see below). This conduct would also amount to gross misconduct under our disciplinary procedure, which

could result in your dismissal.

## **22.2.8 How to deal with data breaches**

The Organisation has robust measures in place to minimise and prevent data breaches from taking place. Should a breach of personal data occur (whether in respect of you or someone else) then you must immediately notify the Data Protection Officer. If the breach is likely to result in a risk to the rights and freedoms of individuals then the data protection officer must notify the Information Commissioner's Office of the breach within 72 hours.

If you are aware of a data breach you must contact the Data Protection Officer immediately and keep any evidence you have in relation to the breach.

## **22.2.9 Subject Access Requests**

Data subjects can make a 'subject access request' (SAR) to find out the information we hold about them. This request must be made in writing. If you receive such a request, you should immediately forward it to the Data Protection Officer who will coordinate a response.

If you would like to make a SAR in relation to your own personal data you should make this in writing [to kaya.hadley@sense-learning.com](mailto:kaya.hadley@sense-learning.com). We must respond within one month unless the request is complex or numerous in which case the period in which we must respond can be extended by a further two months.

There is no fee for making a SAR. However, if your request is manifestly unfounded or excessive we may charge a reasonable administrative fee or refuse to respond to your request.

## **22.2.10 Your data subject rights**

- You have the right to information about what personal data we process, how and on what basis as set out in this policy
- You have the right to access your own personal data by way of a subject access request (see above) • You can correct any inaccuracies in your personal data. To do so you should contact [hr@sense-learning.com](mailto:hr@sense-learning.com)
- You have the right to request that we erase your personal data where we were not entitled under the law to process it, or it is no longer necessary to process it for the purpose it was collected. To do so you should contact [hr@sense-learning.com](mailto:hr@sense-learning.com)
- You have the right to object to data processing where we are relying on a legitimate interest to do so and you think that your rights and interests outweigh our own and you wish us to stop
- You have the right to object if we process your personal data for the purposes of direct marketing
- You have the right to receive a copy of your personal data and to transfer your personal data to another data controller. We will not charge for this and will in most cases aim to do this within one month
- With some exceptions, you have the right not to be subjected to automated decision making
- You have the right to be notified of a data security breach concerning your personal data
- In most situations we will not rely on your consent as a lawful ground to process your data. If we do however request your consent to the processing of your personal data for a specific purpose, you have the right not to consent or to withdraw your consent later. To withdraw your consent you should contact [hr@sense-learning.com](mailto:hr@sense-learning.com)
- You have the right to complain to the Information Commissioner. You can do this by contacting the Information Commissioner's Office directly. Full contact details including a helpline number can be found on the Information Commissioner's Office website [www.ico.org.uk](http://www.ico.org.uk)

## 23. Emergency Procedure Policy

### 23.1 Introduction & Purpose

This policy is the Emergency Procedure Policy for SENse Learning which will be followed by all members of the Organisation and promoted by those in the position of leadership within the Organisation. This policy will be applied to all students and SENse Learning Associates.

### 23.2 Policy Principles & Values

- The Organisation wants to ensure all Associates and students are kept safe
- The Organisation understands that sometimes there are events outside of their control which may impact on student sessions
- The Organisation aims to run their normal service where possible and if unable to, offer a virtual provision in the meantime

### 23.3 Procedures

#### 23.3.1 Weather

- If a person feels the weather deems it to be unsafe of them to travel to work, then please let your Case Lead know as soon as possible
- At times such as heavy snow, a member of the Head Office Team will contact all Associates working on that day and say we are cancelling all sessions for today in a specific area. The Head Office or Case Leads will then inform all parents/carers. The Head Office will email again when it is deemed safe for Associates to travel again. As we can now offer a virtual learning package, we may utilise this if deemed appropriate for the student

#### 23.3.2 Terrorist Attack

- If a terrorist attack occurs in the close vicinity of an Associate or student, all sessions will be immediately cancelled until the Organisation can assure all parties will be safe to work. The Head Office will contact all people affected by the cancellation of sessions and inform them of the emergency plan. If a terrorist attack occurs in the close vicinity while an Associate and student is out in public, then Associates should follow all guidance of the emergency services. The main Associate working within the team should contact The Head Office as soon as possible (if safe to do so), the Head Office will contact parents or carers. As soon as it is safe to do so, you must return the student home to their parent or carer
- An incident form will need to be completed as soon as possible with a member of Head Office

#### 23.3.3 SENse Closure

- In the unlikely event that SENse Learning has to emergency close, all Associates and parents or carers will be contacted and contacted again once we reopen.

#### 23.3.4 High Risk Situation

- In the event of a violent or high-risk situation by members of the public, Associates need to call the police using 999. Associates also need to phone the Head Office who will advise of next steps
- The Organisation takes its duty of care very seriously for those who we work with and who work for us, and if any of our Associates feel threatened or unsafe then they need to leave the situation as soon as safely possible once they have established the safety of the student
- An incident form will need to be completed as soon as possible

### **23.3.5 Car accident or break down**

- If an Associate has a car accident with a student in the car, the emergency services will need to be called
- An accident/injury will need to be completed
- If the accident is not serious, but the car is not able to be driven, please contact a member of leadership and they will decide the next course of action. This may require a parent or carer to come and pick the student up
- If an Associates car breaks down and you are waiting for a breakdown service, please contact the parent or carer and advise that they may need to come and pick up the student if another Associate is not able to do a pickup and drop off service

### **23.3.6 Serious student/Associate accident/injury at work**

- In the event of a serious accident or injury occurring whilst working with a student, please call 999 immediately to gain the needed emergency service. The Head Office will also need to be informed as soon as possible
- An accident/injury form will need to be completed

### **23.3.7 Pandemic**

- In the event of another pandemic, like Covid-19, if deemed appropriate the Organisation would cease all face-to-face provision and close all SENse Learning Offices and move to online provision
- The Organisation aims to keep all Associates, students, parents and carers safe from harm
- The Organisation would follow all government guidance and, if necessary, seek professional advice on how best to keep the SENse Learning community safe
- The Organisation would aim to keep all lines of communication open, and answer any questions Associates, students, parents or carers may have, to the best of our ability
- The Organisation aims to act with the best interests of all its community in mind, and would only move back to face-to-face provision, when it has been deemed safe to do so and after carrying out thorough risk assessments

## 24 Sustainability Policy

### 24.1 Introduction & Purpose

This policy is the Sustainability Policy for SENse Learning which will be followed by all members of the Organisation and promoted by those in the position of leadership within the Organisation. This policy will be applied to all students and SENse Learning Associates.

### 24.2 Policy Principles & Values

- The Organisation aims to have environmental policies and best practice in relation to environmental practice
- The Organisation aims to adopt practices to minimise waste, maximise recycling and implement energy saving procedures
- Where appropriate, learning plans will promote environmental awareness and role model good practice
- The overall aim is to pursue a coherent, consistent, and achievable policy on sustainability issues throughout the Organisation. In doing so, the Organisation aims to educate students, staff, parents, and carers about the importance of good sustainability practices to the benefit of the planet and each one of us
- Sustainability is a process of ensuring the wise use of all resources within a framework in which environmental, social, and economic factors are integrated and balanced. The Organisation considers a definition for sustainability to be: *'to meet present need without compromising the ability of future generations to meet their own needs'*

### 24.3 Procedures

Office and administration practice:

- Recycling

Maintain respect for natural resources by teaching and encouraging the most efficient use of materials and by using renewable, recycled and recyclable products, where possible

Encourage Associates, students and parents to recycle as much waste as possible, in the Head Office and at home

- Paper

Recycled paper is preferable to normal paper. Paper is recycled when appropriate for photocopying and scrap paper

- Shredding

Confidential waste paper is shredded and not recycled at this present time

- Water

Water is conserved wherever possible

- Heating

All heaters are thermostatically controlled and switched off when not required

- Reducing our carbon

- The Organisation will lead from the top and champion carbon reduction
- The Organisation has and continues to establish our carbon baseline
- The Organisation is committed to driving down emissions, by encouraging employees and Associates to switch to electric cars and car sharing where appropriate

## 25 Social Value Policy

### 25.1 Introduction & Purpose

This policy is the Social Value policy for SENse Learning which will be followed by all members of the Organisation and promoted by those in the position of leadership within the Organisation. This policy will be applied to all students and SENse Learning Associates.

### 25.2 Policy Principles & Values

- The Organisation is committed to the delivery of social value through all the activities it undertakes • As an Alternative Education Provider, the primary ambition is to promote greater outcomes for communities and society
- The Public Services (Social Value) Act 2021 does not define what is meant by social value, therefore, the Organisation's definition of social value is: *'a process whereby organisations meet their needs for goods, services and utilities in a way that achieves value for money on a whole life basis in terms of generating benefits not only to the organisation, but also to society and the economy, whilst minimising damage to the environment'*
- The vision is to sustain and multiply this contribution as the Organisation grows, and also to continuously expand the collaboration with other organisations – both public and private – to help foster a holistic approach to delivering social value in the wider community

### 25.3 Procedures

- Jobs
  - SENse Learning currently has a mix of self-employed contractors and some employees of whom are permanent full-time or part-time employees. The vision is to establish the Organisation as a secure, reliable employer and contractor that is accessible to suitably qualified individuals and supportive of the continued professional development of the existing staff base
  - The Organisation aims to continue contracting and employing more local people whether that be permanent employees or contracted staff
  - The Organisation aims to provide more opportunities for disadvantaged people
  - The Organisation aims to continue providing continuous professional development to both permanent employees and contracted staff
- Growth
  - The vision is to establish and maintain a responsible, sustainable, local supply chain and in doing so multiply the social value delivered locally, by:
    - When a requirement for goods or services is identified, it follows a rigorous, ethical supplier selection process. This process includes due diligence and research into suppliers track record and policies – including their social value strategy or equivalent
    - Through the supplier on-boarding process, the Organisation seeks to identify opportunities to leverage efficiencies and reduce waste across the business, pursuing a holistic approach to service delivery
    - Pay suppliers as per contract terms, and critically on time to avoid contributing to cash flow issues that may impact staff
- Social
  - This refers to activities that contribute to create healthier and more resilient individuals, and therefore more resilient communities, equipping vulnerable individuals to participate as fully as possible in society. This goes to the core of the Organisations mission as a provider of alternative education
  - The Organisation offers a flexible and bespoke curriculum to children and young people who are out of school or struggling to attend. The Organisation puts relationship building, interest led learning and social, emotional and academic focusses at the forefront of what it does



- Based on this, the Organisation aims to equip children and young people with complex additional needs with the tools and practical knowledge that will enable them to navigate the world around them and achieve increased independence
- The Organisation has had a high success rate in their students engaging with more formal education or employment

## 26 Modern Slavery Statement

### 26.1 Introduction & Purpose

This statement is the Modern Slavery Statement for SENse Learning, which will be followed and promoted by all members of the Organisation. This statement will be applied to all Associates and every supplier in our supply chain.

### 26.2 Principles & Values

SENse Learning is committed to improving our practices and procedures to combat slavery and human trafficking activities, we will do this by taking steps to ensure, as far as we are able to, that our supply chains are free from slavery and human trafficking

### 26.3 Procedures

SENse Learning was established in 2019, and has since provided hundreds of children and young people with bespoke and holistic packages of education that supports them to re-engage with more formal education at a pace that works for them.

SENse Learning has a wide pool of Associates, employees and suppliers who we utilise in our services. - Supply chains that are utilised by SENse Learning currently include, furniture and equipment, ICT hardware, agencies, catering and educational supplies. SENse Learning has considered which of its supply chains could be at a high risk of slavery or human trafficking.

### Due Diligence

As part of our efforts to identify the risk of slavery and human trafficking within our supply chains, we operate a risk-based approach to due diligence with new suppliers. This approach can include:

- Seeking out general information on any new supplier company and understanding their corporate structure
- SENse Learning's Finance Director will assess supplier financial stability by reviewing recent and previous company accounts
- Ensuring suppliers are able to provide adequate assurances of their own commitment to preventing modern slavery and human trafficking
- Ensuring suppliers have the relevant health and safety policies and procedures

### Monitoring our effectiveness in combating slavery and human trafficking

SENse Learning will continue to monitor our effectiveness by responding immediately and reviewing any reports from employees or law enforcement agencies that indicate that a modern slavery or human trafficking practice has been identified within our supply chain

SENse Learning is committed to ensuring our employees feel empowered and knowledgeable about modern slavery and human trafficking, we will continue to monitor our employees awareness of this and provide training where appropriate

SENse Learning will continue to raise awareness of modern slavery and human trafficking across the organisation more broadly.

## Glossary

- **ADHD** – ADHD stands for Attention Deficit and Hyperactivity Disorder and covers a range of behaviour aspects including poor concentration, hyperactivity and learning difficulties
- **Associate** – Associate refers to any staff member contracted by SENse Learning including volunteers
- **CL** – CL stands for Case Lead. A Case Lead manages the overall package of education for our students
- **CPI** – CPI stands for Crisis Prevention Institute. This is the training programme that teaches management and intervention techniques to help a person cope with escalating behaviour in a professional and safe manner.
- **DSL** – DSL stands for Designated Safeguarding Lead. This person has the authority and status within SENse Learning to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other Associates
- **EHCP** – EHCP stands for Education, Health and Care Plan. It outlines any special educational needs a child has, and the provision a local authority must put in place
- **LA** – LA stands for Local Authority, the Local Authority is responsible for all the public services including education in a particular area
- **LADO** – LADO stands for Local Authority Designated Officer, who works with Children's Services and provides advice to SENse Learning
- **EM** – EM stands for Education Mentor, they support the learning of the students at SENse Learning
- **NCFE** – NCFE is a Functional Skills awarding body and provider of educational services in the UK
- **PDA** – PDA stands for Pathological Demand Avoidance; it was first documented in the 1980s and is characterised by an extreme avoidance of everyday demands and an anxiety-driven need to be in control
- **The WILL Framework** – is SENse Learning's curriculum framework and stands for Wellbeing, Interaction, Learning and Life skills