



Board of Governors of the City of London School for Girls

Date: MONDAY, 7 DECEMBER 2020
Time: 11.00 am
Venue: VIRTUAL PUBLIC MEETING (ACCESSIBLE REMOTELY)

SUPPLEMENTARY AGENDA – APPENDICES PACK

9. POLICIES FOR APPROVAL

Report of the Headmistress of the City of London School for Girls.

The policies for approval comprise:

- Appendix 1 – Accessibility Plan
- Appendix 2 - Attendance Policy
- Appendix 3 - Behaviour Policy
- Appendix 4 - Complaints Policy
- Appendix 5 - Exclusions Policy
- Appendix 6 - Physical Contact and Restraint Policy
- Appendix 7 - Pupil Equal Opportunities Policy
- Appendix 8 - Recruitment Policy
- Appendix 9 - Risk Assessment Guidance
- Appendix 10 - Security Access Control Workplace Safety and Lone Working Policy

For Decision
(Pages 1 - 94)

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Town Clerk and Chief Executive

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CITY OF LONDON SCHOOL FOR GIRLS ACCESSIBILITY PLAN

Policy last reviewed by:	Kathleen O'Connor, Devas Palokkaran, Mark Smith, Jane Elliott-Waine
Date policy last reviewed:	November 2020
Approved by:	
Date approved:	

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3.	Definition of disability
4.	Admission-planning for disability
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	Accessibility Plan 2017-2022

This policy should be read in conjunction with:

- SEND Policy
- Pupil Mental Health Policy
- Anti-Bullying Policy
- Educational Visits Policy
- Management of Health & Safety in Schools Policy
- School Nurse's Guidelines
- City of London Corporation policies relating to Equal Opportunities and Employment
- School Development Plan

1. Principles

1.1 The purpose of this plan is to:

- ensure that pupils with a disability are not discriminated against in the admissions and provision of education and associated services at City of London School for Girls (CLSG);
- take reasonable steps to avoid putting staff and parents with a disability at a disadvantage;
- provide all pupils with a broad and balanced curriculum, which is differentiated and adjusted to meet the needs of individual pupils;
- always seek to make improvements to the school's facilities to increase the extent to which students with a disability can take advantage of the curriculum and associated services.

2. Introduction

2.1 This policy has been written with government policy and legislation in mind. Relevant legislation and guidance taken into consideration include:

- The Disability Discrimination Act 1995
- The Education Act 1996
- [The Special Educational Needs and/or Disability \(SEND\) Code of Practice](#) (September 2014)
- Accessible Schools: Summary Guidance DFES/0462/2002
- The Disability Rights Commission's Code of Practice for Schools 2002
- The Education (Independent Schools Standards) (England) Regulations 2003 as subsequently amended (S12003/1910)
- The Equality Act 2010

3. Definition of Disability

3.1 The school will treat each case in which a pupil or adult considers that they have a disability individually and with sensitivity.

3.2 Under the terms of the Equality Act, a person has a disability if he or she has a physical or mental impairment that has a substantial and long-term adverse effect on his or her ability to carry out normal day activities.

4. Admissions-planning for disability

4.1 CLSG is an academically selective, independent, school. The school endeavours to educate and develop all its pupils to the best of their ability and potential. It is the school's aim that all its pupils, regardless of any need and/or disability will have a complete, happy and successful school career and emerge a confident, well-educated and well-rounded adult.

- 4.2 The school request parents to make a declaration regarding disabilities and learning difficulties in respect of a prospective pupil when registering for entry (Registration Form) and when accepting the offer of a place (Acceptance Form). The acceptance form and entrance procedures give the school adequate details of the nature and effect of any disability so as to enable it to do its best to make reasonable adjustments. In assessing any pupil or prospective pupil, the school may seek advice and/or assessments as it regards as appropriate in order to best support the pupil. The school will be sensitive to any requests for confidentiality.
- 4.3 The school's policy is also to ensure that no visitor, prospective student or parent are put at a substantial disadvantage because of a disability and to ensure that their needs are met, in accordance with its obligation to make reasonable adjustments.

5. Areas of focus of plan

This Accessibility Plan has three areas of focus:

1. Increasing the extent to which pupils with a disability can access the school curriculum.
2. Improving access to the physical environment for pupils with disabilities (this includes improvements to the physical environment of the school and physical aids to access education)
3. Improving the delivery of written information to pupils with a disability.

5.1 Access to the curriculum

A whole school approach to the provision of SEND raises the capability of all school staff to assist in the teaching of pupils with SEND.

When planning, teachers need to set high expectations and provide opportunities for all pupils to succeed. Lessons need to be planned so that all pupils can take part fully and effectively. Such an environment includes valuing all contributions, ensuring the feeling of a safe and secure learning environment for pupils, encouraging independence amongst pupils and using differentiated teaching approaches and resources, as appropriate. Teachers must take into account potential barriers to learning and make provision where necessary to support individuals or groups of pupils

Curriculum planning and assessment for pupils with SEND; must take account of the type and extent of the difficulty experienced by the pupil.

Examples of effective strategies can be found in “Whole school teaching strategies for SEND” and in ‘Personalised Learning Plans’ for individual students.

City of London School for Girls’ SEND policy describes the work of the Learning Support Department. It covers all areas of SEND as per the SEND Code of Practice: Cognition and Learning, Communication & Interaction, Social, Emotional & Mental Health, Sensory and/or Physical, and Other Difficulties. Please refer to this policy for further advice and guidance on the school’s provision and support of students with SEND

Wider Curriculum

The school provides a wide range of extra-curricular clubs, activities and visits. Teachers must take into account, plan for and support the individual needs of pupils who attend clubs and/or school trips. Where appropriate, the school makes reasonable adjustments to meet the needs of pupil during activities and visits.

5.2 Physical Accessibility

At present, our physical facilities for the people with disability are subject to limitations set out below, but we will do all that is reasonable to ensure that the school's culture, policies and procedures are made accessible to pupils and parents who have disabilities. We will fulfil our legal and moral responsibilities in order to accommodate the needs of applicants, pupils and parents who have disabilities which, after reasonable adjustments, we can cater for adequately.

School Site

The school occupies a compact Grade II listed site in a mixed use area. It consists of three separate but connected buildings with up to five levels, a platform lift from G floor to the Prep School, one passenger lift and one goods lift which may be used for passengers if necessary. In general, there are fixed classrooms for each subject to allow as far as possible for all the facilities for one subject to be in one place. This requires pupils to go from classroom to classroom, often up or down internal and external steps or stairs. However, there is a lift, which can be used as required, for pupils with reduced mobility to access all areas of the school with the exception of the swimming pool and the all-weather playing surface.

There is no access for wheelchair users to the swimming pool due to unreasonable cost, lack of space and an intricate underfloor heating system. It was deemed ‘beyond reasonable adjustments’ to insert a lift for very limited usage. There is no access to the all-weather playing surface without mounting or descending internal and external steps. This is due to the practical difficulty of installing a ramp of increased length and the structural implications to the building if the step down was tampered with.

The dance studio has a fire exit at the rear south side with a refuge point for wheelchair users.

Other Adjustments

Car parking: the school has permission to allow parents of pupils, parents or visitors with impaired physical difficulty to bring cars to the reception entrance on St Giles Terrace for the purposes of dropping-off and collection.

Lifts: most powered wheelchairs can fit in the passenger lift from G floor to D floor of the main building but the goods lift can be used if necessary. Powered wheelchairs can fit in the ramp lift between the ground floor and the Prep School.

Fire Precautions: there is an audible fire alarm in all areas of the school. There is a refuge area for wheelchair users on each level of the main building. All Evacuation Chairs are regularly checked. The areas are marked with appropriate signage. The lifts should not be used in an emergency unless instructed to do so by the Fire Brigade. Members of staff will supervise the evacuation of the building. Individual evacuation plans will be drawn up as required.

Specialist chairs, desks and some equipment (e.g. writing slopes) can be provided at short notice in all rooms for pupils. Under new guidelines the school can be expected to make the reasonable adjustments necessary to accommodate needs of any individual affected by a disability.

Wheelchair users can access all rooms, subject to the access restrictions described and subject to the physical limits of the building. Staff will move furniture to improve access where possible.

Wheelchair access is available at the main reception desk. Wheelchair matting has been installed in the main lobby

Provision is made for pupils who require access arrangements. Examples of access arrangements include extra time, word processors, prompts, alternative rooming and rest breaks,

Reasonable adjustments to support those with visual impairments are in place. Examples include: i.e. large print documents, seating, protective eye wear. The school maintenance plan will take into consideration the need for a suitable colour scheme for installing window blinds to benefit pupils with visual impairment.

Arrangements can be made for assistance dogs in school.

A hearing loop is installed in the Main Hall and there is adequate signage. If a pupil required a portable hearing device such a system would be provided.

Individual care plans can be made for all pupils in the school who have a sensory

impairment, visual impairment and/or hearing impairment.

Information Technology

The School Intranet Portal: The School Portal is currently under review; enhanced accessibility will form a part of that review.

The School Website: the website does have a high visibility option however we encourage the use of web browsers such as Chrome, Safari, Firefox, Internet Explorer and Microsoft Edge as they have some excellent accessibility tools built in

The School System: Windows 10 Operating system and Office 2016/365

Current Accessibility features

- Windows Narrator – Read Text Aloud
- Windows Magnifier – Increase Size of Text and Images
- On Screen Keyboard
- Speech Recognition or Dictation
- Closed Captions
- Mouse Keys – Makes mouse easier to use
- Visual Accessibility Options – High Contrast, Colour, Screen Resolution

All pupils have access to IT to support their learning in the classroom. Some pupils will require additional hardware and software to meet their needs. Examples include physical keyboard for typing, reading pen, and/software such as speech to text software.

5.3 Improving the delivery of written information to pupils with a disability

This will include planning to make written information that is normally provided by the school to its pupils available to disabled pupils and parents. Examples might include handouts, textbooks and information about school events. The information should take account of pupils' disabilities and pupils' and parents' preferred formats and be made available within a reasonable timeframe.

Action plans relating to the three areas can be found in appendix 1.

Action Plan: 1. Improving Curriculum Access

<u>Development area</u>	<u>Strategy and Further Action Required</u>	<u>By whom</u>	Time Scale/action taken & outcomes
Developing effective interventions	SENDCo to monitor and devise relevant interventions and their success/impact on progress. Mechanism for reporting of suspected SEND issues to be included on the online half term review form	SENDCo	2019 achieved A range of personalised interventions in place to meet the needs of pupils. 2020 Onwards Achievement Target: Policies; plans and handbooks reflect current legislation and consistently inform access to the curriculum and its deliver.
To map provision of study skills support available to all students	Creation of a study skills working party led by the Deputy Head Academic party to co-ordinate and plan the provision of study skills and to use online resources to deliver some of the material.	Deputy Head Academic, Librarian (liaise with Learning Support Department)	2017-2019 Achieved. Study skills portal page now live for all year groups to access. Overseen by the librarian. 2020 Onwards Achievement Target: Ensure resources are kept accurate and up-to-date and that clear and concise revision guides are produced and are readily accessible.
Better in classroom support for SEND pupils through staff training	Learning Support department to deliver staff training to teaching staff on INSET days in December 2017, January 2018 and April 2018 on: pupils on the ASD spectrum, dyslexia, ADHD, complex medical needs. SEND department to observe girls in lessons to inform better strategies and interventions.	Learning Support Dept. & all staff	2019 achieved Ongoing CPD through year 2019/2020 Onwards Achievement Target: Ensure whole school SEND CPD is embedded into whole school CPD programme. Ensure members of the Learning Support Department have relevant training/access to external specialist professionals to meet the needs of those with a disability, as required.

Action Plan: 1. Improving Curriculum Access

<u>Development area</u>	<u>Strategy and Further Action Required</u>	<u>By whom</u>	<u>Time Scale/action taken & outcomes</u>
Improve curriculum planning in light of previous staff training.	As part of whole school CPD programme, departments to work more closely with SEND department to discuss and plan for the needs of pupils with SEND.	Learning Support Department, HODs, teaching staff	2019 achieved Regular meetings with departments throughout year. CEG groups also enabled greater communication and collaboration between Learning Support and subject departments 2019/2020 Onwards Achievement Target: Continue to ensure effective communication between departments and Learning Support Dept. to support the needs of pupils.
Specific needs of pupils and staff are matched against available accommodations in order to enable and optimise access to the curriculum.	Senior leaders & Heads of Year (HOY) are aware of requirements or accommodations required for pupils or staff with specific needs.	Learning Support Department, Deputy Head Academic, Deputy Head Pastoral and pastoral leads.	2020 Onwards Achievement Target: Staff and pupils with specific needs are able to either deliver or access the curriculum without difficulty.
To use the school's tracking system to monitor and evaluate the progress of pupils who have identified need. To identify those who may need further support	Refine the recording of monitoring grids. Identify pupils who appear to be underperforming; discuss support with HOYs to determine whether further support is required.	Learning Support Department, HOYs, Deputy Head – Pastoral	2020 Onwards Achievement Target: Tracking continues to be integrated into monitoring grids to support students and help identify needs. Regular meetings between Heads of Year, Heads of Section and Pastoral Team at key tracking and review points to identify needs and support progress of pupils with needs.
Access arrangements are in place for pupils with specific needs in order to ensure that any disadvantage is removed.	Additional administrative support is required to make applications and collect evidence to ensure compliance with exam board regulations (JCQ, CIE, ACT, SATS and Cambridge Assessment) and plan the logistics of both internal and external examinations. Careful monitoring of screening/baseline data and pupil progress will support with identifying pupils who may require access arrangements to remove a disadvantage. Head of Learning Support and Head of Examinations (or Admissions Teams for entrance exams) liaise to plan of and implement access arrangements.	Head of Learning Support, Head of Examinations, Exams and Learning Support administrators.	2020 Ongoing Achievement Target Baseline and screening assessments completed and analysed for new pupils. Required access arrangements implemented in admissions and mock examinations. Invigilators to be trained in implementing access arrangements Applications for access arrangements and collection of relevant evidence of need required before exam board deadlines.

Action Plan: 2. Improving Physical Access

Ref	Question	Recommendations	Time Scale	Priority	Cost	Date Completed	Responsibility	
							COL	CLSG
1	Access to proposed new Prep School	Refurbishment of this wing has been put on hold until a re-evaluation of the schools needs are undertaken	2021/22	High		No longer relevant	Joint	Joint
2	Additional space for SEND department to support students.	In September 2017, the SEND department expanded to two full time and one part-time teacher. Support to students has increased; however, there is a need to ensure that additional space to deliver this support is available.	2018	High	Through timetable			CLSG

Development area	Strategy and Further Action Required	By Whom	Time Scale/action taken & outcomes
Access to proposed new Prep School	To ensure that the plans for the new proposed new Prep School have accessibility issues fully planned in	COL, Senior Management Team	2019 No longer applicable 2020 Onwards Achievement Target: inclusion' which will inform decisions regarding choice of lighting, décor, acoustics, ergonomics and mobility. To underpin future expansion with an ethos of 'designing for disability and inclusion' which will inform decisions regarding choice of lighting, décor, acoustics, ergonomics and mobility.
Additional space for SEND department to support students	In September 2017, the SEND department expanded to two full time and one part-time teacher. Support to students has increased, however there is a need to ensure that additional space to deliver this support is available.	Site Manager, Senior Management Team, Learning Support Department.	2019 – ongoing. A lack of physical space makes this target challenging. 2020 Onwards Achievement Target: A quiet space for students with relevant needs to access is required (for example, those with Autism who need a quiet sanctuary during the day). Appropriate space for staff members of the Learning Support Department to support students' needs to be identified. Location at present is often extremely noisy as it is located beside music practise rooms. This means that interventions and specialist assessments cannot always be carried out. At present the Learning Support Department has access to the counsellor's room every Friday which helps increase capacity when the department's part-time staff member is working, however, this is not guaranteed for 2020.
To underpin the school's building and refurbishment plans with an ethos of 'designing for disability and inclusion' which will inform decisions regarding choice of lighting, décor, acoustics, ergonomics and mobility.	Monitor refurbishment plans against legal requirements under the Equality Act (2010), Building Regulations (2000), DDA (1995), Health & Safety Work Act (1974). Seek advice from CoL as appropriate.	Site Manager, SMT, and Head of Learning Support.	2020 Onwards Achievement Target: All reasonable adjustments are incorporated into buildings, fixtures and fittings on a rolling programme and accommodate the needs of pupils and visitors with physical and sensory disabilities.
To accommodate cultural and/or religious practices as and when the need arises.	Establish a designated area for ad hoc religious or spiritual observance.	Site Manager, Senior Management Team.	2020 Onwards Achievement Target: Ensure a number of suitable rooms have been identified and can be made available if requested in advance.

Action Plan : 3. Improving Delivery of Written Information

Development Area	Development Area	By Whom	Timescale/Action Taken and Outcomes
Availability of written material in alternative formats when specifically requested	<p>The school will make itself aware of the services available for converting written information into alternative formats e.g. large print, braille etc. as required.</p> <p>Provide suitably enlarged, clear print and use matt laminates for pupils with a visual impairment as required</p>	Learning Support Department	<p>2019 achieved Pupils who required formatted texts received them in correct format.</p> <p>2020 Onwards Achievement Target Continue to ensure material is available as and when needed.</p>
Improving clarity of documents related to Data Protection	Review and updated Parent Contract, Privacy Notices and other policies with significant data protection implications to ensure clarity of expression and age related suitability.	CoL & Bursar	Outcome required
Increase the accessibility of information delivered in writing in class.	<p>Purchase of software and equipment that can support those with difficulties with accessing texts, as appropriate.</p> <p>Training and information provided for staff and pupils regarding accessibility features available on school computers and online learning tools subscribed to by the school.</p>	Head of Learning Support, Deputy Head -Academic, ICT Department, ICT coordinator	2020 Onwards Achievement Target:

The Bursar will be responsible for implementation of the plan and will report annually to the Board at the December meeting.



CITY OF LONDON SCHOOL FOR GIRLS

ATTENDANCE POLICY

Policy last reviewed by:	Susannah Gilham
Date policy last reviewed:	November 2020
Approved by:	
Date approved:	

This policy should be read in conjunction with:

Related School and City of London Corporation Policies:
Missing Child Policy
SEND Policy

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1. Overview

Pupil attendance at City of London School for Girls is generally excellent. Many pupils will go for an entire year without missing any school and most pupils and their parents will usually keep any absence to a minimum. In cases of more prolonged absence the role of the school is usually to reassure families that such absence will not be detrimental to their child's progress. The attendance policy should therefore be read with this background in mind and Heads of Year will use their discretion when applying it.

Procedures to be followed in case of absence:

- Tutors will only mark as present pupils who are actually in the room at registration.
- The attendance officer will amend the register to record the presence of those who are late or who have been attending a school activity such as music.
- Parents are asked to notify the attendance officer when their child is absent or the Prep staffroom as appropriate. Any absences which have not been reported are first checked to see if the student is in school. If they are not, the attendance officer will ring home to find out the reason for absence.
- The attendance officer will alert the relevant pastoral staff if a child is unaccounted for, i.e. because the parents cannot be contacted. If further attempts to contact the parents are unsuccessful, friends will be asked if they know where the child is. Our primary concern in these cases is that a child has left for school and has failed to arrive.

All absences must be followed up to ensure that we have an explanation and the correct code should be entered in the register by attendance officer or tutor:

C	Leave of absence authorised by the school
D	Receiving education at another establishment
E	Excluded but no alternative provision made
H	Family holiday authorised by the school
I	Illness - not medical or dental appointments
J	At an interview
L	Late arrival before the register has closed
M	Medical or dental appointments
N	Reason for absence not yet provided
O	Absent from school without authorisation
P	Participating in supervised sporting activity
R	Religious observance
S	Study leave
U	Arrived in school after registration
V	Educational visit or trip
W	Work experience
X	Not attending due to coronavirus (Covid 19)
Y	Enforced closure

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Most absences are for no more than three days. After this, tutors will contact parents to discuss how long the absence is likely to be and to give assistance about catching up missed work. Absences of more than a week should be referred to the Head of Year.

If a pupil is absent for two weeks, we would expect to receive a doctor's note confirming the reason for absence. In some cases of a well-documented, chronic medical condition, it might be felt that this would be unnecessarily intrusive. Heads of Year will exercise discretion.

Every month Heads of Year will be emailed an overview of the attendance in their year group. Any pupil whose attendance falls below 85% will be carefully looked at to explore the reasons behind the absence. For those pupils where there are no reasonable explanations for low attendance and where there is cause for concern, a conversation with parents will be arranged by the Head of Year to discuss the absences in more detail.

The Deputy Head Pastoral meets with the Education Welfare Officer once every half term to monitor attendance and keeps a list of those with attendance below 90%.

If a pupil repeatedly appears on the list, parents will be called in and if there are significant grounds, a referral to the relevant external agency will be considered, such as the Education Welfare Officer, CAMHS or Children's Social Services.

Where unauthorised absence is suspected, the Head of Year will immediately be informed by the tutor. Most of such absence at CLSG relates to parents taking their children on holidays which overlap our terms. In such cases the Deputy Head Pastoral or the Head of Section will write to the parents but no further action will be taken provided the absence is no more than five days and it is not a repeat offence. If either of these is the case, referral to the appropriate LEA will be considered and will always be made if the absence is ten days or more.

Where unauthorised absence occurs which does not appear to be a family holiday, this will trigger safeguarding concerns and the procedures outlined in the Child Protection Policy Annex D Children Missing from Education will be followed.

2. Procedures for sending pupils home

ONLY the school nurse or a first aider should take the decision to send a pupil home. In exceptional circumstances a Head of Section may take this decision if a pupil is too unwell to participate in lessons and the school nurse or a first aider is not readily available. Parents will be informed of this decision.

Parents must **always** be contacted and spoken to directly by the member of staff to inform them that their child is being sent home and to give them the opportunity to collect them if appropriate. At Sixth Form level, if parents cannot be contacted, they will be emailed to let them know of our action.

When pupils are being sent home, the relevant member of staff must email Reception to let them know. The pupil may not sign out without this permission.

The member of staff who sends the pupil home should email the tutor so the correct code can be entered in the register.

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3. Punctuality

The school day begins at registration. All pupils should be in their form rooms by 8.40am. Any pupil who arrives later than this time will be recorded as late, unless she has a good reason. Latecomers must report to reception on arrival and sign a late slip.

Any pupil who accumulates 4 lates in a term will be put onto early morning report (EMR) and will be required to report to the Deputy Head (Pastoral) at 8.30am for one week. Incurring 8 lates in a term will result in a further week of EMR plus detention. Any pupil who accumulates 12 lates in a term will be considered for escalation which requires reporting to the Headmistress at 8.30am for two weeks on early morning report (EMR).

4. Summary of procedures for dealing with requests for absence for reasons other than illness, medical treatment or religious observance

The school's policy is to discourage parents from seeking leave of absence for pupils during term time except for reasons of illness, medical treatment or religious observance.

Parents are informed of our policy on absence from school for reasons other than illness, medical treatment or religious observance in the Parents' Handbook and they are regularly reminded of our policy and the requirements of the DFES in end of term mailings.

Parents must always ask for leave of absence in advance and should not present the school with a fait accompli or seek permission for an absence retrospectively. If they do so, we are obliged to record the girl's absence as unauthorised.

From time to time, parents write to Form Tutors asking for their daughter's to be allowed out of school for a reason other than illness, medical treatment or religious observance.

When this occurs the Form Tutor should pass the letter to the Head of Section to deal with.

If the request is for an absence of more than one day in duration, or if the reason for the request seems questionable, the Head of Section will pass the letter on to the Deputy Head (Pastoral) to deal with.

For absences of more than three days in length, or if there are other circumstances which cause concern, such as a pattern of absence from school, the Deputy Head Pastoral will pass the letter on to the Headmistress to deal with or raise with the Education Welfare Officer.

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CITY OF LONDON SCHOOL FOR GIRLS

BEHAVIOUR POLICY

Policy last reviewed by:	Susannah Gilham, Caroline Wright
Date policy last reviewed	November 2020
Approved by:	
Date approved:	

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This policy should be read in conjunction with:

Related School and City of London Corporation Policies:

- Admissions Policy
- Anti-Bullying Policy
- City of London Equal Opportunities Policy
- Complaints Procedure
- Exclusions Policy
- Physical Contact and Restraint Policy
- Pupil Searches and Confiscation of Pupils' Belongings Policy
- Safeguarding & Child Protection Policy
- Safeguarding & Child Protection Policy Annex E
- SEND Policy

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- Curriculum Policy

Covid-19 Addendum to the Behaviour Policy

In addition to the main school rules, the Behaviour Policy and the Anti-Bullying Policy, there will be some new disciplinary regulations related to protecting pupils and staff whilst COVID-19 remains a threat to health. These regulations will cover transgressions or negative behaviour in relation to the following areas:

- Any potentially harmful behaviour in terms of spreading the virus or, indeed, any illness, such as deliberately coughing on people or surfaces, or spitting at people or on surfaces.
- Deliberately not complying with social distancing rules.
- Face coverings – in terms of using them properly and showing respect for the choices of others.
- Playing one's part in cleaning surfaces, as directed.
- Personal hygiene in terms of hand sanitising or washing.
- The carrying of a personalised identity card to access reception (Years 9 – 13).
- Ensuring the correct equipment is brought to lessons, including a fully-charged iPad.
- Conforming to uniform expectations
- Any repeated or deliberate behaviour which negatively impacts the smooth running of the school during these difficult times.

These additional rules will be explained to pupils when they return/arrive in September. The likely sanctions will be explained. We will encourage pupils to adopt these norms and remind them to do so as they adjust to school life under our new circumstances. More serious transgressions (those that could potentially harm others) will attract more serious sanctions.

1. Introduction

- 1.1 City of London School for Girls aims to encourage pupils to adopt the highest standards of behaviour, principles and moral standards and to respect the ethos of the school. Promoting the emotional wellbeing of all of our pupils is key to their development.
- 1.2 The school aims to teach trust and mutual respect for everyone. It believes that good relations, good manners and a secure learning environment play a crucial part in the development of intellectually curious pupils, who are motivated to become life-long learners.
- 1.3 City of London School for Girls is an inclusive community. We welcome pupils from a wide variety of cultural and social backgrounds, faiths and needs. We treat everyone as an

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individual and aim to develop the whole person equipped to take her place in the modern world.

2. Involvement of Parents

- 2.2 Parents and guardians who accept a place for their child at City of London School for Girls undertake to uphold the school's policies and regulations, including this policy when they sign the Parent Contract.
- 2.3 They agree to support the school's values in matters such as attendance and punctuality, behaviour, uniform, dress and appearance, standards of academic work, extra-curricular activities and homework.

3. Teaching and Learning

- 3.1 The school aims to raise the aspirations of all its pupils and to help them to appreciate that there are no barriers to their potential achievements both inside and outside the classroom.
- 3.2 Pupils are encouraged to take responsibility for their own learning. We celebrate success, emphasise the positive and deal with the negative in a sensitive and tactful way.
- 3.3 The school's teaching staff offer every child a high level of individual attention together with consistent and helpful advice. In return, the school expects every pupil to co-operate and to work hard.

4. Code of Conduct

- 4.1 The Pupil Code of Conduct is published in full on the portal in the Parents' Handbook. The school expects the highest values and standards of behaviour inside and outside the classroom, as well as outside the school and in any written or electronic communication concerning the school.
- 4.2 We expect pupils to treat staff and each other with consideration and good manners and to respond positively to the opportunities and demands of school life. They should follow the school's rules and regulations and understand what is expected of them and why sanctions may be imposed for inconsiderate behaviour.
- 4.3 Everyone has a right to feel secure and to be treated with respect. Harassment and bullying will not be tolerated. Our anti-bullying policy is published on the portal. The

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school is strongly committed to promoting equal opportunities for all, regardless of race, gender, sexual orientation, disability or learning difficulty.

- 4.4 We expect pupils to be ready to learn and to participate in school activities. They should attend school and lessons punctually and follow the school's attendance policy. They should care for the buildings, equipment and furniture. The school expects pupils to behave at all times in a manner that reflects the best interests of the whole community.
- 4.5 The school's rules and regulations are designed to encourage positive behaviour and self-discipline. Sanctions are imposed fairly, and, where appropriate, after due investigative action has taken place. The use of force is never used as a punishment in accordance with our Child Protection Policy.
- 4.6 The school's Exclusions Policy is available on the portal.

5. Rewards (for Years 7 – 11)

We aim to reward a range of behaviours that supports pupils' personal development and achievements.

5.1 Merits

Merits are awarded to pupils in Years 3 to 11 in recognition of Effort, Achievement and Contribution, examples might include:

- An excellent piece of work.
- Consistent work of a high standard for that particular student (e.g. 3 excellent pieces of homework).
- Consistent and sustained effort.
- Significant improvement in attainment over a substantial period of time, e.g. half a term.
- Significant improvement in effort over a substantial period of time, e.g. half a term.
- Notable contribution to Extra-Curricular Activities, e.g.: regular performance in a team.
- Outstanding commitment over a significant period of time, e.g. half a term, to extra-curricular teams, groups or clubs.
- Contributions to the community life of the school, e.g. courtesy, kindness, helpfulness, care for the environment, most likely to be judged by Heads of Section and Tutor.
- Outstanding contribution to tutor group and House charity events and activities and the community service programme, as judged by Heads of House, Form Tutors.
- Contributions to School, Year and House Assemblies.

5.2 Letters of Congratulation

Letters of congratulations will be sent home by Heads of Year after mid-term reviews,

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to pupils whose effort and/or attainment has been considered excellent by several teachers.

The Headmistress may also write to girls for exceptional effort, attitude or achievement.

The Headmistress will see individual students at lunchtime to congratulate them personally on for exceptional achievement, effort or contribution to the school life.

6. Rewards (for Sixth Form)

Given the expectation of students to work much more independently in Years 12 and 13, the Sixth Form follows a different rewards and sanctions procedure from the Lower and Senior Schools, which, whilst following basic guidelines, is often followed on a case by case basis.

Merits are not given out at Sixth Form level, as it is felt that praise given directly from subject teachers and Heads of Section is more appropriate. There are, however, some specific times of the year where students are rewarded:

- As with the Senior School, letters of congratulations will be sent home by Heads of Year after mid-term reviews, to students whose effort and/or attainment has been considered excellent by several teachers.
- This review is also used as a means of monitoring and imposing constructive sanctions e.g. informing parents and further monitoring.
- Students are also rewarded through special privileges in the Sixth Form.
- Students are allowed to leave school at lunch time or before the end of the school day if their timetabled lessons have finished. With written permission from their Head of Year, students are also allowed to leave school during their frees. Timetable permitting, students are allowed one free morning or afternoon a week. This is recorded in the register by the student's form tutor, and a central list of free mornings and afternoons is kept by the Sixth Form office.

6.1 Heads of House and Senior Committee

At the end of the Easter term, House Coordinators give House Captains and House Officers a gift voucher with a note of thanks. The Head and Assistant Head of Sixth Form take the House Captains and Senior Committee out for a thank you dinner at the end of the Easter term.

6.2 Prizes

Contributions to school life, academic ability and improvement are recognised through prizes at our annual prize giving afternoon at the end of Year 13. There are a number of service prizes awarded at the end of Year 12. There are also some subject prizes that are awarded to students in KS3 and KS4. The School's Values prizes are awarded to Year 11 students in recognition of those that best embody our values of respect, responsibility and resourcefulness.

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6.3 The Head Girl Team

The Headmistress and the Head of Sixth Form take the Head Girl Team out for a thank you dinner and give them a thank you gift at the end of the Easter term.

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7. Good Citizen Awards (all years)

Twice a year each form will be asked to nominate one of their peers for a 'Good Citizen' award'. Good Citizen awards are given in recognition of those students who demonstrate acts of good citizenship within - or indeed outside - school. It may be awarded to students who are, for example, consistently helpful to those around them, who raise awareness of social issues, who stand up for the less fortunate or extend friendship to those who find it harder socially. Parents of the girls nominated by their peers will be sent a letter by the Headmistress and the Headmistress will meet with the award winners.

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	Autumn Term	Spring Term	Summer Term
1 st half-term	Years 10, 11 and 13		
2 nd half-term	Years 7, 8, 9 and 12	Years 11, 12 and 13	Years 7, 8, 9 and 10

8. Sanctions

Sanctions will be issued for behaviour that is disruptive to teaching, learning and achievement and behaviour that devalues and undermines interpersonal relationships and the fabric of the school community.

Verbal reprimands should be used for minor offences to remind pupils when they stray from expected behaviour or ignore instructions. To prevent repeats of unacceptable behaviour the most effective approach is for individual teachers to respond and deal with the unacceptable behaviour concerned immediately. Electronic pink slips are for recording behaviour and themselves are not a sanction.

8.1 Pink Slips – To record minor infringements

Electronic pink slips should be given to pupils in Years 3 – 11 when they fall short of expectations. Examples of behaviour that might incur a pink slip include:

- Lateness to lessons (one major infringement or 3 minor lapses of punctuality with no clear explanation / reason).
- Missed deadlines for homework (one major infringement e.g.: coursework or over 24- hour delay for homework or 3 minor delays e.g.: forgot to bring to lesson but has in school).
- Poor quality of work handed in (3 below standard pieces of work for the individual concerned).
- Disruptive behaviour in lessons (1 verbal warning and 2nd occurrence incurs a pink slip).
- Misuse of technology.
- Uniform infringement.
- Disruptive behaviour in the dining room.
- 3 pink slips will normally lead to a detention but the Head of Section has the ability to cancel pink slips in the context of serious pastoral concerns.

8.2 Early Morning Report

EMR is used to encourage pupils to be punctual. Registers are reviewed centrally and tutors and Heads of School are kept advised re: parent letters and pupils put on EMR. Pupils are placed on EMR if they are late 4 times in a term. If they are late 8 times in a term, they are asked to complete EMR again, and they will attend an SMT detention. Failure to comply with EMR or persistent EMR results in pupils being sent to the Headmistress.

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8.3 Uniform infringement

Pupils who persistently ignore uniform rules will be required to change and borrow from the second-hand uniform store. They may also be sent home to change and return that morning.

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8.4 Detention

Detentions are given for:

- Cumulative minor offences e.g. 3 pink slips following approval of the Head of Section.
- Single major offence e.g.: purposefully missing a lesson

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A letter will be sent to parents to advise. Pupils may be given community jobs, to support school or maybe required to complete their work, depending on circumstances.

8.5 Canteen Duty

Pupils are put on Canteen duty to help clean the dining room clean and tidy during lunch time, for the following misdemeanours:

- ☑ Eating in an unauthorised place – pupil's name recorded on the clipboard in staff corridor and they report to the lunchtime supervisor on the following day.
- ☑ Disruptive behaviour in Dining Room.

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8.6 Persistent Misbehaviour

Teachers will report causes for concern/persistent offenders/underachievers to the relevant Head of Year. This might result in weekly meetings with the Form Tutor/Head of Year, or the pupil being put on a monitoring report until things improve. A report can monitor attendance/punctuality, quality of homework and/or quality of class work. If a pupil is on report, her form tutor checks and signs it each day and she meets the relevant Head of Year on a weekly basis. Parents are then informed of the pupil's response to being on report.

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9. Malicious Allegations

Malicious allegations against staff are considered a very serious offence and will be dealt with in an appropriate manner and receive an appropriate sanction, could comprise of temporary or permanent exclusion.

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10. Procedures

Our policy for Rewards and Sanctions works on a staged approach.

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- | | |
|---|---|
| <input checked="" type="checkbox"/> Initial Stage | followed up by Subject Teacher/Tutor |
| <input checked="" type="checkbox"/> Secondary Stage | followed up by Head of Department/Head of Section |
| <input checked="" type="checkbox"/> Final Stage | followed up by SMT |

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11. Prep Department Rewards and Sanctions

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We believe that everyone responds better to praise than criticism. So, we have a policy for how we reward effort and positive behaviour. We prefer to reward than to sanction, so we set high expectations for pupils to follow the Code of Conduct.

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Written and agreed by the pupils in collaboration with School Council, the Prep Code of Conduct is a simple guide to behaviours and attitudes we wish to encourage in our school.

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11.1 Prep Code of Conduct

Respect, Resourcefulness and Responsibility.

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Always try your best in everything you do and be resourceful.

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Act respectfully and with integrity, showing kindness to others and yourself.

Always bring what you need and treat property and resources with care.

Follow the Internet Code of Conduct and use your iPad responsibly.

Move around the school sensibly and safely.

11.2 Rewards

We give rewards for positive behaviour, effort and kindness. These can be group or individual rewards. All staff can give merits (on the CLSG portal). This results in an email to the student's parents and is recorded on the portal, with reasons for the merit. Merits are awarded for outstanding sustained effort or behaviour and attitude above and beyond expectations.

Teachers may also use their own motivational schemes in class e.g. marbles in a jar or table points. Teachers ensure these are applied fairly and consistently.

11.3 Sanctions

If pupils fail to follow the Prep Code of Conduct, they receive a verbal warning. After two warnings, staff will issue a pink slip (using the CLSG portal). This results in an email to the student's parents and is recorded on the portal, with reasons for the pink slip. There may be occasions when a pink slip is issued without warning for severe infractions.

If two pink slips are given within a half term, the student will miss a break-time and an email will be sent to parents by her form tutor, outlining her unacceptable behaviour.

If three pink slips are given within a half term, she will miss a break-time, have a formal meeting with the Head of Prep, and a letter will be sent home and be recorded on the girl's personal file.

If there is any serious cause for concern, the Head and Deputy Head of Prep will be informed and involved in discussions with girls and parents where appropriate.

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CITY OF LONDON SCHOOL FOR GIRLS

COMPLAINTS POLICY AND PROCEDURE FOR PARENTS AND PUPILS

Policy last reviewed by:	Jenny Brown, Justine Venditti
Date policy last reviewed:	November 2020
Approved by:	
Date approved:	

This policy should be read in conjunction with:

- Parent Terms and Conditions
- Senior School and Prep Parents Handbooks
- Safeguarding and Child Protection Policy
- Internal Assessments Appeals Policy and Procedure
- Exclusions Policy

1. Policy

This policy and procedure is for the benefit of pupils, and parents of pupils, at the City of London School for Girls ('the School'). This policy and procedure will be relied upon in respect of all complaints by parents and pupils made against the School except in respect of:

- a) child protection allegations where a separate policy and procedure applies;
- b) expulsions where a separate policy and procedure applies.; and
- c) appeals relating to internal assessment decisions for external qualifications where a separate appeals procedure applies.

Complaints made by members of the public about the School will be dealt with under the City of London Corporation Complaints Procedure.

The School expects that most concerns can be resolved informally and will use their best endeavours to resolve any complaints that are made informally, or any concerns that are raised, on that basis. If informal procedures fail to resolve the issue, a formal complaint about any matter not involving child protection allegations, internal assessment decisions or a decision to expel or remove a pupil, must be stated courteously in writing to the Headmistress and will be dealt with under this City of London School for Girls Complaints Policy and Procedure.

This policy and procedure is for parents and is available, on request, to pupils, the parents of pupils and prospective pupils of the School (although parents of prospective pupils are not entitled to use the policy and procedure). Details of the complaints procedure and the number of complaints registered under the formal procedure during the preceding school year are published on the School's website. While pupils may, themselves, raise concerns and complaints under this policy and procedure, the School will involve parents should this occur.

This policy and procedure in no way overrides the right of the School to act in accordance with the School's Terms and Conditions agreed by parents upon enrolment of their child as a pupil in the School, although parents are not prevented from raising concerns or complaints pursuant to this policy and procedure where they are of the reasonable view that the School has not acted in accordance with the School's Terms and Conditions.

Please Note: Parents can be assured that all complaints and expressions of concern, whether raised informally or formally, will be treated seriously and confidentially. Correspondence, statements and records will remain confidential except where the Secretary of State or a body conducting an inspection under section 109 of the Education Act 2008 (as amended) requests access to them or where any other legal obligation prevails.

For the avoidance of doubt, the term "Confidentially" in this policy applies as between the complainant and the School, which includes individual staff and governors, where appropriate, on a need to know basis. The school will not accept and cannot investigate anonymous complaints. Where a teacher is at the centre of any complaint(s), he/she will need to be consulted as part of the investigation.

2. Timeframe for Dealing with Complaints

All complaints will be handled seriously and sensitively. They will be acknowledged within five working days if received during term time and as soon as practicable during holiday periods. It is in everyone's interest to resolve a complaint as speedily as possible. Details of response times for each stage of the procedure, including response times for complaints received during the school holidays or shortly before the commencement of a school holiday are set out below. [COVID-19 restrictions might delay the process.](#)

The school's target is to complete the first two stages of the procedure within 30 working days if the complaint is lodged during term-time and as soon as practicable during holiday periods.

Stage 3, the Appeal Panel Hearing, will be completed within a further 30 days, if the appeal is lodged during term-time and as soon as practicable during holiday periods.

Stage One - Informal Resolution

1. It is hoped that most complaints and concerns will be resolved quickly and informally.
2. If parents have a concern they should normally contact their daughter's Form Tutor. In many cases, the matter will be resolved straightaway by this means to the parents' satisfaction. If the Form Tutor cannot resolve the matter alone, it may be necessary for him/her to consult a Head of Department/Assistant Head of Section/Head of Section, the Deputy Heads or the Headmistress, depending on the nature of the matter. Matters of an academic nature may require involvement from the Deputy Head (Academic) or the Head of Department, whereas matters of a pastoral nature may require involvement from the Deputy Head (Pastoral) of the Heads of section/ Assistant Head of Section.
3. Complaints made directly to a Head of Department/Assistant Head of Section/Head of Section, the Deputy Head (Academic), the Deputy Head (Pastoral), or the Headmistress will usually be referred to the relevant Form Tutor unless a Head of Department/Assistant Head of Section/Head of Section, the Director of Studies, the Deputy Head, or the Headmistress deems it appropriate to deal with the matter personally.
4. The Form Tutor will make a written record of all concerns and complaints and the date on which they were received. **These records will be kept for a minimum of 7 years.**
5. The School will use its reasonable endeavours to resolve any informal complaints within ten (10) working days of them being raised, except where they are raised either during or immediately before (within two (2) working days) the commencement of school holidays, where the School will use its reasonable endeavours to resolve them as soon as possible after commencement of the new school term (usually within ten (10) working days,) should it not be practicable to resolve them during the holidays.
6. Should the matter not be resolved as referred to in paragraph 5 above, or in the event that the Form Tutor and the parents fail to reach a satisfactory resolution, then parents will be advised of their right to proceed with their complaint in accordance with Stage Two of this Procedure.

7. If, however, the complaint is against the Headmistress, parents should make their complaint directly to the Chairman of Governors

Stage Two - Formal Resolution

8. If the complaint cannot be resolved on an informal basis (as set out in paragraphs 1 to 5 above), then parents should put their complaint in writing to the Headmistress, which complaint should be expressed clearly and courteously. Parents should also identify how they wish their complaint to be resolved.
9. The Headmistress will delegate responsibility for undertaking investigation of the complaint to a member of the SMT or a Head of Department as appropriate.
10. The Headmistress will decide, after considering the complaint, the appropriate course of action to take.
11. In most cases, the Headmistress will meet or speak with the parents concerned to discuss the matter. If possible, a resolution will be reached at this stage.
12. The Headmistress will use reasonable endeavours to speak to or meet parents within ten (10) working days of the formal complaint being received, except where the complaint is received in school holidays or within two (2) working days of their commencement where the Headmistress will use all reasonable endeavours to speak or meet with parents as soon as possible after the commencement of the new school term (usually within ten (10) working days), should it not be practicable to meet with them sooner.
13. It may be necessary for the Deputy Heads, a member of the SMT or Head of Department to investigate the matter further.
14. The Headmistress will keep a written record of all meetings and interviews held in relation to the complaint.
15. Once the Headmistress is satisfied that, so far as is practicable, all of the relevant facts have been established, a decision will be made. Parents will be informed of this decision in writing, giving reasons for the decision. The written decision should be provided no later than ten (10) working days after speaking or meeting with parents to discuss the matter (pursuant to paragraph 10 above). The Headmistress may also arrange to meet with parents to explain the decision.
16. The School will keep a written record of all formal complaints, including records of meetings and interviews held in relation to the complaint, and the School's decision, **which record will be kept for a minimum of 7 years.**
17. Where parents are dissatisfied with the outcome of the School's response to their formal complaint, the parents have the opportunity to have their complaint considered by an independent Complaints Panel.

Stage Three – Panel Hearing

18. If parents seek to invoke Stage Three following failure to reach an earlier resolution and where dissatisfied with the Headmistress's decision in respect of their formal complaint, the parents may, in writing addressed to the School, request that their complaint be further considered by an independent Complaints Panel set up for this purpose.
19. This request for further assessment of the complaint will, for the purposes of this Procedure, be known as an 'appeal'.
20. Parents must lodge their appeal in writing and within ten (10) working days of the date of the School's decision made in accordance with the Stage Two Procedure. The parents should provide a list of their complaint(s) made against the School and which they believe to have been resolved unsatisfactorily by the Stage Two Procedure, along with the remedies sought in respect of each. The Complaints Panel is only obliged to consider the complaint(s) lodged in this 'initial submission' although they may use their discretion to consider other relevant and related matters that may subsequently arise.
21. Where an appeal is received by the School, the School will, within five (5) working days, refer the matter to the Town Clerk (Clerk to the Board of Governors), who will act as Clerk to the Complaints Panel. Where the appeal is received by the School during school holidays, or within two (2) working days of their commencement, the School has five (5) working days upon commencement of the school term to refer the matter to the Town Clerk
22. The Clerk provides an independent source of advice on procedure for all parties.
23. Once an appeal has been received by the Clerk, he/she will acknowledge the appeal in writing within five (5) working days, and inform the parents of the steps involved in this Complaints Procedure.
24. The Clerk will then endeavour to convene an independent Complaints Panel hearing as soon as possible to consider the matter, normally no later than twenty (20) school days after receipt by the School of parents written notice that they wish to invoke the Stage Three Procedure, dependent upon the availability of the Panel members.
25. The independent Complaints Panel will consist of at least three people who were not directly involved in the matters detailed in the complaint, including two Governors on the Board and one person independent of the management and running of the school. The process used for selecting an independent person will conform to relevant guidance issued by the Department for Education (DFE).
26. The following are entitled to attend a hearing, submit written representations and address the Panel:
 - a) the parent/s **who may be accompanied by her daughter**
 - b) the Headmistress of the School and/or one representative; and
 - c) any other interested person whom the Complaints Panel considers to have a reasonable and just interest in the appeal and whose contribution would assist the Panel in their decision-making.

Parents have the right to be accompanied by a third party for support. Legal representation will not normally be permitted and we reserve the right to refuse admission of a legal representative other than in exceptional circumstances with the prior agreement of the Chair of the Panel.

27. Where the Complaints Panel deems it necessary, it may require that further particulars of the complaint or any related matter be supplied in advance of the hearing. In such cases all parties will be given the opportunity to submit written evidence to the Panel in support of their position, including:
- a) documents relevant to the complaint(s),
 - b) chronology and key dates relating to complaint(s), and
 - c) written submission setting out the complaint(s) in more detail.

This evidence will be considered by the Panel, along with the initial submission that was lodged by the parents.

28. Evidence will be initially sent to the Clerk, who will then circulate the documentation to all parties, including the Panel members, along with an order of proceedings. All written evidence must be received by the Clerk no later than ten (10) working days in advance of the hearing. The Clerk will distribute the written evidence to the relevant parties no later than five (5) working days in advance of the Panel hearing.
29. It is for the Panel to decide how to conduct the proceedings of the appeal, which should be reasonably informal so that all parties can present their case effectively. If possible, the Panel will resolve the parents' complaint immediately without the need for further investigation. Where further investigation is required, the Panel will decide how it should be carried out.
30. After due consideration of all the facts they consider relevant, the Panel will reach a decision, and may make recommendations, which it shall complete within ten (10) working days of the hearing. The decision reached by the Complaints Panel is final. Any decision reached that may have financial implications for the School will need the appropriate approval from the relevant authorities e.g. the Board of Governors, although any such approval must be compatible with the decision of the Complaints Panel.
31. The Panel's findings will be sent by the Clerk in writing to the parents, the Headmistress, the Governors and, where relevant, the person complained of within ten working days. The letter will state any reasons for the decision reached and recommendations made by the Complaints Panel.
32. The School will keep a record of all appeals, decisions and recommendations of the Complaints Panel, which record **will be kept for a minimum of 7 years** and will be available for inspection on the school premises by the governors and the Headmistress, whether they are resolved following a formal procedure, or proceed to a panel hearing; and action taken by the school as a result of these complaints (regardless of whether they are upheld). Correspondence, statements and records relating to individual complaints will be kept confidential except where the Secretary of State or a body conducting an inspection under section 109 of the 2008 Act requests access to them.

3. Recording Complaints

Following resolution of a complaint, the school will keep a written record of all complaints and whether they are resolved at the preliminary stage or proceed to a panel hearing. At the school's discretion, additional records may be kept which may contain the following information:

- Date when the issue was raised
- Name of parent
- Name of pupil
- Description of the issue
- Records of all the investigations (if appropriate)
- Witness statements (if appropriate)
- Name of member (s) of staff handling the issue at each stage
- Copies of all correspondence on the issue (including emails and records of phone conversations)

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CITY OF LONDON SCHOOL FOR GIRLS

EXCLUSIONS POLICY

Policy last reviewed by:	Susannah Gilham
Date policy last reviewed:	November 2020
Approved by:	
Date approved:	

This policy should be read in conjunction with:

- The Preparatory Department Parents Handbook
- The Senior School Parents Handbook
- School Code of Conduct
- Relationships and Sex Education Policy
- PSHCEE Policy
- Anti-Bullying Policy
- Behaviour Policy
- Terms and Conditions

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This policy is a summary of long-standing procedures which are reflected in the School's Mission Statement and Values and in the Parents' and Prep Parents' Handbooks.

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1. Context

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CLSG is an academic school, which seeks to provide an atmosphere in which every pupil is able to achieve their maximum potential. It is a school which seeks to support and to develop the whole person and which recognises that pupils will achieve their best academically if they are provided with the opportunity to take part in the widest possible range of activities, which contribute to the development of confidence and self-esteem. The school also recognises that pupils will only achieve their best in an orderly and purposeful atmosphere, where they feel known, safe, valued and respected.

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The school can only achieve its educational objectives within an orderly framework, where clear boundaries of acceptable behaviour and mutual respect are established. The expected standard of behaviour is clearly laid out in the Parents' Handbook, which is also summarised in pupil planners.

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The School seeks to reward and to encourage positive behaviour. To this end, a system of rewards and sanctions is in operation, as set out in the school's Behaviour Policy.

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When necessary, sanctions are taken against pupils who fail to behave in an appropriate manner.

These sanctions are always intended to be proportionate and fair. They include

- Loss of privileges – particularly in the 6th form.
- After school detention.
- Being put on “report” – report systems exist for pupils who are failing to make a sufficient effort, for those who are failing to produce homework regularly and for those who are frequently late or unpunctual.
- Permanent or temporary suspension– very rarely used for very serious misconduct or frequent and repeated failure to behave appropriately.

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2. Suspensions

A suspension is a temporary sanction in response to a breach of the school rules. There is no right of appeal to suspensions under 11 days.

Procedures for suspension are:

- The Headmistress (or in her absence a Deputy Head) will decide upon whether a pupil should be excluded.
- Before the decision is made, a full investigation will have taken place and the pupil concerned will have been questioned fairly and been able to have stated their own position and version of events.
- Parents will be told the reasons for the suspension, how long it will last, what measures to support the pupil will be provided while they are suspended
- Parents and pupil will be told of the expectations and conditions for the return to the school prior to the end of the suspension period.

3. Expulsions and Removals

An expulsion is permanent and a sanction of last resort. Expulsions are very rare at CLSG. A pupil may be expelled for a single act which constitutes a major violation of discipline, such as breach of the school rules on substance abuse, or for a criminal offence. Expulsions can be appealed via the Board of Governors – see process below. The pupil will be required to remain away from school pending the outcome of the review.

A removal is a permanent step, usually in response to repeated infringements of school policies, poor behaviour over a period of time and inability to benefit sufficiently from the educational opportunities and / or the community life offered by the school. Where removal is requested by the Headmistress, parents may be given a chance to withdraw their child as an alternative at the sole discretion of the Headmistress. The decision to remove can be appealed to the Board of Governors. The student will be required to remain away from school pending the outcome of the review. Further details on removal are found in the Terms and Conditions.

Procedures for expulsion and removal are:

- The Headmistress (or in her absence a Deputy Head) will decide upon whether a pupil should be expelled/removed.
- Before the decision is made, a full investigation will have taken place and the pupil concerned will have been questioned fairly and been able to have stated her own position and version of events.
- Parents will always be informed fully of the reasons for expulsion/removal and given a copy of the Review Procedure.
- The Chairman of Governors or the Deputy Chairman in the Chairman’s absence will always be informed of expulsions/removals.
- Parents will be able to lodge an appeal against an expulsion/removal within seven calendar days of being notified of the expulsion/removal.
- An appeal review meeting will take place as soon as possible after the appeal has been lodged.

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- The appeal review panel will consist of three members of the Board of Governors, who have not been previously informed of the details of the case in question. Parents may, if they wish, ask the school to nominate an independent person to take the place of the third Governor on the panel.
- The appeal review will be conducted in accordance with the Expulsion/ Removal of Pupils – Review Procedure (Annex A).
- The pupil will be required to remain away from school pending the outcome of the review.

4. Investigations

Disciplinary offences are investigated, depending on the nature and level of the offence, by the Form Tutor, Head of Year, Head of Section, Deputy Head Pastoral and / or Senior Deputy Head as appropriate. Parents will be informed of such an investigation if the sanction is likely to be a suspension or expulsion (see below). Investigations will normally involve an interview with the pupil concerned, as well as gathering evidence from other pupils and members of staff involved (if any). When interviewed by a senior member of staff, and where appropriate, the pupil will be accompanied by their Form Tutor or Head of Year.

5. Exclusion

The term exclusion is reserved for cases of non-payment of fees and is not used in the context of school discipline.

6. Annexes

Annex A – Expulsion/Removal of Pupils – Review Procedure

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▲
ANNEX A

▲
Expulsion/removal of pupils – review procedure

▲
1. Important note

▲ These guidelines are non-contractual in nature. They have been prepared for the information and guidance of all who may become concerned in a review hearing following expulsion or the required removal of a pupil.

▲
2. Request for review

▲ Parents/guardians seeking a review of a decision to permanently exclude/remove a pupil from the School must notify the Clerk to the Governors of the City of London School, at Guildhall, London EC2P 2EJ of their request in writing within 7 calendar days after the parents/guardian were first notified of the decision to exclude/remove, or such longer period of time as the Clerk to the Governors may specify giving full reasons for the request for review.

▲
3. Review panel

▲ A Review Panel comprising 3 members of the Board of Governors selected by the Clerk to the Board of Governors (one of whom will generally be the Deputy Chairman of the Board of Governors) will be convened as soon as practicable after the request has been received.

Parents/Guardians may ask the School for an independent person to be appointed to the Panel in place of the third Governor. This request must be made when making the request for a review. The School will nominate an independent person of its own choosing who has not previously been informed of the details of the case.

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4. Preparation for review hearing

Parents/guardians will receive at least 7 working days written notice of the date, time and place of the meeting of the Review Panel.

At least 5 working days before the day of the review hearing the Headmistress and the parents/guardians shall provide to each other and to the Clerk to the Governors copies of any documents which are intended to be referred to. All the documents will be made available to the members of the Review Panel prior to the day of the review. The documents to be provided by the Headmistress will usually include the pupil's file and other relevant written pupil records.

The Clerk to the Board of Governors will take notes of the hearing. The notes will not be circulated afterwards. Tape recordings will not be permitted. The parents/guardians, the pupil, if aged 16 or over, and the Headmistress will have the chance of addressing the Review Panel either orally or by written statement. The parents/guardians/pupil may be accompanied by a friend or relation if desired, but not by a legal representative.

5. The review hearing

The review procedure is intended to be informal by nature. However, one member of the Panel will act as Chairman of the Panel and will conduct the hearing in such a manner as s/he thinks fit ensuring that all those present have the opportunity to ask questions and make comments.

All those who attend the review hearing are expected to show restraint, courtesy and good manners towards all those present, otherwise the Chairman may, in his/her discretion adjourn or terminate the review hearing. If the hearing is terminated the original decision will stand.

Where two or more pupils have been acting in concert and some or all of them have been expelled, the Review Panel may deal with all reviews at the same time.

6. Matters which the review panel may consider

The Review Panel may take into account all of the following circumstances in relation to each issue raised:

- The nature and gravity of the complaint/s against the pupil.
- Whether or not the grounds of the complaint have been reasonably well established on the information that is before the Review Panel, including any information given before the expulsion.
- Whether the complaint was investigated fairly.
- The level of co-operation that has been given by the pupil and her parents.

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- The effect of the pupil’s alleged conduct on other members of the School community.
- The general record of the pupil during her time at the School.
- The interests of the School community balanced with those of the individual pupil.
- Any other circumstances which appear to the parents, the pupil or the chairman of the Review Panel to be relevant.

7. The decision of the review panel

Parents/guardians will be notified of the Review Panel’s decision by the Chairman of the Review Panel by letter within 3 working days of the hearing. The decision of the Review Panel may be a majority decision and will be final.

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CITY OF LONDON SCHOOL FOR GIRLS

PHYSICAL CONTACT AND RESTRAINT POLICY

Policy last reviewed by:	Susannah Gilham
Date policy last reviewed:	November 2020
Approved by:	
Date approved:	

This policy should be read in conjunction with:

- Behaviour Policy
- First Aid Policy
- Medical and
- Exclusions Policy
- Pupil Code of Conduct
- Safeguarding & Child Protection Policy
- School and City of London Equal Opportunities Policies
- SEND Policy
- Pupils' Mental Health Policy

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Physical Contact

Physical contact with a pupil may be proper or necessary in order to:

- Demonstrate exercises or techniques during PE or music instrumental lessons
- Administer First Aid
- Provide younger children with physical prompts or help
- Comfort a pupil in distress
- Reassure younger pupils

Be aware that some pupils may dislike physical contact of any kind because of their cultural background, sensory sensitivities associated with autistic spectrum conditions or because they have experienced trauma.

If it is necessary to make physical contact with a pupil, as far as possible the member of staff should explain to the pupil why they need to do so.

1. Physical Restraint

City of London School for Girls is committed to safeguarding the well-being of pupils and staff and, in line with relevant legislation, only permits physical restraint by reasonable and non-injurious means. Physical restraint is used only when immediately necessary for the minimum time necessary to prevent injury to self or others or very serious damage to property.

City of London School for Girls is fully committed to ensuring that the application of this policy is non-discriminatory in line with the UK Equality Act (2010). Please refer to the school's and the City of London's Equal Opportunity Policies.

City of London School for Girls seeks to implement this policy through adherence to the procedures set out in the rest of this document. This document is available to all interested parties on our website and on the school portal.

2. Rationale

Whilst wishing to resolve serious incidents without the use of physical intervention, the Board of Governors and staff understand that very occasionally there may be some situations in which the use of physical intervention may be the appropriate course of action. As outlined below, members of staff are encouraged to avoid this eventuality if at all possible. However, the right of teachers to use reasonable force is laid down in the Education and Inspections Act 2006, revised guidelines (August 2010) and the DFE document "Reasonable Use of Force" (2013) all clarify the following:

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- Force may be used to prevent pupils committing a criminal offence, injuring themselves or others or damaging property
- Force may be used to maintain good order and discipline
- Force may not be used as a form of punishment
- Incidents where force is used should be recorded and parents informed
- Schools should not adopt a 'no-contact' policy
- Teachers have a duty of care to pupils but are not required to put their own safety at risk

3. Definitions

For the purpose of this policy document, physical restraint is the positive application of force in order to protect/prevent a child from causing injury to herself or others or seriously damaging property. Injury means 'significant injury'; this would include: actual or grievous bodily harm, physical or sexual abuse, and other behaviour which puts a pupil's own life or the lives of others at risk.

It must be shown that on any occasion where physical restraint is used there were strong indicators that if immediate action had not been taken, injury or the committing of a criminal act would have followed.

4. Planning Ahead

When the school is aware that a pupil is likely to behave in a way that may require physical control or restraint it is sensible to plan how to respond if the situation arises. This planning should address:

- Managing the pupil
- Involving the parents to ensure that they are clear about what specific action the school might need to take
- Briefing staff to ensure they know exactly what action they should take
- Ensuring additional support can be summoned if appropriate
- Taking medical advice if necessary as to the safest way to hold pupils with specific health needs

5. Some examples of when it may be necessary to use physical restraint

- A pupil attacks a member of staff, or another pupil
- Pupils are fighting
- A pupil is engaged in, or is on the verge of committing, deliberate damage or vandalism to property

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- A pupil is causing, or at risk of causing, injury or damage by accident, by rough play, or by misuse of dangerous materials or objects
- A pupil is running in a corridor or on a stairway in a way in which she might have or cause an accident likely to injure herself or others
- A pupil absconds from a class or tries to leave school putting themselves at risk

6. Guidance during an Incident

Staff should not hesitate to act in an emergency provided they follow this guidance; however, they should always satisfy themselves that the action they take would be considered justifiable by a wider audience.

In any application of physical restraint, the minimum reasonable force should be used to calm down the situation. Help should be summoned from colleagues; other pupils should never be involved in restraint.

The pupil should be approached calmly but firmly. Where possible, explain the consequences of refusing to stop the behaviour and continue to communicate with the pupil throughout the incident; it should be made clear that the physical contact or restraint will stop as soon as it ceases to be necessary. A calm and measured approach is needed and a member of staff must never give the impression that she/he has lost his/her temper, or is acting out of anger or frustration - or to punish the pupil. The method of restraint employed must use the minimum force for the minimum time and must observe the following:

Restraint must NOT:

- involve hitting the pupil
- involve deliberately inflicting pain on the pupil
- restrict the pupil's breathing
- involve contact with sexually sensitive areas
- involve locking the pupil in a room

During any incident the person restraining should:

- offer oral reassurance to the pupil
- cause the minimum level of restriction of movement
- reduce the danger of any accidental injury
- cease the restraint if there are any signs of physical distress in the pupil such as sudden change in colour, difficulty breathing or vomiting

Physical intervention can take several forms. It can be:

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- Partial – restricting and preventing particular movements
- Total – as in the case of immobilisation

It might involve staff:

- physically interposing between pupils
- blocking a pupil's path
- holding
- pushing
- pulling
- leading a pupil by the hand or arm
- shepherding a pupil away by placing a hand in the centre of the back or (in extreme circumstances) using more restrictive holds

7. Some Dos and don'ts

Do:

- be aware of any feelings of anger
- summon help
- continue to talk to the pupil in a calm way
- ensure a free passage of air through airways
- provide a soft surface if possible
- be aware of any accessories worn by you or the pupil that could cause injury
- hold the pupil's arms by her sides
- monitor the pupil's respiration, circulation and state of consciousness

Don't:

- try to manage on your own
- stop talking, even if the pupil does not reply
- straddle the pupil
- push their arms up their back
- touch the pupil near the throat or head
- put pressure on joints or on arterial pressure points (inside of upper arm, groin, neck)
- use facedown holds

8. Recording Incidents

It is a requirement that a written report is kept on any occasion when force is used; the member of staff concerned must advise the Headmistress or in her absence, one of the Deputy Heads

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immediately following the incident and provide a written report as soon as possible afterwards. The Headmistress or other member of the SMT will inform parents on the same day – or as soon as practically possible – that physical intervention was used.

The report should include:

- the name(s) of the pupil(s) involved
- when and where the incident took place
- the name(s) of any other staff or pupils who witnessed the incident
- the reason that physical restraint was necessary
- how the incident began and progressed
- the pupil's / pupils' response and the outcome of the incident
- details of any injury suffered by the pupil / another pupil / member of staff, and any damage to property

Staff may find it helpful to seek advice from their professional association or a senior colleague when writing a report.

The Deputy Head Pastoral will keep a confidential file detailing when restraint has been necessary.

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CITY OF LONDON
SCHOOL FOR GIRLS

CITY OF LONDON SCHOOL FOR GIRLS

PUPIL EQUAL OPPORTUNITIES POLICY

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Policy last reviewed by:	Susannah Gilham, Emma Heseltine
Date policy last reviewed:	November 2020
Approved by:	
Date of approval:	

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This policy should be read in conjunction with:

- Recruitment Policy
- Grievance Procedure
- Disciplinary Procedure
- Staff Code of Conduct
- Health, Safety and Wellbeing Policy
- Admissions Policy
- SEND Policy
- Anti-Bullying Policy
- ICT Code of Conduct for Pupils
- Behaviour Policy
- Complaints Policy
- Equal Opportunities in Employment Policy

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Policy

CLSG is an equal opportunities school. We welcome pupils from all ethnic groups and creeds, and human rights and freedoms are respected. All pupils are treated in the same way, regardless of sex, colour, belief, gender reassignment, sexual orientation, pregnancy, maternity, race or disability. The School complies with the SEN Code of Practice and the Equality Act 2010, in order to accommodate the needs of applicants and allow them access to the curriculum and public examinations.

The School is committed to ensuring that its students work in an environment that respects and values difference and diversity. Discrimination, bullying and harassment are not tolerated in the School.

Procedures

All staff have a duty to act in accordance with the policy and all pupils are requested to co-operate to ensure that the policy is implemented in full. The School aims to manage pupil problems fairly.

Admissions

The School's Admissions criteria are objective and are consistently applied. They focus on the prospective pupil's academic and all-round potential and school record. Race, religion, ethnic or national origin, additional need disability, are not part of the criteria applied.

We are committed to ensuring that our admissions process is conducted in a way which is transparent and fair. It is our aim to identify and admit pupils of significant academic potential regardless of their current educational setting and family circumstances.

A well-developed bursary programme enables as many as possible who meet the School's admission criteria to attend the School regardless of their family's financial circumstances.

Pupils who are Looked After or who have found permanency via adoption or a Special Guardianship Order following a period in local authority care are prioritised for places.

We welcome applications from pupils with special educational needs and/or disabilities. We follow the SEND Code of Practice and the Equality Act in order to ensure that pupils who require reasonable

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adjustments can access and enjoy their school careers at CLSG. Our ethos focuses on removing barriers to learning and valuing the benefits of a neurodiversity within the pupil body.

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We often accept pupils whose first language is not English but in order to access the curriculum and benefit from the wide range of opportunities offered at the School, pupils need to be fluent in English. For this reason our entrance process assumes that candidates are able readers, speakers and writers in English.

Anonymised equality data is collected as part of the admissions process.

Developing Understanding

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Assemblies, PSHCEE, curriculum lessons and clubs and societies are used to:

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- Promote tolerance and respect for others
- Promote positive images and role models to avoid prejudice and raise awareness of related issues
- Foster an open-minded approach and encourage pupils to recognise the contributions made by different cultures
- Understand why and how the school will deal with offensive language and behaviour
- Understand why the school will deal with any incidents promptly and in a sensitive manner

Transgender

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We are a girls' school. As such, we will consider at the admissions stage, in adherence to our articles of association and charitable objects, only those prospective pupils who are legally defined as female. This includes any individual who has transitioned to female, and any individual who is legally recognised as female under the Gender Recognition Act (2004). While any in the school would have sympathy with the idea that gender is not binary, UK law presently recognises only two genders, male and female, and City of London School for Girls is a school free to educate girls.

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Addressing Concerns

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Any pupil (or their parents on their behalf) who believe they have received less favourable treatment on grounds of race, religion, ethnic or national origin or disability should first raise the issue with the Headmistress.

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Complaints against other pupils will be investigated and addressed in accordance with the School's disciplinary procedures. Discrimination, bullying and harassment of any kind are not tolerated in the School; such behaviour could result in the pupil being asked to leave the School.

Complaints about the Admissions process should be raised in accordance with the Admissions Policy.

Parents of pupils currently at the school may raise complaints formally with the School through the Complaints policy.

Discrimination

Discrimination may occur deliberately or inadvertently. Direct and indirect discrimination, victimisation and harassment are covered by this policy and are defined as follows:

Direct discrimination – treating someone less favourably because of a protected characteristic: their association with somebody who has a protected characteristic e.g. a parent with a disabled child; or the perception that someone has a protected characteristic.

Indirect discrimination – applying a criteria, provision or practice which places a group of people at a disadvantage because of a protected characteristic which cannot be objectively justified.

Harassment – when unwanted conduct related to a protected characteristic causes a distressing humiliating or offensive environment for that person.

Victimisation – treating a pupil unfairly who has made or supported a complaint about discrimination.

There are nine protected characteristics covered by the Equality Act 2010:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

Disability Discrimination

A disability is defined as any medical condition which has a substantial and long-term effect on a person's ability to do normal day to day activities. Some conditions are covered as soon as they are diagnosed.

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Pupils are encouraged to notify the relevant Head of Section or the Deputy Head (Pastoral) if they have ongoing health issues which are causing difficulties at school or which are of concern generally. The School is often able to provide assistance by considering reasonable adjustments. These are often simple to put in place but can make a significant difference

Addressing Concerns

Any concerns about equality related issues should be reported to the relevant Head of Section or the Deputy Head Pastoral or, if that is not appropriate, a member of the Senior Management Team. All issues relating to discrimination, harassment and bullying are taken extremely seriously in the School and complaints will be investigated in line with the Anti-Bullying policy and the Safeguarding and Child Protection policy.

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CITY OF LONDON SCHOOL FOR GIRLS

RECRUITMENT POLICY

Policy last reviewed by:	Katie Kerr, Neil Codd, Justine Venditti
Date policy last reviewed:	November 2020
Approved by:	
Date approved:	

Contents

1.	Introduction
2.	Aims
3.	Recruitment Process
4.	Supply Staff and Trainee / Student teachers
5.	Governors
6.	Staff training and induction
7.	Equal opportunities

1. Introduction

- 1.1 City of London School for Girls is committed to providing the best possible care and education to its pupils and to safeguarding and promoting the welfare of children and young people.
- 1.2 The School is also committed to providing a supportive and flexible working environment for all of its members of staff. The School recognises that, in order to achieve these aims, it is of fundamental importance to attract, recruit and retain staff of the highest calibre who share this commitment.
- 1.3 This policy should be read in conjunction with:
 - The School's Safeguarding and Child Protection Policy
 - The City of London Corporation's Code of Conduct (and Code of Conduct for Teachers)
 - The City of London Corporation's Whistleblowing Procedure
- 1.4 This policy has been drawn up in line with Part 3 (Welfare, health and safety of pupils) and Part 4 (Suitability of staff, supply staff and proprietors) of the Independent Schools Standards Regulations and has been updated in accordance with Part 3 (Safer Recruitment) of the Department for Education (DfE)'s *Keeping Children Safe in Education: statutory guidance for schools and colleges* (September 2020).

2. The aims of this policy

- 2.1 *Keeping Children Safe in Education: statutory guidance for schools and colleges* (September 2020) states:

“Governing bodies and proprietors should prevent people who pose a risk of harm from working with children by adhering to statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required and ensuring volunteers are appropriately supervised. The School or College should have written recruitment and selection policies and procedures in place”.

- 2.2 Through the implementation of this policy, the School aims to ensure:
- that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position.
 - that all applicants are considered equitably and consistently.
 - that no applicant is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age.
 - that the School creates a culture of safe recruitment and, as part of that, adopts recruitment procedures that help deter, reject or identify people who might abuse children.
 - that the School meets its commitments to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.
 - compliance with all relevant recommendations and guidance including the recommendations of the DfE in *Safeguarding Children and Safer Recruitment in Education* and the code of practice published by the Disclosure and Barring Service (DBS).

3. Recruitment Process

- 3.1 The recruitment process is designed to ensure the suitability of persons appointed as members of staff at the School, such that:
- No such person is barred from regulated activity relating to children in accordance with section 3(2) of the 2006 Act where that person is or will be engaging in activity which is regulated activity within the meaning of Part 1 of Schedule 4 to that Act.
 - No such person carries out work, or intends to carry out work, at the School in contravention of a prohibition order, or any direction made under section 128 of the 2008 Act or section 142 of the 2002 Act, or any disqualification, prohibition or restriction which takes effect as if contained in either such direction.
 - The School carries out appropriate checks (which must be completed before a person's appointment) to confirm in respect of each such person the person's identity, medical fitness, right to work in the UK and, where appropriate, the person's qualifications.
 - Where relevant, an enhanced criminal record check is made in respect of that person and an enhanced criminal record certificate is obtained before, or as soon as practicable after, that person's appointment.
 - Further checks are made as the School considers appropriate in the case of any person for whom, by reason of that person living or having lived outside the UK, obtaining such a certificate is not sufficient to establish the person's suitability to work in a school.

3.1.1 Advertising

All posts are advertised clearly stating that they are exempt from the Rehabilitation of Offenders Act 1974, Exceptions Order 1975 (as amended in 2013) and that as part of the selection process the successful applicant will be required to obtain a Disclosure and Barring Service enhanced check. The School's safeguarding statement is also included in all job advertisements¹:

“City of London School for Girls is committed to safeguarding and promoting the welfare of children and applicants must be willing to undergo child protection screening appropriate to the post, including checks with past employers and the Disclosure and Barring Service.”

3.1.2 Recruitment Personnel

When a position becomes vacant the Deputy Head Academic, in the case of Teaching Staff, or the Bursar, in the case of Support Staff, will, in collaboration with the HR Department, undertake procedures to ensure a safe and successful appointment. A member of staff with appropriate Safer Recruitment training will be involved in the Selection Panel for **all** appointments².

Safer recruitment training has been undertaken by the HR Department, Deputy Heads, Headmistress, Bursar and others involved regularly in the recruitment of staff.

3.1.3 For the recruitment of Teaching Staff

The Head, assisted by SMT and the appropriate Head of Department, will lead on the recruitment process.

3.1.4 For the recruitment of Support Staff

The Bursar, assisted by the HR Department and, if required, members of the SMT and the relevant Head of Department, will lead on the recruitment process.

3.2 Application Form

The application form used by the School clearly states that posts are exempt from the Rehabilitation of Offenders Act. All applicants are required to complete the form as fully and effectively as possible to ensure that the Selection Panel receives consistent and equal information from all applicants.

The application form requires the applicant's full name and any previous name and date of birth. It also requires the applicant's full education, employment, volunteering and other history **with no gaps**. Reasons for leaving all previous posts are requested. All applicants must provide the names of two referees including the current or most recent employer. All

¹ As displayed in recruitment information, including job adverts and application forms.

² The School Staffing (England) Regulations (2009) require governing bodies of maintained schools to ensure that at least one of the persons who conducts an interview has completed safer recruitment training; the School also operates in line with this requirement.

applicants must disclose all convictions spent and unspent. CVs are not accepted as an alternative to the application form.

3.3 Job Description, Person Specification and School / Department Information

These contain the School's safeguarding statement and state clearly the need for an enhanced DBS check. The job description lists the main responsibilities and duties of the position which the successful applicant will undertake and makes reference to the responsibility for safeguarding and promoting the welfare of children. The person specification details the skills, experience and qualifications the School is looking for and includes specific reference to suitability to work with children. The School / Department Information gives candidates up-to-date information about the School and the specific department.

3.4 Selection of candidates and short-listing

3.4.1 All application forms received will be read carefully and considered independently by the Selection Panel and a short-list drawn up.

- For main-scale Teaching Staff posts, the Head, Deputy Head Academic and relevant Head of Department liaise and select.
- For Heads of Department posts, the Head liaises with the Deputy Head Academic and other members of the SMT as required.
- For Senior Management posts, the Head liaises with the Senior Deputy Head and other members of the SMT as required.

3.4.2 For candidates not short-listed, the HR Department records for each candidate the reasons for not short-listing. These records are retained by the HR Department for 12 months.

3.4.3 Applications for internal posts (including positions of responsibility) are considered by the relevant members of the SMT.

3.4.4 For Support Staff posts, the HR Department short-lists with the Bursar or the relevant member of SMT or Head of Department.

3.4.5 For candidates not short-listed, the HR Department records for each candidate the reasons for not short-listing. These records are retained by the HR Department for 12 months.

3.5 Interview

3.5.1 Teaching staff

The HR Department will co-ordinate all teaching interviews and will liaise directly with SMT, Head of Department and applicants short-listed. The HR Department contacts candidates regarding the practical arrangements of the interview visit and where necessary Heads of Department contact candidates to further discuss the lesson(s) they will be required to teach.

3.5.2 Prior to or during the interview, candidates will be informed that:

- proof of ID, address and qualifications must be brought in on the interview day (to ensure right to work in the UK).
- references will be requested, including making contact with the current School at which the applicant is working or last worked, if he or she is not currently working in a school (in order to confirm employment details and reasons for leaving).
- all pre-employment checks must be completed before an appointment can be confirmed.
- the interview panel will ensure that any discrepancies and anomalies are scrutinised during the interview process, including accounting for any gaps in education and employment (see *Previous Employment History* section below).
- the interview panel will explore the candidates' suitability to work with children.

3.5.3 **Support staff**

The HR Department will co-ordinate all support staff interviews with the Bursar (and relevant members of the SMT or Head of Department as required). The interview procedure (as above) will be followed, in line with the City of London Corporation Human Resources Policy.

3.5.4 **Following the interview, for all Staff**

Notes taken at interview and in the 'Decision Meeting' will be dated and retained on file by the HR Department. Notes taken with regard to unsuccessful candidates are retained for 12 months. Feedback is provided to candidates where requested. Feedback requests are directed to the HR Department.

3.6 **Recruitment Checks**

3.6.1 **Barred List and Prohibition from Teaching checks**

A Barred List check is required for all new appointments to the School. This is normally conducted as part of a DBS check (see below), but a separate barred list check must be undertaken in the event that:

- a new enhanced disclosure with barring information is required but is not received in advance of a member of staff starting work in regulated activity.
- a pre-existing enhanced DBS check is accepted under the 'three-month rule' for a member of staff starting work in regulated activity.
- a pre-existing enhanced DBS check without barring information is accepted from a candidate who has subscribed to the DBS update service.

Teaching Staff appointments will be subject to checks by the HR Department to determine that they are not subject to a prohibition order issued by the Secretary of State, or other similar sanction or restriction imposed as a teacher.

3.6.2 **DBS Disclosure³**

An enhanced criminal records check ('DBS check') is required for all new appointments to the school. This includes volunteers and School Governors (see below). DBS checks are carried out by HR staff at the School and / or, for Support Staff and Governors, by HR staff at the City of London Corporation. During employment with the School, all staff are required to declare any convictions, cautions or reprimands, warnings or bind-overs.

Where a member of staff moves from a non-teaching to a teaching role, additional checks may be required.

If the disclosure is delayed (such that the DBS certificate has been applied for but is not available before a person starts work in regulated activity), the Headmistress may allow the member of staff to commence work subject to the following pre-conditions:

- a satisfactory check of the Barred List has been completed
- all other relevant checks have been completed satisfactorily
- it is done without the School confirming the appointment
- appropriate safeguards have been put in place, as determined by a risk assessment, which have been clearly communicated to the member of staff, and which will be regularly reviewed (until such time as the DBS certificate is available; see below). Risk assessments must be signed by the member of staff, the line manager responsible for the supervision and by the Head (or her delegate from the SMT). A copy of any such risk assessment will be retained on the personal file.

Note: Guidance on risk assessment criteria, together with the Risk Assessment pro-forma which must be completed and signed off by the relevant authority before a person starts work, is provided at Appendix 2. If the risk is assessed at 'Medium' or 'High', the person should not start work until all proper checks have been completed. The risk assessment must be reviewed every two weeks and re-signed (where required) until all other checks are satisfactorily completed. If, at any stage, the new member of staff's behaviour is of concern, or the protection measures are not able to be implemented or sustained, then the permission to work must be withdrawn until such time as all other checks are satisfactorily completed.

3.6.3 **Identity Checks**

All candidates must provide evidence of their identity and prove their right to work in the UK. They must bring to their interview (or, when requested, immediately thereafter) proof of identity and National Insurance number (if available). Acceptable proofs of identity include a British passport or current driving licence, passport /

³ Reference is made to the 'Flowchart of Disclosure and Barring Services Criminal record checks and barred list checks' in the DfE's *Keeping Children Safe in Education*.

identity card issued by an EEA country or a passport from another country that contains a valid Visa / Permit, and acceptable proofs of NI number include a NI card or recent P60/P45.

Applicants are also required to provide proof of address (such as a utility bill, bank statement or similar) on the interview day (or, where agreed, immediately thereafter). Applicants who are unable to bring these proofs of identity and address to interview must do so before taking up appointment and before the appointment is confirmed.

3.6.4 Medical Fitness

All successful applicants are required to complete a medical questionnaire to ensure the appropriate level of physical and mental fitness before any offer of appointment is confirmed.

3.6.5 Previous Employment History

Complete information about previous education and employment must be provided along with satisfactory explanations for any gaps in employment. The School will require applicants to explain at interview any employment gaps apparent from their application form.

3.6.6 References

Two professional references must be provided, one of which will be from the candidate's current (or most recent) employer. Where a candidate has previously worked in a school but this was not the most recent employer a reference should also be sought from the school concerned. These should always be sought and obtained directly from the referee and their purpose is to provide objective and factual information to support the appointment decision. Any discrepancies or anomalies must be followed up. Direct contact by telephone is required with each referee to verify the reference. Referees are required to answer specific questions about the candidate's suitability to work with children. If a verbal reference is taken then notes are taken, dated and signed and filed.

Any information provided through references concerning past disciplinary action or allegations that are disclosed should be considered carefully when assessing the applicant's suitability for the post.

3.6.6 References for internal positions

Two references should also be obtained for recruitment for internal positions (where an existing member of staff applies for a role or position within the School) including for:

- internal promotions
- position moves
- new, but not renewed, responsibility allowances

Typically, one reference will be sought from the member of staff's line manager and a second one from a senior member of the teaching staff. These references are supplied on a standard form available from the HR Department.

3.6.7 Qualification Requirements

Applicants must be able to demonstrate they have obtained any academic or vocational qualifications relevant to the post and claimed by them in their application form and which were taken into account when making the appointment. Applicants will be asked to provide original copies of these when attending interview. Applicants who are unable to bring these to interview must do so before taking up appointment and before the appointment is confirmed.

3.6.8 Overseas checks

If, because of a person living or having lived outside of the UK, a DBS check is not considered sufficient to establish suitability to work in a school, the School will carry out such further checks as deemed necessary, in line with relevant DfE and Home Office guidance. The checks usually involve a police check from the overseas country or country but where this is not possible additional references from the country concerned may be sought. All new appointments where persons are living or have lived outside the UK for more than three months once over the age of 18 will be subject to such additional checks. Where the additional checks have not been received before the person is due to start work they may be permitted to commence employment with a risk assessment in line with those for members of staff commencing work before their DBS certificate has been received. The HR Department will be responsible for co-ordinating these checks and for coordinating the checking for evidence of permission to work (for any member of staff who is not a national of a European Economic Area (EEA) country).

Where a person is an overseas-qualified teacher, the School will follow the Teaching Regulation Authority (TRA) guidance on requirements for overseas-qualified teachers and will ensure staff have the relevant qualifications.

3.6.9 Prohibition from management of independent schools check

For new appointments to management positions, checks must be made to ensure that a section 128 direction has not been made by the Secretary of State, precluding that person from a management role.

Such management positions include:

- The Head
- All staff on the Senior Management Team
- Teaching positions with Head of Department responsibility
- Proprietors (see below)

3.7 **Conditional Offer of Appointment**

An offer of appointment will be made only after the satisfactory references have been received (written and / or verbal) and after approval by the Head (for Teaching Staff) or the Bursar (for Support Staff).

The letter of appointment will make it clear that the offer is subject to satisfactory completion of the required safeguarding checks and right to work in the UK as outlined above.

-

4. **Supply Staff and Trainee / Student teachers**

4.1 When a Supply Agency is used to provide temporary Teaching Staff to the School, the Senior Deputy Head will ensure that the agency supplies appropriate documentation giving details of all the checks that the agency has carried out on that person to ensure that they are suitable to work in the School. That documentation will be retained by HR staff.

4.2 Temporary Teaching Staff from a Supply Agency are required to show current photo ID and their DBS certificate when they arrive at the School. This documentation will be retained by HR staff.

4.3 When a Supply Agency is used to provide temporary Support Staff to the School, the HR Department will ensure that the agency supplies appropriate documentation giving details of all the checks that the agency has carried out on that person to ensure that they are suitable to work in the School. That documentation will be retained by HR staff.

4.4 With trainee or student teachers who are on temporary positions in the School, the member of the SMT with oversight of such persons (usually the Assistant Head Teaching and Learning) and the HR Department will ensure that the all necessary checks are completed (Appendix 1).

5. **Governors (The Proprietor)**

5.1 **DBS, Barred List and Prohibition checks for Governors**

The DBS maintains 'barred lists' of individuals who are unsuitable to work with children. Where barred list information is requested, and 'children's workforce independent schools' is specified in the parameters for that check, the certificate will also detail whether the applicant is subject to a direction made under section 128 of the Education and Skills Act (2008). Such a direction prohibits an individual from taking part in the management (including being a governor) of independent schools in England.

- 5.2 The School, in conjunction with City of London Corporation HR staff, undertakes to perform all such checks as are required to confirm the suitability of governors ('the Proprietor', as described in Part 4, Paragraph 20 of the Independent Schools Standards Regulations).

6. Staff Induction and Training

6.1 Safeguarding and Child Protection

All appointed staff are provided with the following documents, and they are required to sign a register to confirm they have been read and understood them:

- The Safeguarding and Child Protection Policy (including the Staff Safeguarding Code of Conduct) and the identity and role of the Designated Safeguarding Lead (DSL) and Deputy DSLs
- Part 1 of the DfE's *Keeping Children Safe in Education* (including Annex A for those who work directly with children)
- The Staff Code of Conduct, including the Whistleblowing Procedure
- Pupil Behaviour Policy
- Data Protection Policy (Employees)
- Mental Health and Wellbeing Policy
- Health and Safety Policies

Safeguarding and Child Protection is also covered in the induction training for all staff (including, where appropriate, an online child protection course), which includes the arrangements for Children Missing in Education.

- 6.2 Further guidance can be found in the New Staff Induction Handbook, available in the Staff Handbook or from the Senior Deputy Head or HR Department.

7. Equal Opportunities

- 7.1 The School promotes employment practices designed to eliminate discrimination. All applicants are provided with an equal opportunities monitoring form to complete.

- 7.2 The School aims to ensure that:

- no applicant for a job receives less favourable treatment on the grounds of:
 - sex
 - age
 - disability
 - sexual orientation
 - gender reassignment

- religion or belief
 - race (including colour, ethnic or national origins)
 - pregnancy and maternity
 - marriage and civil partnership
- all applicants will be treated equally and fairly in the recruitment process outlined in this policy
- the successful applicant will be recruited (and subsequently trained) on the basis of ability, experience and skill(s) to undertake the job successfully, as defined within the job description and person specification.

7.3 Further information and guidance is given in the City of London Corporation Equal Opportunities in Employment Policy, which is available from the HR Department.

Appendix 1: Safer Recruitment Checklist

Item	Description	Checked by	Date
1	Application Form (signed/typed name, declaration on criminal record and suitability to work with children		
2	Equal Opportunities Monitoring Form.		
3	Full employment history (gaps to be scrutinised by interview panel prior to any appointment)		
4	Check of identity/address/National Insurance number and right to work and live in the UK.		
5	Disclosure and Barring Services Check ('Enhanced DBS')		
6	Written references x 2 (to include last employer)		
7	Verbal verification of references x 2 (for the successful applicant) – notes taken and filed		
8	Overseas check for work or residence overseas/3 rd reference		
9	Prohibition from teaching check		
10	Prohibition from Management check (for Senior Management)		
11	EEA check		
12	Disqualification from childcare (for select Senior posts)		
13	Proof of relevant qualifications		
14	Satisfactory Medical Clearance		
15	Interview notes – kept for required period		
16	Approval for hire from Headmistress (for academic staff) or Bursar (for support staff)		
17	Offer letter (subject to all these and the Enhanced DBS check being fulfilled and acceptable)		
18	Contract signed and sent		

Appendix 2: Risk Assessments

- 1.1 There would need to be exceptional and justifiable circumstances for employment to commence prior to DBS clearance. Such a decision can only be taken by the Headmistress or her delegate from the Senior Management Team, following a risk assessment. In any circumstances, potential employees cannot commence work prior to the Barred List check being completed. Nor may they commence work prior to the submission of their completed disclosure application to the DBS.
- 1.2 There must be a record of the Risk Assessment and decision, including “sign off” by the Headmistress, to ensure the auditability and accountability of the judgement. The judgement is an assessment of the risk versus the consequences of the decision. The Risk Assessment pro-forma (see below) is to be used to act as an auditable record of the decision made following risk assessment and must contain the signature of one of the accountable persons. This responsibility cannot be delegated.
- 1.3 If a decision is taken to allow an employee to commence work prior to receiving the DBS certificate, the employee must have completed and submitted their completed disclosure application to the DBS, and their contract of employment should remain subject to this condition being met. The application’s progress within the DBS system should be checked and monitored on a regular basis.
- 1.4 Robust and reliable supervision arrangements must be put into place during the “waiting period”. The employee must be clearly notified of the supervision arrangements that are in place. The situation must be checked and monitored at least every two weeks. The Headmistress, Senior Deputy Head or Bursar remains accountable during this time, until the clearance is received, checked and suitability confirmed.
- 1.5 If at any stage, the new member of staff’s behaviour is of concern, or the protection measures are not able to be implemented or sustained, then the permission to work must be withdrawn until such time as all checks have been satisfactorily completed.

1.6 Risk Assessment - Key Questions for Consideration

- 1 **What are the exceptional reasons for considering commencement of employment prior to receiving clearance?**

This should not be a natural default position, and should be exceptional and clearly linked to the circumstances identified in response to Question 2 below.

2 What would be the consequences to the School's operations of waiting until clearance is received?

These should be exceptional and have a demonstrable substantial impact. The School should be able to demonstrate how it has used effective planning to avoid / minimise this disruption, and clearly show where this has been unavoidable.

3 Is the employee known to the school?

A former employee, who would have had a DBS check when working in the School, and of whom a great deal is known, will present a much lesser risk than a new employee, who is not known to at all. The more recent the departure the lower the risk.

4 If the employee commenced work, what would be their normal level of access to children?

- i. Unsupervised access one-to-one*
- ii. Unsupervised access to a group*

Neither of these would be acceptable arrangements in any circumstances during this "waiting period".

- iii. Supervised access one-to-one*
- iv. Supervised access to a group*
- v. No direct access, but based within premises*

In these circumstances, if an employee does commence employment prior to clearance being received, their access must be supervised at all times. The level of risk declines the lower down the list above, but there continues to be a risk with each of these scenarios.

RISK ASSESSMENT: CONSIDERATION OF COMMENCEMENT OF EMPLOYMENT PRIOR TO DBS CLEARANCE

Name of prospective employee:		Name of Assessor (Headmistress / Bursar / Senior Deputy Head)	
Role:		Date of Risk Assessment:	

RECORD OF FINDINGS

Reasons for considering commencement of employment prior to receiving clearance: Consequences of waiting for clearance (i.e. not allowing the prospective employee to start prior to receiving a satisfactory disclosure):		Supervision arrangements during “waiting period” and any other control measures:	Pre-employment checklist: Has the employee left employment? Y / N Medical clearance received? Y / N / NA Right to work in UK check completed? Y / N Qualifications verified? Y / N ICBL check completed (if applicable)? Y / N References (x2) verified? Y / N Satisfied with general background & Employment history checks? Y / N
			Previous DBS clearance: Is a previous disclosure available? Y / N Has it been seen by you? Y / N What is its date? _____

Assessment of Risk following control measures (circle one): HIGH MEDIUM LOW
Options: 1) If assessed as HIGH or MEDIUM Risk this prospective employee may not commence work prior to satisfactory clearances. 2) Following an assessment of the risks, if assessed as LOW risk, I have determined that the above named person may commence employment with the identified control measures. I undertake to personally review this situation at intervals of no less than every two weeks.

Member of Staff	Date
Supervising Manager	
Date	
Having reviewed the risk assessment I confirm that the member of staff may commence work prior to the school viewing the DBS certificate.	
Head	Date
To be reviewed on	
Member of Staff	Date
Supervising Manager	
Date	
Head	Date
To be reviewed on	

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CITY OF LONDON SCHOOL FOR GIRLS RISK ASSESSMENT GUIDANCE

Policy last reviewed by:	Jane Elliott-Waine
Date policy last reviewed:	October 2020
Approved by:	
Date approved:	

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1. Introduction

- 1.1 The School is committed to providing a safe working and learning environment for all staff, pupils, contractors and visitors. Assessing the risks arising from activities and buildings is fundamental to achieving this. It is important that staff feel engaged in the risk management process and this document sets out the School's approach to identifying risks and how they are controlled.
- 1.2 The School will provide and maintain written risk assessments of the risks to the health and safety of its employees whilst they are at work and others who may be affected, including pupils, as required by the Management of Health and Safety at Work Regulations (1999). These risk assessments should be systematic in their aim to promote the pupils' welfare.
- 1.3 The School aims to provide a wide range of educational opportunities for all of its pupils, and to do so in an environment in which staff and pupils feel safe to participate fully in those activities. This School is not risk-averse but takes an active approach to managing risk in order to reduce the likelihood that pupils (and staff) will be harmed through negligence and lack of foresight or proper planning. In assessing the suitability of activities, therefore, it is important to recognise opportunities as well as the risks.
- 1.4 This policy should be read in conjunction with:
- Health, Safety and Wellbeing Policy
 - Educational Visits Policy
 - Fire Safety Policy
 - First Aid Policy
 - Medicines and Medical Conditions Policy
 - Pupil Supervision Policy
 - Recruitment Policy
 - CoL Display Screen Equipment (DSE) Policy
 - CoL Control of Substances Hazardous to Health Guidance (HSG54)
 - CoL New Expectant Mother (HSG21)
 - CoL Guidance Home / Remote Working Safely
 - City of London Corporation Staff Code of Conduct
 - Safeguarding and Child Protection Policy
 - City of London Corporation Health, Safety and Wellbeing Guidance on General Risk Assessment HSG 23 Risk Assessment

It should also be read in conjunction with the City of London Corporation Health and Safety and Wellbeing Policy and all other relevant City of London Corporation [policies](#)¹.

- 1.5 As listed above, our Safeguarding and Child Protection Policy and Pupil Supervision Policy, as well as training for all staff form the core of our child protection risk management and

¹ Available [COLNET](#) with a City of London Corporation employees' login.

are not assessed as part of this guidance. DSE assessments and Expectant Mother Assessments are completed in line with the CoL Policies listed above.

- 1.6 This policy has regard to Part 3 (Welfare, health and safety of pupils), Paragraph 16 (Risk Assessment) of the Independent School Standards Regulations.

2. Responsibility for Risk Assessment

- 2.1 The Head, through the Bursar and Senior Deputy Head, will ensure that risk assessments of the premises and equipment, methods of work and all school-sponsored activities are conducted annually (or more frequently, as necessary). These risk assessments will identify all defects and deficiencies, together with the necessary remedial actions or risk control measures.
- 2.2 Heads of Department, reporting to the Senior Deputy Head, and Support Staff Managers, reporting to the Bursar, are responsible for conducting risk assessments for their departments, which should be updated on a regular basis, particularly when an incident has occurred, or new processes or equipment are introduced. They will need to:
- Where necessary nominate appropriate staff to assist in carrying out risk assessments (*but remember you are responsible for overseeing it is adequately done*);
 - Ensure that those undertaking risk assessments are competent to do so. Contact the Compliance Manager to arrange training;
 - Ensuring a risk register (Appendix 2) is kept updated and filed in the 'Teams' Health and Safety Manager folder;
 - Ensuring that all staff have signed the Risk Assessment Sign off Sheet, Appendix 6, a copy of which should be uploaded to the folder as above. This provides evidence that staff have been informed of the findings from the risk assessment process. New starters will also need to be informed of all relevant departmental risk assessments and their CLSG New Starter Induction form should be completed to indicate this;
 - When further action is identified on the risk assessment, ensure this is completed within appropriate timescales and cascade any residual risk concerns or budgetary restrictions to the Compliance Manager and Bursar;
 - Ensure that interim measures are introduced in circumstances where further action (control measures) are beyond the finances of the department. The Compliance Manager can assist in identifying appropriate measures.
 - Communicating to staff the outcomes of assessments and the progress of managing residual risks i.e. standing agenda item on local team meetings.
- 2.3 Certain members of staff have responsibility for statutory compliance and the maintenance of up-to-date risk assessments (as shown in Appendix 1).
- 2.4 All members of staff have a responsibility for taking care of their own safety, together with that of pupils and visitors and should make themselves aware of the outcomes of the risk assessments in their areas and report any risks or defects to the Facilities Manager, Compliance Manager or Bursar.

- 2.5 City of London Corporation and whole-school policies / risk assessments supplement departmental risk assessments, Appendix 2.

3. Conducting Risk Assessments

- 3.1 Risk assessments should be produced in line with the City of London Corporation Health, Safety and Wellbeing Guidance on General Risk Assessment (April 2018), See link above. This follows a procedure where the *Severity* of a hazard and its *Likelihood* of causing harm are combined to give an overall *Risk Rating* (*Low*, *Medium* or *High*) for the risk.
- 3.2 A standard template is to be used for recording all risk assessments (in line with the City of London Corporation Health, Safety and Wellbeing Guidance on General Risk Assessment (April 2018); this is reproduced as Appendix 4.
- 3.3 Risk assessment is nothing more than a careful examination of what in the area of your responsibility, could cause harm to people, so you can weigh up whether you have taken enough precautions or should do more to prevent harm. In other words, it becomes a 'record of our thinking' and documents what we are concerned about in our working and learning environment.
- 3.4 It should be noted that this is not a paperwork exercise but an important tool to manage risk. To ensure this doesn't duplicate information we may hold in different formats you may decide there isn't a need to assess all activities, tasks or areas. You may decide that you can evidence sufficient measures are already in place to manage the risk from the list below. If you make this assessment, you should make reference on the Risk Register, Appendix 4, that in your judgement a separate risk assessment does not need to be created, however, you will need to list what evidence exists to justify this approach.
- 3.5 This document provides guidance on how to conduct a 'risk assessment' however; there are different ways that we can demonstrate we have thought about risk including:
- Training records, including induction;
 - Standard operating procedures;
 - Maintenance records;
 - Inspections and audits;
 - Signage;
 - Minutes of meetings;
 - Method statements;
 - Emergency plans;
- Policies, procedure and guidance relating to specific hazards
- 3.6 How do you assess risks in your area of responsibility? Walking around the workplace and watching activities will help you identify hazards; risk assessment shouldn't be just a desk-based exercise. All aspects of the work activity must be considered, routine and non-routine for example, maintenance, cleaning, deliveries, response to emergencies etc. You also need to think about context, pupils, depending on age and experience will not have the same perceptions of risk as you may have. Staff that have been doing the job for many years may have become complacent and picked up bad habits that need addressing in the risk assessment.

3.7 This table provides some examples of hazards that you may need to consider:

Trailing cables	Dealing with spillages	Unsuitable flooring
Lack of training	Poor Housekeeping	Poor storage
Poorly stored chemicals	Use of Chemicals	Dust, fumes and Vapours
Use of ladder	Gas/pressure vessels	Hot surfaces
Vehicle movement	Use of sharps	Ergonomics/poor design
Use of equipment	Lack of maintenance	Heating and Ventilation
Noise & vibration	Workplace stress	Lone working
Abuse and bullying	Poor management of Ignition sources	Poorly maintained electrical equipment / systems

This list is not exhaustive but provides examples

3.8 When you work in a place every day it is easy to overlook some hazards, so here are some tips to help you identify the ones that matter:

- Visit the Health and Safety Executives website where they publish practical guidance on hazards and how to control them;
- If you are a member of a professional organisation or trade association, contact them as many produce helpful guidance documents;
- Check the manufacturer's instructions and manuals as these helps identify additional hazards that you may not have thought of;
- Look back over any accidents that have occurred and what were the lesson learnt;
- Remember to think about long-term hazards to health as well as safety hazards;
- Speak to the Compliance Manager, they are here to help.

3.9 Where a risk is rated as *Low*, no additional control measures are usually required. Where a risk rated as *Medium*, further control measures (short- or longer-term) should be introduced to reduce the risk. **If a risk is rated as *High*, the activity should not be started or continued until the risk has been reduced.**

3.10 It is important to find out if existing controls are actually used in practice, is preventative maintenance or servicing being carried out, are visual checks conducted, is competency training being completed etc. The table below provides examples of types of controls / further actions that should be considered:

Good housekeeping	Local exhaust ventilation	Signage
Machine guards	Training	Supervision
Safe systems of work	Washing facilities	PAT Testing
Visual safety checks	Use of cable strips	First aid provision
Servicing of machinery	Maintenance checks	User checks
Restricted access	Emergency stop buttons	Appropriate storage
Spill kits	Emergency procedures	Ladder registers
PPE	Health checks	Safety procedures

This list is not exhaustive but provides examples

3.11 CLSG subscribes to the CLEAPSS Advisory Service where staff can access model 'generic' risk assessment, for Science, DT and Art and Design. They also provide teaching resources for practical lessons, HazCards, Recipe Cards and model departmental policies which staff

can access. All staff using these documents as part of their risk management approach must read and understand the managing and recording risk assessment documents published by CLEAPSS.

- 3.12 If you use 'generic' risk assessment from external sources i.e. CLEAPSS, they should be assessed in light of your departmental controls and where necessary, they should be adjusted and adapted to meet the needs of your individual circumstances. Generic assessments are by their very nature non-specific and therefore their use may not be seen as a 'suitable and sufficient' as set out in the Management Regs if they have not been customised or if their use is not recorded.
- 3.13 Where staff are recording the use of CLEAPSS risk assessments on schemes of work, lesson plans, worksheets and technicians notes they must ensure they are recording the significant points from the model risk assessment e.g. Do not just record "see Hazcard" but include appropriate details, for example, 0.5M H₂SO₄, Irritant, see Hazcard 98A. Wear eye protection.

4. Risky Areas

- 4.1 The following areas and activities present identified and significant risks. As a consequence, pupils are not allowed unsupervised access to:

Area	Monitoring of use and practices
PE	The Head of PE keeps risk assessments for: all outdoor and indoor games, swimming, gymnastics, dance etc. Records of training and qualifications in life-guarding and other subject specific training are kept.
Science	The Heads of Science subjects keep risk assessments for all experiments and the use and storage of equipment. COSHH assessments and CLEAPSS Hazcards are kept on the use and safe storage of all chemicals. Science HODs keep records of all subject-specific training by teachers and technicians.
Design Technology	The Head of Design Technology keeps risk and COSHH assessments for all activities, the use of all equipment and machinery and the safe storage of flammables. Records of staff training are kept.
Art	The Head of Art keeps risk and COSHH assessments. Records of staff training are kept.
Drama / Theatre	The Head of Drama keeps risk assessments for the lighting box, the safe construction, movement, building and dismounting of scenery, props and staging. Records of staff training are kept.
Kitchen Area	The Catering Manager keeps risk assessments for all activities, safe use and storage of equipment and flammables, COSHH procedures of chemicals and other products. Records of staff training are kept.
Premises workshops	The Facilities Manager keeps risk and COSHH assessments. Records of staff training are kept.

5. Training

- 5.1 Training will be provided to any member of staff who requires it prior to completing risk assessments².
- 5.2 It is considered good practice within the School for risk assessments to be conducted by more than one individual (member of staff), in order that a more experienced member of staff may support a less experienced member of staff and / or to ensure the quality of the risk assessment. When more than one member of staff is involved in producing a risk assessment, both (or all) individuals should be identified as its authors on the risk assessment document. The Head of Department / Manager should also be a named assessor, this is to document that they have management oversight of all risk assessments under their control.

6. Review of Guidance

- 6.1 The guidance is reviewed annually, or more regularly as required, in conjunction with the School's Health and Safety Policy, prior to approval by Bursar.

² Such training is available from the City of London Corporation's Health and Safety Advisor and arranged by the CLSG Compliance Manager.

Appendix 1: Members of staff with responsibility for risk assessments

- 1.1 The following members of staff have responsibility for statutory compliance and the maintenance of up-to-date risk assessments in the areas given below:

Area of responsibility	Person responsible
Fire	Facilities Manager (external fire risk consultant used)
Legionella / Water Hygiene / management and Maintenance of the swimming pool	Facilities Manager / City Surveyor
All non-teaching rooms, corridors and exits as well as security	Facilities Manager
Catering and cleaning functions including Hazard Analysis Critical Control Points (HACCP) system of food hazard awareness and Control of Substances Hazardous to Health (COSHH) risk assessments and procedures	Catering Manager
Maintenance functions (including working at heights, electricity, gas, manual handling, and building work, use of power tools, COSHH and flammable substances)	Facilities Manager
Asbestos Register / Surveys	City Surveyor ³
Lifting Equipment	Facilities Manager / City Surveyor
Pressure vessels	Facilities Manager / City Surveyor, Biology Technicians
Construction Works / Management of Contractors	Facilities Manager / City Surveyor
Reprographics machines and copiers	Media Resources Technician

- 1.2 The following members of staff have responsibility for the maintenance of up-to-date risk assessments for teaching and learning in the areas given below:

Area of responsibility	Person responsible
Science (including COSHH and flammable materials)	Heads of Sciences
All outdoor and indoor games and activities	Head of PE
Swimming	Head of PE
Duke of Edinburgh Award	Duke of Edinburgh Coordinator
Drama / Theatre	Head of Drama
Art (including COSHH and flammable materials)	Head of Art

³ N.B. Local Asbestos Management Plans (AMPs) are developed in consultation with the City Surveyor. The duty to manage asbestos in School is shared between the School and the City Surveyor. Asbestos surveys and re-inspections are completed by the City Surveyor's department. The School has the day to day responsibility to ensure that anyone liable to disturb asbestos, including staff and contractors, are made aware of its presence, and what to do if they have any concerns.

Music	Heads of Music – Academic and Performance
Design Technology (including machinery, COSHH and flammable materials)	Head of Design Technology (in conjunction with the Design Technology technician)
All visits and trips	Educational Visits Coordinator

Appendix 2: City of London Corporation Risk Assessments

2.1 City of London Corporation policies / risk assessments supplement School and departmental risk assessments, covering:

- Asbestos
- Confined spaces
- Contractors / Construction Work, including CDM 2015
- Control of Substances Hazardous to Health (COSHH)
- Covid-19 related guidance
- Corporate Transport
- Display Screen Equipment
- Fire safety
- First Aid
- Guidance for managers on Health & Safety compliance
- Home / Remote Working
- Infection Control
- Legionella and Water Hygiene
- Lifting Operations and Lifting Equipment
- Lone working, personal safety and preventing violence
- Manual handling
- New Expectant Mothers
- Noise at Work
- Property Health and Safety
- Playground safety in Schools
- Slips, Trips and Falls
- Vibration
- Work Experience
- Working at Height
- Occupational Health (including Medical Questionnaires)

Whole-school policies / risk assessments supplement departmental risk assessments, covering:

- Educational visits policy
- Fire Safety Policy
- Fire Risk Assessment
- First Aid Policy
- Medicine and Medical Conditions Policy
- Repairs and Maintenance Procedures
- Security policy
- CCTV Policy
- Critical Incident Policy
- Electrical and Gas Safety Testing
- Health and Safety Notices
- Letting and Hiring
- Swimming pool safety

Appendix 3:

CoL Guidance for Conducting General Risk Assessments

Appendix 4:

CoL General Risk Assessment Form Template

Both found on the policy section on the intranet along with this guidance.

Appendix 5: Department Risk Assessment Register

School / Department:	Section:
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Ref No	Work activity / area assessed	Notes, including whether a RA has been completed or areas where we have looked at hazards and found we can provide sufficient evidence by other means. Please list the evidence and where it can be found	Risk Level low, med, high	Assessment Date	Assessed By	Review Date

Name of Head of Department / Manager:	Completed Date:
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Appendix 6: Risk Assessment Staff Sign Off Sheet

All staff are expected to sign and date this form to confirm they have read and understood the appropriate risk assessments listed on the risk register.

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CITY OF LONDON SCHOOL FOR GIRLS

SECURITY, ACCESS CONTROL, WORKPLACE SAFETY AND LONE WORKING POLICY

Policy last reviewed by:	Mark Smith
Date policy last reviewed:	October 2020
Approved by:	
Date approved:	

Contents

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1. Introduction

Our policy for the security and workplace safety at the City of London School for Girls is primarily to provide a safe and secure environment in which our pupils can learn, our staff can work and our visitors can freely come and go. Its second objective is to protect our buildings and grounds, together with the equipment belonging to the school and the personal possessions of everyone in our community.

2. Responsibilities

2.1. The Headmistress and Bursar

The Headmistress has delegated to the Bursar overall responsibility for health and safety on site. This includes ensuring there are suitable arrangements in place for security, workplace safety and lone working and monitoring and reviewing these arrangements on a regular basis.

2.2. The Facilities Manager

The Facilities Manager is responsible for ensuring that there are suitable arrangements in place for the physical security of the buildings, for locking and unlocking external buildings and windows at the start and close of every day, switching on and off security alarms and for carrying out regular checks of the site. His team monitors the CCTV system from the monitors in the Premises Team's office. The Facilities Manager ensures that at least one member of the team of Premises Assistants is on duty or on call 24 hours a day, 7 days a week, and 365 days a year, including public holidays to respond to the alarm monitoring service. The duty Premises Assistant carries a school mobile phone whilst working or on call. That number is made available to all members of staff to use if they need assistance. A Premises Team manual is used to assist with the daily locking and unlocking procedure.

The Facilities Manager or his deputy will respond to any emergency or intruder alarm activation and will summon the Emergency Services, if the fire alarms go off during working hours. Remote monitoring services monitor the school outside working hours.

2.3. The IT Director

The IT Director and his team are responsible for maintaining a safe IT technical infrastructure at the school. Their responsibilities include protecting the network and equipment from attack by viruses, maintaining robust firewalls to safeguard or

prevent inappropriate usage, and ensuring the security of our electronic hardware. All school computers, printers, copiers, scanners, projectors, screens and other electronic equipment are audited and a register is maintained of all equipment showing: make, date of purchase, cost and location in the school. The asset register is audited and updated annually.

2.4. Teaching staff on duty

At least one member of the teaching staff is always present on duty in order to supervise pupils whenever they are in the school outside normal school hours. Pupils are not allowed to be unsupervised on site, and are expected to go home by 16:20. Arrangements are made to ensure pupils are supervised during play and concert rehearsals, or other events that bring small groups into school out of hours

3. Risk assessments

The Facilities Manager will arrange for a risk assessment to be carried out on the security and safety of the grounds and all the buildings.

4. Visitors and contractors

All visitors and contractors are required to sign in at our Reception, where they are issued with a visitor's badge, which should be worn at all times. They are shown the school's emergency evacuation notice and the way to the assembly point. Visitors and contractors wait in the Reception Area and are collected by the person whom they have come to see. All staff are expected to escort their visitors whilst they are at the school and to ensure that they sign out and return their badges on leaving.

When large numbers of visitors are at the school for open days, plays, concerts, exhibitions and other events, a brief announcement is made advising them of the location of the emergency exits that they should use in the event of the alarms sounding. Any such event is subject to our risk assessment policy.

5. Access control

There is an access control system at each of the exits and entrances to the school. This is linked to Reception and to our Premises Team 2-way radios. The main entrance door is protected by an access code for key holders and the codes are changed at least annually. During school hours access is controlled by the duty Receptionist and out-of-hours the door is monitored remotely by the duty Premises Assistant. All other entrances are locked and accessible only to authorised keyholders.

6. Parking facilities and deliveries

The school has only one parking space for our use in the underground car park. All other bays are owned by residents of the Barbican Estate. Staff or visitors that require use of the parking bay for visitors or loading heavy items, must reserve the space by emailing premisesupport@clsg.org.uk. If the parking bay is already booked then they will need to make alternative arrangements (Pay & Display parking is available on Fore Street). Please note that this arrangement also applies at weekends as we may have lettings in. The school will not be responsible if you have not informed the Facilities Manager and the Barbican car park attendants issue a ticket. The parking of cars is not permitted on St Giles' Terrace except for disabled access and emergency maintenance vehicles when parking in the underground car park is not available. Access to the terrace is controlled by a locked barrier.

Cars need to enter the underground car park located on Fore Street near the junction of Wood Street. Cars must stop at the car park attendant's office and say they are visiting the school and the car park attendant will direct them.

7. Reception

School Reception is manned between 07.30am and 06:00pm during weekdays in term-time. The master fire alarm panel, showing the location of all alarm call points, and the security alarm panel are physically located in the main entrance to the school.

The reception desk is fitted with a panic button and a 2-way radio to communicate with the Premises Team. A monitor covering the CCTVs located at the loading bay, main hall, bridge gate and Gallery doors so that they are visible to the Receptionist on duty; but not to passers-by.

8. Training

All staff receive a briefing on security and workplace safety within their first week at the school. This includes advice on:

- Supervising pupils, where new members of the teaching staff are given training in registration, in the arrangements for supervising pupils.
- Safeguarding their personal possessions. Every member of staff is given his or her own locker for storing valuables.
- Safeguarding the school's property. Staff are asked to follow an agreed procedure for taking equipment, such as laptops off the site, and for returning them.
- Measures to deter opportunist thieves, such as closing windows and blinds when leaving valuable equipment unsupervised.
- Keeping outside doors shut.
- Arrangements for late working.

The briefing also covers:

- The location of the school's CCTV cameras in the high risk areas of the school, together with the school's monitoring procedures.
- The procedure for booking in visitors and escorting them.

- The value of being curious about strangers, and of reporting concerns.
- The regime of login and password protection for electronic equipment.
- How all staff are trained in keeping pupils safe. (See policy on Induction of new staff in Child Protection).

More detailed and specific training is given to the Premises Team and to the staff who work in Reception.

9. Lone working

We do not permit lone working and insist that a Premises Assistant is in the building for as long as another member of staff is present on site.

10. Pupils

We use PHSCEE and form/house/tutor discussions to promote awareness of safety amongst all age groups.

The local Police Community Safety Officer is involved in a programme of safety discussions for Years 3- 6, covering:

- Travelling on foot
- Using public transport
- Safeguarding mobile phones and other personal possessions.

This programme continues in higher years and is linked with our PHSCE programmes on anti-bullying and the safe use of ICT, mobile phones and other electronic devices.

Every pupil is given a locker for the secure storage of her personal possessions. We encourage pupils not to bring large amounts of money or valuables to school. We have cashless dining. We advise pupils that if they have to bring more money than usual into school because of some planned after school activity, that they can store it securely in the Finance Office.

11. Use of school facilities by members of the local community

External groups use our facilities outside school hours, at weekends and in the holidays. We regulate their use by hire agreements that cover practical matters such as: hours of usage, cost, insurance and security. A member of our Premises Team is always on site when outside groups are present.

12. Physical security measures

12.1. External door and windows

All external doors are fitted with locks. The windows that are accessible at ground level are closed every evening.

12.2. Security alarms

Every external door is linked to the security alarm system and also incorporates internal PIR sensors. The alarm is regularly maintained and conforms to British Standards and is operated in accordance with the recommended code of practice and is also monitored by an external monitoring company.

12.3. Unsupervised access by pupils

We ensure that pupils do not have unsupervised access to potentially dangerous areas, such as the swimming pool, (which is fitted with access control) the science laboratories, the design technology rooms, etc. Doors to these areas are kept locked at all times when not in use. All flammables are kept securely locked in appropriate storage facilities. Pupils do not have access to the Service areas of the school. (See our separate policy on the supervision of pupils).

12.4. Security of electronic property

Marking Property - A register of non-electronic valuables is maintained by the Facilities Manager or Bursar. The IT Director maintains the register of electronic equipment. Both registers are reviewed annually.

12.5. CCTV

We have CCTV cameras covering the main entrances to the school all of which are equipped with IR night vision and are vandal and weather proof.

We have notified the Information Commissioner that the City of London School for Girls operates a CCTV system for the prevention and detection of crime and for the protection of pupils, staff and visitors. In accordance with the law, we do not use CCTV for any other purposes, nor provide images to any third party, save to law enforcement bodies. We conduct an annual audit and review of our use of CCTV, and display signs at our entrances, advising of its usage. Our main monitors are located in the Facilities Manager's office and the Premises office to which access is restricted. Satellite monitors are used only in Reception, facing the Receptionist. The satellite monitors are switched off when Reception is closed.

The Facilities Manager is trained in operating, recording and retaining images taken. He is aware of the procedure for handling requests for the disclosure of their own image by individuals, where the school's policy is:

- To agree the request on production of a photograph confirming the identity of the individual making the request and an administrative fee of £10.00.
- To consult the City Corporation Information Officer where there is doubt about the request.

Our CCTV system is serviced annually and cameras are checked regularly to ensure that they continue to provide clear images. An annual checklist of our system is

carried out using the checklist at Appendix 2 to the ICO's CCTV Code of Practice, 2008 (www.ico.org.uk).

12.6. Monitoring

Physical control measures are regularly maintained and are regularly checked to ensure they are functioning.

All external doors and accessible windows and gates are checked by the Premises Assistant when locking up.

Regular checks are made by the Premises Team throughout the day to ensure that restricted areas remain secured.

13. Maintaining a safe and secure environment in our Prep Department

The safety of the children is our highest priority, and because they are so young, we need to be particularly vigilant. We will therefore:

- Only allow a child to go home with someone other than their parent(s) if we have received advance permission (preferably in writing) that she may be collected by another adult.
- Never allow a child to leave the premises unsupervised. There is always at least one adult in charge of the outside play area.
- Ask all visitors to identify themselves and to state their business before we give them access to the premises. Visitors sign in, wear security badges and are escorted throughout their visit. They sign out on leaving.
- Register all pupils at the start of the morning and afternoon sessions.
- Check all pupils out as they are collected by their parents or careers.

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