## Friendship, Opportunity, Resilience, Empathy, Self-awareness, Teamwork



## 'Your Inspirational Community'

# Governance, Conduct & School Information Policy Handbook

|                     | Print Name      | Signature | Date          |
|---------------------|-----------------|-----------|---------------|
| Executive           | John Cooper     |           | December 2023 |
| Headteacher or Head |                 |           |               |
| of School           |                 |           |               |
| On behalf of        | Emma Wainwright |           |               |
| Governing Body      |                 |           | December 2023 |
|                     |                 |           |               |

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## INSTRUMENT OF GOVERNMENT STEETON PRIMARY SCHOOL

- 1. The name of the school is STEETON PRIMARY SCHOOL.
- 2. The School is a Community School.
- The name of the Governing Board is The Governing Board of Steeton Primary School.
- 4. The Governing Board shall consist of:
  - (a) 2 parent governors
  - (b) 1 Local Authority governor
  - (c) 1 Headteacher Executive Head (except at any time when the Headteacher has given notice that he/she chooses not to be a governor)
  - (d) 1 Staff governor
  - (e) 5 Co-opted governors (the number of Co-opted governors who are also eligible to be elected as staff governors must not exceed 1)
- 5. The total number of governors is 10.
- 6. This Instrument of Government comes into effect on 01 January 2021.
- 7. This instrument was made by order of the City of Bradford Metropolitan District Council.

THE COMMON SEAL of City of Bradford Metropolitan District Council was hereunto affixed this 24 Object of Jobo in the presence of

Authorised by the City Solicitor



## **Terms of Reference – Resources Committee**

## Steeton Primary School

## **Resources Committee**

## Terms of Reference 2023-24

## 1. Overall Roles of the Committee

- To assist the Governing Body in fulfilling its statutory responsibilities for all staff employed in school and to generate the best possible professional environment within which all staff can contribute to the raising of pupils' progress and attainment.
- To assist the Governing Body in directing the management of the school budget in support of the School Improvement Plan and ensuring sound financial management practices.
- To determine, in accordance with the pay policy, the salary level for new appointments to all posts and to consider the recommendations of the Executive Headteacher for performance related pay increases for staff.

## 2. Terms of reference:

## A. General

• To establish, recommend to the Governing Body and/or review all policies related to the remit of this Committee, as set out in the annual Governing Body workplan, and to monitor their implementation.

## B. Staffing

- To recommend to the Governing Body and keep under review the staffing structure, in consultation with the Executive Headteacher.
- To oversee the management of workforce change as necessary.
- To keep under review the work/life balance, working conditions, wellbeing and attendance of staff, including the Executive Headteacher.
- To ensure that all staff have a clear job description and contract of employment.
- To ensure that the performance of all staff is managed effectively.
- With the Executive Headteacher, to keep under review the in-service training needs of all staff, taking account of the priorities in the School Improvement Plan.
- To ensure that all requirements of equal rights legislation are observed throughout school.

## C. Finance

- To recommend to the Governing Body the opening budget for the following financial year and three-year budget plan, in consultation with the Executive Headteacher.
- To review the budget position and consider any requests for virement of monies between budget headings, and to report any significant variations from the original approved budget to the Governing Body.
- To ensure that the school operates in accordance with the Local Authority Financial Regulations.
- To monitor expenditure of, and review the annual audit of the accounts holding, all voluntary funds received by the school.

- To make decisions in respect of entering into or terminating Service Level Agreements or contracts for the provision of goods or services and ensure that they represent value for money.
- To advise on expenditure recommended by other Committees.
- To ensure that a register of Governors' interests is maintained.
- To advise on opportunities to maximise school income.

## D. Premises

- To advise the Governing Body on priorities, including Health and Safety, for the maintenance and development of the school's premises.
- To ensure effective monitoring of the security of the premises and that appropriate action is taken as required.
- To monitor the condition of the fabric of the buildings and to approve an annual rolling 3-5 year plan of premises maintenance and development.
- To oversee the effectiveness of arrangements for repairs and maintenance.
- To agree specifications for any building works to be undertaken by a contractor, within the limits of the Committee's financial delegation.
- To oversee bids for funding for matters related to the premises.
- To oversee arrangements, including for Health and Safety, for the use of the school premises by external users within policies agreed by the Governing Body or this Committee.
- To consider the impact of the school on the environment and make recommendations for action to minimise that impact wherever possible and affordable.

## 3. Delegation of powers

So far as permitted by Regulations, the Governing Body delegates to this Committee powers of decision making on all matters within its remit as described in Section 2, except as set out in this section.

## A. General

## B. Staffing

- (1) The Governing Body retains to itself the following powers:
  - Approval of the school staffing structure.
  - Review of the salaries of the Executive Headteacher and Deputy Headteacher in line with national Regulations and the Governing Body's pay policy.
- (2) The Governing Body delegates the following powers to the Executive Headteacher:
  - All aspects of the day to day management of staff.
  - Consideration of staff applications for leave of absence within the normal terms and conditions of relevant employment guidance and/or the policies and protocols approved by the Governing Body or this Committee.
  - Appointment of temporary supply staff.
  - Appointment of staff to posts authorised by the Governing Body or this Committee.
  - Approval of overtime working.

- In consultation with the Chair of the Governing Body or the Chair of this Committee, urgent action on staffing issues.
- (3) The Governing Body delegates the following powers to the Chair of the Governing Body or the Chair of this Committee:
  - Consideration of staff applications for leave of absence outside the normal terms and conditions of relevant employment guidance and/or the policies and protocols approved by the Governing Body or this Committee.

## C. Finance

- (1) The Governing Body retains to itself the following powers:
  - Approval of the annual opening budget.
  - Decisions on expenditure in excess of £20,000 or for which there is no budget provision.
  - All decisions on write-off of debts below £500. (Approval to write off debts in excess of £500 must be sought from Bradford Council's Chief Financial Officer.)
- (2) The Governing Body delegates the following powers to the Executive Headteacher:
  - Expenditure of up to £5,000 at any one time, on non-recurring items without any prior reference to the Committee, provided that expenditure is within budget provision.
- (3) The Governing Body delegates the following powers to the Committee:
  - Approval of expenditure of between £5,001 and £20,000 at any one time.
- (4) In *emergency situations*, the Governing Body delegates the following powers to the Chair of the Governing Body or, in the absence of the Chair of the Governing Body, the Chair of this Committee:
  - Authorisation of expenditure for which there is no budget provision

All expenditure will be made in accordance with the Local Authority (LA) *Guide to Financial Procedures* document and reported to the next meeting of this Committee. Authorisation of expenditure in accordance with subsection (4) above will be reported as a Chair's Action at the next meeting of the Governing Body.

## D. Premises

- (1) The Governing Body retains to itself the following powers:
  - Approval of proposals for works for which there is no provision in the school budget.
  - Approval of specifications and contracts for works whose cost exceeds the delegated financial authority of this Committee.
- (2) The Governing Body delegates the following powers to the Executive Headteacher:
  - Day to day management of Health and Safety matters.
  - Day to day repairs and maintenance.
  - Management of arrangements to let the school premises.
  - Liaison with Bradford Council's Asset Management Team and/or contractors on works funded from the school's delegated budget, and day to day oversight of such works.
- (3) The Governing Body delegates the following powers to the Chair of the Governing Body or, where the Chair of the Governing Body cannot be contacted, to the Chair of this Committee:

• Approval of emergency works to secure the safety and usability of the premises, in consultation with Bradford Council's School Funding Team if the cost cannot be contained within the school budget.

## 4. Reporting

- The minutes of Committee meetings shall be circulated to all governors as quickly as possible after their approval by the Chair and Executive Headteacher.
- Items that are deemed to be confidential by the Committee shall be recorded as a separate confidential minute and reported orally at the next Governing Body meeting by the Chair of the Committee, wherever possible.
- The Chair of the Committee shall answer any questions concerning the minutes at the next Governing Body meeting

## 5. Membership and quorum

- The Governing Body shall appoint Governors as members of this Committee.
- The Governing Body may also appoint non-Governors as Associate Members to this Committee; in doing so, the Governing Body shall specify whether the Associate Member has voting rights on the Committee within the limits specified by Regulations.
- The Committee shall have the right to involve other governors and members of staff as and when agreed.
- Voting rights shall be restricted to members of the Committee.
- The quorum for the meetings shall be 3 governors.
- Further, for this Committee to be quorate there must be at least 1 non-school based governor in attendance.

## 6. Disqualification and declarations of interest

- Any person, other than the Executive Headteacher, employed to work at the school when the matter under consideration is the pay or performance of any person employed to work at the school, is disqualified from participation in, and shall withdraw during, discussion of that matter.
- Any person employed to work at the school when the matter under consideration affects them more than it affects the generality of staff shall declare an interest. That person may then be required by the Committee to withdraw during discussion of that item.

## 7. Review

These Terms of Reference are to be reviewed by the Governing Body at its last meeting of the academic year in preparation for the new academic year.

Approved by the Governing Body at its meeting on 21 July 2022

Signed: \_\_\_\_\_

Date:

## Joint Committee Terms of Reference 2023-24

## The Governing Bodies of Steeton and Steeton Primary Schools Joint Committee Terms of Reference 2023-24

## 1. Overall Roles of the Committee

To oversee the partnership between Steeton and Steeton Primary Schools on behalf of the two Governing Bodies, ensuring that the partnership brings maximum value to the pupils and staff of both schools while respecting and maintaining the distinct identities, visions and budgets of each.

## 2. Terms of reference

- To maximise economies of scale through joint purchasing.
- To maximise the effective use of each school's facilities and resources across both schools. Examples might include shared use of minibuses, shared access to playing fields, cooking kitchen etc.
- To maximise the opportunities for pupils from both schools to learn and play together. Examples might include joint sports events, learning projects, visits, occasional joint meetings of the School Councils etc.
- To maximise the opportunities for staff development across both schools through, for example, joint training and CPD; visits to observe and share good practice; shared planning; shared resources; career development moves or secondments between the schools; succession planning across the two schools.
- To consider the merits of running joint events for parents. Examples might include [joint workshops on online safety.
- To consider any matters referred to the Committee by either Governing Body.
- To keep under review the collaboration agreement that allows each Governing Body to draw upon governors from the other to participate in all types of panel hearing.
- To consider continually any other opportunities for the schools to work together for the benefit of both.

## 3. Delegation

The Committee has powers solely to make recommendations to the two Governing Bodies.

## 4. Reporting

The minutes of Committee meetings shall be circulated to all governors of both schools as quickly as possible after their approval by the Chairs of both Governing Bodies and the Executive Headteacher. The Chair of each Governing Body shall answer any questions at the next meeting of their Governing Body.

## 5. Membership, Chairing, Clerking and quorum

## a) Membership

- The membership of this Committee shall consist of the Chair and the Vice Chair of each Governing Body and the Executive Headteacher.
- The Committee shall have the right to involve other governors and members of staff as and when agreed by the Chair(s).
- Voting rights shall be restricted to members of the Committee.
- The Governing Bodies shall not appoint non-Governors as Associate Members to this Committee.

#### b) Chairing

- The Chairmanship of the Committee shall alternate from meeting to meeting between the Chairs of the two Governing Bodies.
- c) Clerking
  - The committee will appoint its own clerk.

#### d) Quorum

• The quorum for meetings shall be three members of the Committee.

#### 6. Review

These Terms of Reference are to be reviewed by each Governing Body at its last meeting of the academic year in preparation for the new academic year.

Approved by the Governing Body of Steeton Primary School at its meeting on 13 July 2022.

Signed: \_\_\_\_\_

Date:

Approved by the Governing Body of Steeton Primary School at its meeting on 21 July 2022.

Signed: \_\_\_\_\_\_

Date:



#### NGA Governors Code of Conduct

## NGA Governors code of conduct

Once this code has been adopted by the governing board, all members agree to faithfully abide by it.

## We agree to abide by the Seven Nolan Principles of Public Life:

#### Selflessness

We will act solely in terms of the public interest.

#### Integrity

We will avoid placing ourselves under any obligation to people or organisations that might try inappropriately to influence us in our work. We will not act or take decisions in order to gain financial or other material benefits for ourselves, our family, or our friends. We will declare and resolve any interests and relationships.

## Objectivity

We will act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

#### Accountability

We are accountable to the public for our decisions and actions and will submit ourselves to the scrutiny necessary to ensure this.

## Openness

We will act and take decisions in an open and transparent manner. Information will not be withheld from the public unless there are clear and lawful reasons for so doing.

## Honesty

We will be truthful.

#### Leadership

We will exhibit these principles in our own behaviour. We will actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

## We will focus on our core governance functions:

- 1. ensuring there is clarity of vision, ethos and strategic direction
- 2. holding executive leaders to account for the educational performance of the organisation and its pupils and the performance management of staff
- 3. overseeing the financial performance of the organisation and making sure its money is well spent
  - NGA recognises the following as the fourth core function of governance:
- 4. ensuring the voices of stakeholders are heard

## As individual board members, we agree to:

## Fulfil our role & responsibilities

- 1. We accept that our role is strategic and so will focus on our core functions rather than involve ourselves in day-to-day management.
- 2. We will develop, share and live the ethos and values of our school.
- 3. We agree to adhere to school policies and procedures as set out by the relevant governing documents and law.
- 4. We will work collectively for the benefit of the school.

- 5. We will be candid but constructive and respectful when holding senior leaders to account.
- 6. We will consider how our decisions may affect the school and local community.
- 7. We will stand by the decisions that we make as a collective.
- 8. Where decisions and actions conflict with the Seven Principles of Public Life or may place pupils at risk, we will speak up and bring this to the attention of the relevant authorities.
- 9. We will only speak or act on behalf of the board if we have the authority to do so.
- 10. We will fulfil our responsibilities as a good employer, acting fairly and without prejudice.
- 11. When making or responding to complaints we will follow the established procedures.
- 12. We will strive to uphold the school's reputation in our private communications (including on social media).
- 13. \*We will have regard to our responsibilities under <u>The Equality Act</u> and will work to advance equality of opportunity for all.

## Demonstrate our commitment to the role

- 1. We will involve ourselves actively in the work of the board, and accept our fair share of responsibilities, serving on committees or working groups where required.
- 2. We will make every effort to attend all meetings and where we cannot attend explain in advance why we are unable to.
- 3. We will arrive at meetings prepared, having read all papers in advance, ready to make a positive contribution and observe protocol.
- 4. We will get to know the school well and respond to opportunities to involve ourselves in school activities.
- 5. We will visit the school and when doing so will make arrangements with relevant staff in advance and observe school and board protocol.
- 6. When visiting the school in a personal capacity (for example, as a parent or carer), we will continue to honour the commitments made in this code.
- 7. We will participate in induction training and take responsibility for developing our individual and collective skills and knowledge on an ongoing basis.

## Build and maintain relationships

- 1. We will develop effective working relationships with school leaders, staff, parents and other relevant stakeholders from our local community/communities.
- 2. We will express views openly, courteously and respectfully in all our communications with board members and staff both inside and outside of meetings.
- 3. We will work to create an inclusive environment where each board member's contributions are valued equally.

4. We will support the chair in their role of leading the board and ensuring appropriate conduct.

## Respect confidentiality

- 1. We will observe complete confidentiality both inside and outside of school when matters are deemed confidential or where they concern individual staff, pupils or families.
- 2. We will not reveal the details of any governing board vote.
- 3. We will ensure all confidential papers are held and disposed of appropriately.
- 4. We will maintain confidentiality even after we leave office.

## Declare conflicts of interest and be transparent

- 1. We will declare any business, personal or other interest that we have in connection with the board's business, and these will be recorded in the <u>register of business interests</u>.
- 2. We will also declare any conflict of loyalty at the start of any meeting should the need arise.
- 3. If a conflicted matter arises in a meeting, we will offer to leave the meeting for the duration of the discussion and any subsequent vote.
- 4. We accept that the Register of Business Interests will be published on the school's website.
- 5. \*We will act as a governor; not as a representative of any group.

- 6. We accept that in the interests of open governance, our full names, date of appointment, terms of office, roles on the governing board, attendance records, relevant business and pecuniary interests, category of governor and the body responsible for appointing us will be published on the school website.
- 7. We accept that information relating to board members will be collected and recorded on the DfE's national database (Get Information about Schools), some of which will be publicly available.

\*New statement added or updated in 2022

We understand that potential or perceived breaches of this code will be taken seriously and that a breach could lead to formal sanctions.

## Adopted by: Steeton Primary School on 30<sup>th</sup> November 2022

## Signed: Cllr Emma Wainwright [chair of board]

We agree that this code of conduct will be reviewed annually and it will be endorsed by the full governing board.

## **Further reading**

What governing boards and school leaders should expect from each other

Governing board skills audit

Model role descriptions for chairs, governors, trustees and governance professionals

Effective teamwork: a guide for governing boards

Thank you for using this document. If you have any feedback you'd like to share, please email <u>kcfeedback@nga.org.uk</u>

## GOVERNORS' ALLOWANCES

## POLICY FOR PAYING GOVERNORS' ALLOWANCES

This policy statement has been developed in accordance with the Education (Governors' Allowances) (England) Regulations 2003 and The School Governance (Roles, Procedures and Allowances) (England) (Amendment) Regulations 2013. These regulations give Governing Bodies the discretion to pay allowances from the school's annual budget allocation to governors for certain allowances which they incur in carrying out their duties.

School governors provide a voluntary service, and cannot be paid for their role as a governor. However, they can receive out of pocket expenses. This may include reasonable expenses to cover travel costs or child care costs incurred as a result of fulfilling their role as governor. Where the board has a delegated budget, whether to pay allowances and what allowances might reasonably be paid are matters for the board to decide. Where a board does not have a delegated budget, allowances and expenses may be paid by the local authority at a rate determined by them.

Payments can only be paid for expenditure necessarily incurred to enable the person to perform any duty as a governor. This does not include payments to cover loss of earnings for attending meetings. Travel expenses must be at a rate not exceeding the HM Revenue and Customs (HMRC) approved mileage rates which are changed annually and are on HMRC website. Other expenses should be paid on provision of a receipt and be limited to the amount shown on the receipt.

Steeton Primary School believes that paying governors' allowances, in specific categories as set out below, is important in ensuring equality of opportunity to serve as governors for all members of the community and so is an appropriate use of school funds. The specific items allowable reflect this objective.

Governors may claim allowances in respect of actual expenditure incurred whilst attending meetings of the Governing Body and its committees, undertaking governor development and otherwise acting on behalf of the governing body:

Governors may not claim for actual or potential loss of earnings or income.

Governors may not be paid attendance allowance.

All governors and associate members are eligible to claim allowances in accordance with this scheme.

## ELIGIBLE EXPENSES

Categories of eligible expenditure are as follows:

| Care Arrangements         | Child care or baby-sitting expenses, where these are not provided by a |
|---------------------------|--|
|                           | relative or partner.   |
|                           | Care arrangements for an elderly or dependent relative, where          |
|                           | these are not provided by a relative or partner.                       |
| Telephone Calls & Postage |  |
| Travel                    |  |
| Subsistence               |  |
| Other                     | The extra costs they incur in performing their duties either because   |
|                           | they have special needs or because English is not their first          |
|                           | language.  |

## ALLOWANCE RATES

Rates at which allowances are payable are as follows:

| Care Arrangements         | Actual costs incurred, up to a maximum of [minimum wage] per      |
|---------------------------|---|
|                           | hour  |
| Telephone Calls & Postage | Also include photocopying costs and stationery - actual costs     |
|                           | incurred.   |
| Travel                    | The cost of travel relating only to travel to meetings/ training  |
|                           | courses.  |
|                           | In accordance with HRMC Authorised Mileage Rate, which is 45p     |
|                           | per mile for the first 10,000 miles and 25p above 10,000 for cars |
|                           | and vans, 24p per mile for motorcycles.                           |
|                           |   |
| Subsistence               | For public transport, actual costs incurred. However, where more  |
|                           | than one class of fare is available, the rate shall be limited to |
|                           | second-class fares. For travel by taxi the cost must not exceed   |
|                           | [3 miles] per journey.  |
| Other                     | If additional expenses are incurred because work as a governor    |
|                           | requires taking meals (i.e. breakfast, lunch or dinner) away from |
|                           | your school area, reimbursement will be made for the food/drink   |
|                           | items bought on the day claimed.                                  |

## CRITERIA FOR CLAIMS

All claims must be submitted to the head teacher on the attached claims form (Appendix A) within one calendar month of the expenditure being incurred (except for telephone calls).

Receipts must be supplied to support claims for reimbursement, e.g. bus ticket, phone bill, taxi receipt, till receipt.

In the case of telephone calls, an itemised phone bill should be provided, identifying the relevant calls.

## FINANCIAL SYSTEMS

The school's normal systems for authorising and processing payments will apply to claims made under this scheme.

[\*] The Governing Body may vary these rates to meet their particular circumstances. The rates must be agreed at a full governing body meeting.

## FURTHER GUIDANCE

Further guidance can be found at:

The Education (Governors' Allowances) (England) Regulations 2003

http://www.legislation.hmso.gov.uk/si/si2003/20030523.htm

DfES Guidance on Paying Allowances to School Governors

http://media.education.gov.uk/assets/files/pdf/g/paying%20allowances%20to%20governors%20%2 0%20oct ober%202003.pdf

The School Governance (Roles, Procedures and Allowances) (England) (Amendment) Regulations 2013 <u>http://www.legislation.gov.uk/uksi/2013/2688/contents/made</u>

The DfE 'The School Governance (Roles, Procedures and Allowances) (England) Regulations 2013 – Departmental Advice for School Leaders and Governing Bodies of Maintained Schools and Management Committees of PRUs in England', January 2014

https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/270783/school\_g overnan ce\_regulations\_2013\_departmental\_advice.pdf

## Code of conduct for all staff, governors and volunteers

## Code of conduct for all staff, governors and volunteers

## Introduction

- 1. The public is entitled to have trust and confidence in the integrity of The School Community and the staff working within it.
- 2. Your conduct must therefore be of the highest standard. Trust in the integrity of people working (paid or unpaid) within the school is a crucial part of the success of the school.
- 3. This Code of Conduct has therefore been prepared to achieve these aims:
  - To tell you about some of the statutory, national and local obligations which govern your conduct as an employee/volunteer of Steeton Primary School
  - To help you on issues of conduct by providing a framework of guidelines.
- 4. Read the code of conduct, sign the form and return it to the office. In doing so you are agreeing to follow this Code. This code must be signed at the start of each school year.
- 5. If any points are unclear or you are not sure of the appropriate action to take in a situation, whether or not it is covered in this code you must consult your Executive Headteacher.

## **Children's Rights**

6. The aim of this code is also to ensure that children and young people have the right to:

- respect;
- information about themselves;
- be protected from harm;
- have a say in their life;
- a good start in life; and
- be and feel safe and secure.

## Scope

7. This Code of Conduct applies to all people working in Steeton Primary School whether they be paid, contracted, governors or volunteers (see appendix 1).

## **General Obligations**

- 8. You must act with utmost good faith with regard to the business of Steeton Primary School, and must do all in your power to promote the school's interests and not do anything which may adversely affect the School's reputation.
- 9. You must be an outstanding role model to children working professionally at all times. Smoking, including E cigarettes and vapour cigarettes is strictly prohibited in school and on the school premises as in all Local Authority buildings
- 10. Dress should be professional at all times. Shoes must be worn (not trainers or pumps). Jeans should not be worn in school and children should not be able to see 'up, down or through' clothing. Whilst on school outings / sports events, clothing should be suitable for the outing (eg outdoor clothing or work clothing for indoor trips).
- 11. Staff must not wear any item of clothing or accessory which may be linked to an extremist organisation.
- 12. Statutory, National and Local Obligations Teaching staff must also adhere to the terms and conditions outlined in The School Teachers Pay and Conditions Document, annually updated. A copy of which can be found on:

https://www.gov.uk/government/publications/school-teachers-pay-and-conditions

- 13. Sections 35 and 36 of the Education Act 2002 and 2011 applies to the staffing aspects in relation to schools.
- 14. Other relevant documents include:
  - staff handbook
  - disciplinary procedure
  - ICT acceptable use for staff
  - Staff privacy notice
  - Section 1 'Keeping children safe in education' September 2019
  - Sexual Offences Act 2003 (Staff are aware that under the Sexual Offences Act of 2003, it is an offence for any person over 18 to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child).
  - Safeguarding & Child Protection Policies.
  - Care & Control policy
  - Equality policy and principles

These documents will be shared at induction. The Executive Headteacher is responsible for telling you about these. If you are not certain about a course of action, you must ask.

## **Public Duty and Private Interest**

- 12. Your off-duty hours are your own personal concern. It is important, however, that you do not put yourself in a position where your duty to the School and your private interests conflict. (e.g. attendance at a march or rally could result in disciplinary action.)
- 13. You are expected to abide by the policies of the School. Your own personal or political opinions and beliefs must not interfere with the provisions of balanced professional advice or your duty to carry out those policies.

## **Confidentiality and Information Disclosure**

- 14. You must conform to the requirements of the General Data Protection Requirement May 2018 (GDPR) and must take all reasonable steps to ensure that the loss, destruction, inaccuracy or disclosure of information does not occur as a result of your actions. This includes information relating to school business and pupil data.
- 15. You must not disclose personal or financial information about any pupil, volunteer, governor or other member of staff to any unauthorised person, external organisation or agency without the express consent of the individual concerned or that of the Executive Headteacher.
- 16. You must not use information obtained in the course of your duties to the detriment of the School or for personal gain or benefit; nor should you impart this information to others who might use it in such a way.
- 17. Confidential information belonging to the School must not be disclosed to any person not authorised to receive it.

## **Other Employment**

18. You may not set up a business or accept employment with a business engaged in work which is in direct competition with the School.

- 19. If you do have another job it must not conflict with the School's interest or bring the School into disrepute.
- 20. If you have another job with another organisation you should not act as a messenger, go between or arbitrator between that organisation and the School. Formal channels of communication should be maintained.
- 21. Your working commitments to another employer must not interfere with your work for the School; you must be able to work for the School at the contracted/arranged times rested and refreshed.

#### **Use of School Time and Facilities**

- 22. Whilst on duty you should be working. The School's property and facilities (eg stationery, display screen equipment, photocopier) may only be used for official school business unless permission for their private use has been granted.
- 23. You may use the School telephone to make important private calls.
- 24. You must account for all money and property for which you are given responsibility in the course of your work.

#### **Publication of Books/Articles**

25. If you want to publish books, articles, letters, dissertations etc which you have written in connection with your duties and in which you describe yourself as holding an appointment with the School, you must first consult your Executive Headteacher.

#### General

- 26. In accordance with The School's Equality Policy you must ensure that you do not discriminate in recruitment and employment practices nor in the delivery of services. You must also ensure that in your dealings with the local community, all members of the public are treated with respect and fairness.
- 27. You must also comply with the requirements of any professional body of which you are a member.
- 28. Serious misconduct and/or criminal offences committed during or outside of working hours which bring you or the School into disrepute will be the subject of disciplinary action which could lead to dismissal.

#### Financial Inducements, Gifts, Hospitality and Sponsorship

- 29. You must not seek or receive preferential rates by virtue of your dealings on behalf of the School. Offers of hospitality, including visits to exhibitions, business meals, social functions, etc should only be accepted if there is a genuine need to represent the School as part of your official duties. These must be authorised in advance by your Executive Headteacher.
- 30. Where an external organisation wishes to sponsor or is sought to sponsor a School activity, the above rule 29 applies. Particular care must be taken when dealing with contractors or potential contractors.

#### **Disciplinary Action**

31. Any breach of this Code of Conduct will be the subject of a management instruction or disciplinary action which could result in dismissal. A volunteer or governor will receive a caution in the event of any breach.

**Further Information** 

- 32. This Code of Conduct cannot cover every eventuality. Its purpose is to alert you to some of the matters about which queries are received. It does not replace the general requirements of the law, common sense and good conduct.
- 33. If you are uncertain about what to do in a particular situation or you require further information or guidance on the appropriate course of action to take in any situation you must contact your Executive Headteacher for advice before you taken any action.
- 34. Please sign the slip below and forward it to the Executive Headteacher.

## **Steeton Primary School**

## Code of Conduct (Staff and Governors)

I confirm that I have read and understood the Code of Conduct for Steeton Primary School and agree to abide by its contents.

Print Name .....

Signed: ..... Date: .....

Please return this slip to the Executive Headteacher as soon as possible.

## Steeton Primary School Volunteer Code of Conduct Appendix 1

#### NAME\_\_\_

This code of professional conduct is a guide to our professional relationships and interactions. It relates to conduct both in and outside school and via any social networking sites e.g. Facebook and mobile phones or any other media. It is expected that all volunteers will work within these agreed parameters.

## When dealing with colleagues we will:

- Treat colleagues with courtesy, professional respect and trust.
- Ensure that we take actions which take account of and support the roles and responsibilities of others.
- Respect and value the diversity of views and backgrounds represented.
- Try to keep a sense of perspective and understand differing viewpoints.
- Strive to be flexible.
- Work together in the best interests of the whole school to solve problems.
- Share ideas and resources to help colleagues and pupils.
- Strive to remain calm in potentially difficult situations.
- Respect confidentiality.
- Value the differing talents of each other for the good of the whole school.
- Seek a solution rather than blame each other.
- Avoid personal disputes.
- Avoid behaviours that may be interpreted as harassment.

## When dealing with children we will:

- Show a genuine interest in them and listen to what they say.
- Respect and treat them as individuals.
- Expect them to treat all others with respect peers and adults alike.
- Model and constantly show our high expectations.
- Value them for who they are.
- Foster an atmosphere of trust in a safe environment.
- Aim to motivate and inspire.
- Address children appropriately using agreed names.
- Celebrate success by encouraging, praising and supporting them.
- Work with them to maximise their learning potential.
- Treat them appropriately for their age and their needs.
- Be sensitive to their needs.
- Strive to remain calm in potentially difficult situations.

## When dealing with parents we will:

- Direct parents to appropriate members of staff.
- Respect confidentiality at all times.
- Respect that parents and carers may come from different backgrounds.

Remain calm and show a degree of empathy. •

## When talking about our school we will:

- Emphasise the positive.
- Show loyalty.
- Are sensitive to our audience.
- Support the agreed structure and policies.
- Work for the common good and strive to see the whole school picture.
- Acknowledge our position as an ambassador for the school.
- Uphold confidentiality.

Print Name\_\_\_\_\_

Signed..... Dated.....

## **Governor Monitoring Visits Policy**

## **Governor Monitoring Visits Policy**

## Context

One of the key roles and responsibilities for the Governing Body is to monitor the progress and performance of the school. Undertaking visits demonstrates the Governors' role in the strategic management of the school by helping to hold the school to account and evaluate its progress. The Governors visiting programme is an integral part of the school's yearly monitoring calendar. Each Governor is encouraged to make at least one visit a year during school time and governors will often monitor an area of school life in order to verify the school leadership self-evaluation of the school.

## Visits enable Governors to:

- Observe first-hand the quality of education at the school.
- Understand how the school focuses in on the pupil's personal development
- See the school at work and observe the range of behaviour and attitudes.
- Demonstrate that they understand the progress that children are making ensuring that school leaders place sufficient emphasis on tracking the progress of each individual child.
- See first-hand that the leadership and management of the school is such that it improves the outcomes for all pupils.
- Ensure that the needs of SEND pupils and those pupils in the lowest 20% of the ability range are properly planned for and taught within school.
- Get to know the staff and demonstrate their commitment to the school
- Give active support to the staff and the activities of the school
- Be aware of the effect of change and different approaches to teaching and learning
- Evaluate resources and discuss with staff further requirements; ensuring that at all times school leaders are deriving value for money from school budgets.
- Gain first-hand information to assist with policy making and decision taking
- Work in partnership with the staff

## Before making a visit, Governors will

- Contact the Executive Headteacher or Head of School and agree a date, time and focus for the visit.
- Clarify the etiquette, courtesies and expectations for the visit.
- Plan which classes will be visited.
- Draw up a timetable for the visit with the Business Manager or subject-coordinator.
- Business Manager and/or the subject coordinator ensure that all staff are aware of the visit and the expectations on them.

## On the day of the visit the Governor will remember to:

- Arrive on time and clarify the timetable with the Business Manager /subject coordinator.
- Act as an observer and only participate in the class at the invitation of the teacher.
- Respect the professionalism of the teacher, supporting but not interfering.
- Be calm and enjoy the visit

## After the visit the Governor will:

• Remember to thank the teachers and children

- Meet with the Executive Headteacher or Head of School to give a verbal report, and to raise any issues that arose
- Complete the Governor Visit proforma, reporting on the focus. The completed form should be given to the Executive Headteacher or Head of School and then, after any possible alterations, the form will be circulated to the governing body.
- Governors must report without giving opinions and where possible individuals should not be able to be identified.

It is important to remember that visits are a snapshot in time, and judgements should not be made arbitrarily.

## The visit is not about:

- Inspection
- Making judgements about the professional expertise of the teacher
- Checking on your own children
- Pursuing a personal agenda
- Arriving with inflexible pre-conceived ideas

Governors are an important part of the school team and are welcomed into the school by staff. It is important that Governors remember to respect the professionals and the children, support the Executive Headteacher or Head of School and the staff, and acknowledge that they represent the full Governing Body. If the agreed principles and procedures are followed then Governor Visits will be an enjoyable experience for all involved, and will result in effective monitoring by the Governing Body, which will contribute to school improvement.

## NGA New Governor Induction Plan

#### A step-by-step guide to inducting new governors and trustees

A well-planned induction programme helps new governors and trustees to become familiar with their school or trust and what their role entails.

Governing boards are diverse groups – the most effective induction programmes take into account the knowledge, skills and experience of new board members, rather than applying a one-size-fits-all approach.

This guide provides a starting point for those planning induction programmes – use it to develop a programme that suits your context and the experience of the new board member.

#### Step 1. Arrange an introductory visit and meeting

This step will help the new board member to settle in and appreciate that they are part of a team. Extend an early invitation to visit the school (or schools) as an opportunity to:

- be welcomed by and have a conversation with the chair and the senior executive leader
- have a guided tour, experience the culture, meet staff and talk to pupils
- complete preliminary tasks such as appointment verification or a photograph for the website

At this point, discuss any help and support that the new board member may need to participate fully in governance duties. Be open to talking about individual needs and circumstances, such as caring responsibilities, disabilities and religious observances. Make them aware that they can <u>claim for certain expenses</u> such as childcare or caring costs for dependents. (see Governor Allowances above)

#### Step 2. Introduce other contacts

Following the introductory visit, conversations should be arranged with others who have a role in supporting the new board member, such as:

The governance professional (clerk to the board) to talk through meeting arrangements, protocols, compliance and administration matters such as the business interest register and access to governance portals or file sharing platforms.

Committee chairs and relevant link governors to help explain committee responsibilities and areas of focus.

• The mentor assigned to help guide the new board member in the first few months of their role. The mentor should be an experienced governor or trustee on the board who can help answer questions.

If you are part of a multi academy trust who is inducting a new member of an academy committee (local governing body), you may wish to arrange a meeting with a trustee or member of the trust's central team for the committee member to learn about the vision and aims of the trust as a whole.

#### Step 3. Provide an information pack

The information pack that new board members receive from their school or trust is an essential resource to help them understand their role and fulfil their governance duty. We encourage boards to think about how this information can be provided in a way that is easy to navigate and refer to in the first few weeks and on an ongoing basis.

The information pack should be tailored to fit the context of the school or trust and the needs of the individual. As a guide, we recommend that it includes information that covers:

#### **Roles, responsibilities and conduct**

Governors and trustees need to have a clear understanding of the responsibilities and duties associated with their role. Our <u>model role descriptions</u> can be adapted for this purpose and can also be used to explain the important roles of chair and governance professional.

We recommend that all boards adopt a <u>code of conduct</u> that sets out the behaviour and professional standards required for the board to carry out its work. New members should agree to follow the board's code of conduct on being appointed.

#### The current context and priorities

Information that helps the new governor/trustee to know the school or trust they are governing, such as:

- A prospectus or a link to information on the school's website including the school or trust mission, vision and values.
- The current strategy document that references the school/trust improvement priorities.
- Information about performance standards in the school/trust plus relevant external data.
- A copy of the funding agreement (in academies).

#### How governance works in the school or trust

The following will help to give new board members a clearer idea:

- Details of the governing board's committees and their terms of reference.
- A copy of the school's instrument of government or articles of association and scheme of delegation or delegation planner.
- A calendar of meetings for the year, for both the full governing board and its committees and other key dates such as strategy days.
- The school and governing board's most recent self-evaluation or facilitated review.

#### Step 4. Signpost to an induction training course

NGA believes that everyone who is new to school governance should attend an induction training course. This is typically provided by the local authority, the foundation charitable body (associated with the school or trust), the academy trust or a specialist organisation such as NGA. As a minimum, the training must ensure that new board members have a clear understanding of what governance is.

All governors and trustees must also undertake appropriate <u>safeguarding and child</u> <u>protection</u> training (that includes online safety). We recommend that this forms part of your induction programme and takes place regularly thereafter.

While new governors and trustees must take responsibility for undertaking induction training, this expectation should be made clear, courses signposted, and take-up monitored. A <u>skills audit</u> should be used to help identify and prioritise any further areas of development for the new board member.

## Step 5. Offer support prior to the first meeting

Your induction programme should help new board members to make meaningful contributions during meetings as soon as possible. To help them prepare, we advise that you provide:

- an opportunity to observe a meeting before being expected to contribute
- access to meeting papers, logins and digital platforms the governance professional and/or mentor should be able to provide support if needed
- a copy of your virtual meeting protocol or explanation of <u>ground rules for virtual</u> <u>meetings</u>, if applicable
- access to previous minutes to get an understanding of the type of topics covered you may also wish to talk the new board member through an agenda
- examples of the type of questions asked during meetings

## Developing skills and knowledge beyond induction

- New volunteers should remain proactive in developing governance skills and knowledge. We recommend prioritising training and support in key areas of responsibility, such as financial governance or safeguarding, before exploring wider areas.
- You may wish to direct new board members to chapter four of <u>Welcome to</u> <u>Governance</u> or chapter five of <u>Welcome to a Multi Academy Trust</u> for an overview of development routes and opportunities.

## NGA resources to support new governors and trustees

- <u>NGA's Knowledge Centre</u> offers exclusive online access to practical governance resources
- Subscribers to NGA <u>Learning Link</u> can access flexible e-learning including <u>core modules</u> for <u>new governors and trustees</u>.
- <u>NGA networks</u> offer opportunities to share knowledge and experiences.
- Welcome to Governance LIVE training sessions for NGA GOLD members help new governors and trustees make an impact in their first six months.
- NGA's glossary of governance terms is a useful addition to any induction information pack.

## NGA induction guides

We recommend that new governors and trustees receive a copy of <u>Welcome to</u> <u>Governance</u> or <u>Welcome to a Multi Academy</u> <u>Trust</u>.

These are essential entry-level guides to help those new to governance become effective.



#### Don't miss out on membership benefits

If you're an NGA member, check your account details are correct by logging in at <u>nga.org.uk</u> and visiting the account management page. Every member of your governing board needs an up-to- date account to access benefits including our Governing Matters magazine and weekly e- newsletter. If you don't have an account or you're not sure, talk to your governance professional or chair or <u>contact us</u>.

Thank you for reading this guide. If you have any feedback you'd like to share, please email <u>kcfeedback@nga.org.uk</u>.

## **Governor role description**

Governor role description For those governing in maintained schools

#### How to use this model document

This model role description should be adapted to suit the needs of your school. It is neither definitive nor exhaustive but is intended as a guide for those wishing to clarify the role of the governor.

Thank you for using this document. If you have any feedback you'd like to share, please email <u>kcfeedback@nga.org.uk</u>.

#### Governors work together to carry out their core functions:

- 1. ensuring there is clarity of vision, ethos and strategic direction
- 2. holding executive leaders to account for the educational performance of the organisation and its pupils and the performance management of staff
- 3. overseeing the financial performance of the organisation and making sure its money is well spent

NGA recognises the following as the fourth core function of governance:

4. ensuring the voices of stakeholders are heard

Governors must also ensure that the governing body complies with all legal and statutory requirements. Governors should seek the advice of the clerk to the governing board and other professional advice as appropriate.

#### Governing body strategic responsibilities

Governing bodies work closely with headteachers and senior leaders. Headteachers are responsible for day-to-day management whereas the role of the governing body is strategic. As such, governors are responsible for:

determining the mission, values and long-term ambitious vision for the school

deciding the principles that guide school policies and approving key policies

working with senior leaders to develop a strategy for achieving the vision

ensuring that parents, pupils, staff and the wider community are involved, consulted and informed as appropriate

ensuring that all pupils have access to a broad and balanced curriculum such that pupils are well prepared for the next stage of their education and adult life

- setting the school's budget and ensuring it is managed effectively together with premises and other resources
- agreeing the school's staffing structure and keeping it under review to ensure it supports delivery of the strategy

ensuring robust risk management procedures are in place and that risk control measures are appropriate and effective

#### Monitoring and evaluating school performance

Governors must monitor the priorities that have been set to ensure progress is being made by:

measuring the school's impact and progress towards its strategic objectives

ensuring the required policies and procedures are in place and the school is operating effectively in line with these policies

evaluating relevant data and feedback provided by school leaders and external reporting on all aspects of school performance

asking challenging questions of school leaders in order to hold them to account

- holding the headteacher to account for standards, financial probity and compliance with agreed policies
- visiting the school to monitor implementation of the strategy and reporting back to the board (this could be in a link governor capacity)

ensuring that there are policies and procedures in place to deal with complaints effectively

#### **Panels and committees**

When required, governors are expected to serve on panels or committees in order to:

appoint the headteacher and other senior leaders

appraise the headteacher and make pay recommendations

hear staff grievances and disciplinary matters

review decisions to exclude pupils

deal with formal complaints

## Contribution to the governing body

Governors should ensure that they are making a positive and meaningful contribution to the governing body by:

- attending meetings (a minimum of 3 full governing board meetings and a number of committee meetings each year), reading papers and preparing questions for senior leaders in advance
- establishing and maintaining professional relationships with senior leaders and colleagues on the board

getting to know the school, including visiting the school occasionally during school hours

undertaking induction training and developing knowledge and skills on an ongoing basis

#### **Expenses**

Governors should receive out of pocket expenses incurred as a result of fulfilling their role as governor and NGA recommends that a governing board should have such an expenses policy. Payments can cover incidental expenses, such as travel and dependency care, but not loss of earnings.

## School Governor's Induction Checklist

| Governor Name | Date of induction |
|---------------|-------------------|
|               |                   |
|               |                   |
|               |                   |

## School Governor's Induction Checklist

The Governing Board believe it is essential that all new governors receive a comprehensive induction

package covering a broad range of issues and topics. There is a commitment to ensure that the new

governors are given the necessary information and support to fulfil their role with confidence. The process

is seen as an investment, leading to more effective governance and retention of governors.

The purpose of this policy is to ensure that new governors are aware of the following points:

| Points to note  | Comment |
|---|---------|
| <ol> <li>Made aware of their role and responsibilities as a governor and<br/>Governor's Code of Conduct (example found here<br/><u>https://www.nga.org.uk/codeofconduct2018</u>)</li> </ol> |         |
| 2. Welcomed to the governing board and meet other governors<br>and given the Governance, Conduct & School Information Policy<br>Handbook  |         |
| <ol> <li>Encouraged to visit the school to experience its atmosphere,<br/>understand its ethos and meet the Executive Headteacher /<br/>Head of School, staff and children</li> </ol>       |         |
| 4. Informed of the partnership between the Executive Headteacher / Head of School, and the governing board  |         |
| <ol> <li>Alerted to how the governing board, its committees and link<br/>governors work;</li> </ol>   |         |
| <ol> <li>Alerted to the named governor roles and the expectation all<br/>governors will participate</li> </ol>  |         |
| 7. Discuss background material on the school and current issues   |         |
| 8. Made aware of the requirement for a Disclosure & Barring Service (DBS) check   |         |
| 9. Allowed to ask questions about their role and/or the school.   |         |

#### New governors will:

| Actions   | Comment |
|---|---------|
| 1. Be welcomed to the governing board by the Chair of             |         |
| Governors and the Executive Headteacher / Head of School;         |         |
| 2. Be invited by the Executive Headteacher / Head of School to    |         |
| visit the school;   |         |
| 3. Have the opportunity to tour the school and meet the staff     |         |
| and children;   |         |
| 4. Receive an informal briefing on the school from the            |         |
| Executive Headteacher / Head of School;                           |         |
| 5. Have the opportunity to meet formally with the Chair of        |         |
| Governors/Vice Chair of Governors.                                |         |
| 6. Receive relevant information about the school –                |         |
| see governor information below.                                   |         |
| 7. Be required to complete an application for a DBS check and     |         |
| provide the necessary supporting documentation;                   |         |
| 9 How the experiment is attend relevant training including no     |         |
| 8. Have the opportunity to attend relevant training including new | (       |
| governor induction events and safeguarding.                       |         |
|   |         |

All governors will meet with the Head of School or Inclusion Leader in school who will go through schools anonymised safeguarding systems and answer any safeguarding questions that new governors may have.

|            | GOVERNOR INDUCTION CHECKLIST                               |                      |                                   |
|------------|--|----------------------|-----------------------------------|
| Name       |  |                      |                                   |
| Position   |  |                      |                                   |
| 1. Sa      | afeguarding Guidelines & Reporting Procedures.             | Received information | Sign as read<br>or<br>understood. |
| Keeping C  | hildren Safe in Education Part 1 (Sept 22) Booklet         |                      |                                   |
| Keeping C  | hildren Safe in Education Part 1 Annex A (Sept 22) Booklet |                      |                                   |
| What to d  | o if you're worried a child is being abused                |                      |                                   |
| Child Prot | ection Guidelines and Procedures for staff                 |                      |                                   |
| Role of th | e Designated Safeguarding Lead                             |                      |                                   |
| Flowchart  | - Who to contact if there are any issues                   |                      |                                   |
| Provide a  | n understanding of the CPOMs system within school          |                      |                                   |

| All documents that are circulated to me are confidential and should not be shared.                          |  |
|---|--|
| 2. Pupil Security   |  |
| Make sure all doors are closed/locked   |  |
| Any individual on the premises not known to you or without a school pass must be challenged and/or reported |  |
| Any pupil outside the secure premises must be challenged/reported   |  |
| All the above points have been explained to me  |  |
| Signed  |  |
| Dated   |  |

## **Governor Information**

## New governors when joining the governing board will receive information about how to access:

| Governor Information  | • Tick if received |
|---|--------------------|
| 1. Information on how to access the latest edition of the Department for Education (DfE) school governors: <i>Governance Handbook;</i>      |                    |
| 2. The School Prospectus including the school's mission statement, list of staff and their responsibilities and a floor plan of the school; |                    |
| 3. The School Development Plan;   |                    |
| 4. Schools most recent Self Evaluation  |                    |
| 5. Schools latest Ofsted Report   |                    |
| 6. List of governors and their status and contact details;  |                    |
| 7. Details of the committees of the governing board;  |                    |
| 8. Minutes of the last two meetings of the governing board and any committees;  |                    |
| 9. Details of governor training programmes;   |                    |
| 10.Future dates of governing board meetings;  |                    |
| 11.Explanation of Microsoft email and Teams account   |                    |

## **Child Protection flowchart**



## **Child Protection Procedures Flow Chart October 2022**

|     | On discovery or suspicion of child abuse   |
|-----|--|
|     | If in doubt – ACT  |
|     | ↓  |
|     | Inform a member of the Designated Safeguarding Team Leads (DSTL)   |
|     | Claire Redman (DDSL) Sharmyn Kennedy (DSL) Elinor Birtwistle (DDSL)  |
|     | Who should then take following steps   |
|     | $\downarrow$   |
|     | Where it is clear that a Child Protection Referral is needed contact:  |
|     | Children's Services Integrated Front Door without delay Tel No 01274 435600  |
|     | Out of hours Emergency Duty Team Tel No 01274 431010   |
| Nam | ned Persons may also seek advice from the Education Social Work Service <b>Tel 01274</b><br><b>439651/also Police and the emergency services.</b>  |
|     | e the DSL is not sure whether it is a child protection issue they may seek advice from<br>ildren's Safeguarding and Reviewing Unit Consultation Service Tel No 01274 434343<br>for the Children's services switchboard or 01274 435908 for direct contact. |
|     | +  |
| -   | are asked to monitor the situation, make sure you are clear what you are expected to or, for how long and how and to whom you should feedback information to.  |

Remember always make a written record on CPOMS of all events.

Ensure immediate referral to:

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- Children's Social Care (Via telephone) 01274 435600
- Follow directions from Children's Social Care

## USEFUL TELEPHONE NUMBERS

Children's Social Care Initial Contact Point: 01274 435600 Emergency Duty Team: 01274 431010 Police: Child Protection Unit: 01274 376061 Education Safeguarding: 01274 437043

# Register of Business Interests of Heads and Governors:

To be completed

# Public Sector Equality Duty and Equality Objectives: Steeton Primary School Statement

At Steeton Primary School we believe that diversity is a strength, which should be respected and celebrated by all those who learn, teach and visit here. We are committed to ensuring equality of education and opportunity for all pupils.

Inclusion at Steeton Primary School is about providing equality and excellence for all in order to promote the highest possible standards of achievement. It also ensures that we recognise and celebrate the differences that exist amongst us, that we treat all people fairly and that we strive to eliminate discrimination wherever it exists. This is a whole school policy – equality applies to all members of the school community: pupils, staff, governors, parents and community members. We ensure that the content of this policy is known to all staff and governors, and also, as appropriate, to all pupils and parents.

## **Our principles**

We see our first task as equipping pupils with an awareness of an increasingly diverse society. On such foundations, pupils will develop a sense of their own place in, and contribution to, a pluralistic society. The School acknowledges the complexity of society and recognises that it would be failing the pupils if it did not prepare them for their integral part in society. Thus,

1. Discrimination on the basis of colour, culture, origin, sex, ability, political and religious belief is unacceptable in this school.

2. Every pupil, member of staff and Governor will endeavour to further this objective by personally contributing towards a happy and caring environment and by showing respect for, and appreciation of, each other as individuals.

3. The primary objective of this school will therefore be to educate, develop and prepare all our pupils, whatever their sex, colour, culture, origin or ability, for life.

4. An equal opportunities philosophy will be practised by all staff.

## **Equality Act 2010**

On 1 October 2010, the Equality Act 2010 replaced all existing equality legislation such as the Race Relations Act, Disability Discrimination Act and Sex Discrimination Act. It has consolidated this legislation.

The Governing Body of Steeton Primary School is responsible for ensuring that the School meets the requirements of the Equality Act. The Governing Body welcomes this responsibility and will:

- Ensure that everything the School does must be fair, non-discriminatory and not put individuals or groups of people at a disadvantage.
- Ensure the school takes all reasonable steps to see that its employees do not carry out unlawful discriminatory actions or behaviour
- Support and guide the school to have 'due regard' for equality in all its functions
- Ensure the school complies with the two new 'specific' duties to publish equality information and objectives.
- To ensure the success of every pupil, equal opportunity is at the heart of our vision with an insistence that all pupils will do well.

The head teacher is responsible for implementing the policy; for ensuring that all staff are aware of their responsibilities and are given appropriate training and support; and for taking appropriate action in any cases of unlawful discrimination.

### Admission

The school follows the Local Authority Admission Policy, which does not permit (providing resources are available) sex, race, colour or disability to be used as a criteria for admission, augmented by creed and ability. This will be revised as the Local Authority change recommendations.

#### Registration

Pupils' names should be accurately recorded and correctly pronounced. Pupils should be encouraged to accept and respect names from other cultures.

#### Discrimination

All forms of discrimination by any person within the school are to be treated seriously. A careful note must be kept of such incidents, whether they take place in the playground, corridors or teaching areas. It should always be made clear to offending individuals that such behaviour is unacceptable and further action could be taken.

#### **Pupils**

If there are subsequent incidents, then the appropriate senior staff member should be informed and consideration should be given to involving the parents. Racist and political symbols, badges and insignias on clothing and bags are forbidden in school. Graffiti should be immediately removed.

#### The Staff:

The school values diversity amongst the staff. In all staff appointments, the best candidate will be appointed, based on strict professional criteria. All staff should be aware of possible cultural assumptions and bias within their own attitudes.

In order to understand the background and experience of ethnic minority pupils and to raise expectations of their potential, staff need to be aware of the historical and contemporary processes which have caused, and may continue to sustain, racism. Close liaison with families in the school is beneficial to all concerned. Support and advice is available from the authority's multicultural support service. The school's pastoral care organisation should be used, particularly with regard to home/school liaison and for dealing with any situations of discrimination or harassment.

#### **The Curriculum**

All pupils must have equal opportunity of access to the school's curriculum. Staff must be constantly aware that their own expectations affect the achievement, behaviour and status of each pupil. The curriculum must be balanced, objective and sensitive, and must not highlight sexual and cultural diversity.

#### Language

The school views linguistic diversity positively and staff should be aware of the language and dialect spoken by pupils and their families. Staff must be conscious of any racist or sexist connotations in the language they themselves use. Pupils and staff must feel that their language or dialect is valued.

#### Resources

The school's aim is to provide for all pupils according to their needs, irrespective of sex, ability or ethnic origins. Whenever possible, staff must ensure that the resources used in all curriculum areas are multicultural and non-sexist.

Variety should be evident in the morals, stories and information offered to children. Pupils should have access to accurate information about similarities and differences.

## The Public Sector Equality Duty

Since April 2011, schools have been bound by a part of the Equality Act 2010 called the public sector equality duty (hereinafter referred to as the PSED or the 'equality duty').

The equality duty replaces the previous three sets of duties on schools to promote disability, gender and race equality through having equality polices and action plans for these groups. Whilst there is now no requirement for schools to have these equality policies, schemes and/or action plans the Governing Body will ensure that there will be no discrimination, harassment or victimization of a pupil or potential pupil because of their race, sex, disability, religion or belief, or sexual orientation, in accordance with the 'protected characteristics' in the Equality Act. These 'protected characteristics' are:

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

## Sexual orientation

Note: The protected characteristics of age and marriage and civil partnership apply to schools as employers, but not in relation to their provision for pupils. The new equality duty has two parts: the 'general' duty and 'specific' duties.

The general duty

The general duty is the overarching legal requirement for schools and means they must consider how their policies, practices and day-to-day activities impact pupils and staff. Schools are required to have 'due regard' to the need to:

- Eliminate unlawful discrimination, harassment and victimisation
- Advance equality of opportunity
- Foster good relations

## The specific duties

The two specific duties for schools aim to assist them in meeting the general duty. These are:

- To publish information to show how they are complying with the equality duty. This must be updated at least annually
- To prepare and publish one or more specific and measurable equality objectives at least every four years.

As a School we will publish information on :

• The diversity of the school population.

- How we are performing in relation to the three aims of the equality duty.
- We ensure that the content of this policy is known to all staff and governors, and also, as appropriate, to all pupils and parents.

#### How will we achieve equality?

The School makes 'reasonable adjustments' to ensure equality and that no pupil is placed at a substantial disadvantage. To make these reasonable adjustments we:

- plan ahead;
- identify potential barriers;
- work collaboratively;
- identify practical solutions through a problem-solving approach;
- ensure staff have the necessary skills;
- monitor the effects of the adjustments and this policy;
- Consider the effect of any proposed change upon all members of the school community and the available resources.

### **Steeton Primary School Equality Objectives:**

The Governing Body have set the following Equality Objectives for the four academic years commencing 2022/23. These will be monitored by the Governing Body regularly, and reviewed at least annually in the summer term.

- 1. To ensure that we maintain an engaging, purposeful curriculum that inspires, motivates, challenges and excites our pupils.
- 2. To provide our pupils, whatever their starting point (e.g. SEND), with key experiences which will develop their cultural capital and enhance their learning and personal development to help them become successful, confident learners.
- 3. To review standards in school, assessing the long-term impact of the pandemic and to challenge pupil performance targets and monitor pupil progress data.
- 4. To challenge school leaders to provide the best systems and practices which will improve outcomes for children at Steeton.

# **Complying with GDPR**

#### **Complying with GDPR**

A guide for governing boards and Clerks

#### Introduction

Individuals have legal rights in relation to their own personal data. The General Data Protection Regulation (GDPR) legislation determines how personal data is processed and kept safe.

Schools and trusts manage large amounts of data in a variety of forms such as computer files, databases, hard copy files and CCTV. The data includes assessment/exam grades, medical information, images and much more. Schools/trusts will also hold data on staff, governors, volunteers and job applicants. It is the role of the governing board to ensure that the data - regardless of what form it is kept in, is managed in compliance with the requirements of the GDPR.

The consequences of non-compliance are huge and include legal sanctions such as fines, but also the non- legal consequences such as reputational damage to the school or trust, and the effect a data breach will have on the individual to whom the data belongs. The <u>Information Commissioner's</u> <u>Office (ICO)</u> has published guidance outlining the penalties for failure of compliance.

This guide explains in practical terms how governing boards and their clerks ensure compliance with GDPR and should be used in conjunction with the following:

The guide to GDPR by the ICO.

The Department for Education's (DfE) data protection toolkit.

The Information and Records Management Society (IRMS) has produced information management toolkits for schools, which includes information regarding data retention for maintained <u>schools</u> (page 64) and <u>academies</u> (page 61).

Further advice and support for governing boards on complying with GDPR

NGA's <u>GOLDline advice service</u> is available to NGA Gold members and provides strategic, procedural and legal information on all aspects of maintained school and academy governance.

#### What schools and trusts must do to comply with GDPR

Ensuring compliance with GDPR requires a school/trust-wide approach and an overarching culture that takes data security seriously, especially the management and security of personal data. Put simply, the approach taken to GDPR should be the same as the approach taken to safeguarding: policies and procedures should be adopted which strengthen and unify the safety and security of data and receive unconditional support from staff, governors, trustees, clerks and stakeholders.

The following is necessary for schools and trusts to comply

with GDPR. Appoint a Data Protection Officer

GDPR requires schools and academies to appoint a designated data protection officer (DPO) who is responsible for managing compliance with the GDPR on a day to day basis and will be the main point of contact in the school/trust regarding data protection matters. The duties of the DPO include, but are not limited to:

- making sure that data protection policies are in place and that appropriate individuals are aware of them;
- ensuring that staff have undertaken suitable training and know what is required of them;
- providing information and advice regarding GDPR obligations;
- conducting internal data audits and
- reporting to the governing board on GDPR processes and procedures within the school/trust.

The person appointed as the DPO must be well versed in GDPR compliancy and how this applies to schools and trusts. The individual appointed as DPO can be an employee or a contracted service provider. It is also possible and may prove more efficient for the DPO to be shared across more than one school. As a single legal entity, multi academy trusts (MAT) are required to have one DPO for the trust - they are not required to have a DPO for each academy within the MAT. However, larger trusts may want to consider whether there is a need for data protection leads (DPL) for individual academies within the trust to provide local level support for the DPO.

The appointment of the DPO needs to be considered carefully given the potential for conflicts of interest and the fact that the DPO cannot impartially monitor whether their own work or decisions are GDPR- compliant. For example, the role of staff with substantial responsibilities for information systems in the school/trust (e.g. IT managers) would conflict directly with the role of DPO, who has the responsibility of checking the compliance of the systems against GDPR. Therefore, it may be necessary to adjust the job description of staff appointed as the DPO in order to avoid a conflict with their other duties that involve managing and processing personal information.

The DPO's role is operational and reports to and is monitored by the governing board, therefore <u>it</u> is not appropriate for the DPO to be a governor/trustee. By the same token, the role of clerk to the governing board will almost certainly involve processing, sharing and storing personal information and therefore conflicts directly with the role of DPO.

Adhere to key principles when processing personal data

Schools/trusts and their governing boards must demonstrate compliance with the six data protection principles that require personal data to be processed in a fair, lawful and transparent manner; collected for specified, explicit and legitimate purpose (and not in a matter that is incompatible with those purposes); adequate, relevant and limited to what is necessary; accurate and where necessary kept up to date; kept in a form permitting identification for no longer than is necessary, and processed in a manner ensuring appropriate security of the personal data.

Have a clear lawful basis for processing personal data

There are six lawful bases for processing personal data: consent( the individual has given clear consent for you to process their personal data for a specific purpose); contract (the processing is necessary for a contract you have with the individual, or because they have asked you to take specific

steps before entering into a contract); legal obligation (the processing is necessary for you to comply with the law); vital interests(the processing is necessary to protect someone's life); public task (the processing is necessary for you to perform a task in the public interest, for official functions, and has a clear basis in law), and legitimate interests (the processing is necessary for your legitimate interests or the legitimate interests of a third party)

In an educational setting, the most likely applicable bases for processing personal data are consent, legal obligation or public task. Further details on the lawful basis for processing personal data are provided by the <u>Information Commissioner's Office (ICO)</u>.

Recognising the legal rights that individuals have in respect of their own personal data.

Data subjects have legal rights in relation to their personal data, these are the right to be informed about how their data is used; the right to have access to their data; the right to rectify incorrect information; the right to have their data erased; the right to restrict how their data is used; the right to move their data from one organisation to another, and the right to object to their data being used at all.

Furthermore, data subjects have the right to access their personal data, which is covered in ICO guidance.

#### Reporting data breaches

The ICO defines a data breach as "a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed in connection with the provision of a public electronic communications service".

A personal data breach may mean that someone other than the data controller gets unauthorised access to personal data. But a personal data breach can also occur if there is unauthorised access within an organisation, or if a data controller's own employee accidentally alters or deletes personal data.

In the event of a data breach the school/trust has 72 hours (from discovering the breach) to notify the ICO and notify the affected individuals if the breach is of high risk to them. High risk includes the potential of people suffering significant detrimental effect – for example, discrimination, damage to reputation, financial loss, etc. As well as reporting any breaches externally to the ICO, there is a requirement to have internal breach reporting procedures documenting information about data breaches, how they occurred and what action was taken. Failure to notify the ICO of a breach could result in a hefty fine as well as reputational damage. Therefore, there should be a whole school/trust culture, which should include governors and trustees, that encourages prompt reporting of suspected and actual breaches to the DPO. The ICO has published <u>personal data breach</u> guidance that those governing should familiarise themselves with.

#### How governing boards ensure that their schools are GDPR compliant

There are steps that governing boards can and should take in collaboration with school/trust leaders and the DPO to demonstrate their commitment to personal data management and create a culture that ensures compliance with GDPR.

Lead by example

- Arrange training for the whole governing board that covers GDPR legislation, how it affects the school or trust and the data it holds, and ensuring compliance.
- Arrange for this training to be updated on a regular basis and ensure that personal data management is referred to during inductions given to new members of the governing board.
- Make clear the expectation that the clerk prioritises GDPR (see page 6) and has access to the appropriate training and support they need in order to both manage their responsibilities and advise the governing board.
- Require governors/trustees to use a school email account when communicating about governing board matters. Although not required by GDPR, this is good practice and advisable.
- Remind governors/trustees to practice good ICT security. For example, password
  protecting confidential information shared via email (sending the password separately) and
  electronic devices.

Ask the school/ trust leaders and or the DPO to brief the governing board on GDPR compliance

- Provide an overview of the personal data that is kept and managed by the school/trust and how this data is kept safe
- Make clear reference to any specific risks and issues that have been identified, how the school/trust is responding to them and how the governing board will be kept informed.
- A briefing on how the data protection policies, procedures and related documents (e.g. privacy notices) are maintained and reviewed in a way that is both GDPR complaint and promotes best practice in personal data management.
- The training that staff at all levels in the school/trust have received on complying with the relevant policies, procedures and related documents. Also, that this training includes what to do if there are concerns and how to report a data breach.

Monitor GDPR compliance on a routine basis

- Add personal data management and GDPR compliance to the risk register reviewed by the governing board.
- Include the monitoring of GDPR within the terms of reference for a relevant committee.
- Request the DPO to provide the governing board or relevant committee with a routine (e.g. at least termly) GDPR compliance report that is based on the briefing referred to above.
- Adapt and use NGA's set of GDPR questions the governing board should be asking to support the scrutiny of the GDPR compliance report, and identify issues and required actions. The questions are included as appendix 2 to this guidance.

### Clerks and GDPR

Clerks need to have a good understanding of GDPR legislation as it applies to schools, trusts and governing boards in order to:

- advise the governing board on how they meet their responsibilities, and
- ensure that any personal data they hold in order to carry out their role is not only up to date but also held securely and in accordance with GDPR.

The clerk's working arrangement with the governing board will affect the actions that the clerk and the school need to take in relation to GDPR.

If the clerk is employed by the school or trust they would be processing the data on behalf of the institution, which is the data controller. Therefore, if a breach were to occur, the school/trust would be liable, although the clerk may be subject to internal disciplinary procedures. However, if the clerk is contracted from outside the school setting, for example through a clerking service or direct engagement then a third party would be processing the data – this should be reflected in a contract. This contract must cover the fact that the clerking service or individual clerk are GDPR compliant, and the school/trust would need to carry out due diligence to satisfy themselves that they are.

Clerks retaining and sharing personal information and data

Clerks both hold and share personal information and data in order to carry out their role and specifically to:

- share information with governors/trustees that is pertinent to the governance of the school/trust
- fulfil legal compliance obligations, for example providing information to the local authority, the DfE and Charity Commission, and
- service panel meetings that require information to be kept on and shared with pupils, parents and staff.

Ensuring that the personal information and data is secure and complies with the requirements of GDPR

We recommend that clerks seek the advice of the DPO for their school/trust on complying with the adopted data protection policies, procedures and related documents. We also suggest the following measures to make personal data more secure:

- encrypting emails to prevent the content being read by people other than the intended recipient
- not sending emails if there are doubts about the security arrangements of the recipient
- arranging for governors/trustees to be issued with and communicate via their school email account
- password protect documents that are attached to emails
- sending hard copies of paperwork relating to hearings and appeals rather than doing so by email – this will require arrangements for collection from the school to be made but is a more secure way of handling what is likely to include personal and sensitive data as defined by the GDPR. Clerks should also ensure that the paperwork is destroyed after the meeting has taken place.

# Appendix 1

# General Data Protection Regulation (GDPR) -Enhanced Definitions and New Obligations

| TERM  | Definition  | ADDITIONAL SOURCES  |  |
|---|---|---|--|
| Data Audit  | An assessment of whether your school's policies,<br>procedures and controls are delivering data<br>protection compliance. DfE recommends<br>formally scheduling an annual review of<br>current<br>practice through an internal or external audit.   | Consider taking advantage of an <u>ICO advisory audit</u> .   |  |
| Data Breach   | A breach of security leading to the<br>accidental or unlawful destruction, loss,<br>alteration, unauthorised disclosure of, or<br>access to, personal data. It therefore goes<br>beyond simply<br>losing data.  | ICO guidance has a section on<br><u>data breaches</u> which details<br>what to do and when.   |  |
| Data Controller vs.<br>Data Processor               | A data <i>controller</i> determines the reasons for<br>processing data and the means by which this<br>will be done. Schools are data controllers in<br>their own right, and should determine their own<br>policies that ensure compliance with data<br>protection law.<br>A data <i>processor</i> is typically a third party that<br>handles data on behalf of the controller, for<br>example when providing outsourced services.   | ICO has outlined in detail the<br>difference between data<br>controllers and data processors.   |  |
| Data Ecosystem                                      | A term the DfE uses for understanding where<br>you store personal data and, in particular, how<br>those systems might interlink. This should be a<br>'living' document that ensures you keep up<br>with change (data processing will evolve over<br>time) and is one of the key foundations for<br>GDPR compliance.   | DfE has produced a short <u>video</u><br>that elaborates on the concept<br>of a data ecosystem.   |  |
| Data Protection<br>Impact<br>Assessments<br>(DPIAs) | Tools to help you analyse, identify and minimise<br>the data protection risks of new plans or<br>projects. However, while DPIAs form part of<br>accountability obligations under GDPR, there is<br>no definitive DPIA template that you must<br>follow.   | Principles and processes that<br>form the basis of <u>DIPAs</u> have<br>been outlined by the ICO. A<br>rough template can also be<br>found in Annex 6.1 of the <u>Data</u><br><u>Protection</u><br><u>Toolkit for Schools</u> . |  |
| Data Protection<br>Officer (DPO)                    | Every school must designate a named DPO in<br>order to be compliant with the new legislation.<br>The DPO can be an existing employee or<br>externally appointed, providing they have<br>expert knowledge of data protection and GDPR,<br>and are confident about conducting data audits<br>and DIPAs. Crucially, the DPO must have the ear<br>of the governors (and vice versa), together<br>with an ability to work closely with the school's<br>management structure, but independently of<br>those making technology or processing | The 'appointing a data<br>protection officer' section of<br>this guidance provides further<br>information.  |  |

|                                 | 1  | Γ   |
|---------------------------------|--|---|
|                                 | decisions.   |   |
| Privacy Notice                  | A document that explains to data subjects<br>exactly what happens with their data, along<br>with how to exercise their legal rights. It<br>should, therefore, include willingness to help<br>data<br>subjects access their data.   | DfE has published a range of<br>model privacy notices. Minimum<br>standards are also detailed by<br>the ICO.  |
| Personal Data                   | All data that relates to an identified or<br>identifiable living individual. Examples in<br>schools include attendance marks, email<br>addresses and examination results. Personal<br>data can only<br>be processed if one of the six lawful bases for<br>processing is met.   | ICO's guide to the GDPR<br>includes a comprehensive<br>breakdown of <u>personal data</u> .  |
| Subject Access<br>Request (SAR) | The method by which data subjects can access<br>their data. SARs are not new within the 2018<br>legislation, though the timeframe for<br>response has been shortened to one month<br>(with<br>exceptions). Schools also need to have agreed<br>procedures for dealing with SARs.   | Top tips for handing SARs are<br>included in the <u>Data Protection</u><br><u>Toolkit for Schools</u> , under<br>Step 8<br>(communication with data<br>subjects). |
| Special Category<br>Data        | Genetic or biometric data relating to racial or<br>ethnic origin, political opinions, religious or<br>philosophical beliefs, trade-union<br>memberships, health or sex life. This kind of<br>data can put people at risk of unlawful<br>discrimination and therefore needs more<br>protection in the form of additional conditions<br>for processing. Data relating to criminal<br>offences is also afforded similar special<br>protection, while information about children's<br>services interactions, free school meal status,<br>pupil premium eligibility, elements of special<br>educational need information, and some<br>behaviour data should also be treated as having<br>the same protected status. | Conditions for processing special<br>category data are listed in Article<br>9(2) of the GDPR and can be<br>found on the ICO website.                              |

#### GDPR questions governing boards should be asking

1. Do we know what GDPR is, why it is important, and have we understood what it means for us?

The General Data Protection Regulation (GDPR) is the result of an effort to harmonise data protection laws in the EU, designed with the aim to support and better protect individual's data rights and privacy. All matters relating to data protection and personal information will be governed by the GDPR. It replaced the Data Protection Act 1998, and came into force on 25th of May 2018. All schools must comply with the GDPR when handling "any information relating to an identified or identifiable natural person", this includes personal information belonging to pupils, staff, parents and governors and trustees.

Governing boards are the accountable body responsible for the conduct and compliance of a school; this means governing boards are ultimately responsible for data protection. In maintained schools, this will be the governing body and in single or multi academy trusts, it will be the trust board.

2. Have all staff been provided with the relevant training on data protection and have you checked that staff practices have been reviewed?

It is important to remember that as with all responsibilities the board hold, they will approach GDPR from a strategic perspective – the implementation of measures required under the GDPR will remain an operational matter for executive leaders. Everyone within the school should understand their role, responsibilities and the principles, in respect to safeguarding data and personal information under the GDPR. The governing board should be satisfied that all members of staff are receiving adequate training and have the relevant resources in place to ensure GDPR compliance. Ensuring that members of staff are well educated on the key requirements of the regulation reduces the risks of a data breach and non- compliance. You will then need to again seek assurances that staff in turn are reviewing their own practices, and are confident that they now have a firm understanding of the requirements under the GDPR.

3. Have we appointed the right person as our Data Protection Officer and are they confident and able to fulfil the role?

Under the GDPR, public authorities, including all state schools, must appoint a Data Protection Officer (DPO). The DPO's role is operational and the individual appointed needs to be "highly knowledgeable about data protection and GDPR", understanding the schools' operations and policies. For a detailed consideration of the DPO role and guidance on who to appoint, refer to the 'appointing a Data Protection Officer' section of the guidance.

4. Have our policies and data processing procedures been updated to comply with the GDPR?

### Freedom of Information Statement

#### Statement of intent

As an educational provider, our school has an obligation to publish a freedom of information statement, outlining how we will meet our duties under the Freedom of Information Act 2000 and associated regulations. The development and effective implementation of this policy fulfils that requirement.

More specifically, this policy outlines our school's policy and procedures for:

- The release and publication of private data and public records.
- Providing applicants with advice and assistance throughout the duration of their requests.

It also clarifies our position regarding the appropriate limit to the costs incurred by the school in obtaining any requested information, and on charging fees for its provision.

Legal framework

- 1.1. This policy has due regard to the following legislation:
  - The General Data Protection Regulation
  - The Data Protection Act 2018
  - The Freedom of Information Act 2000
  - The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004
- 1.2. This policy also has due regard to guidance, including, but not limited to, the following:
  - Cabinet Office (2018) 'Freedom of Information Code of Practice'
  - ICO (2013) 'Definition document for the governing bodies of maintained and other state-funded schools in England'
  - ICO (2016) 'Model publication scheme'
  - ICO (2016) 'Duty to provide advice and assistance (section 16)'
  - ICO (2015) 'Time limits for compliance under the Freedom of Information Act (section 10)'
- 1.3. This policy will be viewed in conjunction with the following other school policies:
  - Data Protection Policy GDPR
- **2.** Accepting requests for information
- 2.1. The school will only accept a request for information which meets all of the following criteria:
  - It is in writing (this includes requests sent to the school's official social media

#### accounts)

- It states the name of the applicant (not a pseudonym) and an address for correspondence
- It adequately describes the information requested
- 2.2. A request will be treated as made in writing if it meets all of the following requirements:
  - It is transmitted by electronic means
  - It is received in legible form
  - It is capable of being used for subsequent reference
- 2.3. Where a request is submitted in a foreign language, the school is not expected to obtain a translation of the request. For the request to be processed, the school will ask the applicant to provide their request in English.
- 2.4. The school will publish details of its procedures for dealing with requests for information on the website, which includes the following:
  - A contact address and email address

#### 3

## General rights of access to information held by the school

Provided that the request meets the requirements set out in <u>section 2</u> of this policy, the school will
3.1. comply with its duty to:

- Confirm or deny to any person making a request for information to the school, whether it holds information of the description specified in the request.
- Provide the documentation, if the school confirms that it holds the requested information.
- 3.2. The duties outlined in 3.1 will be completed no later than 20 school days, or 60 working days if this is shorter, from receipt of the request.

Where a fee is charged, the timeframe within which the school has to respond to the request begins3.3. from the day the fee is received.

- 3.4. The school will not comply with section 3.1 of this policy where:
  - The school reasonably requires further information to meet a freedom of information request, has informed the applicant of this requirement, but was not subsequently supplied with that further information.
  - The information is no longer readily available as it is contained in files that have been placed in archive storage or is difficult to access for similar reasons.
  - A request for information is exempt under section 2 of the Freedom of Information Act 2000.
  - The cost of providing the information exceeds the appropriate limit.
  - The request is vexatious.

- The request is a repeated request from the same person made within 60 consecutive working days of the initial one.
- A fee notice was not honoured.
- The requested information is not held by the school for the purposes of the school's business.
- 3.5. Where information is, or is thought to be, exempt, the school will, within 20 school days, give notice to the applicant which:
  - States that fact.
  - Specifies the exemption in question.
- 3.6. If information falls within scope of a qualified exemption and the school needs additional time to consider the public interest test, the school may extend the deadline. In most cases, the extension will exceed no more than a further 20 school days; however, the actual length of the extension will be decided on a case-by-case basis.
- 3.7. Where a public interest test extension is required, the school will write to the applicant to inform them of this, stating the following information:
  - Which exemption(s) the extension relies on and why
  - A revised deadline for when the applicant will receive their response
- 3.8. Where a deadline has to be further extended, the school will write to the applicant again, stating the information outlined in 3.7.
- 3.9. Requests for information that is not recorded by the school (e.g. requests for explanations, clarification of policy and comments on the school's business) will not be considered valid requests. In these cases, the applicant will be provided with an explanation of why their request will not be treated under the Freedom of Information Act 2000 and the school will respond to the applicant through other channels as appropriate.
- 3.10. The information provided to the applicant will be in the format that they have requested, where possible.
- 3.11. Where it is not possible to provide the information in the requested format, the school will assist the applicant by discussing alternative formats in which it can be provided.
- 3.12. The information provided will also be in the language in which it is held, or another language that is legally required.
- 3.13. If, under relevant disability and discrimination regulations, the school is legally obliged to provide the information in other forms and formats, it will do so.
- 3.14. In some cases, a request may be dealt with under more than one access regime, e.g. if the request involves both information about the school and personal information, it will be dealt with under the Freedom of Information Act 2000 and the Data Protection Act 2018.

3.15. Staff are made aware that it is a criminal offence to alter, deface, block, erase, destroy or conceal any information held by the school with the intention of preventing disclosure following a request

### 4 The appropriate limit

- 4.1. The school will not comply with any freedom of information request that exceeds the statutorily imposed appropriate limit of £450.
- 4.2. When determining whether the cost of complying with a freedom of information request is within the appropriate limit, the school will take account only of the costs we reasonably expect to incur in relation to:
  - Determining whether it holds the information.
  - Locating the information, or a document which may contain the information.
  - Retrieving the information, or a document which may contain the information.
  - Extracting the information from a document containing it.
  - Costs related to the time spent by any person undertaking any of the activities outlined in section 4.2 of this policy on behalf of the school, are to be estimated at a rate of £25 per person per hour.
  - 4.3. The school is not required to search for information in scope of a request until it is within the cost limit.
  - 4.4. If responding to one part of a request would exceed the cost limit, the school does not have to respond to any other parts of the request.
  - 4.5. Where multiple requests for information are made to the school within 60 consecutive working days of each other, either by a single person or by different persons who appear to be acting in concert, the estimated cost of complying with any of the requests is to be taken to be the total costs to the school of complying with all of them.
  - 5 Charging fees
  - 5.1. The school may, within 20 school days, give an applicant who has requested information from the school, a written notice stating that a fee is to be charged for the school's compliance.
  - 5.2. Charges may be made for disbursements, such as the following:
    - a. Production expenses, e.g. printing and photocopying
    - b. Transmission costs, e.g. postage
    - c. Complying with the applicant's preferences about the format in which they would like to receive the information, e.g. scanning to a CD
  - 5.3. Fees charged will not exceed the total cost to the school of:

- d. Informing the person making the request whether we hold the information.
- e. Communicating the information to the person making the request.
- 5.4. Where a fee is to be charged, the school will not comply with <u>section 3</u> of this policy unless the requested fee is paid within a period of three months, beginning with the day on which the fees notice is given to the applicant.
- 5.5. Where a fee is paid by cheque, the school has the right to wait until the cheque is cleared before commencing work.
- 5.6. Once a fee is received, the school will inform the applicant of the revised response deadline, i.e. an additional 20 school days (or 60 working days).
- 5.7. Where the school has underestimated the cost to be charged to an applicant, a second fees notice will not be issued; instead, the school will bear the additional costs.
- 5.8. The school will not take into account any costs which are attributable to the time spent by persons undertaking any of the activities mentioned in section

5.3 above.

5.9. When calculating the 20<sup>th</sup> school day in which to respond to a freedom of information request, the period beginning the day on which the fee notice is given to the applicant and ending with the day on which the fee is received will be disregarded.

### 6 Means of communication

- Where, on making a request for information, the applicant expresses a preference for
   6.1. communication by any one of the following means, the school will, as far as is practicable, give effect to that preference:
  - The provision to the applicant of a copy of the information in permanent form or in another form acceptable to the applicant.
  - The provision to the applicant of a reasonable opportunity to inspect a record containing the information.
  - The provision to the applicant of a digest, or summary of the information, in permanent form or in another form acceptable to the applicant.
- 6.2. Where a preference is not stated by the applicant, the school will communicate by any means which are reasonable under the circumstances. For example, where an applicant uses Twitter to make a request, the school may respond via an alternative medium as Twitter restricts the length of a response.

### 7 Providing advice and assistance

- 7.1. The school will meet its duty to provide advice and assistance, as far as is reasonable, to any person who proposes to make, or has made, requests for information to the school.
- 7.2. The school may offer advice and assistance in the following circumstances:

- If an individual requests to know what types of information the school holds and the format in which it is available, as well as information on the fees regulations and charging procedures.
- If a request has been made, but the school is unable to regard it as a valid request due to insufficient information, leading to an inability to identify and locate the information.
- If a request has been refused, e.g. due to an excessive cost, and it is necessary for the school to assist the individual who has submitted the request.
- 7.3. The school will provide assistance for each individual on a case-by-case basis; examples of how the school will provide assistance include the following:
  - Informing an applicant of their rights under the Freedom of Information Act 2000
  - Assisting an individual in the focus of their request, e.g. by advising of the types of information available within the requested category
  - Advising an applicant if information is available elsewhere and how to access this information
  - Keeping an applicant informed on the progress of their request
- 7.4. Where the school wishes to ask a different public authority to deal with a request by transferring it to them, this will only be done with the agreement of the applicant.
- 7.5. In order to provide assistance as outlined above, the school will engage in the following good practice procedures:
  - Make early contact with an individual and keep them informed of the process of their request.
  - Accurately record and document all correspondence concerning the clarification and handling of any request.
  - Give consideration to the most appropriate means of contacting the applicant, taking into account their individual circumstances.
  - Discuss with the applicant whether they would prefer to receive the information in an alternative format, in cases where it is not possible to provide the information requested in the manner originally specified.
  - Remain prepared to assist an applicant who has had their request denied due to an exemption.
- 7.6. The school will give particular consideration to what level of assistance is required for an applicant who has difficulty submitting a written request.
- 7.7. In circumstances where an applicant has difficulty submitting a written request, the school will:
  - Make a note of the application over the telephone and then send the note to the applicant to confirm and return the statutory time limit for a reply would begin here.
  - Direct the individual to a different agency that may be able to assist with

framing their request.

**NB.** This list is not exhaustive, and the school may decide to take additional assistance measures that are appropriate to the case.

- 7.8. Where an applicant's request has been refused either because the information is accessible by other means, or the information is intended for future publication or research, the school, as a matter of good practice, will provide advice and assistance.
- 7.9. The school will advise the applicant how and where information can be obtained, if it is accessible by other means.
- 7.10. Where there is an intention to publish the information in the future, the school will advise the applicant of when this publication is expected.
- 7.11. If the request is not clear, the school will ask for more detail from the applicant in order to identify and locate the relevant information, before providing further advice and assistance.
- 7.12. If the school believes the applicant has not provided their real name, the school will inform the applicant that the request will not be responded to until further information is received from the applicant.
- 7.13. If the school is able to clearly identify the elements of a request, it will respond following usual procedures and will provide advice and assistance for the remainder of the request.
- 7.14. If any additional clarification is needed for the remainder of a request, the school will ensure there is no delay in asking for further information.
- 7.15. Applicants are given <u>two months</u> to provide any requested clarification. If an applicant decides not to follow the school's advice and assistance and fails to provide clarification, the school is under no obligation to contact the applicant again.
- 7.16. If the school is under any doubt that the applicant did not receive the advice and assistance, the school will re-issue it.
- 7.17. The school is not required to provide assistance where an applicant's request is vexatious or repeated, as defined under section 14 of the Freedom of Information Act 2000.
- 7.18. Where the school has already sent a refusal request in relation to a previous vexatious request, the school is not obliged to send another notice for future vexatious requests.
- 7.19. An ongoing evidence log is kept, recording relevant correspondence or behaviour that has been taken into account when a request has been classed as vexatious.
- 7.20. The school is not required to provide information where the cost of complying with a request exceeds the limit outlined in the Freedom of Information Act 2000. In such cases, the school will firstly provide the applicant with advice and assistance to help them reframe or refocus their request with a view of brining it within the cost limit. Then the school will consider whether any information can be provided free of charge if the applicant refuses to pay the fee.
- 7.21. If a request is refined, it will be treated as a new request.

A record will be kept by the business manager in the school office of all the advice and assistance provided.

### 8 Consultation with third parties

8.1. The school may need to consult third parties about information held in scope of a request to consider whether it would be suitable to disclose the

information. Situations where third parties may need to be consulted include the following:

- When requests relate to persons or bodies who are not the applicant and/or the school
- When the disclosure of information is likely to affect the interests of persons or bodies who are not the applicant or the school
- 8.2. The school will consider if a third party needs to be directly consulted about a request, particularly, for example, if there are contractual obligations that require consultation before information is disclosed.
- 8.3. Third parties will also be consulted where the school is proposing to disclose information relating to them or information that is likely to affect their business or private interests.
- 8.4. The views of third parties will be given appropriate weighting when deciding how to respond to a request. For example, if the third party created or provided the information, they may have a better understanding of its sensitivity.
- 8.5. It is ultimately the school's decision as to whether information in scope of a request will be released following any relevant consultation.
- 8.6. Where the school decides to release information following consultation with a third party, the third party will be informed in advance that the information is going to be disclosed.
- 8.7. Where the school intends to release information that relates to a large number of third parties, the school will consider whether it would be more appropriate to contact a representative organisation who can express views on behalf of the third parties, rather than contacting each party individually. If no representative organisation exists, the school may also consider only notifying or consulting a sample of the third parties relating to the disclosure.
- 8.8. Decisions made in line with 8.7 will be made on a case-by-case basis.
- 9 Internal reviews
- 9.1. When responding to requests for information, the details of the school's internal review process will be set out, including information about how applicants can request an internal review. Applicants will also be informed of their right to complain to the ICO if they are still dissatisfied following the outcome of the school's internal review.
- 9.2. Requests for an internal review should be made in writing to the school.

- 9.3. For a request for an internal review to be accepted, it must be made within 40 school days from the date the school issued an initial response to the request.
- 9.4. Upon receipt of an application, the school will acknowledge an application and inform the applicant of the intended response date. Responses will usually be delivered within 20 school days of receipt of the application.
- 9.5. If an internal review is complex, requires consultation with third parties or the relevant information is of high volume, the school may need to extend the usual response timeframe. In these cases, the school will inform the applicant and provide an alternative response date. In most cases, the extension will exceed no more than a further 20 school days; however, the actual length of the extension will be decided on a case-by-case basis.
- 9.6. Where clarification is needed from an applicant regarding the review, the normal response period will not begin until clarification is received.
- 9.7. Wherever possible, the review will be undertaken by a different member of staff than the person who took the original decision.
- 9.8. During a review, the school will evaluate the handling of the request; particular attention will be paid to concerns raised by the applicant.
- 9.9. The applicant will be informed of the outcome of the review and a record will be kept of such reviews and the final decision that is made.
- 9.10. If the outcome of the review is to disclose information that was previously withheld, the information will be provided to the applicant at the same time they are informed of the response to the review, where possible. If this is not possible, the applicant will be informed of when the information will be provided.
- 9.11. Within the response to a review, the applicant will be informed again of their right to complain to the ICO.

### 10 Publication scheme

- 10.1. The school will meet its duty to adopt and maintain a publication scheme which specifies the information which it will publish on the school website, and whether the information will be available free of charge or on payment.
- 10.2. The publication scheme will be reviewed and, where necessary, updated on an annual basis.
- 11 Contracts and outsourced services
- 11.1. The school will make clear what information is held by third party contractors on behalf of the school.
- Where a contractor holds information relating to a contract held with the school on behalf of the school, this information is considered in the same way as information held by a public authority and so is subject to the Freedom of Information Act 2000.

- 11.3. When entering into a contract, the school and contractor will agree what information the school will consider to be held by the contractor on behalf of the school, this will be indicated in the contract.
- 11.4. Appropriate arrangements will be put in place for the school to gain access to information held by the contractor on the school's behalf, in the event that a freedom of information request is made. These arrangements will be set out in a contract, and will cover areas including the following:
  - a. How and when the contractor should be approached for information and who the points of contact are
  - b. How quickly information should be provided to the school
  - c. How any disagreement about disclosure between the school and contractor will be addressed
  - d. How requests for internal reviews and appeals to the ICO will be managed
  - e. The contractor's responsibility for maintaining record keeping systems in relation to the information they hold on behalf of the school
  - f. The circumstances under which the school must consult with the contractor about disclosure and the process for doing so
  - g. The types of information which should not be disclosed and the reasons for this confidentiality, where appropriate
- 11.5. In some situations, the school may offer or accept confidentiality arrangements that are not set out within a contract with a third party. The school and the third party will both be aware of the legal limits placed on the enforceability of expectations of confidentiality and the public interest in transparency.
- 11.6. Such expectations outlined in 11.5 will only be created where it is appropriate to do so.
- 11.7. Contractors must comply with requests from the school for access to information they hold on behalf of the school.
- 11.8. Requests for information held by a contractor on behalf of the school will be responded to by the school. If a contractor receives a request, this will be passed onto the school for consideration

#### 12 Monitoring and review

12.1. This policy will be received on an annual basis, or in light of any changes to relevant legislation, by the headteacher

#### **Publication Scheme**

This scheme follows the model approved by the ICO and sets out the classes of information which we publish or intend to publish; the format in which the information will be made available and whether the information is available free of charge or on payment.

### 1. Classes of information

Information that is available under this scheme includes:

- Who we are and what we do
- What we spend and how we spend it
- What are our priorities are and how we are doing?
- How we make decisions
- Our policies and procedures
- The services we offer

Information which <u>will not</u> be made available under this scheme includes:

- Information the disclosure of which is prevented by law, or exempt under the Freedom of Information Act, or is otherwise properly considered to be protected from disclosure.
- Information in draft form, or notes, documents in older versions, emails or other correspondence.
- Information that is no longer readily available as it is contained in files that have been placed in archive storage or is difficult to access for similar reasons.

#### 2. How to request information

Requested documents under this scheme will be delivered electronically where possible, but paper copies can be provided by contacting the school using the below contact details.

To enable us to process your request quickly, please mark all correspondence:

### **"FREEDOM OF INFORMATION REQUEST"**

Documents can be translated under disability legislation into accessible formats where possible.

#### 3. Charges

Documents contained in this scheme are free to view on the school website.

Single paper copies are also available free of charge to parents/carers and prospective parents/carers of the school.

### **Complaints Procedure**

 All maintained schools in England are required, under Section 29 of the Education Act 2002, to have in place a procedure to deal with complaints relating to the school and to any community facilities or services that the school provides. This document details the complaints procedure at Steeton Primary School, follows guidance from the Department for Children, Schools and Families (DCSF) and is publicised on the Governing Body display board.

Any person, including members of the general public, may make a complaint about any provision of facilities or services that a school provides, unless separate statutory procedures apply (such as exclusions or admissions). Schools does not limit complaints to parents or carers of children that are registered at the school'.

2. At Steeton School, we undertake to provide a friendly and safe environment in which pupils will be helped to achieve their potential, both academically and socially. We recognise that sometimes things can go wrong and parents, carers and members of the public may need to make a complaint or raise concerns they have with the school. This procedure is intended to allow you to raise a concern or complaint relating to the school or the services that it provides

#### 2. Framework of Principles

This complaints procedure adheres to the following framework of principles.

An effective complaints procedure will:

- Encourage resolution of problems by informal means wherever possible
- Be easily accessible and publicised
- Be simple to understand and use
- Be impartial
- Be non-adversarial
- Allow swift handling with established time limits for action and keeping people informed of the progress
- Ensure a full and fair investigation by an independent person where necessary
- Respect people's desire for confidentiality
- Address all the points at issue and provide an effective response and appropriate redress where necessary
- Provide information to the school's senior management team to evaluate and possibly amend school policies.

#### 3. Investigating complaints

At each stage the complaints co-ordinator will make sure that they:

- Establish what has happened so far and who has been involved
- Clarify the nature of the complaint and what remains unresolved
- Meet with the complainant or contact them
- Clarify what the complainant feels would put things right
- Interview those involved in the matter and/or those complained of
- Conduct the interview with an open mind and be prepared to persist in the questioning
- Keep notes of the interview

#### 4. Resolving complaints

At each stage we will seek ways in which a complaint can be resolved. It might be sufficient to acknowledge that the complaint is valid in whole or in part. In addition, it may be appropriate to offer one or more of the following:

- An apology
- An explanation
- An admission that the situation could have been handled differently or better
- An assurance that the event complained of will not recur
- An explanation of the steps that have been taken to ensure that it will not happen again
- An undertaking to review school policies in light of the complaint

We will encourage complainants to tell us what actions they feel might resolve the problem at any stage. An admission that the school could have handled the situation better is not the same as an admission of negligence.

#### 5. Publicising the Procedure

This procedure will be publicised on the governor's display board in the school's main entrance and on the school website. In addition, there will be reference made to it in the school prospectus.

#### 6. Dealing with complaints - initial concerns

It is in everyone's interest that concerns and complaints are resolved at the earliest possible stage. At Steeton Primary School we are clear about the difference between a concern and a complaint.

#### **Concerns**

We take informal concerns seriously at the earliest stage and we will always endeavour to resolve them as quickly as possible in an informal way. This includes staff discussing individual cases with complainants "on the spot" if appropriate and apologising where necessary.

#### **Complaints**

The formal procedures set out below will be invoked if initial attempts to resolve the issue are unsuccessful and the person raising the concern remains dissatisfied and wishes to take the matter further.

#### 6. Dealing with complaints – procedures

At Steeton Primary School we have nominated a member of staff who has responsibility for the operation and management of the school's complaint procedure. This role is called the school's "complaints co-ordinator".

Currently Jess Kershaw is the school complaints co-ordinator.

#### 8. Informal Stage:

#### Stage One: Complaint heard by a staff member

The school will always respect the views of a complainant who indicates that he/she would have difficulty discussing a complaint with a particular member of staff. In these cases, the member of staff who first heard the complaint will refer the complainant to the complaints co-ordinator.

Where the complaint concerns the Executive Headteacher, the complaints co-ordinators will refer the complainant to the Chair of Governors. Similarly, if the member of staff initially approached feels too compromised to deal with a complaint, the complaints co-ordinator may consider referring the complainant to another member of staff. We will always endeavour to consider the complaint objectively and impartially.

Where the first approach is made to the Governing Body, or individual governor – either verbally or by letter - the next step would be to refer the complainant to the complaints co-ordinator and advise them about the procedure. Governors will not act unilaterally on an individual complaint outside the formal procedure or be involved at the early stages in case they are needed to sit on a panel at a later stage of the procedure.

#### 9. Stage Two – Complaint heard by the Executive Headteacher

At this point the complainant may be dissatisfied with the way the complaint was handled at stage one as well as pursuing their initial complaint. The Executive Headteacher may delegate the task of collating the information to another staff member but not the decision on the action to be taken.

The Executive Headteacher will acknowledge receipt of the complaint with a written reply within **five working days.** 

Following an investigation of a complaint (see above) the Executive Headteacher will write to the complainant with the outcome of the investigation. Investigations may vary in the length of time they take. The Executive Headteacher will investigate the complaint as quickly and efficiently as possible. However, where investigations become protracted because of reasons outside of the school's control the complainant will be kept regularly informed of the progress of the investigation.

The Executive Headteacher will ensure that the complaints co-ordinator is informed of the outcome.

#### Complaint heard by the Chair of Governors

If the complaint concerns the Executive Headteacher the complainant will be referred directly to the Chair of Governors as stated above. The Chair of Governors will inform the Executive Headteacher of the complaint and will set up a meeting with the complainant and the Executive Headteacher in order to resolve the issue.

#### **10.Formal Stage:**

#### Complaint heard by Governing Body's Complaints Committee

At this point the complainant may be dissatisfied with the way the complaint was handled at the informal stage as well as pursuing their initial complaint. The complainant will need to write to the Chair of Governors giving details of the complaint. The Chair will acknowledge the complaint in writing within seven days, explaining the next stage of the process. The Chair will also inform the Executive Headteacher of the receipt of the complaint.

The Clerk to Governors will convene a Governing Body Complaints Committee meeting and the complainant will be issued a letter inviting them to a hearing. The complainant will be issued a letter inviting them to a hearing.

The Complaints Committee will take the following points into account:

- The hearing is as informal as possible
- Witnesses are only required to attend the part of the hearing in which they give their evidence
- After introductions, the complainant is invited to explain their complaint, and be followed by their witnesses

- The Executive Headteacher may question both the complainant and the witnesses after each has spoken
- The Executive Headteacher is then invited to explain the school's actions and be followed by the school's witnesses
- The complainant may question both the Executive Headteacher and the witnesses after each has spoken
- The Complaints Committee may ask questions at any point
- The complainant is then invited to sum up their complaint
- The Executive Headteacher is then invited to sum up the school's actions and response to the complaint
- The Chair of Governors will be informed in writing of the decision of the committee within seven working days.
- Both parties leave together while the panel decides on the issues
- The Governing Body will be informed of the actions and any points for action at their next Governing Body meeting.

#### **11** The Remit of the Complaints Committee

The committee can:

- Dismiss the complaint in whole or in part
- Uphold the complaint in whole or in part
- Decide on the appropriate action to be taken to resolve the complaint
- Recommend changes to the school's systems or procedures to ensure that problems of a similar nature do not recur.

There are several points which any governor sitting on a complaints committee needs to remember

**a.** It is important that the appeal hearing is independent and impartial. No governor may sit on the panel if they have a prior involvement in the complaint. In deciding the make-up of the panel, governors need to try and ensure that it is a cross section of the categories of governor and sensitive to the issues of race, gender and religious affiliation.

**b.** The aim of the hearing, which needs to held in private, will always be to resolve the complaint and achieve reconciliation between the school and the complainant. However, it has to be recognised, that the complainant might not be satisfied with the outcome if the hearing does not find in their favour. It may only be possible to establish the facts and make recommendations which will satisfy the complainant that his or her complaint has been taken seriously.

**c.** An effective panel will acknowledge that many complainants feel nervous and inhibited in a formal setting. Parents often feel emotional when discussing an issue that affects their child. The panel chair will ensure that the proceedings are as welcoming as possible. The layout of the room will set the tone and care is needed to ensure the setting is informal and not adversarial.

**d.** Extra care needs to be taken when the complainant is a child. Careful consideration of the atmosphere and proceedings will ensure that the child does not feel intimidated. The panel needs to be aware of the views of the child and give them equal consideration to those of adults. Where the child's parent is the complainant, it would be helpful to give the parent the opportunity to say which parts of the hearing, if any, the child needs to attend.

f. The governors sitting on the panel need to be aware of the complaints procedure.

### **12.**Roles and Responsibilities

#### a. The Role of the Clerk

The clerk will:

- Set the date, time and venue of the hearing, ensuring that the dates are convenient to all parties and that the venue and proceedings are accessible
- Collate any written material and send it to the parties in advance of the hearing
- Meet and welcome the parties as they arrive at the hearing
- Record the proceeding
- Notify all parties of the panel's decision.

#### b. The Role of the Chair of the Governing Body or the Nominated Governor

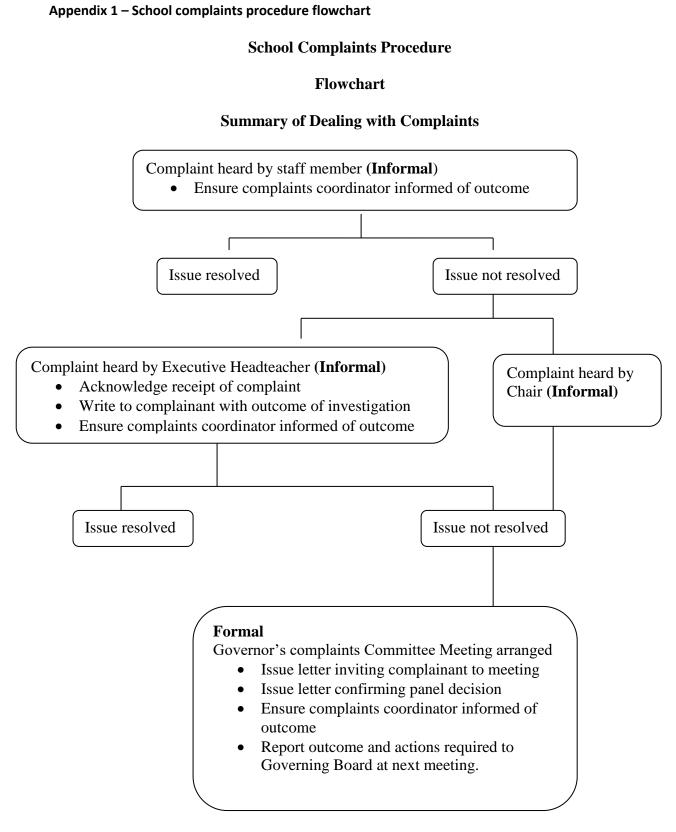
The nominated governor will:

- Check that the correct procedure has been followed
- If a hearing is appropriate notify the clerk to notify the panel

#### c. The Role of the Chair of the Panel

The Chair of the Panel has a key role, ensuring that:

- The remit of the panel is explained to the parties and each party has the opportunity of putting their case without undue interruption
- The issues are addressed
- Key findings of fact are made
- Parents and others who may not be used to speaking at such a hearing are put at ease
- The hearing is conducted in an informal manner with each party treating the other with respect and courtesy
- The panel is open minded and acting independently
- No member of the panel has a vested interest in the outcome of the proceedings or any involvement in an earlier stage of the procedure
- Each side is given the opportunity to state their case and ask questions
- Written material is seen by all parties (if a new issue arises it would be useful to give all parties the opportunity to consider and comment on it)



**School Complaints Procedure** 

Appendix 2 – School complaints procedure complaint form

Please complete and return to Diane Bonham (Complaints Coordinator) who will acknowledge receipt and explain what action will be taken.

Your name:

Pupil's name:

Your relationship to pupil:

Address:

Postcode: Daytime telephone number: Evening telephone number:

Please give details of your complaint:

What action, if any, have you already taken to try and resolve your complaint. (Who did you speak to and what was the response)?

# **Privacy Notice for Pupils**

### **General Data Protection Regulation GDPR**

#### **Vision Statement**

#### A special place where we learn, grow and have fun together.

At Steeton Primary School we work together to inspire and motivate all our children through a diverse range of opportunities. We develop compassionate individuals who are resilient and optimistic with no limit to their success. **Our Core Values:** 

- Learn together through creating memorable experiences.
- Achieve the highest standards and do the basics brilliantly.
- Develop a deep understanding of others through the rich diversity of the school community.
- **Be nurtured** within our school family to become socially **confident**, **kind and considerate** young people.
- Embrace new challenges, thinking and reasoning for themselves.
- Have a love of learning that will last a lifetime.

#### **Introduction**

Everybody has a right to have their personal information kept confidential, this includes the children who attend Steeton Primary School and their families. The school is committed to protecting pupils' and families' privacy. These rights are also part of the law, the General Data Protection Regulation.

#### Why do we keep data?

The School uses data (personal information) for the following main reasons:

- To record who is on the school roll (our admissions)
- To record school attendance
- To assess how well pupils are attaining and to predict how they might attain in the future
- To help keep children safe and healthy (protecting pupils' welfare).
- To make sure that we give equal treatment to all children
- To arrange activities beyond the school day (after school clubs, for example)

The school receives this data, works with it, stores it and shares it with others on the legal basis of *Public Task*. This means that these activities are tasks that the school has to carry out.

The school will ask for families for *consent* to our using other data, such your photograph.

#### Keeping your information private

The school will make every effort to keep your information private. We will lock away paper records and make sure that the computer systems are secure. We will work hard to:

- Prevent any data being lost
- Prevent any data being stolen
- Prevent data from being deleted inappropriately
- Prevent data being seen by people who have no right to see it
- Prevent data being altered inappropriately

To help keep children safe it is important that the adults looking after you know if there are any health issues that you might have. Although we will share this information, we will only share it with people who need to know it to keep you safe and healthy.

The school has asked Mrs Newsome to look after pupils' information. We have also appointed a *Data Protection Officer* who advises and visits the school. He is Mr Stygall who works for a company called Safeguarding Monitor. He has been a head teacher.

The Governing Body has a governor who also looks after pupils' information. Their name is Ms Duffy.

#### Pupils' Data

The sort of data that is personal and which should be kept private includes:

- Your full name and address and your family details
- Anything to do with your health and your welfare
- Anything to do with your religion (if you follow a religion) and your ethnicity
- How you are getting on in school

The school will expect every pupil to play their part in protecting other people's personal information (or data) which is why we ask all the children in Key Stage 2 to sign an Acceptable Use Policy. You have the *right* to have your data kept confidential and you have the *duty* to maintain other people's confidentiality.

The school might have to change this notice if there are changes to the law or if the school decides policy changes are needed.

### Steeton Primary School Governing Body Committee members and Named/Link Governors for 2023-24

1. At its meeting on 13 July 2022 the Governing Body appointed governors to Committees and to Named and SDP Link Governor roles for 2023-24 as follows:

| Headteacher Performance Management   | Resources Committee  |  |  |  |
|--|--|--|--|--|
| Sue West<br>Emma Wainwright<br><i>External adviser</i> : Richard Lait (Bradford<br>Council, Primary Achievement Officer)   | John Cooper<br>Stefan Mills<br>Claire Redman<br>Emma Wainwright<br>Sue West  |  |  |  |
| <u>Policy Review Group</u> – Authorised by the GB<br>to approve all policies except where<br>Regulations require that they be approved<br>by the GB or a Committee or allow that they<br>be approved by the Headteacher. | <u>Pay</u><br>The Executive Headteacher attends and advises<br>this Committee but is not a voting member   |  |  |  |
| John Cooper  | Panels for Hearings etc  |  |  |  |
| <u>School Estate Working Group</u><br>John Cooper<br>Stefan Mills<br>Adam O'Neill  | All governors who are not members of staff are<br>appointed to the Committees for all types of<br>Hearings and appointments, and to the<br>Attendance Panel; members will be selected for<br>panels from those Governors according to<br>availability. |  |  |  |
| Sue West<br>2. The following governors have up to date Safe  | er Recruitment training:   |  |  |  |
| Sue West / John Cooper   |  |  |  |  |

Sue West / John Cooper

Emma Wainwright will undertake Safer Recruitment training in the autumn 2022 term

Named Governor roles:

| SEND   | Sue West      |
|--|---------------|
| Child Protection, Safeguarding and Looked After Children | Stefan Mills  |
| Health and Safety  | Sue West      |
| Pupil Voice  | Claire Redman |
| School website   | Stefan Mills  |
| Governor Briefing representative                         | Sue West      |

#### SDP Link Governor roles:

| 1. SDP Priority                                     | Link Governor(s)              |
|---|-------------------------------|
| Quality of Education (inc Pupil and Sports Premium) | Emma Wainwright; Adam Longden |
| Behaviour and attitudes                             | Adam O'Neill                  |
| Personal Development                                | Adam O'Neill                  |
| Leadership and Management                           | Emma Wainwright, Sue West     |
| Parent/Community Involvement                        | Stefan Mills                  |
| Early Years   | Emma Wainwright; Adam O'Neill |