



## SENse Learning Policies

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

Person responsible for ensuring that these policies are implemented and reviewed in line with the review dates: Sophie Amos, Operational Director.

Policies reviewed: **September 2025** Next Review date: **September 2026**

1. Safeguarding Policy	3
2. Admissions Policy	5
3. Behaviour and Physical Intervention Policy	8
4. Positive Touch Policy	15
5. Lone Working Policy	16
6. Anti-Bullying Policy	18
7. Curriculum Policy	21
8. NCFE and Exam Administration Policy	35
9. Online Safety Policy	38
10. PSHE Policy	39
11. Relationship and Sex Education Policy (RSE)	44
12. Health and Safety Policy	48
13. Risk Management Policy	52
14. First Aid Policy	55
15. Communicable Diseases Policy	59
16. Supporting Students with Medical Conditions Policy	64
17. Equal Opportunities and Diversity Policy	71
18. Safer Recruitment and Selection Policy	78
19. Quality Assurance Policy	81
20. Complaints Policy	83
21. Data Protection Policy	85
22. Emergency Procedure Policy	89
23. Sustainability Policy	90
24. Social Value Policy	92
25. Modern Slavery Statement	94
Glossary	94

## 1. Safeguarding Policy

### 1.1 Introduction and Purpose

This is the shortened Safeguarding and Prevent Policy for SENse Learning. The full policy can be found as a separate document. The policy is followed by all members of the organisation and promoted by those in the position of leadership within the organisation. SENse Learning recognises that it has an explicit duty to safeguard and protect children, young people and adults at risk from abuse as defined in the Children's Act 2004, section 175 of the Education Act 2002, Working Together to Safeguard Children 2023, Keeping Children Safe in Education 2025 (DfE) and the Prevent Duty as outlined in the Counter-Terrorism and Security Act 2015.

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

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

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

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

Everyone at SENse Learning, whether head office staff or associates, have an awareness of safeguarding issues through regular training and briefings, some of which are listed below.

We enable our associates to be aware that these behaviours put children in danger. All associates are aware of the principle Designated Safeguarding Lead, Jenni Griffiths, who is the expert within our organisation and is there to support head office and associates.

### 1.2 Roles and Responsibilities

Designated Safeguarding Lead - Jenni Griffiths (Pastoral Manager)  
[jenni.griffiths@sense-learning.com](mailto:jenni.griffiths@sense-learning.com)

Deputy DSL's - Lucy McCully (Welfare Lead) [lucy.mccully@sense-learning.com](mailto:lucy.mccully@sense-learning.com)  
Amy Attoe (Safeguarding Coordinator) [amy.attoe@sense-learning.com](mailto:amy.attoe@sense-learning.com)

Pathway Leads

Jacqueline Lawrence (Reintegration Lead),  
Kathryn Burgon-Watson (EOTAS and Complex Needs Lead),  
Fiona Jordan (Vocational and Independence Lead)  
Michelle Batchelor (Assessment Lead)

The prevent lead for SENse Learning is Jenni Griffiths, Pastoral Manager.

### 1.3 Procedures

- All staff and associates have annual safeguarding training, online safety, and prevent training. All DSL's also update their Prevent and radicalisation training annually. Training also includes understanding risks and how to respond to harms outside the home.
- Associates and staff know it's their responsibility to report and record and have clear guidelines around how to do this. They are reminded of their responsibilities and the processes at every INSET day. Reporting of safeguarding concerns is done via the students home page on Learn Trek. This concern will be sent automatically to the DSL's who will respond. If an associate believes a child or young person is in need of immediate help or protection they should contact emergency services and also phone through to a DSL.
- The DSL's have undergone the correct training and know the procedures for reporting a concern. They are aware of the different local authority threshold documents.
- Associates are all made aware of their responsibility to report any concerns around the practice of a professional and how to do this. We have a low level concerns and whistleblowing policy that all associates are required to follow. The organisation knows it is their responsibility to keep all children and young people safeguarded and knows their duty in reporting a concern to the relevant bodies.
- SENse Learning has a Safer Recruitment policy which covers in detail the actions that we take. As of 2023 all employees of SENse Learning that are undertaking interviews will have completed Safer Recruitment training.
- The safeguarding policy covers our procedures around students missing from sessions and what actions should be taken. SENse Learning are committed to improving attendance and work in conjunction with parents/carers, students, on roll schools and local authorities to ensure we are following the Working Together to improve school attendance 2024 guidance.
- SENse Learning associates are all provided with a policy and procedure around lone working and are expected to follow this to keep themselves safe whilst working

## 2. Admissions Policy

### 2.1 Introduction & Purpose

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

### 2.2 Policy Principles and Values

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

child or young person's needs safely within the provision.

## 2.3 Procedures

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

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

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

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

An overview of our admissions criteria is detailed in the table below:

Admissions criteria	Location	Curriculum and Learning	Personal Care	Safeguarding	Behaviour and safety
<b>We can take referrals for young people who are aged 5-25 and who:</b>	Can have their sessions within their home  Have a parent/carer available during sessions times to support where needed (if under 18yrs)	Can access our lowest curriculum levels (regardless of their age)  <i>Note:</i> Our lowest curriculum levels are the equivalent of English and Maths at Reception/Year1 level which is above the old P-levels. S	Can attend to their personal care needs	Can engage safely 1:1 with an adult	
<b>We will consider but may not be able to meet the needs of young people who:</b>	Can work in a space in the local community but not their home  Need virtual sessions provided for a short period before moving to face-to-face (up to one term online)	Students who are working below our curriculum levels in one area due to a Specific Learning disability such as dyslexia, Selective Mutism or needs relating to EAL.	Has personal care needs but these can be done by the parent/carer during sessions	Have a history of allegations towards others but not recently  History of sexualised behaviours but these are unlikely in the context of our sessions	Have a history of: Absconding/ Physical aggression/ Needing physical interventions  <i>But these are highly unlikely in the context of our sessions.</i>

<b>Unfortunately, we cannot meet the needs of students who:</b>	Cannot work in their home or local community spaces  Do not have a parent/carer available in the home to supervise sessions when needed and are under 18  Need a fully virtual provision	Have Severe Learning Disabilities (SLD)  Have Profound and Multiple Learning Disabilities (PMLD)	Will need personal care support from our team members	Have a history of: allegations towards others / sexualised behaviours which are recent and or regularly occurring.	Have a history of: Absconding/ Physical aggression/ Needing physical interventions  And these could be present in our sessions.
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We endeavour to be as flexible as possible for our students, and accommodate the requests for specific times, and criteria for the team working with the student. However, at times this can hinder our matching process and cause delays. Our common session start times are 09:00/09:30 and 12:00-13:00. If we have difficulty matching associates to a student, we may consult with the parents/carers again about the requirements. In some instances, we may need to consult with the Local Authority again to discuss how realistic provision is.

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

Should a young person be 'off-rolled' whilst they are receiving SENs Learning provision, the Local Authority will have a full term (14 weeks) to ensure the young person gains another on roll provision or is formally marked as EOTAS, otherwise SENs Learning may have to end provision. All young people should have suitable oversight by an on-roll school or EOTAS package, and SENs Learning cannot take responsibility for this as we are not a registered school.

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

### 3. Behaviour and Physical Intervention Policy

#### 3.1 Introduction and Purpose

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

We believe that all behaviour is communicating an unmet need and work on the principles of CPI (Crisis Prevention Institute, previously MAPA). All direct staff and associates are trained according to CPI content (Verbal Intervention) by fully trained and insured instructors (Sophie Amos, Lucy McCully and Natasha Penney).

SENse Learning aims to ensure that:

- Every student feels safe, listened to, valued and has an input into their individual package
- All associates and staff working with students are trained in CPI Verbal Interventions and have access to support offered by the Behaviour Lead (Lucy McCully)
- All teams and families have access to enhanced support, where necessary. This will be delivered by Lucy McCully (Behaviour Lead) and Natasha Penney
- This behaviour policy has been read and understood by all associates and staff - All teams work with families to ensure that a holistic approach is created for the students in sessions and at home

The purpose of this policy is to:

- Recognise the various levels of behaviour (classified through CPI) and corresponding approaches
- Support staff and associates to manage situations appropriately
- Ensure that all staff and associates working with students are using consistent approaches for all students

Roles and responsibilities:

- Behaviour lead - Lucy McCully (Welfare Lead)
- CPI instructors - Natasha Penney and Sophie Amos

#### 3.2 Procedures

##### Levels of behaviour

SENse Learning categorises behaviour into four levels; anxiety, defensive, risk taking and tension reduction. Please see below for examples of each behaviour. We strongly believe that each level of behaviour has a staff approach which directly impacts on the behaviour, this can be positive impact (de-escalation) or a negative impact (escalation). All staff should always aim to



de-escalate behaviours as soon as they arise. All behaviour is a communication of an unmet need and so will only escalate if we do not meet the need presented.

Behaviour Levels	Behaviour you may see	How would you respond?
<p><b>Anxiety</b> - a change in typical behaviour</p> <p>(you may be aware of the reasons for their anxiety)</p>	<p><b>Examples</b> - nervous body language, pacing, fidgeting, shutting down or repetitive language</p>	<p><b>Supportive</b> -</p> <p>An empathic, non-judgemental approach How can I be supportive?</p> <ul style="list-style-type: none"> <li>• Be patient, listen and convey empathy</li> <li>• Be non-judgemental.</li> </ul> <p>Focus on helping the person meet their needs and address the cause of their behaviour</p>

<p><b>Defensive</b> - Protecting oneself from a real or perceived challenge or threat</p>	<p><b>Examples</b> - Shouting, refusal, asking challenging questions, acting in a threatening manner</p> <p>They may be communicating feeling frightened, scared, not heard, feeling threatened and an escalation of their anxieties. They may be feeling dysregulated.</p>	<p><b>Directive</b> - Providing clear direction or instruction How can I be directive?</p> <ul style="list-style-type: none"> <li>• Use short, simple phrases and instructions</li> <li>• Give them simple and reasonable choices that help them consider positive behaviours and outcomes</li> <li>• Be calm and clear</li> </ul>
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<p><b>Risk Behaviour</b> - Behaviour that presents an imminent or immediate risk of harm to self or others</p>	<p><b>Examples</b> - Striking, throwing objects, pulling or pushing others, harming oneself.</p> <p>They may be communicating that they want the situation to stop. They may be confused, feeling a lack of control and high levels of dysregulation.</p>	<p><b>Safety Interventions</b> - Non-restrictive to maximise safety and minimise harm</p> <p>What Safety Interventions can I use?</p> <ul style="list-style-type: none"> <li>• Non-restrictive interventions - these can include verbal interventions, continuing to use supportive and directive interventions</li> </ul> <p><b>ALWAYS USE VERBAL AND NON-RESTRICTIVE APPROACHES</b></p>
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<p><b>Tension reduction -</b></p> <p>Decrease in physical and emotional energy</p>	<p><b>Examples -</b> Physical signs such as relaxing of postures, reduced muscle tension, maybe sitting or lying down. Emotional signs such as withdrawal, sadness or embarrassment</p>	<p><b>Therapeutic Rapport -</b></p> <p>Re-establish the relationship</p> <p>How I can provide Therapeutic Rapport?</p> <ul style="list-style-type: none"> <li>• Address the needs of the person, support the person, and re-establish the relationship</li> <li>• Understand the incident and agree upon next steps of support</li> <li>• When ready, we should attempt to re-engage in positive communication</li> <li>• Share plans for next steps</li> <li>• Offer positive activity to complete together</li> </ul>
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### Responsibilities of associates/staff when in sessions regarding risk behaviours

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

When risk behaviours are a concern, the following steps will be taken:

- Risk behaviour concerns are recorded by the team
- Student team meeting to create a BSP (Behaviour Support Plan)
- Parent/carers to input BSP
- If risk behaviours continue, a placement review will take place

## 4. Positive Touch Policy

### 4.1 Introduction & Purpose

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

### 4.2 Policy Principles & Values

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

### 4.3 Procedures

- Associates must bear in mind that even perfectly innocent actions can sometimes be misconstrued and must therefore conduct themselves accordingly.
- Associates should therefore respond to students in a way that gives expression to any appropriate level of care, and to provide comfort to ease a students' distress whilst at the same time protecting against the physical contact being misinterpreted by the student.
- If any associate, at any time, thinks that an action may have been misinterpreted, or may lead to a complaint, they need to feel confident to self-report so that the matter can be recorded fully, and the manager can assist any debrief with the student and their parents which may be necessary.
- Any form of physical contact that a reasonable person would judge to be a conscious, self-aware, reasonable and a justifiable act is acceptable. Associates are advised to ensure their actions are acceptable to the student.
- A high proportion of students with emotional and behavioural difficulties may have experienced sexual and/or physical abuse. Associates need to ensure that any physical contact is not misinterpreted.
- If, at any time, a student demonstrates verbally or otherwise that they are not comfortable with physical contact, where appropriate, associates should respect this.
- Physical contact should never be secretive, or for the gratification of the associate and in any way that may be considered indecent, or represent a misuse of authority.
- Associates need to be aware that different cultural factors may apply.

- Age and maturity factors should be considered in deciding appropriate physical contact.
- Where an associate feels that it would be inappropriate to respond to a student seeking physical contact, the reasons for denying this should be explained to the student, and the student should be comforted verbally as necessary.
- The issue of personal contact in general, should be raised in interviews and induction training for associates and discussed in staff development and supervision.
- Students should be given advice and guidance with regard to socially appropriate/inappropriate times/places/situations to seek physical comfort where necessary.
- Any personal care should be carried out in line with the students' individual learning plan and risk assessment which are approved by parents and management.
- The issue of personal contact in general, should be raised in interviews and induction training for associates and discussed in staff development and supervision.
- Students should be given advice and guidance with regard to socially appropriate/inappropriate times/places/situations to seek physical comfort where necessary.
- Any personal care should be carried out in line with the students' individual learning plan and risk assessment which are approved by parents and management.

## 5. Lone Working Policy

### Introduction & Purpose

This policy is the Lone Working Policy for SENs Learning for all workers completing sessions with students. This will be followed by all members of the Organisation and promoted by those in the position of leadership within the Organisation.

### Policy Principles & Values

- The organisation understands it has a duty to keep all workers safe when completing work for SENs Learning.
- The organisation recognises that lone working has risks associated.
- The Lone Working Policy should be read alongside the home visit handbook and all policies related to this

### Procedures

- All workers will be trained in lone working and safety measures involved in this type of role.
- If any associate feels uncomfortable or unsafe in a home or a working location they will end the session immediately and report this to Pathway Leads, Pathway Manager or a Director.
- The Organisation requires all workers to raise any concerns with the Directors or Pathway Leads at the earliest opportunity.



- The Organisation requires all associates to always follow the associate code of conduct.
- Please ensure your car is safe to drive and you follow the driving for work policy.
- Ensure your work phone is charged and you are wearing your ID badge.
- Ensure you follow all lone worker advice from your training.
- Before going into the home, check in to your session via Isimio.
- When you arrive for each session ensure you know the nearest exits if there was to be a fire.
- If a fire occurs, leave the home or the community setting immediately and call 999/follow all community setting procedures. After the situation is under control, please inform Head Office of this incident.
- If out in the community, please ensure you know the nearest fire exits in case of a fire and follow all venue specific fire evacuation procedures. After the situation is under control, please inform Head Office of this incident.
- As soon as you finish your session please check out using Isimio.
- If you are in an emergency situation and can call head office, the emergency phrase is **Please can you let my child's/grandchild's nursery know I will be late to pick them up?**
- Everyone who works in head office knows this is the emergency phrase and will follow the procedure below:
  - We will alert the police and state you are in an emergency situation and need immediate support
  - The Directors will be informed and will manage the situation

### Emergency Information Card

To ensure you are safe, please make sure that a friend or relative has the following details to ensure that if there was an issue with you leaving a session or not returning home, that they have a point of contact.

The Head Office phone number (01444 400896) has an emergency option (option 8) which would divert any call to a company Director to manage the situation.

Your safety is a priority for us so please ensure you have watched our lone worker webinar and if you are ever concerned about your safety, please discuss this with your Case Coordinator and/or someone in Head Office.

Info for friends and/or family:

#### **SENse Learning Emergency Information Card**

Operational Director - Sophie Amos

Pastoral Manager - Jenni Griffiths (extension 5 - safeguarding)

Pathways Manager - Sian Byrne (extension 1 - main desk)

- In an emergency call SENse Learning on 01444 400896 and select option 8.
- This will divert the call to a company Director who can manage/support the situation.
- This option is available 24 hours Monday - Friday.



## **6. Anti-Bullying Policy**

### **6.1 Introduction & Purpose**

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

### **6.2 Policy Principles & Values**

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

safe and disciplined environment where students are able to learn and fulfil their potential.

### 6.3 Procedures

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

5. The Organisation will ensure parents or carers are kept informed about the concern and action taken, as appropriate and inline with child protection and GDPR.
  6. If necessary, other agencies may be consulted or involved, such as the police, if a criminal offence has been committed, or other local services including early help or children's social care, if a student is felt to be at risk of significant harm.
  7. A clear and precise account of bullying incidents will be recorded by the Organisation in accordance with existing procedures. This will include recording appropriate details regarding decisions and action taken.
- The Organisation will take the following steps when responding to all incidents of bullying reported to SENs Learning:
    1. The Organisation will provide appropriate support for the person being bullied - making sure they are not at risk of immediate harm and will involve them in any decision making, as appropriate.
    2. The DSL, or another member of the leadership team, will interview all parties involved.
    3. The DSL will be informed of all bullying issues where there are safeguarding concerns.
    4. The Organisation will speak with and inform other associates, where appropriate.
    5. The Organisation will ensure parents or carers are kept informed about the concern and action taken, as appropriate and inline with child protection and GDPR.
    6. If necessary, other agencies may be consulted or involved, such as the police, if a criminal offence has been committed, or other local services including early help or children's social care, if a student is felt to be at risk of significant harm.
    7. A clear and precise account of bullying incidents will be recorded by the Organisation in accordance with existing procedures. This will include recording appropriate details regarding decisions and action taken.
  - The organisation will take the following steps when responding to all cyberbullying concerns reported to SENs Learning:
    1. The Organisation will act as soon as an incident has been reported or identified. The Organisation will provide appropriate support for the person who has been cyberbullied and work with the person who has carried out the bullying to ensure that it does not happen again.
    2. The Organisation will encourage the person being bullied to keep any evidence of the bullying activity to assist any investigation.
    3. The Organisation will take all available steps where possible to identify the person responsible.
      - a. This may include:
        - b. Looking at the use of the school systems
        - c. Identifying and interviewing possible witnesses
        - d. Contacting the service provider and the police, if necessary
    4. The Organisation will work with the individuals and online service providers to prevent the incident from spreading and assist in removing offensive or upsetting material from circulation. This may include:
      - a. Support reports to a service provider to remove content if those

involved are unable to be identified or if those involved refuse to or are unable to delete content.

5. Requesting the deletion of locally-held content and content posted online if this is deemed appropriate by the Directors.
6. Ensure that sanctions are applied to the person responsible for the cyberbullying; the Organisation will take steps to change the attitude and behaviour of the bully, as well as ensuring access to any additional help that they may need.
7. The Organisation will inform the police if a criminal offence has been committed.
8. The Organisation will provide information to associates and students regarding steps they can take to protect themselves online. This may include:
  - a. Advising those targeted not to retaliate or reply
  - b. Providing advice on blocking or removing people from contact lists
  - c. Helping those involved to think carefully about what private information they may have in the public domain

For further details around peer on peer harm please refer to the Safeguarding Policy

## 7. Curriculum Policy

### 7.1 Introduction & Purpose

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

### 7.2 Policy Principles & Values

- The Organisation aims to provide a bespoke and individualised learning programme to all students who access SENse Learning provision as part of their education.
- The Organisation sets targets based on our WILL (wellbeing, interaction, learning and life skills) Curriculum, and these areas are closely linked to the four areas of the EHCP. The WILL Curriculum covers non-academic learning such as: social skills, anxiety management, social communication and independent living skills.
- The Organisation considers student learning needs, interests and aspirations when planning and incorporates these where possible into the student's targets and planning for their learning.
- The Organisation offers a Functional Skills Curriculum for all students above Secondary School age; this curriculum also includes in-house made Pre-Functional Levels for those students who are not yet ready to access the first levels of the Functional Skills Curriculum.
- The Organisation offers an in-house made Primary Functional Curriculum for students at the primary school age. This takes a pared-down version of the Primary National Curriculum and focuses on the most functional and essential learning objectives, as well as some key skills from the Early Years Framework.

- The Organisation offers NCFE Functional Skills Qualifications in English, Maths and Digital Skills. As well as a menu of options for other qualifications and certifications, as outlined in the Assessment and Accreditation Policy.
- Post-16 students' provision will have greater emphasis on career research and guidance, independent living and life skills.

### 7.3 Procedures

- By the end of the first term, the Case Coordinator and Associates will baseline the student's learning against the Functional Skills Curriculum or the Primary Functional Curriculum.
- Parent/Carers will be asked to complete a baseline with their observations of the student's skills using our WILL Curriculum when the student is in their first week of provision. This gives us an initial indication of areas of need and helps with initial session planning.
- Case Coordinators and Associates will then also do a Baseline against our own WILL Curriculum by the end of the first term, with their observations of the student's skills from sessions so far.
- The Case Coordinator will then write individual targets for each of the areas in the WILL Curriculum, including appropriate academic targets from either of the above academic curriculums, whilst considering the student's EHCP outcomes, their interest and aspirations.
- The Case Coordinator and associates working with the student will plan creatively for learning activities linked to their targets.
- Targets are reviewed half-termly and a report is sent home to parents/carers and the commissioner (LA Caseworker or On-Roll School).
- If students are on a pathway to achieve a Functional Skills qualification, decisions around when this will take place during the year will be made between the student, parent/carer, Case Coordinator and the associate.
- Some sessions are visited throughout the year by the Pathways Team or members of the Leadership Team through the 360 process, where they will also review all aspects of the student's provision for quality assurance. They will write their findings in a report and suggest next steps, all of which will be fed back to the associates.
- Each student will be allocated to one of our four Pathways, and this will form the basis of their programme. Their sessions, learning focus and targets will be informed by the Pathway and next steps.

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

## 8. NCFE and Exam Administration Policy

### 8.1 Introduction & Purpose

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

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

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

### 8.2 Policy Principles & Values

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

### 8.3 Procedures

- There is an appointed Qualifications Lead (Hazel Groves - [hazel.groves@senselearning.com](mailto:hazel.groves@senselearning.com)) who is the first point of call for NCFE matters, including suspected malpractice/maladministration.
- The qualifications lead reports directly to the directors and is appointed to ensure SENse Learning adheres to all NCFE regulations for controlled assessments.
- It is the responsibility of all case coordinators, specialist teachers and education mentors to report any NCFE matters in accordance with this policy.
- The Organisation can offer Functional Skills qualifications in English and Maths. Entry Level 1, 2 and 3 and Level 1 and Level 2 through NCFE, as well as Digital Functional Skills E3 & L1. Students can take these assessments in their homes or in an appropriate private space. Students will be registered and will complete the assessment when ready.

- If students are unsuccessful with their exams, they will be offered the chance to resit

## **Administration**

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

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

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

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

## **Exam Procedures**

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

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

### ***Overview***

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

### **Rationale or Purpose**



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

### **Policy Statement**

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

### **Scope**

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

### **Roles/Responsibilities**

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

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

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

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

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

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

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

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

Evidence used by learners must be current and valid and meet the assessment criteria of the qualification, and evidence must be reliable, whereby centres consistently arrive at equivalent assessment decisions. Evidence obtained through RPL must therefore meet the same rigorous quality criteria that other assessment methods must conform to. It remains the role of Assessors (specialist teachers/case leads) and quality assurance staff to ensure that evidence is:

Valid:

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

Authentic:

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

Sufficient:

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

Reliable:

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

**Outcomes of RPL**

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

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

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

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

The centre must ensure that:

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

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

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

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

Examples of RPL evidence:

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

Circumstances when prior learning will not be recognised:

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

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

Credit accumulation and transfer (CAT) is the system by which learners can accumulate and transfer credits over a period of time, in differing locations and contexts, in order to gain qualifications. Credit transfer is the process of using credit(s) awarded in the context of one qualification or awarded by a different awarding organisation towards the achievement requirements of another qualification. CAT is therefore the term used to describe the system which supports credit transfer. Credit transfer gives recognition to the fact that some units are the same, irrespective of the fact that they appear in different qualifications. This recognition promotes progression within and between industries and avoids unnecessary duplication of learning. Credit transfer is relevant where a unit in a qualification is the same (include unit/qualification assessment number) as a unit in another qualification.

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

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

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

### **Malpractice**

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

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

## **Malpractice by students**

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

## **Malpractice by a SENSE Learning Associate**

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

## **Possible malpractice sanctions**

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

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

Please note that:

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

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

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

Any case of suspected malpractice should be reported in the first instance to the case coordinator or the pathways manager.

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

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

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

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

1. date, time and place the alleged malpractice took place, if known
2. the name of the centre staff, or other persons involved
3. a description of the suspected malpractice; and
4. any available supporting evidence

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

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

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

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

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

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

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

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

## **Conflict of Interest Policy**

### ***Policy statement***

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

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

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

### **Purpose and scope**

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

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

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

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

## **Process**

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

Assessing the risks to SENse Learning arising from potential conflicts of interest is part of SENse Learning's ongoing risk management process. Identified conflicts of interest are mitigated as far as possible and are monitored as part of the overall risk management and internal quality control processes. Reviews of our conflicts of interest policy and procedures are undertaken as part of our external quality review and accountability process. All existing and foreseeable conflicts of interest will be identified and monitored in line with this procedure and escalated to the Operational Director where appropriate.

## **Role specifics**

### **Director**

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

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

### **Case Coordinators**

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

## **Management of Conflict of interests**

All directors and case coordinators receiving information on actual or potential conflicts of interest will ensure that potential conflicts not causing a significant risk to the business are appropriately recorded, monitored and managed. Conflicts, or potential conflicts, that may pose a significant risk to the business must be escalated in confidence to the qualifications coordinator and operational director in order that appropriate steps may be taken to minimize any risks and where possible resolve the issue.

### **Colleagues**

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

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



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

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

### **Monitoring**

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

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

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

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

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

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

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

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

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

## **Appealing an Award**

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

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

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

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

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

The Panel may decide that:

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

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

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

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

## **Withdrawal policy**

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

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

Where a student has achieved some components of their Functional Skills in English and is moving on from SENse Learning, we will work to obtain documentation from NCFE, such as a results slip or certificate, to prove achievement. This student will be partially certified, but

not have achieved the full qualification.

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

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

The withdrawal of any students from a Functional Skills Qualification is the responsibility of the qualifications coordinator. This will take place once informed by the appropriate case lead that they have moved on from our provision.

### **Mandatory disclosure and confidentiality**

#### ***Mandatory disclosure***

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

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

#### **Confidentiality**

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

### **Contact details**

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

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

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

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

SENse Learning, Unit 1, The Forge Offices, Staplefield, RH17 6ET 01444 400896

## 9. Online Safety Policy

### 9.1 Introduction & Purpose

This is the shortened Online Safety policy for SENse Learning. The full policy can be found as a separate document. This policy is the Online Safety Policy for SENse Learning which will be followed by all members of the organisation and promoted by those in the position of leadership. This policy will be applied to all students and SENse Learning associates.

### 9.2 Policy Principles and Values

- The organisation will ensure that all students and SENse Learning associates will feel comfortable, confident and safe with us. The principal DSL, Jenni Griffiths is responsible for overseeing online safety within the provision.
- The organisation will give all students the skills to access a wide range of real world opportunities where it is safe to do so. We recognise the importance of the internet and online learning for education and personal development, but will ensure appropriate safeguards are in place to protect students from harm.
- The organisation will provide annual training to all associates on risks around online safety and practical support in how to manage and respond to these.
- SENse Learning will risk assess any platforms and technologies used with students prior to these being introduced.
- The organisation recognises that the use of mobile technology including mobile phones and tablets is essential in supporting our associates to do their work safely and efficiently and our students to learn effectively.
- The Organisation recognises that the use of this technology introduces risk to the setting and that must be managed appropriately.

### 9.3 Procedures

- SENse Learning will provide associates with mobile phones for work purposes.
- SENse Learning provides laptops for associates to use with students during sessions for their learning where necessary. These are all fitted with Securely filtering software, which is monitored by the principal DSL, Jenni Griffiths.
- The Organisation will ensure training and guidance on safety is comprehensive, up-to- date and shared with associates, families and students.
- The Organisation will use well known and highly recommended providers for our internet based services.
- Associates will only use SENse Learning email devices and phone numbers to communicate with students and their families or use the Whatsapp groups which are monitored by head office staff. Associates should not give out their personal email or phone number to any parent/carer or student they are working with.

- SENse Learning will use Egress or password protection when sending documentation outside of the organisation.
- The organisation will use initials instead of full name in documents that will be stored online.
- Associates will ensure that all students are supervised when using ICT/the internet and that any concerns around this are reported to the DSL and Case Coordinator.
- SENse Learning will only use personal mobile phones when necessary, following the guidance in the Associates handbook.
- Under no circumstances should associates store photographs or data about students on personal devices. Any photos should be shared using the dedicated photos Whatsapp group with parent/carers consent.
- Wherever practical the Whatsapp group, monitored by the case coordinators and DSL's, should be used to communicate with parents or carers. In some instances, students might be part of a Whatsapp group through work phones only, if deemed appropriate by a case coordinator and fully risk assessed.
- Associates must notify a DSL immediately if a student makes contact with them over email/text.

SENse Learning will make online safety a key part of the curriculum for all students, and the curriculum will be delivered whilst focusing on these core areas:

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

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

## Legislation and Guidance

This policy is based on the Department for Education's (DfE) statutory safeguarding guidance, Keeping Children Safe in Education 2025, and its advice for schools on:

- Teaching online safety in schools.
- Preventing and tackling bullying and cyber-bullying: advice for headteachers and school staff.
- Relationships and sex education.
- Searching, screening and confiscation It also refers to the DfE's guidance on protecting children from radicalisation

It reflects existing legislation, including but not limited to the Education Act 1996 (as amended), the Education and Inspections Act 2006 and the Equality Act 2010. In addition, it reflects the Education Act 2011, which has given teachers stronger powers to tackle cyberbullying by, if necessary, searching for and deleting inappropriate images or files on student's electronic devices where they believe there is a 'good reason' to do so. Our filtering and monitoring systems fully comply with the Department for Education's Digital and Technology Standards.

The Organisation's online safety curriculum aims to:

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

**Case Coordinators are responsible for:**

- Implementing 'Education for a connected world - 2020 Edition' UK Council for Internet Safety Framework.
- Ensuring that the e-safety curriculum is taught consistently to all students.
- Monitoring the effectiveness of the e-safety policy.

### **Teachers and education mentors are responsible for:**

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

## **10. PSHE Policy**

### **10.1 Introduction & Purpose**

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

In line with the National PSHE Education Framework SENsE Learning aims to provide a robust PSHE Curriculum which:

- Helps students develop positive relationships with peers and adults.
- Covers a range of topics related to physical and mental health, including healthy lifestyles, nutrition, and mental health awareness.
- Highlights a range of issues and sources of support linked to staying safe and managing risk including outside the home and online.
- Prepares students for transitions into adulthood, including education, training, and work, including those with different backgrounds and beliefs.
- Supports students to understand democracy, the rule of law, and their rights and responsibilities as citizens.

## 10.2 Policy Principles & Values

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

## 10.3 Procedures

Case Coordinators are responsible for:

- Implementing PSHE education planning framework for students with SEN.
- Ensuring that PSHE is taught consistently to all students.
- Monitoring the effectiveness of the PSHE curriculum for individual students.

Teachers and Education Mentors are responsible for:

- Using the PSHE education planning framework for students with SEN and delivering it in a sensitive way.
- Ensuring PSHE delivery is in line with the PSHE policy.
- Modelling positive attitudes to PSHE.
- Responding and delivering PSHE lessons and activities that are suited to the learning styles, interest, and individual needs of each student.
- Monitoring progress.

The PSHE/RSHE Lead is responsible for:

- Monitoring arrangements. The delivery and curriculum content of PSHE is monitored by the PSHE/RSHE lead through regular audits, best practice and resource sharing and when completing the 360 observation process of sessions.
- The PSHE/RSHE Lead will also ensure that any changes to the curriculum or current topics which are recommended by the government due to a changing cultural landscape or areas for concern will be shared as “hot topics” when appropriate.

The Whole SENSE Team is responsible for:

- All those working for SENSE learning, either as Head Office Staff or Associates, are responsible for empowering a culture of inclusion and acceptance which prepares students for life and work in Modern Britain whilst helping them to stay healthy and safe in all aspects of their lives and celebrates differences and diversity.



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

Our Framework is organised into 5 sections across all four key stages which are called:

1. Health and Wellbeing
2. All About Me
3. Living in the Wider World
4. Relationships
5. RSHE (Relationships, Sex and Health Education)

Using this Framework opportunities will be presented to students (wherever possible) to:

- Experience taking and sharing responsibility.
- Feel positive about themselves and others.
- Reflect on their perceptions and experiences.
- Develop the understanding, language, communication skills and strategies required to exercise personal autonomy.
- Carry out or take part in daily personal living routines.
- Make real decisions(with support where necessary so they can act upon them).
- Take part in group activities and make contributions.
- Develop and maintain positive relationships and interactions with others.
- Recognise and celebrate their achievements and success

The Organisation will recognise and embrace the diverse nature of the SENse Learning community.

The Organisation will value and celebrate students' religious, ethnic and cultural diversity.

The intersection between the PSHE/RSHE curriculum and students' own belief systems will be kept in mind and explored in a sensitive and inclusive way. Sessions will create space to challenge stereotypes and discrimination and present students with accurate information based on the law. The Organisation will be respectful of how students choose to identify themselves, understanding that their sexual orientation and gender identity may be emerging.

The Organisation will ensure that personal beliefs and attitudes will not influence the teaching of the PSHE/RSHE curriculum.

The Organisation will understand that PSHE/RSHE topics might feel personally relevant to students in ways that the Organisation does not initially know. All topics should be discussed in a respectful, sensitive way.

Where any questions or content raises safeguarding concerns, it will be referred to the Designated Safeguarding Lead, as per the Safeguarding Policy.

The Organisation will respect that students have a right to privacy, when discussing gender and/or sexual identity. The Organisation will ask the student, who, if anyone, knows this information and who they are comfortable with it being shared to. If a student asks for certain people not to be told, this is their right. It is best practice to have at least one other key staff/team member who is informed so safety and welfare can be monitored, with the student's consent.

The Organisation understands that a student being lesbian, gay, bisexual, trans or exploring their gender identity does not in itself constitute a safeguarding concern, nor is it something the student's parents or carers need to be informed of. Students will be encouraged to share in their own time.

This policy has been informed by the following documents:

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

The Organisation's PSHE curriculum aims to:

1. Be broad, balanced and taught without bias.

2. Offer the opportunity, if possible, for a student to speak with a staff/team member of a different gender if the student asks.
3. Be relevant to modern society, particularly in linking these topics to e-safety.
4. Be relevant to each individual learner and delivered in an age-appropriate and sensitive manner.
5. Provide a learning atmosphere where students feel safe, relaxed and confident to engage in discussions.
6. Be delivered without bias and in line with legal responsibilities. Topics will be presented using a variety of views and beliefs so that students are able to form their own, informed opinions whilst respecting others may have different opinions.
7. Be delivered through the taught curriculum, and through all aspects of daily life, including discussions that arise at any time.
8. Be delivered by openly teaching students what 'slang' words mean and offering a replacement word (where appropriate) and that some are offensive.
9. Be delivered using correct terminology when teaching.
10. Be delivered using medically correct terms for genitalia, for example vulva, vagina, penis and testicles. This is an approach endorsed by OFSTED.
11. Encourage Students to explore their understanding of inclusion, different cultures and sectors of society.
12. Encourage students to live healthy, active lives and understand strategies for supporting their physical and emotional health and wellbeing.
13. Be delivered using inclusive language which is updated regularly in line with any changing cultural norms and preferences.

## 11. Relationship and Sex Education Policy (RSE)

### 11.1 Introduction & Purpose

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

The RSHE curriculum aims to

- Provide students with the age and stage-appropriate knowledge and skills they need to form positive and healthy relationships, understand their own sexuality, and make informed decisions about their sexual health.

### 11.2 Policy Principles & Values

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

Case Coordinators are responsible for:

- Implementing the RSHE education planning framework for students with SEN.
- Seeking parental/carer permission using the template letter before any RSHE sessions are delivered to students, and having an open discussion with parents about this and the content of sessions, and respecting their decisions if they do not feel a child is ready to discuss a certain topic in the RSHE curriculum.
- Ensuring that RSHE is taught consistently to all students.
- Monitoring the effectiveness of the RSHE curriculum for individual students.

Teachers and education mentors are responsible for:

- Using the RSHE education planning framework for students with SEN and delivering it in a sensitive way.
- Ensuring RSHE delivery is in line with the RSHE policy.
- Modelling positive attitudes to RSHE.
- Responding and delivering RSHE lessons and activities that are suited to the learning styles, interest, and individual needs of each student.
- Monitoring progress

The PSHE/RSHE Lead is responsible for:

- Monitoring arrangements. The delivery and curriculum content of RSHE is monitored by the PSHE/RSHE lead through regular audits, best practice and resource sharing and when completing the 360 observation process of sessions.
- The RSHE Lead will also ensure that any changes to the curriculum or current topics which are recommended by the government due to a changing cultural landscape or areas for concern will be shared as “hot topics” when appropriate and coordinate relevant training.

The Whole SENSE Team is responsible for:

- All those working for SENSE learning, either as Head Office Staff or Associates, are responsible for empowering a culture of inclusion and acceptance which prepares students for life and work in Modern Britain whilst helping them to stay healthy and safe in all aspects of their lives and celebrates differences and diversity.

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

Our Framework is organised into 5 sections across all four key stages which are called:

1. Health and Wellbeing
2. All About Me
3. Living in the Wider World
4. Relationships
5. RSHE (Relationships, Sex and Health Education)

**The RSHE section of this Framework includes ;**

1. Personal Care and Hygiene
2. Puberty
3. Adolescence

4. Menstrual Health (including the Menopause)
5. Relationships and Sex
6. Appropriate Behaviour (Including sexualised)
7. Safeguarding
8. Domestic Abuse
9. Online Safety (Including grooming and deep fakes)

These topic areas do not need to be delivered in order and can be delivered to take into account the most relevant topics for the age and stage of the student,

Using this Framework opportunities will be presented to students (wherever possible) to:

- Experience taking and sharing responsibility.
- Feel positive about themselves and others.
- Reflect on their perceptions and experiences.
- Develop the understanding, language, communication skills and strategies required to exercise personal autonomy.
- Carry out or take part in daily personal living routines.
- Make real decisions (with support where necessary so they can act upon them).
- Take part in group activities and make contributions.
- Develop and maintain positive relationships and interactions with others.
- Recognise and celebrate their achievements and success

The Organisation will recognise and embrace the diverse nature of the SENSE Learning community.

The Organisation will value and celebrate students' religious, ethnic and cultural diversity.

The intersection between the PSHE/RSHE curriculum and students' own belief systems will be kept in mind and explored in a sensitive and inclusive way. Sessions will create space to challenge stereotypes and discrimination and present students with accurate information based on the law. The Organisation will be respectful of how students choose to identify themselves, understanding that their sexual orientation and gender identity may be emerging.

The Organisation will ensure that personal beliefs and attitudes will not influence the teaching of the PSHE/RSHE curriculum.

The Organisation will understand that PSHE/RSHE topics might feel personally relevant to students in ways that the Organisation does not initially know. All topics should be discussed in a respectful, sensitive way.

Where any questions or content raises safeguarding concerns, it will be referred to the Designated Safeguarding Lead, as per the Safeguarding Policy.

The Organisation will respect that students have a right to privacy, when discussing gender and/or sexual identity. The Organisation will ask the student, who, if anyone, knows this information and who they are comfortable with it being shared to. If a student asks for certain people not to be told, this is their right. It is best practice to have at least one other key staff/team member who is informed so safety and welfare can be monitored, with the student's consent.

The Organisation understands that a student being lesbian, gay, bisexual, trans or exploring their gender identity does not in itself constitute a safeguarding concern, nor is it something the student's parents or carers need to be informed of. Students will be encouraged to share in their own time.

This policy has been informed by the following documents:

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

The Organisation's PSHE/RSHE curriculum aims to:

- Be broad, balanced and taught without bias.
- Offer the opportunity, if possible, for a student to speak with a staff/team member of a different gender if the student asks.
- Be relevant to modern society, particularly in linking these topics to e-safety.

- Be relevant to each individual learner and delivered in an age-appropriate and sensitive manner.
- Provide a learning atmosphere where students feel safe, relaxed and confident to engage in discussions.
- Be delivered without bias and in line with legal responsibilities. Topics will be presented using a variety of views and beliefs so that students are able to form their own, informed opinions whilst respecting others may have different opinions.
- Be delivered through the taught curriculum, and through all aspects of daily life, including discussions that arise at any time.
- Be delivered by openly teaching students what 'slang' words mean and offering a replacement word (where appropriate) and that some are offensive.
- Be delivered using correct terminology when teaching.
- Be delivered using medically correct terms for genitalia, for example vulva, vagina, penis and testicles. This is an approach endorsed by OFSTED.
- Encourage students to explore their understanding of inclusion, different cultures and sectors of society.
- Encourage students to live healthy, active lives and understand strategies for supporting their physical and emotional health and wellbeing.
- Be delivered using inclusive language which is updated regularly in line with any changing cultural norms and preferences.

## 12. Health and Safety Policy

### 12.1 Introduction & Purpose

SENse Learning considers the health and safety of its employees to be of paramount importance and take seriously the duty to ensure the health, safety and welfare of all workers, visitors and contractors. SENse Learning is committed to continually reviewing and improving on the provisions of a safe and healthy work environment.

All employees and workers at SENse Learning will be bound by the Health and Safety at Work Act 1974 and the accompanying policies and procedures of the Organisation, and must ensure they are made aware of these.

#### Part 1 - Statement

The Health and Safety Policy of SENse Learning is to:



- Prevent accidents and cases of work-related ill health.
- Manage health & safety risks in our workplace.
- Provide clear instructions and information, and adequate training, to ensure employees are competent to do their work.
- Provide personal protective equipment if necessary.
- Consult with our employees on matters affecting their health & safety.
- Provide and maintain safe plant and equipment.
- Ensure safe handling and use of substances.
- Maintain safe and healthy working conditions.
- Implement emergency procedures, including evacuation in case of fire or other significant incident.
- Review and revise this policy regularly.

## Part 2 - Responsibilities for Health and Safety

At SENSE Learning we believe that maintaining a safe and healthy work environment is a shared responsibility. Employees & associates play a crucial role in our health and safety efforts.

This section of the Policy is essential for translating the policy's aims into actionable steps. It provides practical guidance on implementing safety measures, clarifying roles and responsibilities to ensure accountability across the organisation. By detailing processes for hazard identification, risk assessment, and control measures, it helps manage and mitigate risks effectively.

H&S Element	Details	Responsibility
Overall Health and Safety	Overall and final Health and Safety responsibility	Directors
Associate safety		Pathways & Pastoral Manager
Risk Assessments (Associates)	<ul style="list-style-type: none"> <li>- Provide risk assessment tools and training</li> <li>- complete relevant risk assessments and take necessary actions</li> <li>- review risk assessments when working habits or conditions change</li> </ul>	Pathways & Pastoral Manager

Accidents / Incident reporting	<ul style="list-style-type: none"> <li>- Provide incident forms and reporting systems</li> <li>- Ensure a clear and accessible system for employees and associates to report incidents, near-misses, and unsafe conditions.</li> <li>- Ensure reports are reviewed and actioned promptly, conducting thorough investigations of all reported incidents to identify root causes and prevent recurrence.</li> <li>- Document findings and corrective actions taken in an incident report</li> <li>- For associates, be continually vigilant and identify hazards in the workplace, or offsite and if relating to a student as soon as possible. When practical, always take immediate action to control a hazard yourself. If the hazard is out of your control, immediately report it to a member of management.</li> <li>- Near Miss Incident Guidance is available</li> </ul>	Pathways & Pastoral Manager HR Team (employees)
First Aid	<ul style="list-style-type: none"> <li>- Provide first aid kits for all associates</li> <li>- Provide relevant first aid training</li> </ul>	HR Team
Work-related ill health	<ul style="list-style-type: none"> <li>- Ensure associates and employees know who and how to report ill health to</li> </ul>	HR Team / Directors
Emergency Procedures	<ul style="list-style-type: none"> <li>- Develop and maintain an emergency response plan covering potential emergencies such as fire, medical emergencies, and natural disasters.</li> <li>- Ensure the plan includes clear procedures for evacuation, communication, and coordination with emergency services.</li> <li>- Conduct regular emergency drills (for Head Office) to ensure employees are familiar with emergency procedures and can respond quickly and effectively.</li> <li>- Evaluate the effectiveness of drills and make necessary improvements to the emergency response plan.</li> <li>- Emergency evacuation plans and critical incident plans will be in place and reviewed termly and updated where necessary.</li> <li>- For Associates in an emergency, SENse Learning needs to be able to check the whereabouts of associates and students quickly and efficiently to ensure everyone is safe. It is therefore essential that Find my Phone is set up on your work phone and personal and emergency contact details are up to date.</li> </ul>	Pathway Manager  HR Team (for Head office)
Fire and evacuation	<ul style="list-style-type: none"> <li>- We will make sure escape routes are well signed and kept clear at all times</li> <li>- Evacuation plans are tested/reviewed from time</li> </ul>	Pathway Manager

	to time as necessary	HR Team (for Head office)
Use of Safety Signs and Equipment (head office)	<ul style="list-style-type: none"> <li>- There will be clear and visible safety signs throughout the Head Office to indicate hazards, mandatory actions, and emergency exits.</li> <li>- These are regularly inspected and maintained to ensure they are in good condition and up to date with current regulations. Any issues found from these inspections will be brought to the attention of the landlord for remedy</li> </ul>	HR Team (employees in head office)
Maintaining Equipment	<ul style="list-style-type: none"> <li>- Replacing used and out of date first aid kits</li> </ul>	HR Team
Policy and information	<ul style="list-style-type: none"> <li>- We will consult with employees routinely on health &amp; safety matters as they arise and formally at any health &amp; safety review.</li> </ul>	HR Team
Training & Competence	<ul style="list-style-type: none"> <li>- We will give employees (and contractors) appropriate training (safeguarding, manual handling, lone working etc).</li> <li>- We will ensure suitable arrangements are in place for remote working</li> </ul>	Pathway & Pastoral Manager HR Team (for Head Office)
Home Visits	<ul style="list-style-type: none"> <li>- Ensure assessments are carried out for home visits</li> </ul>	Referrals
Lone Working	<ul style="list-style-type: none"> <li>- Have a lone working policy</li> <li>- Provide training</li> <li>- Ensure associates have a work mobile phone with Find My Phone activated</li> </ul>	Pathway & Pastoral Manager HR Team (for Head Office)
PPE & Hygiene	<ul style="list-style-type: none"> <li>- Provide PPE (e.g., hand sanitizer, masks if needed)</li> <li>- Practice good hygiene</li> </ul>	Pathway & Pastoral Manager HR Team (for Head Office)
Travel Safety	<ul style="list-style-type: none"> <li>- Assess travel risks</li> <li>- Provide travel and adverse weather information</li> <li>- Plan safe travel routes to and from homes</li> </ul>	Pathway & Pastoral Manager HR Team (for Head Office)
Other	<ul style="list-style-type: none"> <li>- Co-operate with Case Coordinators / Pathway Leads on health &amp; safety matters</li> <li>- Take reasonable care of their own and others health &amp; safety</li> <li>- Report all health &amp; safety concerns to an appropriate person as detailed above</li> </ul>	Associates & Employees

Monitor, Consult, instruct and supervision		HR Team / Pathway Manager
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## Smoking, Alcohol and Drugs

As per legislation it is illegal to smoke in enclosed public spaces. Smoking (including e-cigarettes) is therefore strictly prohibited on all SENs Learning premises, students homes and vehicles.

Outside areas at Head Office may have been identified for those who wish to smoke during their break-time.

Bringing alcohol or any unlawful drugs to the workplace or student homes and / or consuming them there is strictly prohibited both during work time or during a period prior to work where the effects carry over to the workplace. Any such instances will be dealt with accordingly.

## Display Screen Equipment (DSE)

As a self-employed associate, it's important to be aware of legal guidance surrounding Display Screen Equipment (DSE) use. If you regularly use DSE - such as a computer, laptop, or tablet, for continuous periods of an hour or more as part of your work for SENs Learning, you may be classed as a DSE user.

Self-employed individuals are responsible for ensuring their own working practices are safe. This includes setting up your workstation ergonomically and taking regular breaks to prevent strain or injury. You can find detailed guidance on your responsibilities and how to stay safe by referring to the Health and Safety Executive (HSE) website: <https://www.hse.gov.uk/msd/dse/>

## 13. Risk Management Policy

### 13.1 Introduction & Purpose

This policy is the Risk Management Policy for SENs Learning, which will be followed by all members of the Organisation and promoted by those in leadership positions within the Organisation. This policy will be applied to all students and SENs Learning associates.

### 13.2 Policy Principles & Values

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

### 13.3 Procedures

- The Organisation will conduct a risk assessment for each student, identifying likely causes of challenging behaviour, the risks this may pose, and the strategies for managing the risk. These will be reviewed termly and updated if necessary.
- Associates will follow the Lone Working Policy.
- The Organisation will conduct a risk assessment for all activities outside of the student's home, control the risks identified and monitor this, checking them termly and updating them where necessary.
- Associates will use the student team WhatsApp groups to confirm their location when taking their students outside of the home for activities.
- Associates will enable the trackers on their work phones during sessions.
- The Organisation will ensure that all associates have had the necessary training to complete their work safely.
- The Organisation will maintain appropriate staffing ratios based on each individual student's needs.
- The Organisation will provide training and updated information to associates in relation to Risk Assessments and will utilise the Resources folder on the G-Drive to share relevant training and updates for associates.
- The Organisation may sometimes have accidents where students, associates or others are injured. Please refer to the First Aid policy for guidance on these situations.
- In the event of a violent or high-risk situation out in public, associates must inform the police or emergency services using 999. The Incident form will need to be completed and associates then need to contact the Pastoral Team, who will advise on next steps.

## Risk Assessments

### *What is a Risk Assessment?*

‘A systematic process of identifying hazards and evaluating any associated risks within a setting, then implementing reasonable control measures to remove or reduce them.’

- An **accident** is ‘*an unplanned event that results in a generally negative outcome*’
- A **hazard** is ‘*something that has the potential to cause harm*’
- A **risk** is ‘*the likelihood and the severity of a negative occurrence (injury, ill-health, damage, loss) resulting from a hazard.*’

A risk assessment can be broken down into the following 5 steps:

1. Identify hazards
2. Assess the risks
3. Control the risks
4. Record your findings
5. Review the controls

### *What do we need to Risk Assess?*

We risk assess locations and activities, which are broadly environmental and physical risks.

- Environmental - where we go and what we are doing, including science/PE and high-risk curriculum areas. People, (the main risk reducing factor we have is that we are 1-1), inclement weather, interaction between others and vehicles, traffic management.
- Physical- slips, trips, falls, working at height, manual handling.

We also need to consider:

- Chemical- science/bleach.
- Biological- food, faeces, mould, body fluids, COVID, infection control, e.g animals.
- Mechanical- cars/vehicles/how you sit, hazardous equipment.
- Psychological- we consider this throughout all other risks.
- Organisational - unsafe work practices.

### *Whose responsibility is it?*

- SENse Learning will maintain and update the process and policy documents.
- Case coordinators will follow the process and write the Risk Assessments, ensuring the team understands them and has the opportunity to input into the controls where they know the location/student best.
- Associates will follow the procedures and policies put in place and update their case coordinator if anything changes or they have any concerns.

- Associates will not attend or carry out an activity with a student if there is no risk assessment in place, or where they have any concern that the Risk Assessment is not sufficient.

## 14. First Aid Policy

### 14.1 Introduction & Purpose

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

### 14.2 Policy Principles & Values

- The Organisation aims to ensure the health and safety of all associates, students and visitors.
- The Organisation will look to comply with all relevant health and safety legislation and regulations regarding first aid.
- The Organisation aims to ensure that all associates are aware of their responsibilities with regards to health and safety and will provide training for First Aid.
- The Organisation aims to provide a framework for responding to an incident, recording and reporting the outcomes.

### 14.3 Procedures

#### *Legislation*

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

- The Health and Safety (First Aid) Regulations 1981, which states that employers must provide adequate and appropriate equipment and facilities to enable first aid to be administered to employees, and qualified first aid personnel.
- The Management of Health and Safety at Work Regulations 1992, which require employers to make an assessment of the risks to the health and safety of their employees.
- The Management of Health and Safety at Work Regulations 1999, which require employers to carry out risk assessments, make arrangements to implement necessary measures, and arrange for appropriate information and training.
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013, which state that some accidents must be reported to the Health and Safety Executive (HSE), and set out the timeframe for this and how long records of such accidents must be kept.

- Social Security (Claims and Payments) Regulations 1979, which sets our rules on the retention of accident records.
- The Education (Independent School Standards) Regulations 2014, which require that suitable space is provided to cater for the medical and therapy needs of pupils.

### *Roles and Responsibilities*

All associates will be trained in First Aid to be able to support their student if required. The associates role as a First Aider will be:

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

All associates are responsible for:

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

### *First Aid Procedures*

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

- The first aid trained associate will assess the seriousness of the injury and inform the parents/guardians of their conclusions.
- Provide first aid treatment where the parent/guardian asks them to, or the parent/guardian is unable to.
- The first aid trained associate will assess the injury and decide if further assistance is needed from a colleague or the emergency services. They will remain on scene until help arrives.
- The first aid trained associate will also decide whether the injured person should be moved or placed in a recovery position.



- The first aid trained associate will complete an accident report form on the same day or as soon as is reasonably practicable after an incident resulting in an injury.

Out of office procedures, where outside of the home:

- Make sure everyone is safe and call for emergency services if needed.
- Give First Aid if needed.
- Make parents/carers aware.
- After the session finishes, complete the Accident/Incident form.

If the student or associate requires any medical intervention more than minor first aid, call Head Office at the earliest convenience and make sure the case coordinator is aware.

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

- 1 x First Aid Emergency Booklet
- 1 x Large Sterile Dressing 18 x 18cm - in Paper Pouch
- 1 x Resuscitation Face Shield
- 1 x Triangular Bandage Viscose 90 x 90 x 127cm with Paper Insert
- 1 x No.16 Eye Pad Dressing - in Paper Pouch
- 1 x Tweezers (Pair)
- 1 x Washproof 50% Bamboo 50% Wood Pulp Sustainable Plasters (Pack of 20)
- 1 x Hand Sanitizer 60ml
- 1 x Low Adherent 5 x 5cm
- 1 x Microporous Tape 1.25cm x 10m
- 2 x Nitrile Medium Powder-Free Gloves (Pair)
- 2 x Medium Sterile Dressing 12 x 12cm - in Paper Pouch
- 2 x Eye Wash Vials 20ml
- 4 x Sterile Hydrogel Burn Gel Sachet 3.5g
- 4 x Wound Cleansing Wipe - 100% Viscose - Plastic Free

#### Record keeping and recording

- An accident form will be completed by the associate on the same day or as soon as possible after an accident/incident resulting in an injury.
- As much detail as possible should be supplied when reporting an accident ensuring all boxes of the SENse Learning accident form on the shared G-Drive is filled in fully.
- A copy of the accident report form will also be kept within SENse Learning's records.
- Records held in the first aid and accident book will be retained by SENse for a minimum of 3 years, in accordance with regulation 25 of the Social Security (Claims and Payments) Regulations 1979, and then securely disposed of.

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

Reportable injuries, diseases or dangerous occurrences include:

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

The associate will inform parents or carers of any accident or injury sustained by a student, and any first aid treatment given, on the same day, or as soon as reasonably possible

### Training

All associates that work with students are expected to undertake first aid training. Associates will not be able to leave the home environment until the associate has completed their First Aid training.

All first aiders must have completed a training course, and must hold a valid certificate of competence to show this. SENse Learning will keep a register of all trained first aiders, what training they have received and when this is valid until.

Associates are expected to renew their first aid training every three years.

### Review and Compliance

This policy will be reviewed annually or following any significant change to office operations, the workforce, or relevant legislation.

Non-compliance with this policy may result in disciplinary action or termination of contracts.

This policy is intended to ensure a safe and healthy working environment. Adherence to this policy is mandatory for all associates to ensure the safety and well-being of everyone at SENse Learning.

## 15. Communicable Diseases Policy

### 15.1 Introduction & Purpose

This policy is the Communicable Diseases Policy for SENse Learning, which will be followed by all members of the organisation and promoted by those in leadership roles. It applies to all students, associates, visitors, contractors, and members of the public who engage with SENse Learning.

The purpose of this policy is to:

- Support and promote good practice in managing communicable diseases.
- Provide clear procedures for communication, internal and external notification, and safety.
- Set out responsibilities and actions to manage risk, including during outbreaks or confirmed cases.
- Ensure compliance with relevant health and safety legislation and guidance.

### 15.2 Policy Principles & Values

- SENse Learning aims to reduce the risk of communicable diseases spreading among students, staff, associates, and the wider community.

- All staff and associates will be aware of the processes to follow if they or others develop, or are exposed to, a communicable disease.
- The organisation will work in conjunction with public health authorities, following official guidance at all times.
- Risk assessments will be carried out for associates, staff, students, visitors, and contractors, and reviewed regularly.
- SENSE Learning will maintain confidentiality while ensuring the safety of all.

### Definitions

There are specific diseases or illnesses which can transmit from one person to another. For the purpose of this document we will term these Communicable Diseases, however, this is not an exhaustive list:

- Fungal infections.
- Headlice.
- STDs/STIs.
- Covid.
- Diarrhoea and Vomiting.
- Measles.
- Flu.
- Hepatitis.
- Chicken Pox.
- Monkey Pox.

Not all the above will pose a significant risk, however, the risk of transmission and the risk of contraction should be considered. It is important that actions are taken appropriately to prevent further transmission, the correct medical advice is sought and any actions required taken.

### Risk Assessment

Students, associates, employees and visitors may be at different levels of risk if they contract a contagious illness.

- Risk assessments will consider individual health vulnerabilities, immunisation status, ability to comply with health measures, and local outbreak data.

- Personal risk assessments will be undertaken for any staff, associates or students with additional vulnerabilities, i.e. family, if they have other caring responsibilities or work with other vulnerable people.
- Separate assessments will be in place for visitors, contractors, and members of the public if required.

Risk Assessments will also consider the need to notify appropriate persons/professionals in the event of a concern or confirmed case. Consideration will also be given as to how transmission may occur within the home, and to associates and this will further be supported by the following policies:

- Health and Safety Policy.
- Business Continuity Plan.

### Concerns

In the event of a concern of a communicable disease as defined in this policy it is important that the appropriate response be enacted. Even if a person is unsure, this process should be followed until it is confirmed by a medical professional that the concern is unsubstantiated.

The severity, potential for transmission and risks to other people of communicable illnesses can vary from each illness to the people at risk.

These are the three types of concerns:

1. Self-reported concern - a person has a contagious illness or symptoms and are self-reporting symptoms / issues / concerns.
2. Contact concern - a person or professional has alerted that they have had contact with someone who has been confirmed or suspected to have a contagious disease.
3. Observational or situational concern - concerns raised because of a incident, behaviour or observation by another person.

### Outbreak Management

An outbreak is a sudden increase in occurrences of a serious disease whereby cases are in excess of normal expectancy for the location or season. In addition to the practice/s already outlined in this policy, an outbreak can be managed effectively by:

- Encouraging all individuals who are unwell not to attend the home or office, or remain separate from others, wherever possible.
- Ensuring all eligible groups are enabled and supported to take up the offer of immunisation programmes - for example coronavirus or flu.
- Ensuring occupied spaces are well ventilated and let fresh air in.
- Reinforcing good hygiene practices (frequent cleaning & hand hygiene etc).
- Communications to raise awareness among associates, families, employees and visitors.
- Reinforcing key government messages amongst associates, families, employees and

visitors.

- Having discussions with GP about the support they can offer, particularly, where a student's family may face barriers to accessing health care.

### Internal & External Notification

In the event of a concern regarding a communicable disease associates or employees should:

- Inform a manager immediately.
- Seek appropriate medical advice and act on it.
- Inform partner agencies/regulators where required.

Certain communicable diseases are also known as 'notifiable diseases' as they have a significant public health implication - please refer to Appendix A for the current list. GP's have a statutory duty to notify the 'proper officer' at their local council or health Protection Team of suspected cases of certain infectious diseases.

### Roles & Responsibilities

SENse Learning Ltd will endeavour to fulfil the following responsibilities.

- To work in conjunction with and on the advice of UK Health Security Agency (UKHSA) to inform associates, employees, families, professionals and any recent visitors as soon as possible, following notification of a confirmed case, or suspected outbreak of an communicable disease.
- To ensure sufficient information is made available to everyone who is deemed to have been in close contact with or proximity to the infected individual within the period prior to diagnosis (please note: statutory guidance may vary depending on the type of contagious disease: therefore, SENse Learning Ltd will adhere to the advice provided by UKHSA).
- To assist UKHSA by providing as detailed information as possible in relation to a suspected case/outbreak by completing contact tracing for associates, employees, students and/or visitors.

Managers will:

Ensure this policy is implemented.

- Oversee risk assessments and outbreak response.
- Liaise with UKHSA and other relevant bodies.

Associates and Employees will:

- Follow communicable disease procedures.
- Report concerns promptly.

- Cooperate with risk assessments and outbreak measures.

#### Record Keeping & Reporting

All incidents will be recorded following SENSE Learning's reporting procedures.

- Records will be kept for the period required by law and securely disposed of thereafter.
- Notifiable diseases will be reported in accordance with statutory requirements (see Appendix A).

#### Training

- All associates will receive training on this policy and communicable disease management.
- Refresher training will be provided following any significant policy changes or legislative updates.

#### Review and Compliance

- This policy will be reviewed annually or after significant operational, legislative, or workforce changes.

#### Appendix A - Current List of Notifiable Communicable Diseases

- Acute encephalitis
- Acute infectious hepatitis
- Acute meningitis
- Acute poliomyelitis
- Anthrax
- Botulism
- Brucellosis
- Cholera
- COVID-19
- Diphtheria
- Enteric fever (typhoid or paratyphoid fever)
- Food poisoning
- Haemolytic Uraemic Syndrome (HUS)
- Infectious bloody diarrhoea
- Invasive group A streptococcal disease
- Legionnaires' disease

- Leprosy
- Malaria
- Measles
- Meningococcal septicaemia
- Mumps
- Plague
- Rabies
- Rubella
- Severe Acute Respiratory Syndrome (SARS)
- Scarlet fever
- Smallpox
- Tetanus
- Tuberculosis
- Typhus
- Viral Haemorrhagic Fever (VHF)
- Whooping cough
- Yellow fever

## 16. Supporting Students with Medical Conditions Policy

### 16.1 Introduction & Purpose

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

### 16.2 Policy Principles & Values

- The Organisation aims to ensure that all students, associates, parents and carers understand how SENSE Learning supports students with medical conditions.
- We want to ensure that any students with medical conditions are properly supported to allow them to access the same education and opportunities as other students, including SENSE Learning's educational trips and activities.
- The Organisation will ensure that associates are suitably trained.
- The Organisation will ensure that associates are aware of the students' conditions, where appropriate.



- The Organisation will write individual healthcare plans (IHPs) as needed for students with medical needs, where these are highlighted to us by parents/carers, and/or follow any IHPs created by the student's medical teams, where these are shared with us by parents/carers.

### **16.3 Procedures**

#### *Legislation and statutory responsibilities*

This policy takes into account the requirements under Section 100 of the Children and Families Act 2014 to ensure there are arrangements in place for supporting pupils with medical conditions. It also takes into consideration the Department for Education's statutory guidance for schools on *Supporting Pupils with Medical Conditions At Schools*, where this is appropriate and relevant to our non-school setting.

#### *Responsibilities*

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

#### *Associates*

- Supporting students with medical conditions during their session time is not the sole responsibility of one person. Any associate may be asked to provide support to students with medical conditions, although they will not be required to do so. This includes the administration of medicines.
- Associates who take on the responsibility of supporting students with medical conditions will receive sufficient and suitable training and will achieve the necessary level of competency before doing so.
- Associates will take into account the needs of students with medical conditions that they support. All associates will know what to do and respond accordingly when they become aware that a student with a medical condition needs help.

#### *Parents/carers*

- Parents/carers will provide the Organisation with sufficient and up-to-date

information about the child's medical needs.

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

#### *Students*

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

#### *Other Healthcare Professionals*

- Healthcare professionals, such as GPs and paediatricians, will liaise with SENse Learning where necessary at the parents' request. They may also provide advice on developing IHPs.

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

- When the Organisation is notified that a student has a medical condition by the parent or carer, the Case Coordinator will liaise with parents/carers to decide whether the student requires an IHP.
- The Organisation will make every effort to ensure that arrangements are put into place within two weeks, or by the beginning of the relevant term for students who are new to the Organisation.
- Where the Organisation is informed of a student's medical condition as part of the initial referrals process or home visit, the referrals team will send a blank IHP form for the parent/carers to complete, or asked to send us any existing IHP the student has, which will then be added to the student's folder for those working with them to refer to.

#### *Individual Healthcare Plans*

- Case Coordinators oversee IHPs for individual students in coordination with the parent/carers.
- Plans will be reviewed at least annually, or earlier if there is evidence that the student's needs have changed.
- Plans will be developed with the student's best interest in mind and will set out:
  - What needs to be done
  - When
  - By whom
- Not all students with medical conditions will require an IHP.

- It will be agreed with a healthcare professional and the parents when an IHP would be inappropriate or disproportionate. This will be based on evidence. If there is no consensus, parents/carers will make the final decision.
- Plans will be drawn up in partnership with the Organisation, parents/carers and a relevant healthcare professional, such as the student's medical specialist or paediatrician, who can best advise on the student's specific needs. The student will be involved wherever appropriate.
- IHPs will be linked to, or may already form part of, any EHC plan.
- The level of detail in the plan will depend on the complexity of the student's condition and how much support is needed.
- The Case Coordinator will use information provided by the parent/carer and/or healthcare professionals to inform the IHP, this information can include:
  - The medical condition, its triggers, signs, symptoms, and treatments
  - The pupil's resulting needs, including medication (dose, side effects and storage) and other treatments, time, facilities, equipment, testing, access to food and drink where this is used to manage their condition, dietary requirements, and environmental issues, e.g. crowded corridors, travel time between activities.
  - Specific support for the pupil's educational, social, and emotional needs. For example, how absences will be managed, requirements for extra time to complete exams, use of the rest periods or additional support in catching up with lessons, counselling sessions.
  - The level of support needed, including in emergencies. If a pupil is self-managing their medication, this will be clearly stated with appropriate arrangements for monitoring.
  - Who will provide this support, their training needs, and expectations of the role.
  - Who in SENse Learning needs to be aware of the pupil's condition and the support required.
  - Arrangements for written permission from parents/carers for medication to be administered by an associate or self-administered by the pupil during SENse Learning sessions.
  - Separate arrangements or procedures that may be required for SENse Learning trips or other SENse Learning activities outside of the normal SENse Learning timetable that will ensure the pupil can participate, e.g. risk assessments.
  - Where confidentiality issues are raised by the parent/pupil, a discussion will be had as to who the designated individuals to be entrusted with information about the pupil's condition.
  - What to do in an emergency, including who to contact and contingency arrangements and contingency arrangements.

### *Managing medicines*

Prescription and non-prescription medicines will only be administered at SENse Learning:

- When it would be detrimental to the student's health and attendance not to do so and
- Where we have parents/carers' written consent.

The only exception to this is where the medicine has been prescribed to the student without the knowledge of the parents.

Students under 16 will not be given medicine containing aspirin unless prescribed by a doctor.

Anyone giving a student any medication (for example, for pain relief) will first check maximum dosages and when the previous dosage was taken. Parent/carers will always be informed by the end

of the session at the latest.

The Organisation will only accept prescribed medicines that are:

- In-date
- Labelled
- Provided in the original container, as dispensed by the pharmacist, and includes instructions for administration, dosage, and storage

The Organisation will accept insulin that is inside an insulin pen or pump rather than its original container, but it must be in date.

All medicines will be stored safely.

Students will be informed about where their medicines are at all times and be able to access them immediately.

Medicines and devices such as asthma inhalers, blood glucose testing metres and adrenaline will always be readily available to students and not locked away.

Medicines will be returned to parent/carers to arrange for safe disposal when no longer required

#### *Controlled Drugs*

Controlled drugs are prescription medicines that are controlled under the Misuse of Drugs Regulations 2001 and subsequent amendments, such as morphine or methadone.

A student who has been prescribed a controlled drug may have it in their possession if they are competent to do so, but they must not pass it to another pupil to use.

Controlled drugs will be easily accessible in an emergency, and a record of any doses used and the amount held will be kept.

#### *Students managing their own needs*

Students who are competent will be encouraged to take responsibility for managing their medicines and procedures. This will be discussed with parents, and it will be reflected in their IHPs.

Students will be allowed to carry their own medicines and relevant devices wherever possible. Associates will not force a student to take a medicine or carry out a necessary procedure if they refuse, but will follow the procedure agreed in the IHP and inform parents so that an alternative options can be considered, if necessary.

#### *Unacceptable practice*

The Organisation will use it's discretion and judge each case individually with reference to the student's IHP, but it is generally not acceptable to

- Prevent students from easily accessing their inhalers and medication, and administering their medication when and where necessary.
- Assume that every student with the same condition requires the same treatment.
- Ignore the views of the student or their parents/carers.
- Ignore medical evidence or opinion (although this may be challenged).
- Send students with medical conditions home frequently for reasons associated with their medical condition, or prevent them from staying for normal activities, including

lunch, unless this is specified in their IHP.

- Penalise students for their attendance record if their absences are related to their medical condition, e.g. hospital appointments.
- Prevent students from drinking, eating or taking toilet or other breaks whenever they need to in order to manage their medical condition effectively.
- Administer, or ask students to administer, medicine in the toilet.

### *Emergency Procedures*

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

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

### *Training*

Associates who are responsible for supporting students with medical needs will receive suitable and sufficient training to do so.

The training will be identified during the development or review of the IHPs. Associates who provide support to students with medical conditions will be included in meetings where this is discussed, where appropriate.

The relevant healthcare professionals will lead on identifying the type and level of training required and will agree on this with the student's parent/carers and inform the Case coordinator.

Training will be kept up to date and will:

- Be sufficient to ensure that associates are competent and have confidence in their ability to support the students.
- Fulfil the requirements in the IHPs.
- Help associates to have an understanding of the specific medical conditions they are being asked to deal with, their implications and preventative measures.

### *Record Keeping*

The Organisation will ensure that written records are kept of all medicine administered to students for as long as these students are at SENsE Learning. Parents will be informed if their child has been unwell at SENsE Learning.

IHPs are kept in a readily accessible place within the student's shared drive folder, which all associates are aware of.

## **17. Equal Opportunities and Diversity Policy**

### **17.1 Introduction & Purpose**

This policy is the Equal Opportunities and Diversity Policy for SENse Learning which will be followed by all members of the Organisation and promoted by those in the position of leadership within the Organisation.

This policy applies to all associates, consultants, students, parents/carers, Local Authorities and Schools. We reserve the right to amend it at any time.

## **17.2 Policy Principles & Values**

SENse Learning is committed to creating an inclusive environment that respects the dignity and diversity of all individuals. We want to promote equal opportunities ensuring all associates and employees receive fair treatment. We aim to create a work environment free from discrimination, harassment and victimisation where everyone is treated with dignity and respect.

The Organisation will adhere to the requirements of the Equality Act 2010 by not discriminating against students, associates, volunteers, or any individual involved in external agencies the Organisation may be working with on any grounds set out in the Equality Act 2010.

The Organisation will also not discriminate against:

- Students due to the behaviour of their parents/carers/siblings.
- When recruiting associates, health-related questions will not be asked until after a job offer is made, and then, only if it is necessary for the role.

SENse Learning is committed to the following:

### **Equality:**

- No Employee or associates will be treated less favourably on the grounds of age, disability, gender, marriage, pregnancy, sex or sexual orientation or any other reason as stated in the act.
- All employment decisions will be based on merit, qualifications and abilities, employment decisions will not be influenced by any protected characteristics.

### **Diversity:**

- We recognise the value that a diverse workforce brings and are committed to fostering a culture where diversity is embraced.

### **Inclusion:**

- We aim to ensure that all associates and employees feel valued and respected and have equal access to opportunities and resources.
- We are committed to providing reasonable adjustments to accommodate employees/associates/applicants with disabilities to ensure equal access to opportunities.

## Responsibility

- The HR Team is responsible for implementations and monitoring of this policy.
- The Organisation will monitor any issues that arise within the Organisation and take appropriate action, fully supporting any person in the Organisation who is faced with prejudice or discrimination.
- The Organisation will undertake an annual review process to ensure that the policy is clear, in keeping with current legislation.

## Key Actions

In adopting these principles SENse Learning:

1. Will not tolerate acts that breach this guidance, and all such breaches or alleged breaches will be taken seriously, be fully investigated and may be subject to disciplinary action where appropriate.
2. Fully recognises its legal obligations under all relevant legislation and codes of practice.
3. Will encourage associates to pursue any matter through the internal procedures which they believe has exposed them to inequitable treatment within the scope of this policy.
4. Will select candidates only on the basis of their ability to carry out the job, using a clear and open process.
5. Will provide all associates with the training and development that they need to carry out their job effectively.

## Dignity at Work

The Company believes that the working environment should at all times be supportive of the dignity and respect of individuals. We believe that every individual has the right to work in a supportive atmosphere that fosters mutual respect and promotes well-being.

The company has a zero-tolerance approach to harassment of any kind. If a complaint of harassment is brought to the attention of management, it will be investigated promptly, and appropriate action will be taken.

Please see the separate Harassment policy for further information on policy and procedure for reporting.

## How we carry out our responsibilities and duties?

Both management and associates are essential for ensuring the success of this policy and each has their own duties and responsibilities. We all have a legal responsibility to comply, and any of us – Management and associates – may be found personally liable for unlawful discrimination if we breach the terms of this policy.

Overall responsibility for the effective implementation and operation of the policy lies with Management, specifically with the Directors. Everyone working at managerial level is expected to act in full accordance with this policy, lead by example, and attain and maintain appropriate standards of behaviour within the teams they manage.

The ethos and standards covered by this policy can only be achieved and maintained if all associates cooperate fully, and it is important to understand that you also have a legal

responsibility to comply. If you breach this policy, you may also make SENse Learning liable for your actions. We accordingly expect you to take personal responsibility for adhering to this policy's aims and commitments and for drawing any breaches to our attention.

Violations of this policy will be taken seriously and may result in termination of contracts.

## 18. Safer Recruitment and Selection Policy

### 18.1 Introduction & Purpose

This policy is the Safer Recruitment and Selection Process Policy for SENse Learning which will be followed by all members of the Organisation and promoted by those in the position of leadership within the Organisation. SENse Learning is committed to safeguarding and promoting the welfare of children, young people and vulnerable adults. As an organisation we closely follow the Safer Recruitment guidance in order to ensure we protect the children and young people we work with.

It is essential that our approach to recruitment and selection responds to an increasingly competitive market for the best talent. This policy provides a framework for the delivery of flexible recruitment and selection activity, which ensures the best candidates are secured.

Our Recruitment & HR Team will hold delegated responsibility for ensuring that all recruitment processes are delivered in line with this policy.

### 18.2 Policy Principles & Values

SENse Learning will ensure we implement robust safer recruitment practices, identifying and rejecting applicants who are unsuitable to work with children and young people, responding to concerns about the suitability of applicants during the recruitment process, carrying out the necessary pre-employment checks and ensuring all new staff participate in an induction which includes child protection.

The Organisation aims to ensure that no applicant receives less favourable treatment on the grounds of any of the protected characteristics (including race, gender, disability, gender reassignment, age, social class, sexual orientation, religion or belief, marriage and civil partnership, pregnancy and maternity).

#### Advertising the job

The Organisation will always seek to recruit the best candidate for the job. Vacancies will be advertised externally using the most appropriate advertising medium and sometimes internally via email. All adverts will be written with gender coded language in mind, and work to avoid any discrimination throughout the recruitment process.

#### Recruitment Pack

Each candidate deemed suitable, by a selection criteria to which all candidates are assessed, will receive a recruitment pack applicable to the role they applied for or which is felt most suitable for them based upon their experience and qualification. All Specialist Teachers are



required to have QTS and evidence extensive experience with SEN relevant to the students SENse Learning work with.

#### Application form

The application process is broken down into a two-part process for ease of the applicant and to ensure adherence to the Safer Recruitment guidelines. Each candidate will be asked to supply a completed Information Form truthfully and without knowingly omitting or altering information, along with an up to date CV. With this information, each candidate will be vetted against the criteria set for all candidates applying to that role, to determine their eligibility for interview. Upon successful completion of the interview the candidate will then be asked to complete the further Application Form to include a full work history or explained gaps in employment, along with any disclosures or details they feel could be relevant to the role to ensure our adherence to the Safer Recruitment guidance. If applicants don't have a CV available, they can request a Full Application Form which will incorporate information usually on a CV into the application. All applications should be completed digitally, as stated in both the Information Form, Application Form and Full Application Form, unless reasonable adjustments are required, which we will do our best to accommodate.

#### Self-disclosure form

This form (included within the application form) gives the applicant the opportunity to let us know, confidentially, about any relevant criminal convictions, child protection investigations or disciplinary sanctions they have on their record.

Self-disclosure forms contain sensitive, confidential information. Forms should be submitted in a separate, sealed envelope marked 'Confidential'. The details within the form will be kept in the applicants file and in line with GDPR guidance around retention, storage and destruction of records.

Anything disclosed will be reviewed alongside the other relevant checks carried out and discussed with the applicant where necessary.

#### Selecting Applicants for Interview

The Organisation welcomes applications from all, including those with disabilities and will always seek to ensure that it operates a fair and accessible recruitment and selection process, including making reasonable adjustments where necessary.

All applicants will be asked in advance whether they have any access requirements for the interview, and we aim to respond accordingly to their needs.

Reviewing applications will take place between two members of the HR or management team.

Once an invitation to interview has been sent out, the candidate will have two weeks to respond before the invitation will be rescinded, unless extenuating circumstances are discussed. SENse Learning will take all reasonable steps to ensure that the candidate is

aware of the invitation before rescinding.

### Interview

All applicants will be asked the same questions (role dependant) so that they are all treated equally. Each interview will include a minimum of two panel members with notes taken for each question asked. This will form the evidence for assessing each candidate after the interviews are complete. We use an interview review and scoring process based on the person and role specification and follow the same criteria for each candidate to ensure applicants are reviewed fairly.

Interviewers are not involved in a recruitment exercise and/or appointment where they are related to an applicant or have a close personal relationship with them outside of work, or where any financial gain can be made due to the Referral Scheme.

All associates are required to declare any familial or close personal relationships with other members of the SENse Learning team.

The Referral Scheme has its own separate policy which can be accessed on request or found in the associate handbook.

### Making an offer

Offers will be sent via email from the Recruitment Team. All offers are conditional to the completion of categories set out in the Safer Recruitment guidance such as providing full work history or employment gaps, references totalling the past 6 years without mitigating issues such as gross misconduct dismissal and honest representation throughout the recruitment process. All candidates will be treated with respect and courtesy, aiming to ensure that the candidate experience is positive, irrespective of the outcome.

### Withdrawing an offer

SENse Learning reserves the right to withdraw an offer to work with us, for a number of reasons, these could include, but are not limited to:

- Non completion of the SENse Learning onboarding process, including references.
- Any offences and their seriousness including the circumstances which led to the offence (e.g. driving offences deemed serious by a director).
- Any dishonest representation throughout the recruitment process.
- Any unsatisfactory references.
- Any failure to follow guidance available in the policies or in the associate handbook.
- Any failure to provide open and honest communication with SENse Learning.

- A period of four weeks has lapsed with no response from the initial offer.

### Confidential information

If the vetting and barring check includes additional information that is marked "in confidence", it will not be discussed with the applicant. This could compromise a criminal investigation or the safety of another person, and may in itself constitute a criminal offence under the Police Act 1997.

If this information means we are withdrawing an offer then it will be sufficient to tell the applicant that, on the basis of checks and references that have been made, we have had to withdraw the provisional job offer.

We will treat all references as confidential which, in line with the Data Protection act, means we are under no obligation to provide to anyone including but not limited to those that make a Subject Access Request.

### Pre-Employment checks

#### *Disclosure and Barring checks (DBS Checks)*

An enhanced DBS check will be carried out for all associates and staff regardless of job role. SENse learning will agree to complete payment for all DBS checks carried out.

The Enhanced DBS check (Enhanced Disclosure) will show current and spent convictions, cautions, reprimands and warnings held on the Police National Computer; plus any relevant and proportionate information held by local police forces as well as a check of the new Children barred lists where requested.

The DBS application is made online. Details of the I.D. documents required are confirmed with the individual in advance via email as part of the onboarding process. Information and advice can also be found at [www.gov.uk](http://www.gov.uk).

The applicant is responsible for completing the appropriate declarations honestly and accurately as required by the company. Completing the online application form at the pre-employment stage and providing the identification required. The associate is responsible for informing their line manager immediately if they are subject to criminal proceedings.

Associates will be asked to sign up for and maintain registration with the DBS update service. The DBS update service aims to improve the speed of the recruitment process and enable efficient re-checking on a yearly basis. Once you are working with a SENse student you will be able to claim back the annual subscription charge for remaining on the update service.

HR is responsible for undertaking DBS checks at the pre-employment stage, administering the ongoing application process, checking ID documentation and processing checks with the DBS. This includes;

- Updating systems with DBS disclosure information in line with this policy, providing advice on

the next steps if a disclosure is made during the application process.

- Providing advice on the next steps following receipt of a DBS certificate that details disclosures or bars an individual from working with children or vulnerable adults.
- Escalating concerns to the relevant Directors such as concerns including associates continually failing to complete a recheck.

#### Storing disclosure and barring checks

Copies of disclosure and barring check certificates are not kept and stored unless there is a dispute about the results of the check. Instead, we only keep a confidential record of:

- The date the check was completed.
- The level and type of check.
- The reference number of the certificate.
- Whether the DBS certificate is on the update service or not.
- Expiry date of the DBS certificate.

#### Overseas checks

Individuals who have lived or worked outside the UK for more than 3 months within the last 10 years must undergo the same checks as all other associates and staff. This includes obtaining an enhanced DBS certificate (including children's barred list information).

In addition, we will make any further checks appropriate so that any relevant events that occurred outside the UK can be considered. Where this information is not available, the Organisation will seek alternative methods of checking suitability and/or undertake a risk assessment that supports informed decision making on whether to proceed.

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

#### Right to work in the UK check

The Right To Work in the UK is an essential part of the role and one that will be checked as part of our recruitment process.

We are unable to provide overseas sponsorship.

#### QTS / QTLS

SENse Learning works with qualified Teachers who have either QTS or QTLS. These two qualifications grant different skills for different ages in terms of working with our students. Therefore, if you have a QTLS qualification we will look to match you with students aged 16 or above, unless you are a member of SET (Society for Education and Training) in which case this will be working with students aged 14 or above. Once you have established a working

relationship with SENse we are happy to review the students you are available to work with, this will be at SENse Learning's discretion to ensure we are matching our students to the most suitable associates for their learning experience.

### Disqualification from working with children

SENse Learning uses the TRA Employer's Access Service to make prohibition, direction, restriction and children's barred list checks. Before appointing teachers, we will check their qualifications, qualified teaching status and their eligibility to work as a teacher.

### Concerns

Where references, vetting, disclosure and barring checks or any other relevant pre-employment check reveal concerns about an applicant's history, SENse Learning will assess whether or not they are suitable to work with children and young people. Discussions will be held with applicants and our Safeguarding team and these will be dealt with sensitively and with empathy. Whilst discussions take place we may put any formal offer of an appointment on hold to consider everything thoroughly.

If necessary, we may pass on information to the relevant authorities, such as the criminal records agency, professional bodies or police.

### References

SENse Learning requires 6 years worth of references including an applicant's current/previous employer. References will be sourced prior to interview, where possible (except where applicants request us not to for current employers). We use the reference software RefNow to send, chase and verify references.

A link to RefNow will be sent out to applicants who are required to complete all information and submit via software platform. The Reference Guidance form sent to applicants during the recruitment process provides full information as to the list of acceptable referees. If an applicant has requested that a current employer reference is not provided prior to interview, a second RefNow link will be sent upon offer of the role for these details to be provided.

Please note onboarding cannot be completed until all references have been received, checked and verified. Applicants therefore cannot start working with any SENse student until this process is complete.

### Driving Licence

As we are working with vulnerable people, our preference is that associates are to have a clean driving licence. Any points on the licence will be discussed and reviewed with directorial discretion. When reviewing the points we will take into account the nature of the offence and the circumstances surrounding them, and any final decisions will be made by the operational director.

As the role involves travelling between students' homes within strict time limits as well as escorting students on trips out of the house, a reliable mode of personal transport suitable for passengers is an essential criteria, unless stated otherwise, depending on the role. To maintain adherence to GDPR guidance, we also require that any associate is able to get to students' homes independently, unless anyone supporting also has a DBS registered to SENse Learning.

#### Remaining on our books

If we are unable to match associates with students straight away, our onboarding team will check in at around 3 months to check whether associates still want to remain on our books. We will also recheck with Referrals whether there is a student available or why we cannot match them. After 6 months have passed, the associate will receive an email to let them know that we are unable to match them and therefore will be removing them from our books.

### ***Procedures***

#### *Pre-recruitment process*

- Before any recruitment activity, the Organisation will review the job description and person specification to ensure they are up to date and an accurate reflection of what the job entails.
- The person specification will relate directly to the job description. Some criteria may be desirable rather than essential and this will be highlighted.
- For a new role, the job description and person specification will be created for this role.
- The role may be advertised solely internally or externally, some may be advertised both internally and externally. In extenuating circumstances, the Operational Director may waive the need to advertise.
- All applicants are required to complete an application form containing questions about their academic and employment history and their suitability for the role.
- Should there be any gaps in employment history, a satisfactory explanation must be provided at interview. A curriculum vitae will only be accepted as

the first part of the recruitment process and to complete the recruitment process, a fully completed application form would be required to ensure we adhere to Safer Recruitment guidance.

- Shortlisting will be completed by at least two people to ensure fairness and consistency and prevent bias.
- During the recruitment process we will be doing our Due Diligence which can include searches on social media.
- The panel will agree their criteria and evidence for selecting for interview; these should be objective, relevant to the role and measurable, and against the person specification.
- The interview panel will scrutinise the application form, reviewing employment history and identifying any gaps, and look to see if the applicant has recently been working abroad.

### *Safer Recruitment*

- SENse Learning will be following Safer Recruitment guidance throughout the recruitment process. This will include Due Diligence checks on social media and through 6 years' worth of references.
- SENse Learning will accept a brief Information Form and CV in the first instance, though to complete the recruitment process we will require candidates to complete a full application form including work and education history and an explanation for any gaps in employment as well as personal declarations.

### *Employment offer*

- Following the interview, the Recruitment Coordinator will make a conditional job offer to a successful applicant via email. Unsuccessful applicants will also be informed of the outcome via email.
- If it is decided to make an offer of employment following the formal interview, any such offer will be conditional on the following:
  1. Verification of the applicant's identity and right to work.
  2. At least two satisfactory references- one of which must be from the applicant's most recent employer and both must cover 6 years of employment.
  3. Receipt of a clear Enhanced DBS certificate (and a clear overseas check where applicable).
  4. Clear TRA checks
- These offers will last for a total of one week until they are rescinded, unless there are extenuating circumstances and an extension requested.
- Should any offers of association be declined or not be responded to or, should any associate leave the company, they will have to reinterview for the role should the role still be available.

### Training

At SENse we recognise that our greatest asset is our people. To ensure our continued success and to foster a culture of continuous improvement as well as keeping our associates and students safe we are committed to providing training for all our associates.

Once an applicant has agreed to work with SENse, they will complete all mandatory training, including:

- SENse induction training - online.
- GDPR - online.
- Safeguarding - online.
- Safeguarding Adults webinar - online.
- CPI - online annually
- First Aid - online every three years.
- INSET day - online three times a year.



Induction, GDPR, Safeguarding & First Aid training are paid at our training rate upon completion. CPI is paid at either our training rate OR at the session rate if the associate was due to see a student on that day.

## 19. Quality Assurance Policy

### 19.1 Introduction & Purpose

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

### 19.2 Policy Principles & Values

The Organisation is committed to continuously reviewing and evaluating all practices and procedures to ensure we provide the highest quality of education possible for all our students.

The Organisation believes that every aspect of the educational provision should be held up to scrutiny and that all Associates are accountable for ensuring quality provision for all students.

### 19.3 Procedures

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

- Termly Head Office meetings.
- Appraisals.
- 121 Check-ins

The pathways manager:

- Review whole cohort data related to student progress, engagement and attendance each full term.
- Discuss student progress with Pathways Leads at 1:1s.
- Discuss trends in data termly with Pathway Leads and make plans and recommendations where there are any concerns.
- Attend and/or input into Quality Assurance meetings with commissioners as needed, along with the Business Development Manager.

The pathway leads will:

- Have regular meetings with case coordinators and discuss student progress.
- Carry out ad-hoc observation visits to student teams as part of the 360 process.
- Monitor the termly reports that the case coordinators produce.
- Spot check student folders and documents such as daily logs, tracking and monitoring documents and risk assessments.

- Feedback where changes to these documents or their usage are needed, and monitor for improvements afterwards.
- Monitor data on progress, engagement, and attendance for students in their Pathway each half term.
- Make recommendations and suggest actions for the case coordinator to implement where the student data shows concerns or room for improvement.

The case coordinators will:

- Monitor all daily logs for students they oversee once per week and raise any quality issues or concerns with the associate and pathway lead as needed.
- Review and update student tracking documents half termly.

The qualifications lead is our designated NCFE Coordinator and they will:

Quality assure our Qualification Offer on a continual basis, including exams and coursework.

Attend EQA external visits from NCFE per year and action any recommendations that come from these visits.

### The 360 Process

The Pathways Team and members of Leadership visit sessions to check quality and ensure the students' provision is effective and suitable. They will also review the student's logs, paperwork and speak to their team to check all processes are being suitably followed. They will also send feedback forms to parents/carers, the student, and any relevant professionals, such as the Social Worker, to gain their insight into the quality of the provision offered.

These steps combined to create the student 360 process, which is an overall 'health check' and a deep dive into all aspects of an individual student's provision.

Students booked to have a 360 review are chosen based on need and length of time since their sessions have last been reviewed. Pathway Leads, the Pathways Manager, plus the Managing and Operational Directors will all attend 360 reviews every term on a rolling basis. Other members of the Head Office Team may also be included in this process, as decided by the Pathways Team.

A report is written after 360 reviews are completed, which highlights the areas of progress for the student and suggests next steps. Any immediate concerns will be addressed and resolved by the person conducting the 360 immediately.

Feedback from students and their parents/carers is reviewed and acted on where possible/necessary immediately.

### Provision Feedback

The Organisation encourages open and honest feedback from all stakeholders, including

parents/carers, students, on-roll schools, Local Authority partners and associates on the quality and effectiveness of the provision.

- Feedback forms are sent to parents/carers and students once every term.
- Additional feedback forms are sent to any parent/carer, student and external professionals involved in the student's education or care, when a student is being reviewed in our 360 process in that term.
- When students leave SENSE Learning, feedback forms are sent to their parents/carers, the student, and relevant professionals such as their social worker or SENCO.

This feedback is reviewed by the pathways manager and pathway leads, who then develop action plans based on any concerns or improvement areas raised.

## 20. Complaints Policy

### 20.1 Introduction & Purpose

This policy is the Complaints Policy for SENSE Learning which will be followed by all members of the Organisation and promoted by those in the position of leadership within the Organisation. This policy will be applied to all stakeholders at SENSE Learning, including associates, families and commissioners.

### 20.2 Policy Principles & Values

The Organisation recognises that students who access SENSE Learning often have very varied and complex needs and it is essential that communication is effective with families so that we are able to understand and meet these needs. SENSE Learning is committed to providing high-quality and bespoke packages of education for our students. We understand that, on occasion, issues or concerns may arise. This Complaints Policy outlines the process for raising and resolving complaints in a fair, transparent, and timely manner.

A complaint is defined as an expression of dissatisfaction regarding the standard of service, actions, or lack of action by SENSE Learning, its staff, or any person associated with the organisation.

### 20.3 Procedures

- All complaints will be treated confidentially, and information will only be shared with those directly involved in the process.
- Complaints will be handled impartially, ensuring that all parties involved have the opportunity to present their perspective.
- The process for handling complaints will be open and transparent, with clear communication at each stage.
- Complaints will be addressed promptly, with established timelines for each stage of the process.
- No individual will face discrimination or retaliation for making a complaint in good

faith.

### Informal Resolution

Step 1: If possible, concerns should be raised informally with the relevant pathway lead. Many issues can be resolved quickly and amicably at this stage.

Step 2: If the issue is not resolved, the complainant may proceed to the formal complaint process.

### Formal Complaint

Step 3: The complainant should submit a formal complaint in writing to the SENse Learning complaints officer. This complaint should include:

- The nature of the complaint.
- Details of the incident(s) or issue(s).
- Any steps taken to resolve the issue informally.
- The desired outcome.

Step 4: The complaints officer will acknowledge receipt of the complaint within five working days and begin an investigation. The investigation may involve interviews with relevant parties and a review of related documentation.

Step 5: The complaints officer will provide a written response within 15 working days of receiving the complaint, detailing the findings and any actions to be taken.

### Appeal

Step 6: If the complainant is not satisfied with the outcome, they may appeal the decision in writing to the SENse Learning director within ten working days of receiving the response.

Step 7: The director will review the appeal, considering all relevant information, and provide a final written response within 15 working days.

### External Resolution

Step 8: If the complainant remains dissatisfied after the appeal, they may refer the matter to an external body, such as the Local Education Authority. SENse Learning will provide information on how to do so upon request.

### Safeguarding

If a complaint relates to safeguarding concerns, the complainant should contact the LADO at their relevant Local Education Authority.

### Record Keeping

All complaints, including details of their investigation and outcomes, will be documented and retained securely by SENse Learning. These records will be reviewed periodically to identify any patterns or areas for improvement.

## 21. Data Protection Policy

### 21.1 Introduction & Purpose

This policy is the Data Protection Policy for SENSE Learning which will be followed by all members of the Organisation and promoted by those in the position of leadership within the Organisation. This policy will be applied to all stakeholders at SENSE Learning, including associates, families and commissioners.

### 21.2 Policy Principles & Values

This policy sets out how SENSE Learning ('the Organisation') handles the personal data of our students, parents and carers, staff, associate, suppliers and other third parties.

SENSE Learning acts as the Data Controller for all personal data it collects and processes. As a Data Controller, SENSE Learning determines the purposes and means of processing and is responsible for ensuring that processing is carried out lawfully, fairly, and transparently in compliance with the UK GDPR and the Data Protection Act 2018.

This policy applies to all personal data we process regardless of the medium on which it is stored or whether it relates to past or present students, employees, associates, contractors, parents/carers, suppliers, or any other Data Subject.

Any breach to this policy may result in disciplinary action.

### 21.3 Procedures

#### Data Protection Officer

Given the nature of SENSE Learning's activities and its processing of sensitive special category data (including health and safeguarding records), a data protection officer (DPO) is appointed to oversee compliance.

The data protection officer for SENSE Learning is Kaya Hadley.

The DPO's responsibilities include:

- Monitoring compliance with GDPR and UK Data Protection Law.
- Advising on Data Protection Impact Assessments (DPIAs).
- Acting as the contact point for the ICO, regulators, and data subjects.
- Investigating and managing personal data breaches.

#### Personal Data Protection Principles

SENSE Learning adheres to GDPR principles. Personal data must be:

1. Processed lawfully, fairly and transparently.
2. Collected only for specified, explicit and legitimate purposes.
3. Adequate, relevant and limited to what is necessary.
4. Accurate and kept up to date.
5. Stored no longer than necessary (see retention section below).

6. Secured against unauthorised or unlawful processing, accidental loss, destruction or damage.

We also ensure that:

- Personal data is not transferred outside the UK without adequate safeguards.
- Data subjects can exercise their legal rights (access, rectification, erasure, restriction, objection, portability, etc).
- SENse Learning can demonstrate accountability for compliance.

#### Lawful Basis & Consent

SENse Learning processes personal data only where a lawful basis applies, such as:

- Performance of a contract (employment, associate agreements, student placement).
- Compliance with legal obligations (e.g. safeguarding, tax).
- Protection of vital interests (emergency medical information).
- Legitimate interests (where rights are not overridden).
- Consent (e.g. use of photographs, holding unsuccessful job applications).

Where consent is relied upon, it must be freely given, specific, informed, and recorded. It may be withdrawn at any time.

#### Data Retention

SENse Learning's Data Retention schedule governs how long we keep data. In summary:

##### Employment & associate records

- Personnel and training records, contracts, payroll, and working time records - **kept during employment and up to six years after.**
- Recruitment records of unsuccessful candidates - **retained for six months, unless consent obtained to retain longer.**
- Allegations of abuse/harm relating to associates - **kept securely until pension age or 10 years after the allegation, whichever is longer.**

##### Student records

- Student records (all SENse students have EHCPs) - **retained until the student turns 31.**
- Safeguarding files - **original retained securely for 25 years, copy transferred securely if moving provision.**
- Incident reports - **20 years.**
- Low-level concern logs - **retained anonymously, with names removed when staff leave.**

## Disposal

All data no longer required is securely destroyed. Deletion must be verified (not relying solely on 'delete' keys). Physical records are shredded/confidentially disposed of. Digital records are permanently deleted.

## Security, Integrity and Confidentiality

SENse Learning protects personal data with appropriate organisational and technical measures, including:

- Access restricted to authorised staff/DSLs for safeguarding.
- Encryption and secure storage of electronic records.
- Clear desk and password security policies.
- Regular staff training on confidentiality.

## Monitoring of Data

SENse Learning reserves the right to monitor, access and review data that is created, sent, or received using its systems and networks, including but not limited to emails, messages, documents and files.

Monitoring is undertaken for legitimate business purposes including:

- Ensuring compliance with safeguarding, confidentiality, and legal obligations.
- Preventing unauthorised disclosure of personal data or other sensitive information.
- Detecting and investigating breaches of this policy or other organisational policies.
- Maintaining system security and preventing misuse of SENse Learning resources.

Monitoring will always be proportionate, justified, and compliant with data protection law and employment law.

## Data Breaches

Any suspected personal data breach must be reported immediately to the DPO. The DPO will investigate, record, and (if required) report the breach to the ICO within 72 hours, and to affected data subjects where necessary.

## Data Subject Rights

Data subjects have the right to:

- Access their personal data.
- Request rectification or erasure.
- Restrict or object to processing.

- Data portability (where applicable).
- Be informed of how their data is used.

Requests must be referred immediately to the DPO. Identity checks will be carried out before disclosure.

#### Direct Marketing

SENse Learning is committed to ensuring that any direct marketing activities comply with data protection and privacy legislation.

Prior consent will be obtained for electronic direct marketing (e.g. email) unless the 'soft opt-in' exception applies.

SENse Learning may contact existing service users or parents/carers about services similar to those they have previously engaged with, provided that an opportunity to opt out was offered at the time of data collection and in every subsequent communication.

All recipients of direct marketing have the right to opt out at any time. Requests will be promptly honoured and details will be suppressed (not deleted) to ensure preferences are respected in the future.

Marketing communications will always identify SENse Learning as the sender and will be clear, relevant and respectful.

#### Sharing Personal Data

SENse Learning only shares personal data where:

- There is a safeguarding or legal obligation.
- It is necessary for educational purposes, with informed consent where required.
- The recipient has agreed to comply with GDPR standards and confidentiality.

Third party processors must have written contracts including GDPR clauses.

#### Training and Accountability

All SENse Learning staff and associates will receive mandatory GDPR/data protection training.

Compliance will be reviewed through audits and data protection will be integrated into all new projects (privacy by design).

## 22. Emergency Procedure Policy

### 22.1 Introduction & Purpose

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



## 22.2 Policy Principles & Values

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

## 22.3 Procedures

### Weather

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

### Terrorist Attack

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

### SENse Closure

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

### High Risk Situation

- In the event of a violent or high-risk situation by members of the public, associates need to call the police using 999. Associates also need to phone the Head Office who will advise of next steps.
- The Organisation takes its duty of care very seriously for those who we work with and

who work for us, and if any of our associates feel threatened or unsafe then they need to leave the situation as soon as safely possible once they have established the safety of the student.

- An incident form will need to be completed as soon as possible.

#### Car Accident or Breakdown

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

#### Serious Student/Associate Accident/Injury at Work

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

#### Pandemic

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

## 23. Sustainability Policy

### 23.1 Sustainability Policy

This policy is the Sustainability Policy for SENSE Learning which will be followed by all

members of the Organisation and promoted by those in the position of leadership within the Organisation. This policy will be applied to all students and SENse Learning associates.

### 23.2 Policy Principles & Values

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

### 23.3 Procedures

Office and administration practice:

Recycling:

- Maintain respect for natural resources by teaching and encouraging the most efficient use of materials and by using renewable, recycled and recyclable products, where possible.
- Encourage associates, students and parents to recycle as much waste as possible, in the Head Office and at home.

Paper:

- Recycled paper is preferable to normal paper. Paper is recycled when appropriate for photocopying and scrap paper.
- Shredding.
- Confidential waste paper is shredded and not recycled at this present time.

Water:

- Water is conserved wherever possible.

Heating:

- All heaters are thermostatically controlled and switched off when not required.

Reducing our carbon:

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

## 24. Social Value Policy

### 24.1 Introduction & Purpose

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

### 24.2 Policy Principles & Values

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

### 24.3 Procedures

#### Jobs

- SENsE Learning currently has a mix of self-employed contractors and some employees of whom are permanent full-time or part-time employees. The vision is to establish the Organisation as a secure, reliable employer and contractor that is accessible to suitably qualified individuals and supportive of the continued professional development of the existing staff base.
- The Organisation aims to continue contracting and employing more local people whether that be permanent employees or contracted staff.
- The Organisation aims to provide more opportunities for disadvantaged people.
- The Organisation aims to continue providing continuous professional development to

both permanent employees and contracted staff.

#### Growth

- The vision is to establish and maintain a responsible, sustainable, local supply chain and in doing so multiply the social value delivered locally, by:
- When a requirement for goods or services is identified, it follows a rigorous, ethical supplier selection process. This process includes due diligence and research into suppliers track record and policies - including their social value strategy or equivalent.
- Through the supplier on-boarding process, the Organisation seeks to identify opportunities to leverage efficiencies and reduce waste across the business, pursuing a holistic approach to service delivery.
- Pay suppliers as per contract terms, and critically on time to avoid contributing to cash flow issues that may impact staff

#### Social

- This refers to activities that contribute to creating healthier and more resilient individuals, and therefore more resilient communities, equipping vulnerable individuals to participate as fully as possible in society. This goes to the core of the Organisations mission as a provider of alternative education.
- The Organisation offers a flexible and bespoke curriculum to children and young people who are out of school or struggling to attend. The Organisation puts relationship building, interest led learning and social, emotional and academic focuses at the forefront of what it does.
- Based on this, the Organisation aims to equip children and young people with complex additional needs with the tools and practical knowledge that will enable them to navigate the world around them and achieve increased independence.
- The Organisation has had a high success rate in their students engaging with more formal education or employment.

## 25. Modern Slavery Statement

### 25.1 Introduction & Purpose

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

### 25.2 Policy Principles & Values

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

### 25.3 Procedures

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

SENse Learning has a wide pool of associates, employees and suppliers who we utilise in our services.

Supply chains that are utilised by SENse Learning currently include, furniture and equipment, ICT hardware, agencies, catering and educational supplies. SENse Learning has considered which of its supply chains could be at a high risk of slavery or human trafficking.

### Due Diligence

- As part of our efforts to identify the risk of slavery and human trafficking within our supply chains, we operate a risk-based approach to due diligence with new suppliers. This approach can include:
- Seeking out general information on any new supplier company and understanding their corporate structure.
- SENse Learning's Finance Director will assess supplier financial stability by reviewing recent and previous company accounts.
- Ensuring suppliers are able to provide adequate assurances of their own commitment to preventing modern slavery and human trafficking.
- Ensuring suppliers have the relevant health and safety policies and procedures.

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

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

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

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

### Glossary

**ADHD** - ADHD stands for Attention Deficit and Hyperactivity Disorder and covers a range of behaviour aspects including poor concentration, hyperactivity and learning difficulties.

**Associate** - Associate refers to any staff member contracted by SENse Learning including volunteers.

**CC** - CC stands for case coordinator. A case coordinator manages the overall package of education for our students.

**CPI** - CPI stands for Crisis Prevention Institute. This is the training programme that teaches management and intervention techniques to help a person cope with escalating behaviour in a professional and safe manner.

**DSL** - DSL stands for Designated Safeguarding Lead. This person has the authority and status within SENse Learning to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other sssociates.

**EHCP** - EHCP stands for Education, Health and Care Plan. It outlines any special educational needs a child has, and the provision a local authority must put in place.

**LA** - LA stands for Local Authority, the Local Authority is responsible for all the public services including education in a particular area.

**LADO** - LADO stands for Local Authority Designated Officer, who works with Children's Services and provides advice to SENse Learning.

**EM** - EM stands for Education Mentor, they support the learning of the students at SENse Learning.

**NCFE** - NCFE is a Functional Skills awarding body and provider of educational services in the UK.

**PDA** - PDA stands for Pathological Demand Avoidance; it was first documented in the 1980s and is characterised by an extreme avoidance of everyday demands and an anxiety-driven need to be in control.

**The WILL Framework** - is SENse Learning's curriculum framework and stands for Wellbeing, Interaction, Learning and Life skills.











