



**COMPANY POLICIES
AND
PROCEDURES**

March 2020

CONTENTS

1. Introduction – Our philosophy
2. Equal Opportunities Policy
 - 2.1 SEND
3. Safeguarding Policies and Procedures
 - 3.1 Child Protection & Disclosure
 - 3.2 Guidelines for managing tutees
 - 3.3 Registration, departure, non-collection, lost child, sick child, and centre capacity procedures
 - 3.4 Online Tuition
4. Company Health & Safety Policy Statement/Procedures
5. Fire Policies and Procedures (accompanied by Fire Log)
6. Accident Policy (accompanied by Accident Folder)
7. Incident Policy (accompanied by Incident Folder)
8. Administration of Medication/Treatment Policy
9. Management of Documentation and Records Policy
10. Notification of Information to Enforcing Authorities Policy
11. Recruitment Policy
12. Whistle Blowing
13. Complaints Policy
14. Data Security Management

1. OUR PHILOSOPHY

The founders of Clear Steps Plus Education are like minded colleagues and friends, who wanted to help support children in our local area. We have years of teaching experience within primary and secondary schools within the northwest, from being classroom teachers, to senior leaders and specialist leaders in education – supporting other schools in the improvement of teaching and learning.

During our careers we have witnessed class sizes increase to unmanageable levels, budgets cut and children suffering as a result. Through no fault of their own teachers and teaching staff find it increasingly difficult to give children more focused support that they require on a daily basis. Children then struggle, their confidence decreases and they find it increasingly difficult to move onto the next stage of their learning. There are also consequences for more able children, who again are not always facilitated to achieve their very best and can in fact become disengaged.

We want to help children in these circumstances, without the politics and red tape experienced within schools that so often take time away from the ‘real’ job, that of educating our children to reach their full potential as a ‘person’. We want to wholeheartedly support children in achieving their very best and enjoying their ‘learning’ journey, enabling every child we teach to ‘shine’.

Clear Steps Plus Education work with ‘**outstanding**’ teachers in order to ensure that all of the children whom we tutor are provided with the best quality teaching, which will in turn have the greatest impact on a child’s progress and confidence

2. EQUAL OPPORTUNITIES POLICY

CSPE is an equal opportunities provider which endeavours to provide equality of opportunity for all tutors/tutees, regardless of sex, race, age, disability, marital status, creed, ethnic origin, cultural differences, religion or sexual orientation.

CSPE aims to respect equality of opportunity and celebrate positively the variety in our multi ethnic/cultural society.

CSPE demonstrates all the legal obligations as outlined under the Sex Discrimination Act of 1975 and 1986, The Race Relations Act of 1976 and the Disability and Discrimination Act of 1993 (in addition to the statements outlined above)

CSPE upholds the Code of Practice on the Identification and Assessment of Additional Needs (1st September 1994) as established in the 1993 Education Act. This entitles all students with Special Needs to receive their full educational entitlement. All tutors and directors of CSPE should have an awareness of this.

CSPE is focused on bringing the educational opportunities and benefits to as many tutees as possible. It is important to us that we serve a diverse mix of tutees and in particular:

- from both sexes
- from a diversity of racial and cultural backgrounds

- of all abilities
- with special additional or special educational needs and disabilities

Our ways of working ensure that every child is treated as an individual.

It is the responsibility of our staff to ensure that the centre is welcoming to all tutees, and that they all benefit from what we have to offer. This includes a high level of individual attention, recognition, celebration of their successes and positive social interactions with staff and other.

CSPE staff promote the fundamental British values of:

- democracy,
- the rule of law,
- individual liberty, and
- mutual respect and tolerance of those with different faiths and beliefs.

Staff and tutees are encouraged to regard people of all faiths, races and cultures with respect and tolerance. It is expected that they should understand that while different people may hold different views about what is 'right' and 'wrong', all people living in England are subject to its law.

CSPE will endeavour to enable students to:

- develop their self-knowledge, self-esteem and self-confidence;
- distinguish right from wrong and to respect the civil and criminal law of England;
- accept responsibility for their behaviour, show initiative, be resilient and to understand how they can contribute positively to the lives of those living and working in the locality of the centre and to society more widely;

We will always encourage students to:

- acquire a broad general knowledge of and respect for public institutions and services in England;
- be tolerant of different cultural traditions by enabling students to acquire an appreciation of and respect for their own and other cultures;
- respect other people;
- have respect for democracy and support for participation in the democratic processes, including respect for the basis on which the law is made and applied in England.

2.1. SEND POLICY

CSPE aims to bring educational opportunities and benefits to as many tutees as possible, including disabled tutees and tutees with special additional and special educational needs.

CSPE aims to treat all tutees with equal concern, as individuals, with diverse needs, likes and dislikes. Our service has a lot to offer all tutees, irrespective of ability. We tutor with a high staff to child ratio of 1:4 which helps us take a child centred approach.

We will always ensure that:

- we discuss a child's needs with the parent/carer and child at the time of registration.
- all tutees are supported and encouraged irrespective of ability.
- all tutees are included in the social life of the centre, irrespective of ability.
- tutees' progress is constantly reviewed and assessed with a view to adapting their programmes if necessary.
- we provide opportunities for dialogue and feedback with parents/carers.
- we are aware of disability issues and endeavour to attend development training on developing inclusive practice.
- we are always open to guidance from parents and professionals on the type of training that may be beneficial or necessary for working with a specific child.
- our centre is accessible to wheelchairs in the reception area
- information provided by a parent/carer will remain confidential, and only shared with the minimum necessary members of staff.
- all information provided will be stored securely.
- we work within the guidelines of the Disability Discrimination Act 1995.

3. Safeguarding Policy and Procedures

3.1 CHILD PROTECTION AND DISCLOSURE

All Directors have current safeguarding training. It is not the responsibility of all Directors to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and maintain an open mind. Accordingly, all concerns regarding the welfare of pupils will be recorded and discussed with Directors prior to any discussion with parents.

CSPE Staff are well placed to observe any physical, emotional or behavioural signs which indicate that a child may be suffering significant harm. The relationships between staff, pupils, parents and the public which foster respect, confidence and trust can lead to disclosures of abuse, and/or CSPE members of staff being alerted to concerns.

Staff must immediately report:

- any suspicion that a child is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play;
- any explanation given which appears inconsistent or suspicious;
- any concerns that a child may be suffering from inadequate care, ill treatment, or emotional maltreatment;
- any concerns regarding person(s) who may pose a risk to children (e.g. living in a household with children present).

Staff are also encouraged to actively consider children who might present as vulnerable

All concerns about a child or young person should be reported without delay and recorded.

All referrals will be made in line with Local Children's Services procedures.

If, at any point, there is a risk of immediate serious harm to a child a referral should be made to Children's Services and/or the police immediately.

3.2 GUIDELINES FOR MANAGING TUTEES

These guidelines are to be followed by **ALL** members of staff to ensure that tutees behave in an appropriate manner.

Behaviour Management is the responsibility of all the Directors on duty.

If a child's behaviour has been problematic during their time in the centre the Directors will speak with the parent or guardian when they come to collect the child, notifying them of what happened, how the situation was handled and the outcome. It may be more appropriate to speak to them privately about the circumstances rather than in the reception. If the child attempts, or leaves, the centre on their own, a Director will notify the parent or guardian by telephone. Details of the event will be recorded in the Incident Record Folder.

If a child's behaviour is such that they are deemed to be 'out of control' (i.e. causing excessive harm to other tutees, staff or property), Directors reserve the right to telephone the parent or guardian and ask them to remove the child.

At CSPE we endeavour to:

- Always remain positive when dealing with a child – praise and encourage them, make them feel good about what they're doing and help them to see achievement rather than failure. If they achieve a low score, stress the effort they put into the task rather than the fact they did not get many answers right.
- Take the time to listen to tutees, and record any problems they are having. Directors must be notified.
- Make sure a child understands what they are doing and encourage them to ask if they do not understand something or do not know how to do something. Work closely with each child to ensure

they understand: e.g. go through some examples to make sure they understand the methodology, get the child to: read a few sentences, spell a word, and elicit the correct answer.

- Not raise our voice where we encounter difficulties with a child. Speak quietly and calmly to the child, lower yourself so that you are speaking with the child at their level.

Where a child is being difficult and have to be reprimanded, we will make sure that they understand you are disagreeing with their behaviour rather than them as a person. We will make it clear that by being disruptive they are spoiling other tutee's experiences and that this is unfair; make them see that they wouldn't like being disturbed by someone else.

If a child uses inappropriate language we will make it clear that such language is unacceptable and that CSPE is an inappropriate place to use such language, and can upset and offend other staff and tutees.

Where a child is bullying, or being mean to another child, we will deal with the situation immediately making it clear that such behaviour is inappropriate. We aim to explain that CSPE is a place where tutees have the opportunity to come and have fun learning, make new friends and work together, not a place to be unpleasant to others.

Where a child is getting stressed or upset at under-achievement or is dissatisfied with their score, we will always praise them and make them see what they've achieved so far.

Where a child is destructive towards the equipment or facilities at CSPE, we will make it clear that such behaviour is inappropriate and disrespectful.

Serious incidents that involve injuries to the child, another person, including tutees or staff must be written up in an Incident Report and reported to all Directors. Records should always be made in pen so they cannot be edited or erased.

Registration Procedure

The parent or guardian should bring his/her tutee(s) into the Centre's reception area. Here they will be met by a member of staff. The child's name and time of arrival is written on a paper Attendance/Evacuation Register in pen, which is kept on reception.

If the parent is not present, the above procedure should be followed with regards to the child and staff member.

Departure Procedure

Upon registration of their child, the parent is required to indicate on the Registration document who is authorised to collect their child at the end of their session. If the parent does not provide any other names, then only that parent will be allowed to collect the child. They may only give permission for their child to be allowed to leave independently if they KS4/5. This still applies to tutees leaving the centre for a break between double sessions. Parents should understand that CSPE can take no responsibility for tutees leaving or arriving unaccompanied.

If a child must be collected, CSPE will keep tutees within the premises until the parent or nominated person arrives in the reception area, where they will be greeted and identified by a staff member,

before collecting the child. Anyone not known to the team must have been given permission on the Registration form. Changes to these names can be made in the future, but must be advised by the parent. This information is then recorded which is fully compliant with GDPR practices.

On the Registration form the parent is also asked to provide a password for collection and security purposes. If the person collecting a child is known to the team, they will not ask for this password. If a person asks to collect a child who is not known, they will check the pick-up permission list to see if they have permission to collect the child. If they are not listed we will call the parent and ask to confirm this new person was sent to collect the child, and ask both parent and the person sent to collect them to confirm the pickup password. If this cannot be done, the child will not be permitted to leave until a nominated person can come to collect them.

If there is a police or court order in place to prevent visitation/contact of a child by a parent, the family are required to inform the Directors, and provide evidence to prevent an incident occurring where a child could be released into the care of a person who was previously allowed contact. If a couple divorce and a parent does not want their ex-partner to have access, they would need to notify the Directors so they could change the pickup arrangement records.

On leaving the Centre the child is required to sign out by writing the time of departure on the paper.

On leaving the premises all staff take responsibility to conduct a thorough sweep of the entire centre and any additional rooms to make sure all tutees have departed.

Child Non - Collection Procedure

In the instance of a child within our care, who is not permitted to leave CSPE independently not being collected within 120 minutes of being registered or by closing time, the following action would be taken:

- Telephone the parent/guardian, or a person on their nominated collection contact list.
- If the parent or guardian cannot be contacted, telephone the Social Services, who are trained to support the child and help them cope with their vulnerable position.

Lost Child Procedure

In the instance of a finding that a child within our care is missing and unaccounted for, actions should be taken in following sequence, until the child is located:

- Immediately inform the Directors and other staff members.
- Conduct a thorough search of the Centre. Check they have not been signed out/collected by someone else.

Sick Child Policy and Procedure

At the initial registration process all parents/guardians sign an agreement, this document states that:

- I give permission to the seeking of any emergency advice or treatment. (CSPE will attempt to contact you in the event of an accident or emergency).

- In the instance of a child becoming ill whilst in CSPE's care, actions should be taken in the following sequence:

Immediately inform the Directors who are qualified in First Aid.

Assess the child's needs and treat accordingly. Check the child's medical records and Emergency medical treatment authorisation form.

If required immediately call emergency services on 999 and request an ambulance.

Telephone the parent/legal guardian to inform them of the incident if the emergency services have been called, or if we need them to collect the child.

Explain on collection the child's symptoms, how we responded and any treatment given. For details on administration of medicine/treatment please refer to our policy: Administration of Medicine/Treatment.

Centre Capacity Policy

CSPE maintains a capacity limit of 1:4 teacher to tutees ratio with a limit of 20 tutees should the need arise (i.e. in the case of conducting mock exams etc).

Should a situation arise whereby admitting further tutees would exceed these limitations, we reserve the right to not admit these tutees. In this situation we would reserve a place by completing a session note ready for them and request that parents return after a short period of time.

3.4 ONLINE TUTORING

Prior to tutoring on-line sessions, CSPE will seek emailed written permission from parent/carer for their preference of video and audio usage before online tuition commences.

As a default, CSPE will ensure that the video settings are turned off and only audio will be allowed. The tutor will instruct parent/carer at the start of each session to ensure video is also off to comply with best safeguarding practice unless written permission has been received.

CSPE will screen share documents, files, computer whiteboards or computer windows solely for the purpose of tutoring online.

At each scheduled session time parents/carers to ensure a suitable device is logged on with directed video conferencing software started.

CSPE tutor to call/text/email Meeting ID to parent/carer ready for commencing online tuition.

Parent/carer to be available at the start and end of session for telephone instructions and feedback.

It is a requirement that parents/carers are in the vicinity while the online sessions are ongoing with the door wedged/propped open.

CSPE tutors will not record the online session but will regularly 'screen shot' shared annotated screen for retrospective marking and as a log of the session content.

4. COMPANY HEALTH AND SAFETY POLICY STATEMENT

Based upon Health and Safety at work Act 1974

This is the Health and Safety Policy Statement of CSPE Ltd.

We are committed to providing a safe environment for workers, tutees or any other visitors to CSPE centres. The safety procedures in operation are for the protection of people who work at or visit the organisation's premises and compliance with these procedures is mandatory.

CSPE's Statement of General Policy is to:

- Always maintain a safe and healthy working environment.
- Identify person/s responsible for monitoring and controlling risks arising from work activities.
- Keep all parties informed on all matters of Health and Safety.
- Provide and maintain safe plant and equipment.
- Ensure that substances are handled in a safe manner.
- Provide Health and Safety training.
- Prevent accidents and cases of work related ill-health.
- Review and revise this policy as necessary at regular intervals.

HEALTH AND SAFETY POLICIES AND PROCEDURES

The following document details health and safety policies and procedures specific to the CSPE.

Responsibilities

- Overall responsibility for Health and Safety is that of the Directors.
- The day-to-day responsibility of ensuring this policy is put into practice is delegated to the Directors in the centre.
- Any employees are personally responsible for health and safety within the Centre and should:
 - a. Co-operate with the Directors on health and safety matters.
 - b. Take reasonable care of their own health and safety and that of the tutees in their care.
 - c. Not interfere with anything provided to safeguard their health and safety and that of the tutees in their care.
 - d. Report any concerns over health and safety.

Health and Safety Risks Assessments

- The Directors will carry out regular risk assessments of the Centre and will approve any action required to remove or control a risk.
- Informing employees of Health and Safety

Safe Equipment

- Directors will be responsible for identifying all equipment needing maintenance and effective maintenance procedures will be drawn up.
- Any problems found with equipment should be reported immediately.
- The purchaser will check that any new equipment meets health and safety standards before it is purchased.

Safe handling, storage and use of substances

- The Directors will be responsible for identifying all substances used at the centre, which require a COSHH assessment (Chemicals or Substances Hazardous to Health).
- The Directors will be responsible for undertaking COSHH assessments.
- The Directors will be responsible for ensuring that all actions identified in the assessments are implemented.
- All purchasers will check that new substances can be used safely before they are purchased.
- Cleaning products will be stored in a cool environment in a locked cupboard and or shelf out of reach of tutees.

Information, Instruction and Supervision

- Health and Safety advice is available from the Director Tyrone McIvor.
- Supervision of part-time staff and/or trainees will be arranged, undertaken and monitored by the Directors.
- The Directors are responsible for ensuring that employees working at locations under the control of other employers are given relevant health and safety information.

Accidents & First Aid

- The first aid box is kept in the Centre outside the stockroom, and it includes a stock take.
- All Directors are first aid trained
- All accidents are recorded in the Accident Folder
- The Directors are responsible for reporting accidents, diseases and dangerous occurrences (RIDDOR) to HSE and to the enforcing authority (Ofsted/Care Inspectorate).
- All Directors are responsible for investigating accidents of the students in their care.

Emergency Procedures

- The Directors are responsible for ensuring the Annual Fire Risk Assessment is undertaken and implemented.
- The Directors are responsible for checking escape routes.
- Fire extinguishers are checked weekly and maintained and serviced on an annual basis.
- Emergency Lighting is tested on a monthly basis and recorded in the Fire Log.
- CSPE operates a strictly No Smoking Policy

- Serious H&S incidents must be written up in an Incident or Accident Report in pen and reported centrally to the Head of Ofsted, Safeguarding & Compliance. Records should always be made in pen so they cannot be edited or erased.

INFECTION CONTROL POLICY

CSPE aims to promote the general wellbeing and health of all tutees and to ensure that the risk of infection is minimised amongst all tutees and staff.

We ensure that:

- Staff do not come into work if they are unwell and will inform the Directors if they are feeling unwell during work.
- Antibacterial hand gel is available in the bathroom.
- All tutees are encouraged to regularly wash their hands to maintain good hygiene practice.
- Antiseptic soap is provided in the toilet facilities.
- Directors to ensure that the centre is cleaned daily; and equipment which is used by tutees on a regular basis is cleaned after each use.
- During periods when tutees are present on site, visitors and staff are not allowed to bring food or animals into the centre, unless they require a guide dog.
- Directors will notify parents if there is spread of infection in the centre amongst tutees or staff.
- In the event of having to dispose of clinical waste, we would consult the Environment Agency to comply with correct guidelines.
 - Serious incidents must be written up in an Incident Report and reported centrally to the Head of Ofsted, Safeguarding & Compliance. Records should always be made in pen so they cannot be edited or erased.

5. FIRE POLICIES & PROCEDURES

Management Responsibilities

It is all the Directors' overall responsibility to:

- Ensure all staff are familiar with CSPE's Fire Safety Policies and Procedures.
- Ensure all firefighting equipment on the premises is correct, sufficient and in good working order.
- Conduct emergency lighting tests, evacuation drills and training on a regular basis, and record in the Fire Log.

All Directors maintain a day to day responsibility for fire safety. In the event of a fire, procedures should be followed as outlined.

Staff Training

- CSPE ensures all staff receive induction fire training.
- Our high staff to child ratios allows us to safely and efficiently evacuate the centre as our staff are able to manage small groups of tutees, with one of the Directors coordinating an evacuation.
- Evacuation Exits and Routes are always clear from obstruction, well lit and lead directly to a point of safety with a clear path to the Evacuation Meeting Point.
- The centre has a Fire Risk Assessment conducted at its launch and is reviewed on an annual basis. Action points are set out clearly with a time frame to be completed.

Equipment

In accordance with the local authority Fire Inspector the centre is equipped with:

- Sign in/out sheet to record member attendance
- Staff & Visitors Sign in/out Records
- CO2 Extinguisher, 1 Hydro spray Extinguisher
- Emergency Exit signs
- Fire Log
- First aid box

Notification of Procedures to Parents and Tutees

Posters are displayed throughout the centre detailing the Emergency Fire Evacuation Procedures and reminding them to:

- stay calm,
- listen to the staff
- stay with the staff and follow their instructions.

All fire related incidents must be written up in an Incident Report and reported centrally to the Head of Ofsted, Safeguarding & Compliance. Records should always be made in pen so they cannot be edited or erased. Emergency Fire Evacuation Actions

IF YOU DISCOVER A FIRE

- **Tutees:** Alert a member of staff
- **Tutors:** Shout out 'Fire, fire, fire!' and instruct other staff to start evacuating themselves and their tutees not taking any unnecessary personal risks. Close any doors/ windows if it is safe for you to do so. Evacuate the building. Unless trained to do so, do not attempt to extinguish the fire CALL THE FIRE BRIGADE

ON HEARING THE ALERT OF FIRE i.e. Shout of 'Fire, fire, fire!' from tutor

- **Tutees:** Listen to your Tutor

- **Tutors:** Prepare to begin evacuation. Ensure tutees DO NOT leave the centre unaccompanied i.e. to find parent. Evacuate the premises

EVACUATION PROCEDURE

- **Tutees:** Stay calm and listen to your tutor. Stay with your tutor & follow their instructions. Evacuate via your nearest fire exit to the fire assembly point
- **Tutors:** Evacuate tutees through the nearest fire exit in an orderly fashion. Take responsibility for the tutees in your area and take tutees to the fire assembly point. Do not let tutees leave unaccompanied
- **Director in charge:** Conduct full & final check of premises to ensure empty i.e. toilet, storage room, and proceed to fire assembly point with attendance register and pen

AT FIRE ASSEMBLY POINT

- Call attendance register on arrival and notify the Fire Brigade if anyone is not accounted for.
- Await further instruction from Fire Brigade.
- Do not return to the building unless instructed to do so by the Fire Brigade.
- If you are not permitted to return to the centre, parents must sign next to the child's name on the Fire Register before you can release them into their care.
- Details of the evacuation must be recorded in the Fire Log on your return to the centre.

6. ACCIDENT POLICY

CSPE has a commitment to the safety and well-being of the tutees, staff, parents and visitors who come to our centre. Our Accident Policy is designed to ensure that any accident that takes place within our centre is dealt with appropriately. This policy works in conjunction with our Behaviour Management and Incident policies..

- CSPE will notify Ofsted/ Care Inspectorate of a serious injury or death to any child in our care or an adult on our premises.
- The premises have a First Aid Box and Accident Report and Accident Procedure
- Where an accident takes place it will be reported in an Accident Report
- The following will be recorded:
 - a) Date, time and location of accident
 - b) Name of the person(s) injured.
 - c) Name(s) of the staff reporting the accident.
 - d) Circumstances of the accident, what the accident was, when it happened and whether any furniture or equipment was involved.
 - e) A description of any injury sustained (type and location). A note should also be made if no visible injury or wound is visible.
 - f) What actions were taken and by whom e.g. First Aid administered.
 - g) The signature of 2 members of staff as witnesses to the event.

- h) The signature of the parent / guardian collecting the child or the signature of the adult to whom the accident happened.
- A copy of the accident report should be given to the parent / guardian of the child involved or to the adult to whom the accident happened.

N.B. If a child has been injured and has permission to leave the centre by themselves and is not being collected by a parent or guardian, a Director will telephone the parent or guardian and notify them of the accident, explaining that it has been recorded in the Accident Report. The staff member should make sure the parent signs the record confirming they have been notified the next time they come to the setting.

If the child has been involved in an accident, and the staff do not feel it is appropriate for the child to leave on their own, they will call the parent/guardian and ask them to collect the child.

An accident report should also be made if a child comes to a centre with an existing injury.

Serious Accidents or those who need **hospitalisation** must be written up and reported centrally to the Head of Ofsted, Safeguarding & Compliance. Records should always be made in pen so they cannot be edited or erased. All Directors are responsible for reporting accidents, diseases and dangerous occurrences (RIDDOR) to HSE and to the enforcing authority, and Ofsted/Care Inspectorate.

7. INCIDENT POLICY

An 'incident' as any incident causing concern for the welfare of staff, a child, parent or visitor that is not accidental. This may or may not have resulted in an injury.

This would include any situation where:

- it is necessary to restrain a child physically due to severe or dangerous behaviour
- an individual attempted to or actually caused deliberate harm to another person
- an individual verbally abuses another person
- a child attempts to escape from the premises
- a child actually escapes from the premises
- a child is removed without authorisation from the centre
- a safeguarding incident
- theft, burglary or vandalism.

CSPE has a commitment to the safety and wellbeing of tutees under the care of CSPE staff. Our Incident Policy is designed to protect the tutees, staff, parents and visitors to CSPE and ensure that any incident is dealt with appropriately.

Where an incident takes place at CSPE premises the situation will be recorded in our Incident Report.

The following details will be recorded:

1. Date and time the incident happened

2. Child's full name and age
3. Full name of the member(s) of staff or others involved
4. An account of the incident from a member of staff and any witnessed
5. An account of the incident from the tutees involved
6. How the incident was handled
7. The outcome of the investigation
8. The signature of 2 members of CSPE staff (1 for the member of staff involved and the other as a witness to the event)
9. The signature of the parent/guardian on collecting the child
10. Whether the incident requires reporting to Social Services or enforcing authorities such as Ofsted/Care Inspectorate

CSPE staff will notify the parent/guardians of the tutees involved in the incident when they come to collect them, or telephone them immediately, depending on the severity of the incident. CSPE staff will review the child's behaviour with the parent and the child and agree the best course of action.

N.B. If the child is leaving our CSPE centre on their own and not being collected by a parent or guardian, one of the Directors will telephone them and notify them of the incident explaining that it has been recorded in the Incident Folder.

Serious incidents must be written up in an Incident Report and reported centrally to the Head of Ofsted, Safeguarding & Compliance. Records should always be made in pen so they cannot be edited or erased.

8. POLICY FOR THE ADMINISTRATION OF MEDICINE/TREATMENT

CSPE is committed to bringing educational opportunities and benefits to as many tutees as possible including those with disabilities, special additional needs, special educational needs, and medical needs.

Whilst CSPE has a **general policy of not administering** any medication to tutees whilst they are on CSPE premises, we recognise that certain tutees, in certain circumstances, might require the administration of a specific medication or treatment in a life-threatening situation. This includes tutees with life threatening allergies. In such situations, a First Aid trained person will administer the necessary medication or treatment. Written permission from the child's parent(s) or guardian(s) must be obtained.

In order to administer the necessary medication or treatment to a child in an emergency or life-threatening situation the parent/guardian must provide:

- A full written description of the medication/treatment needed on the 'Emergency Medication/Treatment Permission Form': type, name and strength of medication, how the medication should be

stored, what dose is required, the time that medication should be administered and any other relevant information.

- **Signed parental consent** on the 'Emergency Medication/ Treatment Permission Form' giving permission to administer the named medication or treatment should the need arise to be stored in the child's file.

- Any medication required as per the child's medical needs, the parent is responsible for providing in-date medication and the disposal of out of date medication.

In addition, should the administration of the named medication/treatment require specific training:

- The parent(s) or guardian(s) should either give CSPE Directors the necessary training or arrange for the necessary training to be given.

- A record of all training events will be kept. It is the parent or guardian's responsibility to ensure that Directors are kept up to date with the relevant training for administering their child's medication or treatment in a life-threatening situation.

- When any new full-time staff joins CSPE the Directors will notify the relevant parent(s) and guardian(s) and arrange for the new member(s) of staff to be appropriately trained.

CSPE will:

- Keep an up-to-date list of tutees with severe allergies or life-threatening medical conditions.

- Ensure the safe storage of such medicines or life-saving equipment in a clean hygienic storage box in the stock room out of reach of tutees. A small fridge can be supplied if medicine requires refrigeration.

- Each medicine is clearly labelled with the child's name and dosage requirements.

- Details describing the administration of medication will be kept in the child's file, and will be referred to before any medication is given.

- Contact the parent(s) or guardian(s) of the child in the event that any life-threatening situation arises.

- Ensure that any medication administered is recorded with the following information:

1. The full name of the child being given the medication.

2. The full name of the staff member administering the medication.

3. A description of what happened.

4. The medication administered: name, strength, dose and time.

5. In addition, a second member of staff should sign the Medication Record as a named witness.

6. The parent(s) or guardian(s) should also sign the record on collecting the child.

CSPE will inform parents of any medication administered to reduce the risk of overdose.

Serious incidents must be written up in an Incident Report and reported centrally to the Head of Ofsted, Safeguarding & Compliance. Records should always be made in pen so they cannot be edited or erased.

9. POLICY FOR THE SAFE STORAGE AND MANAGEMENT OF CONFIDENTIAL DOCUMENTS AND RECORDS

CSPE is committed to the safe storage of records, policies and procedures. This information will be kept at the CSPA premises within the secure cupboard.

CSPE will keep records of the following and retain them for a period of ten years:

- The name, home address and date of birth of each child who attends the premises.
- The name, home address and telephone number of a parent/guardian/carer of each child who attends the premises.
- A daily record of the names of the tutees who attend on the premises and their hours of attendance.
- Accidents which involve the tutees who attend and which occurs on the premises
- Any medicine administered to any child who attends the premises, including the date and circumstances and who administered it, including medicine which the child is permitted to self-administer, together with a record of a parent/guardian/carer's consent.
- The name, home address and telephone number of every person working on the premises
- Incident and Accident Records
- Administration of Medicine Records
- Staff and Visitor Log
- Complaints Records

Tutees' Records:

- All tutees' records comply with the Children's Act 1989 Regulations.
- An electronic database record will be kept
- Are openly shared with the child's parent/guardian and their contribution is valued.

In the event of CSPE as a company ceasing to operate, all records and documentation will become shredded. We will maintain the secure storage of the above records and documentation for the appropriate length of time. All electronic data will be stored in accordance with the GDPR.

While CSPE staff share records and information concerning a child and their family, this information is private and therefore treated with strict confidentiality. On joining CSPE all employees sign a contract of employment and agree to keep all information about a child and their family, other employees and the Company strictly confidential.

Parents are informed of our Confidentiality Policy and Ofsted's/Care Inspectorate's right to inspect our records at any point in the Parents Information Form. They give agreement to this when they sign the GDPR Form.

10. POLICY FOR THE NOTIFICATION OF INFORMATION TO ENFORCING AUTHORITIES

CSPE understands its requirements to comply with Ofsted's Voluntary Childcare Requirements Care Inspectorates Standards. Staff understand they must provide the following information and any changes of circumstance as soon as possible and no later than 14 days after the change occurs:

- A change to the address of the premises where childcare is provided.
- A change in the type of childcare we provide.
- Any change of the Directors or Nominated Person.
- Any change of the Managers or Nominated Person's name, address or telephone number.
- Any significant event which is likely to affect the Managers or Nominated Person's suitability or any person caring for tutees on the premises, such as any offences or orders that may disqualify them.
- Any incident of food poisoning affecting two or more tutees in the provider's care.
- Any serious accident or injury to, or the death of any child while receiving childcare.
- Any serious accident or injury to, or the death of, any other person on the premises on which childcare is provided.
- Any allegation of serious harm to, or abuse of, a child committed by any person looking after tutees at the premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere), or by any person, where the allegation relates to harm or abuse occurring on those premises.

Ofsted and the Care Inspectorate notification forms can be used along with guidance to inform them of such events as detailed above.

11. TUTOR RECRUITMENT PROCESS

CPSE adopt a rigorous recruitment process which will include:

- Application forms
- References
- Interview
- Teaching observation
- Trial period
- Enhanced DBS checks

The purposes of this process being to ensure only the best tutors are recruited and they hold the same professional ethics as our company.

Candidate requirements

The job description and person specification may alter, depending on the company's needs.

Job Description: CSPE Tutors

At CSPE, you will be working as part of a team and we encourage everyone to help in generating a positive, fun and exciting atmosphere where tutees will love to learn.

Specific duties include:

- Tutor tutees and adults with all subjects using engaging teaching methods.
- Effectively tutor up to 4 tutees at a time, ensuring every child gets equal time, attention and quality of teaching.
- Inspire and motivate our members and pass on a genuine enthusiasm for learning, so that they become excited by learning, and adopt a have-a-go attitude to trickier tasks.
- Provide useful feedback about notable successes or problems during a child's session; enabling us to give good quality feedback to their parents.
- Develop a thorough knowledge of the curriculum at CSPE.
- Act as a positive role model to all of our members.
- Support the management of tutees' behaviour in a calm and fair manner.
- Be vigilant regarding the welfare and safety of all tutees and adults at CSPE premises.
- Assist with administrative and maintenance duties as requested by the Centre's Managerial team.
- Maintain high Health and Safety standards within the centre.
- Contribute to CSPE's aims to meet Ofsted/ Care Inspectorate requirements and standards.
- Treat any knowledge of customers' personal details and the internal affairs of CSPE with total confidentiality.
- Publicly represent CSPE in the best possible manner through your personal conduct.

12. WHISTLE BLOWING POLICY

CSPE actively encourages a very open culture within its workplace, which includes a high level of communication between all staff.

If any member of staff is concerned with the working practices of another member of staff, they must report this to a Director as set out in the terms and conditions of their contract of employment.

If you have concerns in connection to safeguarding or regulation, and feel they are not being addressed appropriately you can contact any Director:

CSPE Director Alicia Hampson on: 07747102041 and a.hampson@clearstepsplus.co.uk

CSPE Director Karen Greenwood on: 07788628681 and k.greenwood@clearstepsplus.co.uk

CSPE Director Tyrone McIvor on: 07830775773 and t.mcivor@clearstepsplus.co.uk

13. CSPE LTD COMPLAINTS POLICY

Parents are informed that should they feel at any time that they have reason for complaint or concern regarding the quality of service provision, in the first instance they should speak to one of the Directors.

Any complaint made in writing or made by e-mail that relates to the Requirements of the Voluntary Childcare Register (in England and Wales) or the National Care Standards (in Scotland) will be fully investigated.

Any complaint will be dealt with in full within 28 days of receipt of the written complaint, including a written response which will include an account of the findings of the investigation and any action taken as a result.

CSPE keeps a written record of complaints which includes:

- i. the nature of the complaint,
- ii. the Ofsted requirement it relates to,
- iii. how the complaint was dealt with,
- iv. the outcome of the investigation,
- v. any action taken, and
- vi. whether the parent was given an account of the findings within 28 days of the date on which the complaint was received.

Complaint report summaries (data protected) are available to parents and Ofsted/Care Inspectorate on request.

Complaints records are kept for ten years. If the complainant is not happy with the final decision made they can take their complaint directly to Ofsted or Care Inspectorate(CI).

Complaints made to Ofsted/Care Inspectorate about a provider may be referred to the provider for investigation.

Ofsted Complaints Line: 0300 123 1231 Care Inspectorate Complaints Line: 0131 653 4100

14. CSPE LTD ICT SECURITY MANAGEMENT POLICY

This document sets out CSPE Security Policies governing protection of the confidentiality, integrity and availability of the computer network and its resources.

It establishes the responsibilities for IT security, preserve integrity of the computer network, protect the computer network and its resources, preserve confidentiality and protect assets against unauthorised disclosure.

All staff must consider the sensitivity of the information they handle.

All staff must protect information in proportion to its sensitivity by ensuring that information, whatever its format, is secured by physical means or by using approved electronic means (laptop/tablet-pc)

Network Security

Only CSPE employees, using company laptops/tablets and PCs can connect to the CPSE network. These laptops/tablets and pcs are firstly set-up and managed by the I.T team employed by CSPE (2PLUS1) prior to deployment and use.

Computer Security & Monitoring

- All staff must abide by the rules of **GDPR 2018** and the Data Protection Act and the Computer Misuse Act 1990
- All resources of the company, including computers, email, and voicemail are provided for legitimate use. If there are occasions where it is deemed necessary to examine data beyond that of the normal business activity of the company then, at any time and without prior notice, the company maintains the right to examine any systems and inspect and review all data recorded in those systems. This will be undertaken by authorised staff only. Any information stored on a computer, whether the information is contained on a hard drive, USB pen or in any other manner may be subject to scrutiny by the company. This examination helps ensure compliance with internal policies and the law. It supports the performance of internal investigations and assists in the management of information systems.
- Storage of data on PC or Laptops C: drive is discouraged and all users are requested not to store files on PC or Laptops C:\drives because in the event of failure, all data stored on the C: drive would be lost as it not backed up. PLEASE ensure that data is saved on the NEXT cloud provided by 2Plus1.
- All information related to company business is to be stored on CSPE NEXT Cloud and encryption / data protection is outlined in the section below outlining the contractual agreement between CSPE and 2Plus1. This is a secure storage area which is regularly backed up and is therefore resilient to failure.

- Storage of any paper-based data will be held in a locked filing cabinet in a locked cupboard within the premises. The premises will be armed with an intruder alarm that will text message directors if there is a breach of security.

Wireless Security

All employees who log into the CSPE network via access points or more commonly known as WIFI, will be presented with a password prompt which is governed by the 802.11 authentication protocol. The network is secure and uses industry standard encryption to manage the passwords.

Limited access is available to guests, who are also presented with a SSID (network name – Service Set Identifier). MAC addresses (media access control) are unique to each machine or mobile device that connects to the network, are also retained for security and monitoring movements around the network.

Email use and Security

Emails sent or received on the hosted email system, Office 365 (Microsoft), form part of the official records of the company. CSPE does not recognise any right of employees to impose restrictions on disclosure of emails within the system.

When using emails, employees must: ensure they do not disrupt the wider IT systems or cause an increase for significant resource demand in storage, capacity, speed or system performance e.g. by sending large attachment to a large number of internal recipients (currently set to 25MB), and bring it into disrepute, incur liability on the part company or adversely impact on its image.

Employees must not seek to gain access to restricted areas of the network or other “hacking activities” is strictly forbidden must not use email for the creation, retention or distribution of disruptive or offensive messages, images, materials or software that include offensive or abusive comments about ethnicity or nationality, gender, disabilities, age, sexual orientation, appearance, religious beliefs and practices, political beliefs or social background. Employees who receive emails with this content from other employees, should report the matter to their line manager or supervisor not send email messages that might reasonably be considered by recipients to be bullying, harassing, abusive, malicious, discriminatory, defamatory, and libellous or contain illegal or offensive material, or foul language, not upload, download, use, retain, distribute, or disseminate any images, text, materials, or software which might reasonably be considered indecent, obscene, pornographic, or illegal.

Employees must not engage in activities that serve to deny service to other users be outside of the scope of normal work-related duties – for example, unauthorised selling/advertising of goods and services affect or have the potential to affect the performance of damage or overload the company system, network, and/or external communications in any way be a breach of software licence.

Staff who receive improper emails from individuals inside or outside the Company, should discuss the matter in the first instance with the Directors.

As part of the email security filters, we also utilise Barracuda network security, which scans incoming and outbound emails for viruses, Trojans, and network threats and vulnerabilities.

Passwords

Passwords should not be written down or given to others to use under any circumstances, and for individual use only.

Passwords must be a minimum of 7 case sensitive characters and should be a combination of upper/lower/numeric/special characters. Ideally Passwords should also contain random characters such as #@?!\$& etc.

Passwords must be changed every 90 days as a minimum. If a Director needs access to your computer, for example if you are off sick, they must contact the I.T support to request managerial access to your computer.

Viruses

ESET NOD32 anti-virus protection is installed on all laptop/pc/servers throughout the entire CSPE networked environment. This is provided by 2Plus1

Telephone & Mobile

All CSPE smartphones setup with work email accounts and/or internet based access to company data must be protected with four-digit security passcode. Mobile phones may not be used to store and/or transmit personal data for which are company sensitive, with the exception of email.

Telephones are provided primarily for business use in order to assist staff in carrying out official company business. Company landlines and mobile phones must not be used for any secondary business purpose.

Use of Next Cloud and Deslock

CSPE's requirements:

- Central location for shared data with regular back up
- Secure storage of personal data
- Offline access to data

Implementation of Next Cloud and Deslock

With regard to the above requirements 2Plus1 have provided the product Nextcloud (cloud storage) which satisfies shared access that is secure and backed up regularly.

The devices that data could potentially be held on need to be addressed as cloud storage doesn't mean data is only held in the cloud as this would prohibit offline access to the data, instead data is kept in sync with a central server where all clients and server all have a copy of the data.

This means that the PCs that have the data synced to them have the potential to leak data if they were stolen or lost. This risk is easily mitigated through the use of encryption software which makes the devices storage (hard drive) unreadable to anyone without the correct credentials (user name

and password). A windows password is unsecure as a drive can just be read by another computer system but if the data is encrypted it cannot be read. Deslock encryption software has therefore been installed on all CSPE PCs and Laptops as it provides maximum protection with minimal disruption to ease of use of a computer system.

Data Processing agreement with 2plus1.com PC Services Ltd agreed 29/11/18.