



CENTRE HANDBOOK

January 2026



PURPOSE OF THE CENTRE HANDBOOK

This Centre Handbook aims to provide information on the policies, procedures, and guidelines at Aletheia Academy. It applies to all staff (teaching and non-teaching), students, parents, guardians, visitors, volunteers, and contractors associated with the Centre.

The Centre reserves the right to add new policies and procedures or amend existing ones to reflect changes in legislation, regulatory guidance, or organisational needs. Where any changes affect the contractual terms and conditions of staff, the Centre will consult with affected employees and provide reasonable written notice before any changes take effect. Staff will be informed of all changes in writing.

Every parent, carer, staff member, and student is responsible for reading and understanding this Handbook. We recognise, however, that no handbook can answer every question. If you do not find an answer to your particular question in this Handbook, or if you would like a particular policy or procedure clarified, please feel free to contact the Centre Manager.

This Handbook should be read in conjunction with individual contracts of employment (for staff) and the Terms and Conditions of Enrolment (for parents/guardians).

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1.0 ABOUT ALETHEIA ACADEMY

MISSION

Aletheia Academy is an after-school, supplemental childcare provision service with a challenging and inspiring mission to improve and enrich its students' academic prospects through targeted, focused, and personalised tutoring. Our main aim is to provide your child with a safe, caring, and educational environment in order to help improve their life chances and academic levels.

We believe that children need a formidable foundation in literacy, numeracy, and science to help them excel in other areas of their lives, and it is our firm belief that all young children have academic abilities — therefore, we provide the right opportunities for them to apply their knowledge and personalise learning so that every child is given the opportunity to reach their full potential. We understand that a child's ability can blossom with the right support and encouragement, and we exist to reinforce teaching and learning given in KS1, 2, 3, 4, and 5, with our unique understanding of the national curriculum for schools being the driving force behind our success.

Beyond this, we also provide a consultation service for those children who are at a strong Level 5 and have an aptitude to read courses tailored for grammar school examinations. If you are looking for an institute that will guide you and your child through 11+ preparation, GCSE, and A Level study, then we are here for you!

VALUES

1. **Excellence in Learning:** Providing a learning environment where each child is encouraged to develop to the full extent of their ability; where each person is valued and is made aware that they have the potential to make a positive contribution to the Centre; where students are supported to build confidence and a positive self-image.
2. **Maximising Opportunity:** Creating opportunities for all children to learn and achieve through our teaching by utilising all the time we have with our students to teach, assess, and advise.
3. **Whole-Child Development:** Providing an education which places importance on the development of the whole child — academically, intellectually, physically, emotionally, and socially.
4. **Partnership with Parents:** Encouraging the partnership between home and school and encouraging parents to take an active part in their child's education.
5. **Equality and Fairness:** Providing equal opportunities at the Centre and treating all individuals fairly and with dignity, regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation, in accordance with the Equality Act 2010.
6. **Safeguarding:** Ensuring the safety, welfare, and protection of all children and young people in our care is our paramount concern and a core organisational commitment shared by all staff.
7. **Technology-Enhanced Learning:** Using appropriate technology to enhance the children's learning in a safe and responsible manner.

8. Accessibility and Inclusion: Making reasonable adjustments to ensure that students and staff with disabilities or additional needs can fully participate in the life of the Centre.

APPROACH

We use our own materials and those of well-known publishers to support teaching from the National Numeracy, Literacy, and Science Curriculum and to reinforce problem-solving and reasoning skills.

Students sit mock exams at the Centre under normal examination conditions. We prepare them for their real exams and help them develop coping strategies under examination conditions.

Our targeted tutoring has helped many children gain admission into Grammar and other Selective Schools and many more have boosted their National Curriculum levels as well as made notable improvements in their respective classes, which have culminated in successful GCSE and A-level results.

We have mentored many students and liaised with countless parents, offering free advice on the choice of subjects or schools for their children. Furthermore, we have provided many one-to-one free sessions for parents who want to understand the national curriculum levelling and its implications for their children's future academic life.

2.0 RIGHTS AND OBLIGATIONS OF ALETHEIA ACADEMY

Whilst Aletheia Academy offers to provide high-quality tuition to enhance the performance of its students in their regular schools and at various examinations, the Centre does not guarantee specific grades a child can achieve in any examination. The Centre will, however, provide services with reasonable care and skill in accordance with the Consumer Rights Act 2015.

Aletheia Academy has the right to:

Fix and alter lesson sessions and times, giving a minimum of 14 days' written notice to parents/guardians (except in emergencies, such as adverse weather or building safety issues, where shorter notice may be given).

Increase tuition fees, giving a minimum of one month's written notice to parents/guardians before any increase takes effect.

Discipline a student for misbehaviour or gross misconduct according to the Centre's disciplinary procedures, with due regard to the student's individual circumstances and any special educational needs or disabilities.

Withdraw a student for gross misconduct according to the Centre's disciplinary procedures and the Centre's conditions for parents, following a fair process that allows parents/guardians to make representations.

Reschedule lessons due to adverse weather or other conditions that could jeopardise the health and safety of students, staff, or visitors.

Refuse admission to any person whose behaviour poses a risk to the safety or well-being of students, staff, or other Centre users.

Aletheia Academy has the obligation to:

Provide tuition services with reasonable care and skill.

Employ suitably qualified, experienced, and vetted staff (including Enhanced DBS checks with children's barred list checks).

Maintain a safe, clean, and well-equipped learning environment.

Comply with all applicable UK legislation, including employment law, health and safety law, safeguarding legislation, equality legislation, data protection law, and consumer protection law.

Treat all students, parents, and staff fairly and without unlawful discrimination.

Make reasonable adjustments for students and staff with disabilities or additional needs.

Provide a clear complaints procedure and respond to complaints promptly and fairly.

Issue receipts for all payments received.

Protect the personal data of students, parents, and staff in accordance with the Data Protection Act 2018 and UK GDPR.

Maintain appropriate insurance, including public liability and employer's liability insurance.

Ensure all staff receive regular training in safeguarding, health and safety, data protection, equality and diversity, and Prevent duty.

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3.0 RIGHTS AND OBLIGATIONS OF PARENTS AND GUARDIANS**Rights**

Parents and Guardians have the following rights:

The right to know how their child is performing and to receive regular progress reports.

The right to be informed promptly of any problems or concerns relating to their child's learning, behaviour, or wellbeing.

The right to be informed immediately if their child is injured at the Centre.

The right to complain if they have concerns about any aspect of the Centre's services, including the standard of teaching, through the Centre's Complaints Procedure (Section 24.0).

The right to withdraw their child after giving one month's written notice to the Centre (Section 26.0).

The right to access their child's personal data held by the Centre, and to exercise other data subject rights, in accordance with the Data Protection Act 2018 and UK GDPR (Section 15.0).

The right to be informed of the Centre's safeguarding policies and procedures and to know who the Designated Safeguarding Lead is.

The right to request reasonable adjustments for their child if they have a disability or special educational need (Section 23.0).

The right to a clear, transparent, and fair fee structure and to receive receipts for all payments.

Obligations

Parents' and guardians' involvement and cooperation in the development of their children is vital. Parents and Guardians are expected to:

Disclose any health condition, disability, special educational need, or allergy pertaining to the child at admission (on the student profile), where this information is relevant to the child's safety, wellbeing, or learning needs at the Centre. Any changes in the state of the child's health or needs should be reported to the Centre and updated on the student profile. This information will be processed as special category data in accordance with the Data Protection Act 2018 and UK GDPR, treated as strictly confidential, and shared only on a need-to-know basis with relevant staff (see Section 15.0).

Conduct themselves in a lawful, ethical, safe, and responsible manner that recognises and respects the rights of other parents, students, and staff.

Show an active interest in their child's schooling and progress.

Cooperate with the Centre to achieve the best outcomes for their child or children.

Support the Centre staff in maintaining a safe and respectful learning environment for all students.

Initiate and maintain constructive communication and relationships with Centre staff regarding their child's learning, wellbeing, and behaviour.

Contribute positively to behaviour support plans that concern their child or children.

Show respect and courtesy to the Centre staff, other parents, and other students at all times, including respect for the Centre's property. Parents, guardians, and students alike are expected to behave in a manner that does not constitute harassment, intimidation, threats, or violence towards any person at the Centre.

Positively reinforce their children and show an interest in their learning at home.

Desist from harassing, victimising, or discriminating against other parents, students, or Centre staff on any grounds, including the protected characteristics set out in the Equality Act 2010: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race (including colour, nationality, ethnic or national origins); religion or belief; sex; and sexual orientation.

Comply with the Centre's data protection, photography, and safeguarding policies.

Ensure that contact details provided to the Centre are kept up to date.

Inform the Centre of any court orders, custody arrangements, or legal restrictions that may affect who may collect the child or have contact with the child.

4.0 TEACHERS AND STAFF CODE OF CONDUCT

CONDUCT

All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of students. They should adopt high standards of personal conduct in order to maintain the confidence and respect of their peers, students, parents, and the public in general. A staff member's behaviour, either in or out of Aletheia Academy, should not compromise their position within the work setting or bring the Centre into disrepute.

All staff must read and comply with this Code of Conduct, the Centre's safeguarding policies, and all relevant legislation. Breach of this Code may result in disciplinary action up to and including dismissal.

Teachers and staff are expected to:

Have high expectations of all pupils; respect their social, cultural, religious, and ethnic backgrounds; and be committed to their academic achievement.

Be guided by the fact that through their teaching, they are providing opportunities for students and pupils to learn and achieve and therefore should wisely utilise the time with students to teach, assess, and advise.

Be driven to make a positive impact on students' academic life.

Provide the support and encouragement needed for students' progress, making reasonable adjustments for students with disabilities or special educational needs.

Be regular and punctual, and be present in the designated classroom at least 10 minutes before the scheduled teaching time.

Be professional and minimise private discussions with others when on duty.

Abstain from making calls and text messages, or using personal phones, in the presence of the students, unless in an emergency.

Maintain appropriate professional boundaries with students at all times. Staff must not engage in any form of inappropriate physical contact with students. Staff must not develop or pursue any personal, non-academic relationship with any student. Staff must not exchange personal contact details (including social media) with students. Staff must not be alone with a student behind a closed door wherever possible.

Physical contact: Physical contact with students should be avoided except where it is necessary and appropriate, such as administering first aid, preventing a student from harming themselves or others (reasonable force), or guiding a young child in an emergency such as a fire evacuation.

Where physical contact is necessary, it should be proportionate, brief, and in the presence of another adult wherever possible. All instances of physical contact (other than routine first aid) must be recorded and reported to the Centre Manager and the Designated Safeguarding Lead.

Desist from eating while teaching, as this is unprofessional and not permitted.

Report any safeguarding concerns about a child to the Designated Safeguarding Lead immediately, in accordance with the Centre's Safeguarding and Child Protection Policy (Section 8.0).

Report any concerns about the conduct of another member of staff (including low-level concerns) to the Centre Manager or the Designated Safeguarding Lead, in accordance with the Centre's Safeguarding Policy and Whistleblowing Policy (Section 19.0).

ABSENCE

Planned absence: Staff should seek authorised absence from the Centre Manager, giving at least two weeks' notice wherever possible.

Emergency absence: In emergency cases, staff should telephone the Centre as soon as reasonably practicable to inform them of the emergency.

Statutory rights to time off: The Centre recognises that staff have statutory rights to time off which may not be subject to the two-week notice requirement, including but not limited to:

Time off for dependants (Emergency leave): All employees have a statutory right under section 57A of the Employment Rights Act 1996 to take reasonable unpaid time off to deal with an emergency involving a dependant (for example, a dependant falls ill, is injured, gives birth, or is affected by unexpected disruption to care arrangements). No advance notice is required — the employee should inform the Centre as soon as reasonably practicable.

Carer's Leave: Under the Carer's Leave Act 2023 (in force from 6 April 2024), employees with caring responsibilities for a dependant with a long-term care need are entitled to one week's unpaid leave per year. This is a day-one right. Employees should give notice as specified in the Centre's Carer's Leave procedure.

Parental Bereavement Leave: Under the Parental Bereavement (Leave and Pay) Act 2018 (Jack's Law), employees who lose a child under the age of 18 (or suffer a stillbirth after 24 weeks of pregnancy) are entitled to two weeks' leave. This is a day-one right.

Maternity, paternity, adoption, and shared parental leave: Staff are entitled to statutory leave in accordance with the relevant legislation. Details are set out in the Centre's Family Leave Policy or will be provided on request.

Jury service and other statutory time off: Staff called for jury service or other statutory duties must inform the Centre Manager as soon as possible.

DBS CHECKS AND PRE-EMPLOYMENT VETTING

All staff (including teachers, administrative staff, volunteers, and contractors) who have regular contact with children must hold a current Enhanced Disclosure and Barring Service (DBS) check with a children's barred list check before commencing work at the Centre.

The Centre maintains a Single Central Record (SCR) of all pre-employment checks carried out on staff, in accordance with Keeping Children Safe in Education (KCSiE) 2024.

Pre-employment checks include: Enhanced DBS check with barred list check; verification of identity; verification of right to work in the UK; verification of qualifications; references (a minimum of two, including from the most recent employer); assessment of suitability to work with children; where applicable, prohibition checks (for teaching staff); and where applicable, overseas criminal record checks (for staff who have lived abroad).

Staff have a duty to inform the Centre Manager immediately if they are arrested, charged with, cautioned for, or convicted of any criminal offence, or if there are any changes to their circumstances that may affect their suitability to work with children.

MANDATORY TRAINING

All staff are required to complete the following training before commencing work and on a regular basis thereafter: safeguarding and child protection (including reading Part 1 of Keeping Children Safe in Education 2024, or Annex A); Prevent Duty awareness training; health and safety induction; data protection and UK GDPR awareness; equality, diversity, and inclusion awareness; first aid (designated first aiders); and fire safety awareness.

Records of all training undertaken by staff will be maintained by the Centre Manager.

DRESS CODE

Whilst a person's dress and appearance are matters of personal choice and self-expression, staff should recognise that they are role models to the children and their choice of dress should uphold the Centre's expectations.

Staff must ensure they are dressed decently, safely, and appropriately for the tasks they undertake. Those who dress or appear in a manner which could be considered inappropriate could render themselves vulnerable to criticism or allegations of misconduct.

The dress code will be applied fairly and consistently in compliance with the Equality Act 2010. Reasonable adjustments and accommodations will be made for religious or cultural dress, disability-related needs, and gender identity. If a member of staff has any concerns about how the dress code applies to them, they should discuss this with the Centre Manager in confidence.

MATERIALS

Personal property of a sexually explicit nature — such as books, magazines, DVDs, or such material on any electronic media — must not be brought onto or stored at the Centre premises. This includes material stored on personal devices that are brought onto the premises.

Staff must not post material online (including on social media, blogs, or messaging platforms) which damages the reputation of the Centre; causes concern about their suitability to work with children and young people; identifies students or shares personal information about students or families; or could be considered discriminatory, harassing, or offensive.

Those who post material which could be considered inappropriate could render themselves vulnerable to criticism, allegations of misconduct, or disciplinary action up to and including dismissal.

Note: This provision does not prevent staff from making a qualifying disclosure (whistleblowing) in accordance with the Public Interest Disclosure Act 1998 and the Centre's Whistleblowing Policy (Section 19.0).

5.0 EXPECTED PARENTS AND GUARDIANS' BEHAVIOUR

CONDUCT AT THE CENTRE

Parents and guardians are expected to behave in a respectful, courteous, and non-threatening manner towards all staff, students, and other parents at the Centre at all times. The Centre will not tolerate aggressive, abusive, or threatening behaviour (verbal or physical); harassment, intimidation, or victimisation; discriminatory language or conduct; damage to Centre property; use of alcohol or drugs on the premises; or smoking or vaping on the premises or within the Centre grounds.

Any parent or guardian who behaves in an unacceptable manner may be asked to leave the premises and, in serious or persistent cases, may be banned from the Centre. The Centre reserves the right to report criminal behaviour to the police.

Parents must inform the Centre if a student is absent from tuition by 3pm on the day of tuition, giving a reason for the absence.

Parents and Guardians are restricted to the reception area at the Centre or the admin office. They are not permitted to enter classrooms except by permission from reception or admin staff. This restriction exists for safeguarding purposes.

Parents and Guardians are reminded to meet with teachers in the admin area and not in lesson rooms. Parents requiring a private consultation can arrange that with the Centre Manager.

Parents, Guardians, and students are required to act safely so that they do not put themselves or others at risk.

Children should be reminded by parents that inappropriate physical contact with other children or adults is not acceptable within the premises.

SUBSCRIPTION FEES

Subscription fees have been fixed per calendar month. Parents are required to pay for a full month in advance on the first day of tuition and then every month on the same date.

The tuition centre is open 45 weeks a year. We are closed for the 3 half-term weeks, 2 weeks of the Christmas, Easter and Summer holidays plus additional weeks. We have factored in the closure periods (including school holidays and bank holidays) throughout the year to reflect in the monthly subscription fee.

Six of the 45 weeks are designated for mock examinations instead of tuition.

There are no concessions on fees during half term or for the 6 weeks of mock examinations a year.

During the month of Ramadan, tuition takes place over the weekend for up to five weeks. Schedule changes will be communicated to all parents with a minimum of 14 days' notice.

During the month of August, tuition takes place from 10am to 5pm Monday to Wednesday.

Payment methods: The Centre accepts payment by card payment (through our card terminal), bank transfer into our designated account. The Centre does not accept payment by cheque.

Receipts: A receipt will be issued for every payment received, regardless of payment method.

Refund Policy: If the Centre cancels a session and is unable to reschedule it, parents will be offered either a credit against the following month's fees or a pro-rata refund for the session or sessions not delivered. In the event of a dispute about fees or refunds, parents should raise this through the Complaints Procedure (Section 24.0).

Fee increases: The Centre will provide a minimum of one month's written notice before any fee increase takes effect. Fee increases will normally take effect from the start of a new academic term.

DROPPING OFF AND COLLECTING CHILDREN

It is the responsibility of parents and guardians to bring their children to the Centre at the beginning of each day's session and collect them promptly at the close of lessons.

Only authorised persons will be allowed to drop off and collect children. Parents are required to provide the Centre with a list of authorised adults who may collect their child; notify the Centre Manager in advance if an adult not on the authorised list will be collecting their child; and inform the Centre of any court orders, custody arrangements, or other legal restrictions on who may collect the child.

The Centre will not release a child to any unauthorised person. If there is any doubt about the identity or authorisation of a person attempting to collect a child, the Centre will contact the parent or guardian to verify before releasing the child.

Late collection: Students will be allowed to wait to be collected for up to 15 minutes after their lesson. Beyond that, the Centre will attempt to contact the parent or guardian and authorised emergency contacts. A late collection charge of ten pounds for each 15-minute period (or part thereof) may be applied. This charge reflects the additional staffing costs incurred by the Centre in supervising students beyond normal hours. If a child has not been collected within 60 minutes of the end of their lesson and the Centre is unable to contact any authorised person, the Centre may contact Children's Social Care and/or the police.

Parents who experience regular difficulties with collection times are encouraged to discuss this with the Centre Manager so that we can work together to find a solution.

6.0 EXPECTED STUDENTS' BEHAVIOUR

Whilst it is not possible to lay down an exhaustive set of standards, detailed below are general standards which, if broken, could result in action being taken in accordance with the Centre's behaviour management procedures.

CONDUCT AT THE CENTRE

Students are expected to:

Behave in a sensible, respectful, and considerate manner at all times at the Centre.

Treat fellow students, Centre staff, and visitors with respect at all times and be considerate of their rights and interests.

Desist from harassing, victimising, bullying, or discriminating against another student, staff member, or any person at the Centre on any grounds, including the protected characteristics set out in the Equality Act 2010: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race (including colour, nationality, ethnic or national origins); religion or belief; sex; and sexual orientation.

Desist from spitting or dropping chewing gum inappropriately at the Centre.

Only behave in ways which do not adversely affect the reputation of the Centre.

Behave in a manner that respects the rights of others, including the right to learn in a safe and supportive environment.

Cooperate with staff and others in authority at the Centre.

Be appropriately dressed at all times.

Refrain from taking part in any illegal activity.

Desist from using rude, foul, abusive, or discriminatory language at the Centre.

Desist from any form of bullying, including cyberbullying (sending hurtful, threatening, or inappropriate messages via text, email, social media, or any other electronic means).

Not bring any prohibited items to the Centre, including weapons, alcohol, tobacco, e-cigarettes or vapes, illegal drugs, or any other dangerous or inappropriate items.

STUDENTS' ACADEMIC CONDUCT

Students are expected to:

Be regular and punctual to all lessons.

Ensure that homework is submitted at the next lesson.

Submit to any test or examination at the Centre with or without notice.

Work hard and complete all assignments within specified deadlines.

Seek help from their lesson tutors when required.

Take personal responsibility for their own learning and make active use of Centre resources.

Promptly submit to their parents or guardians progress records that will be given to them at the Centre.

STUDENTS' CONDUCT IN THE CLASSROOM

The following rules apply to all students during lessons:

Mobile phones must not be charged or used during lessons. Phones should be switched off or placed on silent and stored in bags.

Food and drinks (other than water) are not allowed in the classroom during lesson time.

Students are required to dispose of their waste in bins provided in the classrooms.

Littering or chewing gum is not allowed during lessons.

Eating is not permitted during lessons. Students will have the opportunity to eat during designated break times.

Students may drink only water in class with permission from the teacher.

Students should not behave in disruptive, aggressive, intimidating, or unruly ways.

Students should not disrupt or interfere with the learning of fellow students.

Students should not misuse Centre property, resources, or equipment.

Students are prohibited from making or sending annoying, obscene, malicious, or indecent telephone calls, letters, SMS messages, text messages, or emails.

REASONABLE ADJUSTMENTS FOR STUDENTS WITH SEND

The Centre recognises that some students have special educational needs and/or disabilities (SEND) that may affect their behaviour. Behaviour expectations will be applied with due regard to any SEND or disability, and reasonable adjustments will be made where appropriate, in accordance with the Equality Act 2010 and the Centre's SEND Policy (Section 23.0).

Where a student's behaviour is related to their disability or additional needs, the Centre will work with parents and guardians to develop an individual behaviour support plan before applying sanctions.

BEHAVIOUR MANAGEMENT AND CONSEQUENCES

The Centre operates a staged approach to managing student behaviour:

Stage 1 — Verbal warning: The teacher will speak to the student about their behaviour and explain what is expected.

Stage 2 — Recorded verbal warning: The behaviour will be recorded and the parent or guardian will be informed.

Stage 3 — Meeting with parents or guardians: The Centre Manager will arrange a meeting with the student's parent or guardian to discuss the behaviour and agree an action plan.

Stage 4 — Withdrawal of place (exclusion): In cases of gross misconduct or where the student's continued presence poses a serious risk to the safety or wellbeing of others, the Centre may permanently withdraw the student's place. Before doing so, the Centre will inform the parent or guardian of the allegations and evidence in writing; give the parent or guardian the opportunity to make representations (in writing or at a meeting); consider any mitigating circumstances, including SEND; and provide a written decision with reasons.

Parents and guardians have the right to appeal a decision to withdraw a student's place (see Complaints Procedure, Section 24.0).

EXAMPLES OF GROSS MISCONDUCT (Students)

The following are examples of behaviour that may constitute gross misconduct and may result in immediate suspension or withdrawal of place: physical violence or assault against another person; bringing weapons, drugs, alcohol, or other prohibited items to the Centre; serious bullying or harassment (including online); sexual violence or sexual harassment; deliberate damage to Centre property; theft; discriminatory abuse (based on any protected characteristic); and any behaviour that puts others at serious risk of harm.

This list is not exhaustive. Individual circumstances will be considered in all cases.

7.0 HEALTH AND SAFETY

POLICY STATEMENT

It is the policy of Aletheia Academy to protect all persons — including students, staff, parents, visitors, volunteers, contractors, and members of the public — from potential injury and damage to their health which might arise at the Centre.

Aletheia Academy will provide and maintain safe working conditions, equipment, and systems of work for all staff; provide such information, training, and supervision as is needed for this purpose; give a high level of commitment to health and safety; and comply with all statutory requirements.

LEGAL FRAMEWORK

This policy is informed by and complies with the following legislation:

Health and Safety at Work etc. Act 1974

Management of Health and Safety at Work Regulations 1999

Workplace (Health, Safety and Welfare) Regulations 1992

Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)

Regulatory Reform (Fire Safety) Order 2005

Health and Safety (First-Aid) Regulations 1981

Control of Substances Hazardous to Health Regulations 2002 (COSHH)

Health Act 2006 (smoke-free legislation)

RESPONSIBILITIES

Centre Manager: Overall responsibility for health and safety at the Centre. Ensuring risk assessments are carried out, reviewed, and actioned. Ensuring staff receive health and safety training. Reporting incidents under RIDDOR where required.

All Staff: Observing all safety requirements. Reporting any unsafe or hazardous conditions immediately to the Centre Manager. Cooperating with health and safety arrangements. Not interfering with or misusing anything provided in the interests of health and safety.

Students, Parents, Visitors: Acting safely and responsibly at the Centre. Following instructions from staff regarding safety. Reporting hazards or concerns to staff.

RISK ASSESSMENTS

The Centre conducts suitable and sufficient risk assessments of all areas and activities, as required by the Management of Health and Safety at Work Regulations 1999. Risk assessments are carried out by the Centre Manager (or a competent person); reviewed at least annually, and following any incident, change of activity, or change of premises; and available for review upon request.

FIRST AID

The Centre maintains first-aid equipment in accessible locations. There are dedicated First Aiders on site.

All accidents, injuries, and near misses must be recorded in the First AID log available online.

Where an accident, injury, or dangerous occurrence is reportable under RIDDOR, the Centre Manager will notify the Health and Safety Executive (HSE) as required by law.

Parents will be informed immediately if their child is injured at the Centre.

FIRE SAFETY

The Centre complies with the Regulatory Reform (Fire Safety) Order 2005. The Centre Manager is the designated Responsible Person for fire safety.

The Centre has a current fire risk assessment, which is reviewed at least annually; appropriate fire detection and alarm systems, which are tested weekly; fire extinguishers, which are inspected and maintained annually; clearly marked fire escape routes and emergency exits; a designated fire assembly point; and fire wardens.

In the event of a fire or fire alarm activation, all persons should exit the building immediately via the nearest safe exit and proceed to the designated assembly point. Staff will take registers to account for all students. Unless specifically designated and trained, no one should attempt to extinguish any fire. Trained staff may use fire extinguishers only where it is safe to do so. The emergency services should be called immediately (999). No one should re-enter the building until the Centre Manager or fire service has confirmed it is safe to do so.

HYGIENE AND INFECTIOUS ILLNESS

Contact with any person suffering from an infectious or contagious disease must be reported before commencing work. Anyone suffering from an infectious or contagious disease or illness (such as rubella, hepatitis, COVID-19, or similar) must not attend the Centre without medical clearance. Any exposed cut or burn must be covered with a first-aid dressing. Staff and students should wash hands regularly, particularly after using the toilet, before handling food, and after coughing or sneezing. The Centre will follow current public health guidance (such as UK Health Security Agency guidance) on managing infectious diseases.

Note: The Centre recognises that some health conditions are protected as disabilities under the Equality Act 2010. Health information will be handled sensitively and in accordance with the Data Protection Act 2018 and UK GDPR (see Section 15.0).

SMOKING AND VAPING

Smoking (including the use of e-cigarettes and vaping devices) inside Aletheia Academy or anywhere on the Centre grounds is prohibited, in accordance with the Health Act 2006 and the Smoke-free (Premises and Enforcement) Regulations 2006. The appropriate no-smoking notices are displayed in accordance with legislation. Staff, students, parents, guardians, visitors, and contractors are not permitted to smoke or vape in or around the Centre.

LONE WORKING

Staff should not normally work alone at the Centre. Where lone working is unavoidable, a lone working risk assessment must be carried out, and the Centre Manager must be informed. Lone workers should have access to a telephone and should inform a designated person of their whereabouts and expected departure time.

8.0 SAFEGUARDING AND CHILD PROTECTION POLICY

POLICY STATEMENT

Aletheia Academy is committed to providing a safe and secure environment for all children and young people in our care. Safeguarding is everyone's responsibility. All adults at Aletheia Academy — including staff, volunteers, contractors, and visitors — have a duty to safeguard and promote the welfare of children.

The Centre recognises that the welfare of the child is paramount; that all children, regardless of age, gender, ability, culture, race, language, religion, or sexual identity, have a right to equal protection from harm; that all staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm; and that students and staff who are involved in child protection issues will receive appropriate support.

LEGAL FRAMEWORK

This policy is informed by and complies with the following legislation and statutory guidance:

Children Act 1989 and Children Act 2004

Keeping Children Safe in Education (KCSiE), DfE — September 2024 (current edition)

Working Together to Safeguard Children, HM Government — December 2023 (current edition)

The Prevent Duty, Counter-Terrorism and Security Act 2015

Prevent Duty Guidance: England and Wales (2023 update)

Sexual Offences Act 2003

Female Genital Mutilation Act 2003

Serious Crime Act 2015

Safeguarding Vulnerable Groups Act 2006

Protection of Freedoms Act 2012

Data Protection Act 2018 and UK GDPR (in the context of information sharing)

Equality Act 2010

Online Safety Act 2023

Domestic Abuse Act 2021

All staff are required to have read and understood Part 1 of Keeping Children Safe in Education (September 2024) (or Annex A, which is a condensed version for those staff who do not work directly with children). Confirmation of this will be recorded.

DESIGNATED SAFEGUARDING LEAD (DSL)

The Centre has appointed a Designated Safeguarding Lead (DSL) who has overall responsibility for safeguarding and child protection at the Centre.

The DSL is responsible for receiving and managing all safeguarding concerns and referrals; making referrals to Children's Social Care, the police, and other agencies as appropriate; liaising with the local authority and local safeguarding partners; ensuring all staff receive appropriate safeguarding training; maintaining safeguarding records securely; and promoting a culture of safeguarding throughout the Centre.

TYPES OF ABUSE AND NEGLECT

All staff should be aware of the indicators of abuse and neglect, which include (but are not limited to):

Physical abuse: Hitting, shaking, throwing, poisoning, burning, drowning, suffocating, or otherwise causing physical harm.

Emotional abuse: Persistent emotional maltreatment causing severe and adverse effects on a child's emotional development.

Sexual abuse: Forcing or enticing a child to take part in sexual activities, including non-contact activities such as online sexual abuse.

Neglect: Persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of health or development.

CHILD-ON-CHILD ABUSE

The Centre recognises that children can abuse other children (child-on-child abuse). This may include, but is not limited to, bullying (including cyberbullying, prejudice-based, and discriminatory bullying); physical abuse; sexual violence and sexual harassment; sharing of nudes and semi-nudes (sexting); initiation or hazing-type violence and rituals; and upskirting (a criminal offence under the Voyeurism (Offences) Act 2019).

The Centre takes a zero-tolerance approach to child-on-child abuse. All concerns will be taken seriously, investigated, and dealt with in accordance with this policy. The fact that both the victim and the perpetrator are children does not diminish the seriousness of the concern. Both the victim and the alleged perpetrator will be supported.

CHILDREN WITH SEND

The Centre recognises that children with special educational needs and/or disabilities (SEND) are particularly vulnerable to abuse and may face additional barriers to disclosing abuse, including communication difficulties; assumptions that indicators of abuse relate to the child's disability; being more prone to peer isolation; and dependency on adults for personal care.

Staff should be particularly alert to safeguarding concerns involving children with SEND and should apply the same vigilance and reporting procedures.

ONLINE SAFETY

The Centre recognises the growing risks to children from online activity. Online safety is a key part of safeguarding. The Centre will ensure appropriate filtering and monitoring systems are in place on all Centre IT systems and devices, in accordance with KCSiE 2024; educate students about staying safe online, in an age-appropriate manner; ensure staff are aware of the risks of online abuse, including grooming, exploitation, and the sharing of inappropriate content; and report any concerns about online activity to the DSL.

See also Section 12.0 (Internet Use and Electronic Communication) and Section 13.0 (Social Media Policy).

LOW-LEVEL CONCERNS ABOUT STAFF

The Centre has a clear procedure for recording and responding to low-level concerns about staff behaviour, in accordance with KCSiE 2024.

A low-level concern is a concern that an adult working in or on behalf of the Centre may have acted in a way that is inconsistent with the Centre's Staff Code of Conduct, including behaviour outside work, but does not meet the threshold for referral to the Local Authority Designated Officer (LADO) or to Children's Social Care.

Examples may include being overly friendly with children, having favourites, taking photographs on personal devices, or engaging in inappropriate conversations.

Any person may raise a low-level concern about any adult at the Centre. Concerns should be shared with the Centre Manager (or the DSL if the concern relates to the Centre Manager). All low-level concerns will be recorded in writing, including the name of the person raising the concern, details of the concern, the context in which the concern arose, and action taken. Records will be reviewed regularly to identify patterns of behaviour. Low-level concerns will be stored securely and separately from personnel files. Self-referral is encouraged — if a member of staff is concerned that their own behaviour may have been misinterpreted, they should report this promptly.

REPORTING SAFEGUARDING CONCERNS

All staff have a duty to report any safeguarding concern immediately.

If a member of staff has a concern about a child's safety or welfare, they must report the concern to the DSL immediately (or the Deputy DSL if the DSL is unavailable). This should be done verbally first, followed by a written record on the same day using the Centre's safeguarding concern form.

Staff must not investigate — it is not the role of Centre staff to investigate safeguarding concerns. This is the role of Children's Social Care and/or the police.

If a child discloses abuse, the member of staff should listen carefully without interrupting; not ask leading questions; reassure the child that they have done the right thing by telling someone; explain that the information may need to be shared with someone who can help; record the disclosure as soon as possible, using the child's own words; and not promise confidentiality.

If the DSL is unavailable and the child is at immediate risk of harm, any member of staff may make a direct referral to Children's Social Care at [insert local number]; Police on 999 (in an emergency) or 101 (non-emergency); NSPCC Helpline on 0808 800 5000; or Childline on 0800 1111.

If the concern involves the Centre Manager or the DSL, staff should report directly to the Local Authority Designated Officer (LADO) directly at Duty LADO. Tel: 0121 675 1669.

ALLEGATIONS AGAINST STAFF

If an allegation is made against a member of staff that they have behaved in a way that has harmed or may have harmed a child; committed a criminal offence against or related to a child; or behaved towards a child in a way that indicates they may pose a risk of harm to children, the Centre Manager (or DSL) will not investigate the allegation themselves; will contact the Local Authority Designated Officer (LADO) immediately for advice at 0121 675 1669; will follow the LADO's guidance on next steps, which may include suspension of the staff member (on full pay) pending investigation; and will cooperate fully with any external investigation by the LADO, police, or Children's Social Care.

RECORD-KEEPING AND INFORMATION SHARING

Safeguarding records are kept securely, separate from the child's academic file. Records are retained in accordance with the Centre's data retention schedule and relevant legislation. Information will be shared on a need-to-know basis, and in the best interests of the child, in accordance with Working Together 2023 and the Data Protection Act 2018 and UK GDPR. The Centre will cooperate with multi-agency information sharing in the interest of child protection.

9.0 PREVENTING EXTREMISM AND RADICALISATION

POLICY STATEMENT

Aletheia Academy is committed to preventing extremism and radicalisation and to promoting the fundamental British values of democracy; the rule of law; individual liberty; and mutual respect and tolerance of those with different faiths and beliefs.

LEGAL FRAMEWORK

Counter-Terrorism and Security Act 2015 (the Prevent duty)

Prevent Duty Guidance: England and Wales (2023 update)

Keeping Children Safe in Education (September 2024)

Channel Duty Guidance (2023)

RESPONSIBILITIES

All adults working within Aletheia Academy (including staff, visiting staff, volunteers, contractors, and students on placement) are required to report any instances where they believe a young person may be at risk of radicalisation or being drawn into extremism to the Designated Safeguarding Lead.

Staff should be alert to changes in behaviour, attendance, or engagement; expressions of sympathy for extremist ideologies or groups; attempts to recruit others to extremist causes; evidence of involvement with extremist material online; and possession of extremist literature or propaganda.

REPORTING PROCESS

Report the concern to the Designated Safeguarding Lead (DSL) immediately. The DSL will seek advice from the local Prevent team or police Prevent contact at [insert local details]; the local Channel programme at [insert local details]; and Children's Social Care (where safeguarding thresholds are met). The Centre will only notify parents of these concerns if this course of action is approved by the external agencies listed above. The Centre will only speak with the young person about the concern based on the advice given by the external agency.

TRAINING

All staff receive Prevent awareness training as part of their induction and on a regular ongoing basis (at least annually as part of safeguarding refresher training).

10.0 EQUALITY, DIVERSITY, AND INCLUSION POLICY

POLICY STATEMENT

Aletheia Academy is committed to promoting equality of opportunity, valuing diversity, and creating an inclusive environment for all students, parents, staff, and visitors. We will not unlawfully discriminate against any person and we will treat everyone with dignity and respect.

This policy applies to all aspects of the Centre's activities, including admission and enrolment of students; recruitment, employment, and management of staff; delivery of teaching and learning services; and interactions with parents, guardians, visitors, and the wider community.

LEGAL FRAMEWORK

Equality Act 2010

Worker Protection (Amendment of Equality Act 2010) Act 2023 (in force from 26 October 2024)

Human Rights Act 1998

Public Sector Equality Duty (where applicable)

PROTECTED CHARACTERISTICS

Under the Equality Act 2010, it is unlawful to discriminate against any person because of the following protected characteristics:

1. Age

2. Disability
3. Gender reassignment
4. Marriage and civil partnership
5. Pregnancy and maternity
6. Race (including colour, nationality, ethnic or national origins)
7. Religion or belief (including lack of religion or belief)
8. Sex
9. Sexual orientation

TYPES OF UNLAWFUL DISCRIMINATION

The Centre will not tolerate any form of:

Direct discrimination: Treating someone less favourably because of a protected characteristic.

Indirect discrimination: Applying a provision, criterion, or practice that puts people with a particular protected characteristic at a disadvantage, unless it can be objectively justified.

Harassment: Unwanted conduct related to a protected characteristic which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment.

Victimisation: Subjecting someone to a detriment because they have made a complaint or allegation of discrimination, or have supported someone else's complaint.

Discrimination arising from disability: Treating a disabled person unfavourably because of something arising in consequence of their disability, where this cannot be objectively justified.

Failure to make reasonable adjustments: Failing to take reasonable steps to avoid disadvantage to disabled people.

EMPLOYER'S DUTY TO PREVENT SEXUAL HARASSMENT

Under the Worker Protection (Amendment of Equality Act 2010) Act 2023, which came into force on 26 October 2024, the Centre has a proactive legal duty to take reasonable steps to prevent sexual harassment of its employees in the course of their employment. This includes harassment by third parties (such as parents, visitors, or other service users).

The Centre will carry out risk assessments to identify situations where staff may be at risk of sexual harassment; take appropriate preventative measures, such as training, clear reporting channels, and a culture of zero tolerance; investigate all complaints of sexual harassment promptly and thoroughly; take appropriate disciplinary action against any person found to have committed sexual harassment; and support any employee who reports sexual harassment and ensure they are not subjected to victimisation.

REASONABLE ADJUSTMENTS

The Centre will make reasonable adjustments for students, parents, and staff with disabilities, in accordance with the Equality Act 2010. This may include (but is not limited to) adjusting teaching methods or materials; providing additional support or resources; modifying physical access arrangements; adjusting working arrangements for staff; and allowing additional time or breaks.

If you require a reasonable adjustment, please speak to the Centre Manager.

REPORTING DISCRIMINATION, HARASSMENT, OR VICTIMISATION

Any person who believes they have been subjected to discrimination, harassment, or victimisation should report this to the Centre Manager. If the complaint involves the Centre Manager, it should be reported to [insert name of proprietor or senior management].

Reports will be taken seriously and investigated promptly. Appropriate action will be taken, which may include disciplinary action against the perpetrator.

For staff, complaints of discrimination or harassment may also be raised through the Grievance Procedure (Section 20.0) or the Whistleblowing Policy (Section 19.0).

TRAINING

All staff receive equality, diversity, and inclusion training as part of their induction and on a regular ongoing basis.

11.0 ETHICAL CONDUCT

All employees of Aletheia Academy, as well as persons dealing with the Centre, shall:

- a. Conduct Aletheia Academy business with honesty and integrity, striving for excellence in all aspects of their work.
- b. Maintain the highest level of personal conduct and ethics, including respecting the rights, dignity, and views of students, parents, and fellow employees; presenting information honestly and accurately, never plagiarising or falsely representing personal or professional information; and maintaining the confidentiality of information to which they have access and using it only in the discharge of official duties, in accordance with the Data Protection Act 2018 and UK GDPR.
- c. Be familiar with and uphold laws and regulations related to their jobs and the Centre's activities, and adhere to all Centre policies and procedures.
- d. Report unethical, illegal, or fraudulent activities directly to the Centre Manager, or if inappropriate to report to the Centre Manager, directly to [insert name of proprietor or senior management], or through the Centre's Whistleblowing Policy (Section 19.0). Staff are reminded that they are protected by law when making a qualifying disclosure in accordance with the Public Interest Disclosure Act 1998 (see Section 19.0).

12.0 INTERNET USE, ELECTRONIC COMMUNICATION AND ONLINE SAFETY

POLICY STATEMENT

Aletheia Academy recognises the benefits of technology for teaching and learning, as well as the risks that online activity can pose to children and adults. This policy sets out the Centre's expectations for the safe and responsible use of the internet, electronic communications, and digital devices.

This policy applies to all staff, students, parents, volunteers, and visitors when using Centre IT equipment or personal devices on Centre premises or in connection with Centre activities.

ACCEPTABLE USE

All users of Centre IT systems and equipment must use the internet, email, and other electronic communications responsibly, ethically, and in accordance with this policy; not access, create, store, or distribute any material that is inappropriate, offensive, discriminatory, defamatory, or illegal; not use Centre systems for personal commercial activity; not install unauthorised software on Centre equipment; not share passwords or allow others to use their login credentials; and report any concerns about inappropriate content or online safety to the Centre Manager or DSL immediately.

PROHIBITED ACTIVITIES

Under no circumstances should students or staff access inappropriate images on Centre equipment or using Centre internet access.

Deliberately accessing pornography on Centre equipment will be treated as gross misconduct and may constitute a criminal offence.

Accessing, making, storing, or disseminating indecent images of children on the internet or any device is illegal under the Protection of Children Act 1978 and the Criminal Justice Act 1988, and is likely to lead to criminal prosecution, referral to the DBS, and barring from work with children and young people.

Accessing, creating, or sharing extremist or terrorist material is a criminal offence under the Terrorism Act 2006 and the Counter-Terrorism and Security Act 2015.

FILTERING AND MONITORING

In accordance with Keeping Children Safe in Education (September 2024), the Centre has appropriate filtering and monitoring systems in place on all Centre IT systems and devices to block access to harmful and inappropriate content; monitor usage patterns for safeguarding purposes; and detect potential safeguarding concerns.

Users should be aware that their use of Centre IT systems may be monitored. Any monitoring will be conducted in accordance with the Data Protection Act 2018, UK GDPR, and the Investigatory Powers Act 2016.

PERSONAL DEVICES

Staff must not use personal devices (phones, tablets, laptops) to photograph, film, or record students at the Centre under any circumstances, except with the explicit written authorisation of the Centre Manager and the written consent of parents or guardians (see Section 14.0). Staff must not store any student personal data on personal devices unless specifically authorised and in compliance with the

Centre's Data Protection Policy (Section 15.0). Staff must not contact students through personal devices, personal email, social media, or messaging apps (see Section 13.0).

STUDENTS AND TECHNOLOGY

Students are not permitted to use mobile phones or personal devices during lessons (see Section 6.0). Students must not use Centre IT equipment to access inappropriate, offensive, or harmful content. Students must not share personal information online while at the Centre. The Centre will provide age-appropriate guidance on online safety to students.

13.0 SOCIAL MEDIA POLICY

POLICY STATEMENT

This policy sets out the Centre's expectations regarding the use of social media by staff, students, and parents in connection with the Centre.

For the purposes of this policy, social media includes (but is not limited to) Facebook, Instagram, Twitter/X, TikTok, Snapchat, YouTube, WhatsApp, LinkedIn, blogs, forums, and any other online platforms where content can be shared.

STAFF

Staff must not contact current students or their parents or guardians through personal social media accounts for any purpose; not accept friend requests, follow requests, or other connections from current students on personal social media accounts; not post photographs, videos, or any other material identifying students on personal social media accounts; not post material on social media that damages or could damage the reputation of the Centre, identifies students, parents, or colleagues without their consent, shares confidential information about the Centre, its students, or its staff, or could be considered discriminatory, harassing, bullying, or offensive, or raises concerns about their suitability to work with children; exercise professional judgement in all social media activity and be aware that their online behaviour may be visible to students, parents, and colleagues; and report any concerning social media contact from students or parents to the Centre Manager.

Note: This policy does not prevent staff from making a qualifying disclosure in accordance with the Public Interest Disclosure Act 1998 and the Whistleblowing Policy (Section 19.0).

PARENTS AND GUARDIANS

Parents and guardians must not post photographs, videos, or material identifying other people's children taken at Centre events on social media without the consent of those children's parents; not use social media to make defamatory, threatening, discriminatory, or harassing comments about the Centre, its staff, students, or other parents; and raise any concerns about the Centre through the official Complaints Procedure (Section 24.0), not through social media.

STUDENTS

Students must not use social media to bully, harass, discriminate against, or intimidate other students, staff, or any person connected with the Centre; not share personal information about other students or staff on social media; and not photograph, film, or record other students or staff at the Centre for sharing on social media.

14.0 PHOTOGRAPHY AND USE OF IMAGES POLICY

POLICY STATEMENT

Aletheia Academy recognises the need to ensure the safety and privacy of children in our care, particularly regarding the use of photographs and images. This policy sets out the Centre's approach to photography, filming, and the use of images of children.

LEGAL FRAMEWORK

Data Protection Act 2018 and UK GDPR (photographs and recordings of identifiable individuals constitute personal data)

Keeping Children Safe in Education (September 2024)

Human Rights Act 1998 (right to privacy, Article 8)

CONSENT

The Centre will only take or use photographs or recordings of children with the prior written consent of their parent or guardian. Consent will be sought at enrolment and will specify the purposes for which images may be used (such as internal records, promotional materials, website, and social media). Parents and guardians may withdraw consent at any time by notifying the Centre Manager in writing. Where consent is withdrawn, the Centre will take reasonable steps to remove images from its website and materials, although it may not be possible to recall printed materials already in circulation.

STAFF RESPONSIBILITIES

Staff must not use personal devices (phones, cameras, tablets) to photograph, film, or record students at any time, unless specifically authorised by the Centre Manager for a legitimate Centre purpose. Only Centre-owned equipment should be used for authorised photography. All images of students must be stored securely on Centre systems, in accordance with the Data Protection Policy (Section 15.0). Images must not be stored on personal devices or in personal cloud storage. Images must not be shared with third parties without the written consent of parents or guardians and the authorisation of the Centre Manager.

PARENTS AND VISITORS

Parents and visitors may not photograph, film, or record other people's children at the Centre without the explicit consent of those children's parents or guardians and the authorisation of the Centre Manager. At Centre events (such as award ceremonies), the Centre will communicate any restrictions on photography to attendees.

RETENTION

Images will be retained only for as long as they are needed for the purpose for which they were taken and in accordance with the Centre's data retention schedule. Images will be securely deleted when no longer needed.

15.0 DATA PROTECTION AND PRIVACY POLICY

POLICY STATEMENT

Aletheia Academy is committed to protecting the personal data of all individuals associated with the Centre — including students, parents and guardians, staff, volunteers, and visitors — in accordance

with the Data Protection Act 2018 (DPA 2018) and the UK General Data Protection Regulation (UK GDPR).

DATA CONTROLLER

Aletheia Academy is the data controller for the personal data it processes. The Centre is registered with the Information Commissioner's Office (ICO).

KEY PRINCIPLES

The Centre will ensure that personal data is:

- e. Processed lawfully, fairly, and transparently — We will only process personal data where we have a lawful basis for doing so, and we will inform individuals about how their data is used.
- f. Collected for specified, explicit, and legitimate purposes — We will only collect data for defined purposes and not use it in ways that are incompatible with those purposes.
- g. Adequate, relevant, and limited to what is necessary — We will not collect more data than we need.
- h. Accurate and kept up to date — We will take reasonable steps to ensure data is accurate and rectify inaccuracies promptly.
- i. Kept for no longer than necessary — We will retain data only for as long as it is needed for the purpose for which it was collected, in accordance with our data retention schedule.
- j. Processed securely — We will implement appropriate technical and organisational measures to protect data against unauthorised access, loss, or damage.

LAWFUL BASES FOR PROCESSING

The Centre processes personal data on one or more of the following lawful bases (Article 6, UK GDPR): consent (the individual has given clear consent for the Centre to process their data for a specific purpose); contract (processing is necessary for the performance of a contract, such as the enrolment agreement); legal obligation (processing is necessary to comply with the law, such as safeguarding, tax, or employment law); vital interests (processing is necessary to protect someone's life); and legitimate interests (processing is necessary for the Centre's legitimate interests, where these are not overridden by the individual's rights).

SPECIAL CATEGORY DATA

The Centre processes some special category data (Article 9, UK GDPR), including health information, religious beliefs, and ethnicity data. Special category data is processed only where the individual has given explicit consent, or processing is necessary for reasons of substantial public interest (such as safeguarding), or processing is necessary to protect vital interests (such as medical emergencies).

DATA SUBJECTS' RIGHTS

Under the UK GDPR, individuals have the following rights:

Right to be informed: To know how their data is being used (via privacy notices).

Right of access: To request a copy of the personal data held about them (Subject Access Request).

Right to rectification: To request correction of inaccurate data.

Right to erasure: To request deletion of data in certain circumstances.

Right to restrict processing: To request limitation of how data is used.

Right to data portability: To receive data in a commonly used format.

Right to object: To object to processing in certain circumstances.

Rights related to automated decision-making: Not to be subject to solely automated decisions with significant effects.

Subject Access Requests (SARs): Any individual (or a parent on behalf of a child) may make a Subject Access Request by writing to the Centre Manager. The Centre will respond within one calendar month of receiving the request. There is no charge for a SAR unless the request is manifestly unfounded or excessive.

PRIVACY NOTICES

The Centre provides privacy notices to staff at the point of recruitment; parents, guardians and students at the point of enrolment; and visitors via signage and/or on request. Privacy notices explain what data is collected, why, how it is used, who it is shared with, how long it is kept, and individuals' rights.

DATA SHARING

The Centre may share personal data with third parties where required by law (such as safeguarding referrals, HMRC, or court orders); necessary for the performance of a contract; the individual has given consent; or it is in the vital interests of the individual. Data will be shared on a need-to-know basis and with appropriate safeguards.

DATA SECURITY

The Centre implements appropriate security measures, including secure storage of physical records (locked cabinets, restricted access); password protection and encryption for electronic data; access controls (data accessible only to authorised personnel); regular review of security measures; and secure disposal of data when no longer needed (shredding, secure deletion).

DATA BREACHES

A personal data breach is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

If a data breach occurs, the staff member who discovers the breach must report it to the Data Protection Lead immediately. The Data Protection Lead will assess the severity of the breach. If the breach is likely to result in a high risk to the rights and freedoms of individuals, the ICO must be notified within 72 hours of the Centre becoming aware of it. If the breach is likely to result in a high risk to specific individuals, those individuals must be informed without undue delay. All breaches (including those not reported to the ICO) will be documented in the Centre's data breach log.

ICO Contact: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Telephone: 0303 123 1113. Website: www.ico.org.uk

DATA RETENTION

The Centre retains personal data in accordance with its data retention schedule. Key retention periods include:

Student enrolment and academic records: 6 years after the student leaves the Centre.

Staff employment records: 6 years after employment ends.

Safeguarding records: In accordance with local safeguarding partnership guidance (typically retained until the child's 25th birthday, or indefinitely in cases of serious concern).

Financial records: 6 years (as required by HMRC).

CCTV footage (if applicable): 30 days (unless required for an investigation).

Accident records: 3 years for adults; until the child reaches 25 for children.

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16.0 CONFIDENTIALITY

Employees of Aletheia Academy are prohibited from disseminating to third parties any confidential information or documentation about the Centre during or after their employment. Violation of this policy may result in disciplinary action up to and including dismissal, and may also give rise to legal action.

We expect staff to have an awareness of and high regard for the confidential, sensitive, and important nature of their role and to be mindful of this at all times, including during formal and informal discussions with parents, other members of staff, students, and the wider community.

Staff should avoid being drawn into discussions which relate to Centre matters or matters regarding an individual child, group of children, or their families. If there are any concerns in this area, please refer them to the Centre Manager.

Details relating to children are confidential and should only be shared with staff as part of their professional role or with the parents or guardians of the child in question, in accordance with the Data Protection Act 2018 and UK GDPR.

Members of staff and teachers may have access to confidential information about students in order to undertake their responsibilities. In some circumstances, the information may be highly sensitive. Confidential or personal information about a student or their family must never be disclosed to anyone other than on a need-to-know basis.

In circumstances where the student's identity does not need to be disclosed, the information should be used anonymously. Information must never be used to intimidate, humiliate, or embarrass a student.

Where possible, no names should be explicitly mentioned — whether for positive, negative, or informational purposes — in public areas, unless it is on a need-to-know basis for all present.

EXCEPTIONS TO CONFIDENTIALITY

There are some circumstances in which a member of staff may be expected or required to share information, including:

Safeguarding: Where abuse is alleged or suspected, or a child is at risk of harm, individuals have a duty to pass information on without delay to the Designated Safeguarding Lead (see Section 8.0).

Whistleblowing: Where a member of staff makes a qualifying disclosure in accordance with the Public Interest Disclosure Act 1998 (see Section 19.0).

Legal requirements: Where the Centre is required to disclose information by law (such as a court order or statutory requirement).

SECURE STORAGE

Confidential records — including those in hard copy, on a laptop, USB drive, or other portable storage — must be kept in a safe and secure place at all times. They must not be left in open places at the Centre or at home.

If a member of staff is in any doubt about the storage or sharing of information, they must seek guidance from the Centre Manager. Any media or legal enquiries must be referred to the Centre Manager.

17.0 CONFLICT OF INTEREST

POLICY

It is the policy of Aletheia Academy that all employees avoid or appropriately disclose both actual conflicts of interest and the appearance of conflicts of interest whenever possible.

A conflict of interest arises where an individual's personal interests, relationships, or activities could, or could appear to, influence their professional judgement or actions.

EXAMPLES

Examples of potential conflicts of interest include (but are not limited to) having a financial interest in a supplier or competitor of the Centre; employing or supervising a close family member; accepting gifts, hospitality, or benefits from a parent, supplier, or other party connected with the Centre; and undertaking paid or unpaid work for a competitor tuition centre.

PROCEDURE

All staff must declare any actual or potential conflict of interest to the Centre Manager in writing at the earliest opportunity. Where a conflict of interest exists, the Centre Manager (or, where the conflict involves the Centre Manager, the proprietor or senior management) will advise on how to manage or avoid the conflict, including recusal from relevant decisions. Declarations of interest will be recorded and reviewed regularly.

If a member of staff is unclear about whether any particular situation could constitute a conflict of interest, they should consult the Centre Manager.

18.0 FRAUDULENT OR DISHONEST CONDUCT

DEFINITION

Fraudulent or dishonest conduct is a deliberate act or failure to act with the intention of obtaining an unauthorised material benefit. Examples include, but are not limited to:

- k. Violation of law or government regulation
- l. Forgery or alteration of documents
- m. Unauthorised alteration or manipulation of computer files
- n. Misappropriation or misuse of Aletheia Academy resources
- o. Authorising or receiving compensation for goods not received or services not performed
- p. Authorising or receiving compensation not earned
- q. Theft or embezzlement

INVESTIGATION

All allegations of fraudulent or dishonest conduct will be investigated by Aletheia Academy management. All employees are expected to cooperate fully in any investigation. Appropriate corrective action, up to and including dismissal, will be taken if the investigation finds that an employee engaged in fraudulent or dishonest conduct. Where conduct constitutes a criminal offence, the Centre may report the matter to the police.

FALSE ALLEGATIONS

Staff members are encouraged to report genuine concerns about wrongdoing without fear of reprisal (see Whistleblowing Policy, Section 19.0). However, an employee who deliberately and maliciously files a report that they know to be false may be subject to disciplinary action. This provision does not apply to good-faith reports that are not ultimately substantiated — employees who raise concerns genuinely and in good faith will not be penalised, even if the concern turns out to be unfounded.

19.0 WHISTLEBLOWING POLICY

POLICY STATEMENT

Aletheia Academy is committed to maintaining the highest standards of honesty, integrity, and accountability. We encourage all employees, workers, volunteers, and contractors to raise concerns about wrongdoing, malpractice, or danger at the earliest opportunity so that these can be addressed.

This policy provides a framework for raising concerns that are in the public interest, in accordance with the Public Interest Disclosure Act 1998 (PIDA). It is separate from the Centre's Grievance Procedure (Section 20.0), which is intended for matters relating to an individual's personal employment.

WHAT IS WHISTLEBLOWING?

Whistleblowing is the disclosure of information that a worker reasonably believes shows one or more of the following (a qualifying disclosure):

A criminal offence has been committed, is being committed, or is likely to be committed.

A person has failed, is failing, or is likely to fail to comply with a legal obligation.

A miscarriage of justice has occurred, is occurring, or is likely to occur.

The health or safety of any individual has been, is being, or is likely to be endangered.

The environment has been, is being, or is likely to be damaged.

Information tending to show any of the above has been, is being, or is likely to be deliberately concealed.

PROTECTION FOR WHISTLEBLOWERS

Under PIDA, workers who make a qualifying disclosure in good faith are protected from dismissal (which will be automatically unfair) and detriment (any form of negative treatment, including being overlooked for promotion, being subjected to disciplinary action, or being ostracised).

The Centre takes this protection seriously. No employee will be subjected to any detriment for making a good-faith disclosure under this policy, even if the concern is not ultimately upheld.

HOW TO RAISE A CONCERN

Internal reporting (first step): Raise the concern with the Centre Manager. This can be done verbally or in writing.

If the concern involves the Centre Manager, or if the employee feels it is inappropriate to raise the concern with the Centre Manager, they should contact [insert name and contact details of proprietor, senior management, or trustee].

Anonymous concerns: The Centre will consider anonymous disclosures, but it may be more difficult to investigate them. Workers are encouraged to identify themselves if possible, as this enables the Centre to provide feedback and protection.

External reporting: If the employee is not satisfied with the Centre's response, or believes the concern is not being addressed, they may report to a prescribed person or body, including:

Safeguarding or child welfare concerns — Ofsted, local authority LADO, Children's Social Care

Health and safety concerns — Health and Safety Executive (HSE)

Fraud or financial irregularity — HMRC, Serious Fraud Office

Data protection concerns — Information Commissioner's Office (ICO)

Employment rights concerns — HM Revenue and Customs, ACAS

General wrongdoing — A relevant regulatory body or, in the last resort, a legal adviser

INVESTIGATION

All concerns raised under this policy will be taken seriously and investigated promptly and confidentially. The Centre will acknowledge receipt of the concern within 5 working days; investigate the concern (or appoint an appropriate person to do so); keep the whistleblower informed of progress, where possible; provide a written outcome where appropriate; and take appropriate remedial action where wrongdoing is confirmed.

RECORDS

Records of all whistleblowing disclosures will be maintained securely and confidentially.

20.0 GRIEVANCE PROCEDURE

POLICY STATEMENT

Aletheia Academy is committed to ensuring that all employees are treated fairly and that any concerns or complaints about their employment are dealt with promptly, consistently, and in accordance with the ACAS Code of Practice on Disciplinary and Grievance Procedures and relevant employment legislation.

This procedure applies to all employees (teaching and non-teaching staff) of Aletheia Academy. It does not apply to concerns about public interest matters, which should be raised under the Whistleblowing Policy (Section 19.0).

SCOPE

A grievance is a concern, problem, or complaint that an employee raises about their work, working conditions, or relationships with colleagues. Examples include (but are not limited to) terms and conditions of employment; health and safety; work relations; bullying or harassment; working environment; equality and diversity issues; and new working practices or organisational change.

INFORMAL STAGE

Wherever possible, grievances should first be raised informally with the Centre Manager through discussion. Many issues can be resolved quickly and effectively through open communication. The Centre Manager will endeavour to resolve the matter within 5 working days.

If the grievance is about the Centre Manager, the employee may raise the matter informally with [insert name of proprietor or senior management].

FORMAL STAGE

If the matter is not resolved informally, or if the employee feels it is inappropriate to raise the matter informally, the employee may raise a formal grievance.

Step 1 — Written grievance: The employee should set out their grievance in writing (a letter or email) and submit it to the Centre Manager (or to [insert name of proprietor or senior management] if the grievance is about the Centre Manager). The written grievance should include the nature of the grievance; the facts and any relevant evidence; and how the employee would like the matter to be resolved.

Step 2 — Grievance meeting: The Centre Manager (or an appropriate alternative manager) will arrange a formal grievance meeting within 10 working days of receiving the written grievance.

At the grievance meeting, the employee has the statutory right to be accompanied by a trade union representative or a fellow worker of their choice, in accordance with section 10 of the Employment Relations Act 1999. The employee will be given a full opportunity to explain their grievance and present any evidence. The meeting may be adjourned to allow further investigation if necessary.

Step 3 — Written outcome: The Centre will provide a written response to the employee within 10 working days of the grievance meeting (or as soon as reasonably practicable). The written response will set out the findings; explain the decision; set out any action to be taken; and inform the employee of their right to appeal.

APPEAL

If the employee is not satisfied with the outcome of the formal grievance, they may appeal.

The appeal must be submitted in writing to [insert name of proprietor or senior management] within 10 working days of receiving the written outcome, stating the grounds for appeal.

An appeal meeting will be arranged within 10 working days of receipt of the appeal. The appeal will be heard by a person who has not been previously involved in the grievance, where reasonably possible.

The employee has the statutory right to be accompanied at the appeal meeting.

A written response to the appeal will be provided within 10 working days of the appeal meeting. The appeal decision is final.

NOTES

All parties involved in a grievance are expected to act in good faith and to maintain confidentiality. The Centre will not tolerate victimisation of any employee for raising a grievance. The Centre will keep a written record of all grievances raised, meetings held, and outcomes. If a grievance involves allegations of discrimination, harassment, or victimisation, it may be investigated under the Centre's Equality, Diversity, and Inclusion Policy (Section 10.0) in addition to this procedure. Where a grievance overlaps with a disciplinary matter, the Centre may need to deal with both concurrently. If appropriate, the grievance procedure may be temporarily suspended while a disciplinary process is underway.

PARENTS OR GUARDIANS

Parents or guardians who wish to raise a concern or complaint should do so through the Complaints Procedure (Section 24.0).

STUDENTS

Students who have a concern or complaint should raise this with the Centre Manager through their parents or guardians, or through the Complaints Procedure (Section 24.0).

21.0 DISCIPLINARY PROCEDURE

POLICY STATEMENT

Aletheia Academy is committed to ensuring that all employees are treated fairly and consistently in matters of discipline. This procedure is designed to help and encourage employees to achieve and maintain acceptable standards of conduct, attendance, and performance.

This procedure follows and is consistent with the ACAS Code of Practice on Disciplinary and Grievance Procedures and relevant employment legislation, including the Employment Rights Act 1996 and the Employment Relations Act 1999.

SCOPE

This procedure applies to all employees (teaching and non-teaching staff) of Aletheia Academy, subject to any applicable probationary period provisions.

PRINCIPLES

The procedure will be applied fairly and consistently. No disciplinary action will be taken until the matter has been properly investigated. The employee will be informed of the allegations against them and the evidence, in writing, before any disciplinary meeting. The employee will be given a reasonable opportunity to state their case before any decision is made. The employee has the statutory right to be accompanied at all formal disciplinary meetings and appeal meetings by a trade union representative or a fellow worker of their choice (Employment Relations Act 1999, section 10). The employee has the right to appeal against any disciplinary sanction. Disciplinary action will not normally be taken against an employee for a first offence, except in cases of gross misconduct. The Centre aims to resolve matters at the lowest appropriate level. Confidentiality will be maintained throughout the process. The procedure will be conducted without unreasonable delay.

INVESTIGATION

Before any formal disciplinary action is taken, the Centre will carry out a reasonable and proportionate investigation into the alleged conduct. This may involve gathering witness statements; reviewing documentary evidence (including electronic records); interviewing the employee concerned (this is an investigation meeting, not a disciplinary hearing, but the employee may be accompanied if they wish); and consulting relevant records.

The purpose of the investigation is to establish the facts, not to make a judgement. If, following the investigation, there are reasonable grounds for proceeding, a formal disciplinary hearing will be arranged.

SUSPENSION

In cases of alleged gross misconduct, or where there is a risk to the safety of staff, students, or others, or where the employee's continued presence may impede the investigation, the employee may be suspended on full pay pending the outcome of the investigation and any subsequent disciplinary hearing.

Suspension is a neutral act and does not imply guilt. Suspension will be kept as brief as possible and will be reviewed regularly.

FORMAL DISCIPLINARY HEARING

Step 1 — Written notification: The employee will be informed in writing of the allegations against them, with sufficient detail to enable them to prepare their response; the evidence relied upon (copies of relevant documents will be provided); the date, time, and location of the disciplinary hearing; their statutory right to be accompanied by a trade union representative or a fellow worker; and the potential consequences if the allegations are upheld (the level of sanction being considered).

The employee will be given at least 5 working days' notice of the hearing.

Step 2 — The hearing: At the disciplinary hearing, the allegations and evidence will be presented. The employee (and/or their companion) will have the opportunity to respond to the allegations, present evidence, and call witnesses. The hearing may be adjourned to allow further investigation or to consider the decision. The employee's companion may address the hearing and confer with the employee, but may not answer questions on the employee's behalf.

Step 3 — Written outcome: Following the hearing, the Centre will provide a written decision within 5 working days (or as soon as reasonably practicable). The decision letter will set out the findings of fact; confirm the decision (no action, warning, or dismissal); explain the reasons for the decision; set out any action required by the employee; and inform the employee of their right to appeal and the deadline for doing so.

DISCIPLINARY SANCTIONS

The following sanctions may be applied. The Centre retains the discretion to enter the process at any stage, depending on the seriousness of the conduct.

Stage 1: Formal verbal warning — Authority: Centre Manager — Duration: Normally disregarded after 6 months.

Stage 2: First written warning — Authority: Centre Manager — Duration: Normally disregarded after 12 months.

Stage 3: Final written warning — Authority: Centre Manager or Senior Management — Duration: Normally disregarded after 24 months.

Stage 4: Dismissal — Authority: Senior Management or Proprietor.

Notes on sanctions: At each stage, the employee will be told the reason for the warning, the improvement expected, the timescale for improvement, and the consequences of failure to improve. Warnings will be confirmed in writing and placed on the employee's personnel file. Spent warnings (those that have exceeded the duration above) will normally be disregarded for the purpose of future disciplinary proceedings, unless the offence is of a similar nature and the earlier warning is still relevant.

GROSS MISCONDUCT

Gross misconduct is conduct so serious that it fundamentally undermines the employment relationship and may justify summary dismissal (dismissal without notice) for a first offence.

Examples of gross misconduct include (but are not limited to): physical violence, assault, or threats of violence; theft, fraud, or deliberate falsification of records; serious breaches of safeguarding policy; deliberate damage to Centre property; serious insubordination or refusal to carry out reasonable instructions; being under the influence of alcohol or drugs at work; bringing the Centre into serious disrepute; serious breach of confidentiality; serious breach of data protection legislation; unlawful discrimination, harassment, or victimisation; accessing, creating, or distributing indecent images of children; any criminal offence that affects the employee's suitability to work at the Centre or with children; gross negligence causing or likely to cause serious harm; and serious breach of the Centre's internet or IT policies.

This list is not exhaustive. The Centre reserves the right to treat other serious conduct as gross misconduct depending on the circumstances.

DISMISSAL

Dismissal (with or without notice, depending on whether the conduct constitutes gross misconduct) may be applied where the employee has committed an act of gross misconduct, or the employee's conduct has not improved despite previous warnings and no lesser sanction is appropriate.

Only Senior Management or the Proprietor may authorise a dismissal.

The employee will receive written confirmation of the dismissal, including the reasons for dismissal; the effective date of dismissal; details of any notice period (or payment in lieu of notice); and information about the right to appeal.

RIGHT OF APPEAL

The employee has the right to appeal against any disciplinary sanction, including dismissal.

The appeal must be submitted in writing to [insert name of proprietor, senior management, or alternative senior person] within 10 working days of receiving the written outcome, stating the grounds for appeal.

An appeal meeting will be arranged within 10 working days of receipt of the appeal. The appeal will be heard by a person who has not been previously involved in the disciplinary process, where reasonably possible.

The employee has the statutory right to be accompanied at the appeal meeting.

A written response to the appeal will be provided within 10 working days of the appeal meeting. The appeal decision is final.

DRUGS AND ALCOHOL

Aletheia Academy considers it unacceptable for an employee to be under the influence of alcohol or illegal drugs during working hours; to have taken illegal drugs before or during working hours; or to bring alcohol or illegal drugs onto Centre premises.

No employee may consume alcohol before or during working hours to the extent that their performance is impaired, they act improperly or irresponsibly, or they put their own or others' health or safety at risk. No alcohol may be brought onto or consumed at the Centre during normal working hours, including break times.

Breach of this policy may be treated as gross misconduct.

Support: The Centre recognises that alcohol or drug dependency can be a health issue. Employees who believe they may have a dependency problem are encouraged to seek help and to speak to the Centre Manager in confidence before their performance or conduct is affected. The Centre will deal with such situations sympathetically and supportively, where the employee is willing to engage with appropriate support. However, this does not excuse conduct that puts others at risk.

Note: The Centre is aware that some conditions related to substance dependency may constitute a disability under the Equality Act 2010 and will take this into account where appropriate. However, the Equality Act excludes addiction to alcohol, drugs, or other substances from the definition of disability (although related conditions, such as depression or liver disease, may be covered).

SMOKING AND VAPING

Smoking (including the use of e-cigarettes and vaping devices) inside Aletheia Academy or anywhere on the Centre grounds is prohibited (see Section 7.0, Health and Safety).

CRIMINAL OFFENCES

Where an employee is charged with or convicted of a criminal offence, this will not necessarily be treated as a disciplinary matter. The Centre will consider whether the offence is relevant to the employee's role; whether the offence affects the employee's suitability to work with children; whether the offence makes the employee's continued employment untenable; and the need to maintain public confidence.

A conviction is not required for disciplinary action to be taken if the Centre's own investigation establishes that the conduct occurred.

22.0 FLEXIBLE WORKING POLICY

POLICY STATEMENT

Aletheia Academy supports its employees in achieving a work-life balance where it is possible to do so while meeting the needs of the Centre. The Centre recognises the statutory right of employees to request flexible working arrangements.

LEGAL FRAMEWORK

Employment Relations (Flexible Working) Act 2023 (in force from 6 April 2024)

Flexible Working Regulations 2014 (as amended)

ELIGIBILITY

From 6 April 2024, all employees have a statutory right to request flexible working from day one of their employment. Employees may make up to two requests in any 12-month period.

TYPES OF FLEXIBLE WORKING

Flexible working may include (but is not limited to) changes to working hours (such as part-time working or compressed hours); changes to the times or days of work; changes to the place of work (such as working from home, where the role permits); term-time working; job sharing; and annualised hours.

PROCEDURE

The employee should submit a written request to the Centre Manager, including the date of the application; details of the change requested; the proposed start date; whether a previous application has been made and, if so, when; and an explanation of the effect the employee thinks the change would have on the Centre and how this might be dealt with.

The Centre Manager will arrange a meeting to discuss the request within a reasonable period.

The Centre will consider the request carefully and will respond in writing within two months of the date of the request (including any appeal).

The request may be approved, refused, or a compromise may be proposed.

A request may only be refused for one or more of the following business reasons: the burden of additional costs; detrimental effect on the ability to meet service user demand; inability to reorganise work among existing staff; inability to recruit additional staff; detrimental impact on quality; detrimental impact on performance; insufficiency of work during the periods the employee proposes to work; and planned structural changes.

If the request is refused, the written response will set out the business reason or reasons and explain the right of appeal.

APPEAL

The employee may appeal in writing within 10 working days of receiving the decision. An appeal meeting will be arranged and a written response provided within the overall two-month statutory period. The appeal decision is final.

23.0 SPECIAL EDUCATIONAL NEEDS AND DISABILITIES (SEND) POLICY

POLICY STATEMENT

Aletheia Academy is committed to providing an inclusive learning environment where students with special educational needs and/or disabilities (SEND) can participate fully and achieve their potential. We recognise our duties under the Equality Act 2010 and the Children and Families Act 2014 to make reasonable adjustments and to ensure that no student is disadvantaged because of their SEND.

IDENTIFICATION AND ASSESSMENT

Parents and guardians are encouraged to inform the Centre at enrolment of any diagnosed or suspected SEND, including learning difficulties, physical disabilities, sensory impairments, autism spectrum conditions, ADHD, dyslexia, dyscalculia, or any other condition that may affect the child's learning. The Centre will also identify students who may have additional needs through observation, assessment, and dialogue with parents and mainstream school staff (where appropriate and with parental consent).

REASONABLE ADJUSTMENTS

The Centre will make reasonable adjustments to ensure students with SEND can access tuition, which may include adapting teaching methods, pace, or materials; providing additional support or one-to-one assistance; allowing additional time or breaks; adjusting the physical learning environment (such as seating, lighting, or access); modifying behaviour expectations (see Section 6.0); and creating individual learning plans or behaviour support plans.

COMMUNICATION

The Centre will work in partnership with parents and guardians to understand the child's needs and to agree on appropriate support. Where appropriate (and with parental consent), the Centre will liaise with the child's mainstream school, educational psychologist, or other professionals. Parents will be kept informed of their child's progress and any adjustments being made.

CONFIDENTIALITY

Information about a student's SEND will be treated as confidential and processed in accordance with the Data Protection Act 2018 and UK GDPR (see Section 15.0). Information will be shared with relevant staff on a need-to-know basis to enable appropriate support.

24.0 COMPLAINTS PROCEDURE

POLICY STATEMENT

Aletheia Academy is committed to providing a high-quality service and to resolving any complaints promptly, fairly, and transparently. This procedure applies to complaints from parents, guardians, students, and members of the public about any aspect of the Centre's services.

Note: This procedure is separate from the staff Grievance Procedure (Section 20.0), which applies to employment-related concerns raised by staff.

INFORMAL RESOLUTION

In the first instance, we encourage complainants to raise their concerns informally with the Centre Manager. Many issues can be resolved quickly through discussion. The Centre Manager will endeavour to resolve the matter within 5 working days.

FORMAL COMPLAINT

If the matter is not resolved informally, or if the complainant prefers to make a formal complaint, they should submit the complaint in writing (letter or email) to the Centre Manager, including the nature of the complaint; relevant facts and dates; any supporting evidence; and the outcome the complainant is seeking.

INVESTIGATION AND RESPONSE

The Centre will acknowledge receipt of the formal complaint within 3 working days. The Centre Manager (or a designated person) will investigate the complaint. A written response will be provided within 15 working days of receiving the complaint. If more time is needed, the complainant will be informed of the reason and the expected response date.

ESCALATION

If the complainant is not satisfied with the response, they may request an escalation in writing to Company Director within 10 working days of receiving the response. A meeting will be arranged between the complainant and a member of senior management to discuss the complaint. A final written response will be provided within 15 working days of the escalation meeting.

EXTERNAL REFERRAL

If the complainant remains dissatisfied after exhausting the Centre's internal complaints procedure, they may refer the matter to an external body, depending on the nature of the complaint:

Safeguarding or child welfare: Ofsted, local authority Children's Social Care.

Data protection: Information Commissioner's Office (ICO).

Consumer rights or fees: Trading Standards, Citizens Advice.

Health and safety: Health and Safety Executive (HSE).

Discrimination: Equality Advisory Support Service (EASS).

RECORDS

All formal complaints will be recorded, including the complaint itself, the investigation, the outcome, and any action taken. Complaint records will be retained in accordance with the Centre's data retention schedule and reviewed periodically to identify any trends or areas for improvement.

UNREASONABLE OR VEXATIOUS COMPLAINTS

While the Centre takes all complaints seriously, it reserves the right to manage complaints that are clearly unreasonable, vexatious, or persistent in a proportionate manner. The Centre may decline to investigate a complaint further if it is satisfied that it has been adequately addressed.

25.0 STAFF WELLBEING AND MENTAL HEALTH

POLICY STATEMENT

Aletheia Academy recognises that the wellbeing and mental health of its staff are essential to the effective functioning of the Centre and to the quality of education and care provided to students. The Centre is committed to promoting a positive, supportive, and healthy working environment for all staff.

LEGAL FRAMEWORK

Health and Safety at Work etc. Act 1974 (employer's duty of care, including psychosocial risks)

Management of Health and Safety at Work Regulations 1999 (risk assessment, including stress-related risks)

Equality Act 2010 (mental health conditions may constitute a disability)

Working Time Regulations 1998 (rest breaks, maximum working hours, annual leave)

COMMITMENTS

The Centre will promote a culture of openness where staff feel able to discuss concerns about their wellbeing without stigma; ensure that workloads are reasonable and manageable; provide clear job descriptions and realistic expectations; ensure staff have access to rest breaks and annual leave in accordance with the Working Time Regulations 1998; take steps to identify and manage work-related stress through risk assessment; and provide access to support, including signposting to external services such as NHS mental health services, Mind (www.mind.org.uk, Infoline 0300 123 3393), Samaritans (116 123), and Education Support for education professionals (08000 562 561).

The Centre will also train managers to recognise signs of stress and mental health difficulties in their teams; make reasonable adjustments for staff with mental health conditions that constitute a disability under the Equality Act 2010; and treat disclosures about mental health confidentially and sensitively.

STAFF RESPONSIBILITIES

Staff are encouraged to take care of their own wellbeing and seek help when needed; be mindful of the wellbeing of colleagues and report any concerns to the Centre Manager; use their annual leave entitlement and take regular breaks; and communicate with the Centre Manager if their workload is unmanageable or if they are experiencing difficulties.

26.0 WITHDRAWAL NOTICE

WITHDRAWAL BY PARENTS OR GUARDIANS

Where parents or guardians wish to withdraw their child from the Centre, they should do so by giving the Centre one month's written notice. Notice can be submitted by letter or email to the Centre Manager.

Fees remain payable during the notice period. Any overpayment of fees beyond the notice period will be refunded.

WITHDRAWAL BY THE CENTRE

Where the Centre decides to withdraw a student's place due to a serious or persistent breach of the Centre's behaviour code, gross misconduct, or other circumstances that make the student's continued attendance untenable, the Centre will follow the behaviour management and consequences procedure set out in Section 6.0; inform the parent or guardian in writing of the reasons for the proposed withdrawal and the evidence relied upon; give the parent or guardian the opportunity to make representations (in writing or at a meeting) before a final decision is made; provide a written decision with reasons within 5 working days of the meeting or receipt of written representations; and give the parent or guardian one week's written notice of the withdrawal.

Parents and guardians have the right to appeal a withdrawal decision through the Complaints Procedure (Section 24.0).

Any fees paid in advance for the period after the withdrawal date will be refunded on a pro-rata basis.

27.0 MODERN SLAVERY STATEMENT

POLICY STATEMENT

Aletheia Academy is committed to acting ethically and with integrity in all its dealings and relationships, and to preventing modern slavery and human trafficking in its operations and supply chains.

Modern slavery encompasses slavery, servitude, human trafficking, and forced or compulsory labour. The Centre has a zero-tolerance approach to modern slavery and expects the same high standards from all its employees, contractors, suppliers, and other business partners.

LEGAL FRAMEWORK

Modern Slavery Act 2015

OUR COMMITMENTS

The Centre will ensure that modern slavery is not taking place in any part of our operations; conduct appropriate due diligence on suppliers and contractors; encourage the reporting of any concerns related to modern slavery, without fear of reprisal, through the Whistleblowing Policy (Section 19.0); and take appropriate action, including reporting to the relevant authorities, if any concerns are identified.

Any employee, contractor, or other person who has concerns about modern slavery should report them to the Centre Manager or through the Whistleblowing Policy.