

## **POLICY – Governance, Leadership and Management**

### **Education Universal**

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| Policy Author         | Laura Dickie, Head of Policy<br>Tonia Lewis, Education and Quality Improvement Lead |
| Approval Date         | Feb 2026                                                                            |
| Policy Approver       | Jo Dunn, Compliance, Regulation and Quality Director                                |
| Next Review Date      | Feb 2029                                                                            |
| Version No.           | 001                                                                                 |
| Policy Level          | Education                                                                           |
| Staff groups affected | All Education                                                                       |

### **Monitoring and Review**

This policy will be monitored on an ongoing basis through the service's established governance and quality assurance systems. Responsibility for ensuring that the policy remains compliant with legislation and regulatory frameworks sits with the Proprietor Representative and Regional Lead.

A formal review of this policy will be undertaken no later than three years from the date of approval, or sooner if changes in legislation, regulatory guidance, or operational requirements necessitate it.

The Head of Policy will support this process by identifying relevant changes in legislation, regulation, national standards and emerging best practice. The Head of Policy will also incorporate learning from inspections, audits and practice developments into future revisions whilst overseeing all proposed amendments to the universal content to ensure accuracy, consistency and compliance.



**September 2026**

**Tawanda Madhlangobe**  
**(Headteacher / Principal)**

**Andrew Sutherland/Rob Mcconomy**  
**(Proprietor Representative/Regional Lead)**

## Terminology

Our aim is to use consistent terminology throughout this policy and all supporting documentation as follows:

| Term                             | Definition                                                                                                                                 |
|----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|
| <b>‘Establishment’ or ‘Site’</b> | A generic term referring to the school/college owned by CareTech.                                                                          |
| <b>Learner</b>                   | Any child or young person under the age of 18, or young adult over 18 who receives education.                                              |
| <b>Service Head</b>              | The senior person with overall responsibility for the school/college.                                                                      |
| <b>Tutor/Teacher</b>             | Members of staff who have teaching responsibility for learners at the school/college.                                                      |
| <b>Parent/Carer</b>              | Parent or person with parental responsibility.                                                                                             |
| <b>Regulatory Authority</b>      | The independent regulatory body responsible for inspecting and regulating services (e.g., Ofsted, Estyn, Education Scotland).              |
| <b>Social Worker</b>             | The worker allocated to the individual learner; if none is allocated, the Duty Social Worker or Team Manager is responsible.               |
| <b>Placing Authority</b>         | The local authority/agency responsible for placing the learner or commissioning the service.                                               |
| <b>Local Authority</b>           | The local authority for the establishment’s location.                                                                                      |
| <b>Staff</b>                     | All staff working at the location, including employed staff, students on placement, contractors, agency staff, volunteers and proprietors. |

## 1. Purpose

Across our settings, children and young people should experience the same steady, reliable care—whoever they meet and wherever they learn. This policy turns that promise into daily practice. It sets out our non-negotiable universal standards and the few areas where sites will add local detail to reflect their nation's safeguarding arrangements and inspection frameworks. We also take an organisation-wide approach to certain procedures where a single, safe way of working benefits learner.

This policy sets out our **non-negotiable universal standards** for:

- safeguarding and child protection;
- behaviour, relationships and safety;
- inclusion and additional needs (SEND);
- curriculum quality and self-evaluation;
- data protection and information governance; and
- health, safety and risk.

It enables us to keep children safe, provide high-quality education that stands up to inspection, and handle personal data lawfully—in line with the frameworks of the nation where each site operates (see Appendices A).

## 2. Scope

This policy applies everywhere we educate, care for, or interact with learners, and to everyone who works with or for us. It sets the standards for how we keep learners safe, uphold dignity, protect information, and deliver high-quality education—whether learning happens on our premises, off-site, or online.

### 2.1 Who this policy binds

- **All staff:** permanent, fixed-term, part-time, sessional, agency, supply, peripatetic, apprentices, and those on probation.
- **Senior Leaders/Proprietors:** including any person acting with delegated authority.
- **Volunteers and placement students:** including mentors and coaches working with learners.
- **Contractors and third-party providers:** on-site or remote (e.g., IT support, catering, security, cleaning, alternative providers, tutoring platforms, external clubs).
- **Visitors:** professionals and partner agencies while engaged in activities with our learners.

### 2.2 Where this policy applies

- **On-site:** all buildings, grounds, residential areas, specialist spaces (e.g., workshops, labs), and any temporary accommodation.
- **Off-site activity:** trips/visits, residentials, sporting fixtures, alternative provision, work experience/internships, and community placements.
- **Transport and transitions:** minibuses, contracted transport, supervised travel between sites, and arrival/departure points when we are responsible.



- **Digital environments:** remote/blended learning, online platforms, school-managed devices/accounts, and any digital space used for learning, support, or assessment.

### 2.3 What the policy covers

- **Safeguarding and child protection** for learners under 18, and parallel safeguarding approaches for adult learners, including recognition, recording, escalation, multi-agency working, and safer recruitment/allegations processes.
- **Behaviour, relationships and safety**, including routines, de-escalation, proportional responses and, where necessary and lawful, searching, screening and confiscation undertaken by authorised staff in line with our organisational procedure.
- **Inclusion and additional needs (SEND), equality and accessibility duties and the design and review of reasonable adjustments and Education, Health and Care Plan provision.**
- **Curriculum quality and self-evaluation**, assessment, improvement planning, and how evidence is gathered and presented.
- **Data protection and information governance**, including personal data relating to learners, families, and staff; secure handling of records; subject access; DPIAs; and incident/breach response.
- **Health, safety and risk**, including educational visits, individual risk management, contractor controls, and post-incident learning.

### 2.4 Linked policies and hierarchy

This policy should be read alongside our safeguarding/child protection policy, behaviour policy, inclusion/equality and accessibility plans, curriculum and assessment guidance, data protection and information security policies, educational visits procedures, health and safety arrangements, and complaints/whistleblowing procedures. Where there is any conflict, the following order applies:

1. **Law and nation-specific statutory guidance,**
2. **This policy,**
3. **Supporting procedures and guidance,**
4. **Local operating instructions.**

### 2.5 Accountability and assurance

- **Leaders** ensure this policy is implemented, resourced, and evidenced; governance provides oversight and challenge.
- **Everyone** is responsible for following the standards in their daily practice and for seeking guidance when unsure.
- **Assurance activity** (monitoring, dip-samples, audits, and self-evaluation) checks that practice is safe, consistent, and inspection-ready.

### 2.6 Scope limits and escalation

If a scenario falls outside the detailed procedures but sits within the spirit of this policy (e.g., a new digital platform or novel off-site activity), staff must:

1. apply the principles in Section 4,
2. consult the relevant lead (e.g., safeguarding, data protection, health & safety), and
3. record decisions and rationale so actions are transparent and reviewable.

### 3. Local Adaptation Requirement (*Adapt Locally*)

Some sections in this policy are marked *Adapt Locally*. These sections are completed by each site to reflect local operational procedures or national equivalents (e.g., safeguarding framework, inspection remit, curriculum/quality framework, data protection contacts).\*\*

All local additions must be:

- Accurate
- Up to date
- Consistent with national legislation and regulator guidance
- Fully aligned with the universal standards in this policy

Where no local adaptation or local equivalent is required, the universal content remains fully applicable.

Cambian Wisbech School local governance model: the school operates as one school across Sessions House and Anglia Way. The Headteacher retains overall accountability and is supported by the Deputy Headteacher, Assistant Headteachers, Pastoral Manager, Lead Teacher and administrative functions. Regional and proprietor oversight provides external challenge and assurance. Daily operational briefings and debriefs, regular senior leadership review, policy and risk tracking, safeguarding oversight, quality assurance and regional reporting are used to maintain consistent standards across both sites.

### 4. Legal and Regulatory Context

This policy is governed by the statutory duties, safeguarding requirements and inspection arrangements of the nation in which it operates. The universal standards in this policy are implemented in line with the correct national frameworks set out in **Appendices A–C**, which summarise the legal, regulatory and inspection requirements for England, Wales and Scotland.

### 5. Our principles

Everything we do should feel human, fair and safe. That means we act early, explain our decisions, and leave a clear evidence trail. We respect children's rights; we use the least intrusive intervention that keeps everyone safe; and we document actions in a way that stands up to external scrutiny. Our approach reflects the spirit and letter of national frameworks and inspection handbooks across the three nations, while using an organisation-wide standard for searches so dignity and proportionality are never compromised.

- **Learner/child-centred, rights-respecting and early help-minded**—we act in learner's best interests, involve them and their families/cares, and intervene early.
- **Kind and clear**—warmth in tone, clarity in expectations, fairness in follow-through
- **Evidence-led and inspection-ready**—we know what good looks like and can show it
- **Privacy by design**—we collect only what we need, protect it carefully and use it lawfully.

## 6. Roles and accountability

Learners notice what adults consistently do. Roles are therefore defined so that accountability is clear, training is targeted, and evidence is always where the work lives. Leaders set tone and tempo; designated leads provide expert coordination; all staff carry the everyday responsibility to notice, record and act—including following our organisation-wide search procedure where a search is necessary and lawful.

- **Governing Body** — set the tone, ensure resources, monitor compliance and impact; hold leaders to account (inspection frameworks expect clear governance oversight).
  - **Headteacher** — owns delivery on site; appoints and designates the Designated Safeguarding Lead and deputies, the SENDCo and relevant information governance leads; ensures training, supervision, resourcing and evidence readiness.
  - **Designated Safeguarding Lead** — the Headteacher leads safeguarding referrals and multi agency work, maintains oversight of secure records and chronology, guides staff and ensures learning from cases. Deputy Designated Safeguarding Leads provide operational cover across Sessions House and Anglia Way.
  - **All staff and regular volunteers** — notice, record and share concerns promptly; follow behaviour and data procedures; complete training; uphold equality duties.
  - **Data Protection Officer/Lead** — advises on lawful processing, DPIAs, incidents and SARs; maintains accountability artefacts (ROPA, breach log, notices).
- Local leadership and oversight: Headteacher and Designated Safeguarding Lead, Tawanda Madhlangobe; Deputy Headteacher and whole school SEND leadership; Assistant Headteachers providing site and curriculum leadership across Sessions House and Anglia Way; Pastoral Manager supporting behaviour, attendance, examinations and pastoral quality assurance; Regional Lead and proprietor representatives providing governance, challenge and assurance. Current names and deputies are maintained on the school leadership and safeguarding contact lists.

## 7. Universal standards

### 7.1 Safeguarding and child protection

**Our promise:** *If something worries you, you act. Learners are heard, seen, and supported. Records are timely and factual; decisions are defensible and kind.*

- Recognise, record, report concerns promptly and follow the site's national multi-agency pathway.
- Maintain safer recruitment, induction, supervision and allegations/concerns about adults processes.
- Keep secure, accurate records and a chronology of significant events; evidence timely decisions and rationale. (National guidance expects timely, coordinated action.)

Local safeguarding routes: concerns are reported immediately to the Designated Safeguarding Lead or a Deputy Designated Safeguarding Lead and recorded on Behaviour Watch in line with the Safeguarding and Child Protection Policy. External referrals follow Cambridgeshire Children's Social Care and local safeguarding partnership procedures. The Local Authority Designated Officer route is used for allegations against adults. Emergency services are contacted immediately where there is imminent risk.

## 7.2 Behaviour, relationships and safety

**Our promise.** We build a calm, safe culture through respect, fairness and belonging. Expectations are taught, not assumed. When behaviour dips, we respond promptly, proportionately and with dignity, repairing harm and restoring learning.

### **What this looks like every day**

- Respect in every interaction — calm language, listening first, consistent follow-through.
- Clarity and fairness — routines are visible, corrections are explained, consequences match context.
- Belonging before boundaries — positive relationships and predictable norms so learners feel safe to learn.
- Restore and learn — we repair where there's harm, teach the behaviour we expect, and move forward.
- Act when safety requires it — authorised staff may use searching, screening and confiscation; always lawful, proportionate and recorded.

### **Local arrangements**

- The Headteacher retains overall accountability for behaviour and safety. The DSL, Assistant Headteachers and the Pastoral Manager support consistent implementation across both sites.
- Daily routines include structured arrival, transitions, movement, breaks, lunchtimes and end of day arrangements with clear staff responsibilities.
- Positive Behaviour Support, co regulation and restorative approaches are used to prevent escalation, repair harm and support re engagement with learning.
- Searches are authorised and undertaken only in accordance with the school's Searching, Screening and Confiscation arrangements. Records are retained through the appropriate school record and Behaviour Watch where relevant.
- Learner voice is gathered through individual reviews, key work, pastoral conversations and wider school consultation and is used to inform behaviour support and school improvement.

## 7.3 Relationships, Behaviour and Safety

**Our promise:** *We build safe, calm classrooms and environments through routines, relationships and clarity. Sanctions are proportionate; support is thoughtful; everyone's dignity is intact.*

- Run a whole-setting behaviour culture with clear routines and staged responses
- Searching, screening and confiscation—by authorised staff, when lawful and necessary, with recorded outcomes and appropriate parent/carer communication. (

Local behaviour and safety arrangements: searches are authorised and conducted only by the Headteacher or staff authorised in accordance with the school's Searching, Screening and Confiscation arrangements. Records are maintained on the appropriate school record and Behaviour Watch where relevant. De-escalation and restorative approaches are set out in the Positive Behaviour Support Policy. Visitor controls and safeguarding interfaces apply consistently across both sites.

#### 7.4 Inclusion, equity and additional needs (SEND)

**Our promise:** *Every learner belongs; support is early, practical and reviewed. We speak about strengths, not labels.*

- Identify needs early; plan and review support with learners and parents/carers; ensure reasonable adjustments and accessibility in line with the Equality Act/PSSED.
- Follow the nation-specific statutory systems:

Local inclusion arrangements: whole school SEND leadership is coordinated through the Deputy Headteacher and SENDCo function. All pupils have Education, Health and Care Plans and provision is reviewed with placing local authorities, parents and carers and relevant health or social care professionals. Statutory mediation and tribunal routes apply in England where required. Translation and interpreting are arranged where reasonable to support family participation.

#### 7.5 Curriculum, quality and self-evaluation

**Our promise:** *Our curriculum is ambitious and accessible; we know our impact and keep improving.*

- Deliver curriculum and assessment in line with national frameworks:
- Maintain a live improvement plan informed by self-evaluation

#### 7.6 Data protection and information governance

**Our promise:** *We only collect what we need, protect it carefully, and explain it clearly.*

- Comply with UK GDPR and Data Protection Act 2018: lawful bases, data minimisation, storage limitation, integrity/confidentiality, accountability; conduct

DPIAs for higher-risk processing; maintain breach response and privacy notices. Follow ICO guidance.

- Train staff; test understanding in practice (secure sharing, SAR handling, password hygiene, emailing safely). (ICO training and accountability resources).

Local information governance arrangements: the school follows CareTech data protection and information governance procedures with specialist advice from the Group Data Protection and Information Governance function. Data incidents are reported through the organisational reporting route. Privacy notices and retention requirements are applied to pupil, family and staff records and subject access requests are coordinated through the relevant organisational process.

## 7.7 Health, safety and risk

**Our promise:** *We take sensible, proportionate precautions so that learning can be joyful and safe.*

- Maintain risk assessments for activities, individuals and off-site visits; ensure first aid, contractor controls, and learning from incidents.

Local health, safety and risk arrangements: emergency and evacuation procedures are maintained for Sessions House and Anglia Way. Educational visits require prior approval, suitable risk assessment and the school's Educational Visits process. Individual pupil and activity risk assessments are reviewed when circumstances change. Accidents, incidents, hazards and estates concerns are recorded and escalated through the school and CareTech reporting arrangements. The Health and Safety Policy and Educational Visits Policy provide the detailed procedures.

## 8. Training and induction

**Mandatory for all:**

- Safeguarding/child protection (induction + regular refresh) in line with national guidance (England: *KCSIE*; Wales: *Keeping Learners Safe*; Scotland: GIRFEC principles and local child protection procedures).
- Positive Behaviour Support
- Searches
- Data protection essentials (UK GDPR/DPA; ICO).

Role specific training includes Designated Safeguarding Leads and deputies, SEND leadership, educational visits coordination, first aid, examinations responsibilities and physical intervention training where the role requires it and staff are authorised and trained. The school maintains a training matrix and monitors completion.

Maintain a **training matrix** at each site.

## 9. Monitoring, assurance and review

- **Monthly (light-touch):** safeguarding case dip-sample; behaviour/search record check (England); DPIA/breach/ SAR spot-check; equality and accessibility progress note.
- **Termly:** evidence map refresh; improvement plan progress review; curriculum/self-evaluation check against national frameworks.
- **Annual:** governance and regional assurance reporting, equality information and objectives review, Accessibility Plan review and whole policy review or earlier review where statutory guidance changes.

## 10. Records and evidence (keep where the work lives)

Have these ready—and make sure they're the records you use:

- Safeguarding: local pathway, Designated Safeguarding Lead and deputy rota, case chronology, referrals and outcomes, training logs, safer recruitment checks and learning from cases.
- **Behaviour & safety:** walkthrough notes; search authorisation list and records, removals/suspensions analysis with support actions.
- Inclusion: Accessibility Plan, equality information and objectives, representative Education, Health and Care Plans, individual learning plans and review records.
- **Quality:** concise self-evaluation; improvement plan; sampling; stakeholder voice.
- **Data protection:** privacy notices; ROPA; DPIAs; breach log; SAR tracker and responses; training records.

## 11. Standard operating procedures (SOPs) — one page each

### SOP 1 — Safeguarding Concern → Action

1. **Notice & listen.** Keep the Learner's words intact; don't promise confidentiality.
2. **Record immediately** on the agreed system (facts, times, who said what).
3. Tell the Designated Safeguarding Lead or a Deputy Designated Safeguarding Lead the same day. If there is immediate danger, follow the emergency route.
4. The Designated Safeguarding Lead or deputy triages the concern, consults where required, makes referrals through the local pathway and records outcomes, rationale, next steps and chronology.

### SOP 2 — Behaviour & Searching

1. **Relationships first:** consistent routines, calm language, staged response.
2. **Search** only if authorised, necessary and lawful; follow national guidance (who, where, how); keep a written record and inform parents appropriately.

### SOP 3 — Data Incident / Subject Access Request

1. **Contain & notify** the DPO/lead at once; log the incident.
2. **Assess risk;** if required, notify ICO and affected individuals within legal timeframes.
3. **SARs:** acknowledge promptly, verify identity, locate data, apply exemptions narrowly, respond within time limits. (*UK GDPR/DPA 2018; ICO guidance.*)

## 12. Local procedures and contacts

Each site completes and keeps current:

- Designated Safeguarding Lead and deputies, safeguarding partners, Cambridgeshire Children's Social Care, Local Authority Designated Officer, police and Early Help routes are maintained in the Safeguarding and Child Protection Policy and on the current safeguarding contact sheet at both sites.
- Authorised search list and search record form
- SEND leadership and placing authority contacts are maintained through the Deputy Headteacher and SENDCo arrangements. Education, Health and Care Plan review, mediation and tribunal routes follow the English SEND framework.
- DPO/IG contacts; incident mailbox; retention schedule; privacy notices. (UK GDPR/ICO).
- Emergency procedures and off-site visit approvals.

## 13. Measures that matter (how we know it's working)

**Leading indicators (shaping day-to-day):**

- % staff completing safeguarding/behaviour/data refresh on time (KCSIE & national guidance expect all-staff awareness).
- Time from "concern noticed" → "recorded" → "decision/referral" (national guidance prioritises timeliness).
- % searches recorded with parent comms within expected timeframe.
- % IDPs/CSPs reviewed to schedule (Wales/Scotland).
- % high-risk processes with current DPIA (UK GDPR).

**Lagging indicators (confirm the story):**

- Trends in referrals/Early Help; behaviour/removals; attendance; parent feedback; breach/SAR volumes and timeliness (ICO's accountability lens)

## Equality Impact Statement

This policy has been developed to promote equality, safeguard individual's rights, and ensure fair and inclusive practice across all services. The potential impact of the policy on children, young people, young adults, families, and staff with protected characteristics has been considered in line with the Equality Act 2010.

No negative impacts have been identified. Staff must apply this policy with sensitivity to individual need and make reasonable adjustments to ensure equitable access, safety, wellbeing, and participation for every individual. Any emerging risks of differential impact should be reported and addressed through ongoing review and quality assurance.

## Appendix A – England

Legislation, guidance and regulatory frameworks underpinning Governance, Leadership and Management in England.

### Education inspection framework (EIF) – Ofsted (Updated 9 September 2025; for use from 10 November 2025)

- **Means:** The EIF sets how Ofsted inspects education and skills providers (including non-association independent schools and further education & skills) and frames judgements on leadership, governance and continuous improvement.
- **Requires:** Providers must evidence effective leadership and governance, robust safeguarding, clear improvement planning, and accurate self-evaluation aligned to EIF evaluation areas and remit toolkits.
- **Our stance:** We align School/College self-evaluation and board reporting to the EIF leadership/governance expectations and FE remit methodology.
- **Implementation example:** Sites keep a single **Leadership & Governance Evidence Set** (SEF, improvement plan, risk register, safeguarding assurance, board minutes) mapped to EIF prompts.
- **Links:** <https://www.gov.uk/government/publications/education-inspection-framework/education-inspection-framework-for-use-from-november-2025>

### The Education (Independent School Standards) Regulations 2014 – England (In force 5 January 2015; current)

- **Means:** Statutory minimum standards independent schools must meet; includes leadership & management (Part 8), provision of information (Part 6) and complaints (Part 7).
- **Requires:** Proprietors/boards ensure effective leadership and governance, publish required information, operate compliant complaints procedures, and maintain welfare and safety systems.
- **Our stance:** We treat Parts 6–8 as the governance backbone for all School/College sites, with FE sites mirroring these controls where equivalent.
- **Implementation example:** Sites maintain an **ISS compliance grid** (Parts 6–8) cross-referenced to policies, website disclosures, complaints logs, and governance records.
- **Links:** <https://www.legislation.gov.uk/ukSI/2014/3283>

### Keeping children safe in education (KCSIE) (Statutory guidance, in force 1 Sep 2025)

- **Means:** Statutory safeguarding guidance for **schools and colleges**; Part 2 sets management of safeguarding duties for leaders and governance.
- **Requires:** Governing body/proprietor ensure policies, DSL leadership, safer recruitment, training, online safety, and robust oversight; applies to sites with under-18s in FE too.
- **Our stance:** Headteacher/Principal and DSL provide a standing KCSIE compliance update each term to proprietorial governance.
- **Implementation example:** Annual KCSIE read/brief record for all staff and governors; DSL file audit and SCR spot-checks logged to the board.

- **Links:**

[https://assets.publishing.service.gov.uk/media/68add931969253904d155860/Keeping children safe in education from 1 September 2025.pdf](https://assets.publishing.service.gov.uk/media/68add931969253904d155860/Keeping_children_safe_in_education_from_1_September_2025.pdf)

**Working together to safeguard children (WT 2023) (Statutory multi-agency guidance, 12 Jun 2025 page; Dec 2023 guidance)**

- **Means:** Sets national multi-agency safeguarding standards and leadership/accountability across partners, including education settings.
- **Requires:** Leaders embed the national child protection standards, information-sharing and multi-agency escalation; governance assures compliance and partnership working.
- **Our stance:** Sites use WT 2023 to test thresholds, escalation routes, and audit inter-agency casework from a leadership lens.
- **Implementation example:** Annual safeguarding partnership audit (WT 2023 standards) with actions tracked in the leadership improvement plan.
- **Links:** [WT 2023 landing \(DfE\)](#)

**Further education & skills inspection — toolkit/operating guides (Guidance, 9 Sep 2025; updates 5 Nov 2025)**

- **Means:** Ofsted's FE/skills inspection toolkit and operating guides set evaluation areas including **leadership and governance** and **safeguarding** at provider level.
- **Requires:** FE leaders demonstrate impact of systems, quality assurance, safeguarding and compliance; used for self-evaluation and inspection.
- **Our stance:** Colleges use the FE toolkit as the leadership checklist alongside the EIF.
- **Implementation example:** FE leadership dashboard aligned to toolkit headings (leadership/governance; safeguarding) with evidence packs for inspection.
- **Links:** [FE/skills toolkit & guides landing](#)