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NEURODIVERGENT AFFIRMATIVE BEHAVIOUR POLICY

**Underley Garden**

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**BEHAVIOUR POLICY**

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1. **INTRODUCTION**

Outcomes First Group places the safety and well-being of the children and young people we educate and care for as its highest priority. We aim to create inclusive communities where children and young people flourish, enjoy their education in a culture and environment which is conducive to their strengths and needs.

Our schools have different identities and approaches, which are unique to them and reflect the needs of their pupils. The aim of this policy is to promote positive behaviour through a supportive and consistent approach that is based on an understanding of our children and young people’s individual needs.

Underley Garden is a specialist provision which offers support for children and young people who are neurodivergent with multiple complex co-occurring needs.

The school has a holistic neurodiversity affirming approach that encourages positive behaviour by proactively and flexibly supporting our pupils’ individual strengths and needs. Staff are trained to apply this approach in practice at all times and support our children and young people consistently and fairly, developing positive, respectful relationships with them.

# 2.0 LEGAL FRAMEWORK AND GUIDANCE

This policy complies with all relevant regulations and other legislation as detailed, including:

* [The Education (Independent School Standards 2018)](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/800615/Independent_School_Standards-_Guidance_070519.pdf) (Part 3, Para 9 and Part 6 Para 32)
* [Equality Act (2010),](https://www.legislation.gov.uk/ukpga/2010/15/contents)
* [Education Act (2011)](https://www.legislation.gov.uk/ukpga/2011/21/contents/enacted)
* [Children and Families Act 2014](https://www.legislation.gov.uk/ukpga/2014/6/contents/enacted)
* [Positive environments where children can flourish, Ofsted Guidance (2021)](https://www.gov.uk/government/publications/positive-environments-where-children-can-flourish)
* [Behaviour and Discipline in Schools DFE Guidance (2016)](https://dera.ioe.ac.uk/25117/1/Behaviour_and_Discipline_in_Schools_-_A_guide_for_headteachers_and_School_Staff.pdf)
* [Behaviour in Schools A guide for Head Teachers and School Staff (September 2022)](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1101597/Behaviour_in_schools_guidance_sept_22.pdf) DFE Guidance
* [Use of reasonable Force – advice for school leaders, staff and governing bodies](https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools)
* [Keeping Children Safe in Education, statutory guidance for schools and colleges (September 2022)](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1101454/Keeping_children_safe_in_education_2022.pdf)
* [DFE Guidance on Searching, Screening and Confiscation (July 2022)](https://www.gov.uk/government/publications/searching-screening-and-confiscation)
* [Standards in Scotland’s Schools etc. Act 2000](https://www.legislation.gov.uk/asp/2000/6/contents)
* [Education (Additional Support for Learning) (Scotland) Act 2004](https://www.legislation.gov.uk/asp/2004/4/contents)
* [Holding safely a guide for residential child care practitioners and managers (2005) SIRCC](https://hub.careinspectorate.com/media/1213/holding-safely-a-guide-for-residential-child-care-practitioners-and-managers.pdf)

The [Behaviour and Discipline in Schools Guidance (2016)](https://dera.ioe.ac.uk/25117/1/Behaviour_and_Discipline_in_Schools_-_A_guide_for_headteachers_and_School_Staff.pdf) states that ‘schools need to ensure they have a strong behaviour policy to support staff in managing behaviour, including the use of rewards and sanctions’. Behaviour policies are typically informed by behaviourist approaches; however we are aware that they are not successful with all individuals. This is especially true for schools with a neurodivergent population.

[Behaviour in Schools (2022)](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1101597/Behaviour_in_schools_guidance_sept_22.pdf) is clear that good behaviour in schools is central to a good education, with schools providing a calm, safe and supportive environment which pupils want to attend and where they can learn and thrive.

# 3.0 POLICY FRAMEWORK

The Group is committed to reducing the use of restraint and restrictive practices and supporting preventative practices across all services and is part of the Reducing Restraint Network. The Group’s Restraint Reduction Practices Board has developed a policy supplement, **The Use of Restrictive Practices and Restraint Terms of Reference**, which must be implemented as part of this policy.

The neurodiversity affirmative approach in all our Options Autism schools is underpinned by our **Ask, Accept, Develop Strategy** core principles. This is supported by the Ask, Accept, Develop Accreditation Criteria which outlines best practice and is driven forward by the Ask, Accept, Develop Champion in each school. Both the Strategy and the Accreditation have been discussed, reflected on and embraced by our Lived Experience Expert Panel and our Advisory Board.

For those young people who have also experienced trauma, our schools can draw from our Acorn Education and Care Trauma Informed Practice training and approach.

This policy should be read alongside the above strategies, guidance and other relevant School and Group policies and guidance, including :

* Safeguarding Policy
* Anti-bullying Policy
* Child-on-Child Abuse/Peer-on-Peer Abuse Policy
* Suspension and Permanent Exclusions Policy
* Self-Harm and Self-Injurious Behaviour policies
* Medication Policy
* Code of Conduct and Ethics Policy
* Managing Allegations Against Staff Procedure
* Complaints Policy
* Ask, Accept, Develop Strategy

1. **PURPOSE OF THIS POLICY**

This policy aims to promote a strength-based, person-centred, acceptance-focused inclusive community where all our students experience a true sense of belonging.

At Underley Garden we aim to promote positive social, emotional and behavioural change in our children and young people through a supportive and consistent approach across education and care based on the needs of our children and young people. Our Positive Behaviour Management Strategy is a holistic person centered approach to the development of our children and young people based on effective, evidence-based methods of teaching, learning and quality of care.

Underley Garden admits vulnerable children and young people who experience significant barriers to learning due to severe and complex learning difficulties and disabilities, autistic spectrum condition, associated medical and health needs and mental health conditions.

Many of our children and young people exhibit and display behaviours that act as barriers to learning and inclusion. An integral part of our holistic strategies is to overcome these barriers. We aim to provide a consistent, supportive and well supervised environment where children and young people feel safe and secure and reach their potential through positive relationships.

**4.1 POLICY IMPLEMENTATION**

Everyone is expected and supported to treat one another with dignity, kindness and respect. We use an ‘inclusion by design’ model, meaning we create school environments which are predictable and comfortable and teaching teams who are consistent whilst remaining adaptable.

This policy can be implemented alongside Individual Plans, which may identify a specific approach tailored to a student’s strengths and needs.

When incidents of behavioural distress and emotional dysregulation occur, we respond promptly, predictably and with confidence to maintain a calm, safe learning environment. We consider and reflect together how the likelihood of such incidents recurring can be reduced.

The policy, practice and procedures aim to reflect and demonstrate the importance of the school’s commitment to promoting the entitlement of children and young people to the highest quality of education, care, health and therapy. The philosophy and ethos of the school reflects acceptance and respect for all children and young people irrespective of their age, sex, religion, disability, ethnicity, sexual orientation, gender identity and gender re-assignment or immigration status and includes a clear set of values that are seen to be important within the school and wider community, they are as follows:-

* To value each other and our community
* To listen to each other and ask for help when we need it
* The promotion of mutual respect, acceptance, trust and honesty
* To develop and encourage self-confidence, self-worth, self-discipline and ultimately independence
* To proactively manage and de-escalate challenging and unacceptable behaviours
* To implement holistic, integrative and consistent approaches which promote positive behaviour, develop children and young people’s understanding and manage behaviour fairly, effectively and encourage young people to achieve their potential
* To establish and consistently apply clear and obvious boundaries, to ensure children and young people’s safety, security and well-being
* To work in partnership with all stakeholders, to promote good behaviour
* To apply rules reasonably and fairly, to use Consequences effectively and proportionately in relation to the age, needs and ability of the child or young person, or any religious requirements affecting them
* To develop and reinforce the principles of good citizenship, including the fundamentals of British values of democracy, the rule of law, individual liberty, and mutual respect for and tolerance for of those with different faiths and beliefs
* Corporal punishment is illegal in all circumstances

**5.0 OUR PHILOSOPHY**

* Young people are all individual and unique, and we celebrate this.
* We have an inclusive by design approach.
* We value developing strong and respectful relationships. This includes with our young people, between staff, with parents/carers, and the wider community, such as CAMHS.
* We maintain clear boundaries and expectations to create safe and predictable environments.
* We include consultation to the student population to ensure a co-produced inclusive neurodiversity affirmative school.
* We recognise children can be distressed and can experience meltdowns or shutdowns. We also recognise that some behaviours are just part of everyone’s childhood and adolescence, for example, pushing boundaries when developing independence.
* We recognise that we as a whole school community we impact one another. Regular reflective practice enables us to understand, make sense of and support this impact positively.
* Our philosophy is never based on punishment but **focused on solutions**.
* There are times when children may become so distressed that additional measures may be required to keep them and others safe. Our staff are trained to respond appropriately and must always use the least restrictive intervention as possible.
* Our teachers and wider school team are role models in creating inclusive communities.

# 6.0 MAINTAINING HIGH STANDARDS OF WELLBEING TO SUPPORT POSITIVE BEHAVIOUR

Senior Leaders take responsibility for implementing measures to ensure our school’s approach to supporting needs and behaviour meets the following national minimum expectation:

* We have high expectations of pupils. Our expectation relating to their behaviour is always understood according to their individual strengths and needs.
* School leaders visibly and consistently support all staff in supporting pupil need and behaviour through following this policy.
* Universal, Enhanced and Specialist measures are in place to support our neurodivergent students to be the best versions of themselves.
* All members of the school community create a positive safe environment in which bullying, physical threats or abuse and intimidation are not tolerated, in which students are safe and feel safe and everyone is treated respectfully.
* Any incidents of bullying, discrimination, aggression, and derogatory language (including name calling) are dealt with quickly and effectively.

**6.1 KEY ROLES**

**The role of school leaders -** Our school leadership team is highly visible, with leaders routinely engaging with pupils, parents / carers and staff on setting and maintaining the school culture and an environment where everyone feels safe and supported.

Leaders ensure that all new staff are inducted into the Group and School culture to ensure they understand its rules and routines and how best to support pupils to participate in creating the culture of the school. All new staff receive bespoke training as part of their induction into understanding the needs of the pupils through the group’s Neurodiversity training modules, and *CPI (Crisis Prevention Institute) De-escalation and Behaviour Management Training*. Ongoing training and support is also provided via the Group’s Well-being and Clinical Team.

**The role of school staff -** All school staff have a responsibility to provide a safe environment in which pupils can learn, including regulation of their own emotions and behaviour, encouraging respect for others, and preventing all forms of bullying (including cyberbullying, prejudice-based and discriminatory bullying) and being alert to any signs of child-on-child abuse. Staff have an important role in developing a calm and safe environment and establishing clear expectations and boundaries. Staff uphold the whole-school approach to behaviour by teaching and modelling expected behaviour and positive relationships so that pupils can see examples of good habits and are confident to ask for help when needed.

Staff communicate school expectations, routines, timetables, values and standards both explicitly through teaching skills, visual supports and in every interaction with pupils. Staff also receive clear guidance about school expectations of their own conduct, which are set out in the Group’s *Code of Conduct and Ethics Policy*.

**The role of pupils -** All pupils deserve to learn in an environment that is calm, safe, supportive and where they are treated with dignity. To achieve this, every pupil is made aware, in line with their individual capacity, of the school standards and expectations. Pupils are taught that they have a duty to contribute to the school’s inclusive community culture. Our pupils are asked about their experience of the school and provide feedback in ways that are accessible and meaningful to them. This can help support the evaluation, improvement and implementation of this policy. Every pupil is supported to achieve the best standards they can, including an induction and transition process that familiarises them with the school culture.

**The role of parents/carers** - The role of parents/carers is crucial in helping the school to develop and maintain our culture and approach. Including parents and carers within the whole school community is key to ensure comprehensive support around the young person. Parents/carers are encouraged to get to know the school’s Behaviour Policy and related policies and, where possible, take part in the life of the school. Parents/carers should be encouraged to reinforce the policy at home as appropriate. Where a parent/carer has any concerns, they should raise this directly with the school while continuing to work in partnership with them.

We build and maintain positive relationships with parents/carers, by keeping them updated about their child, encouraging them to celebrate successes, or holding sessions for parents/carers to help them support the consistency of the policy and their child’s needs. Where appropriate, parents/carers should be included in pastoral work, including attending reviews of specific interventions in place.

**Clinical and wellbeing approaches -** The overarching wellbeing approach throughout the Group is embedded by delivering care, education and clinical provisions that meet a young person’s needs, informed by current wellbeing research theory and evidence. The Clinical Well-Being Team is multi-disciplined, and includes psychology/psychotherapy, speech and language therapy and occupational therapy. The Team provides training, consultation, individual therapy, group sessions and facilitate reflective practice for staff teams.

**Focus on relationships** – Positive and meaningful relationships throughout the whole school community are essential to fostering a healthy environment for all. Empathy, trust and consistency are all important in building relationships. For various reasons, children can test and challenge relationships, therefore adults responsible for them require the ability to sensitively and confidently manage the adult-child relationship. There is an expectation that we are kind to one another and help to lead and drive high standards of culture and positive behaviour across the Group to benefit young people.

**Individual needs** – We celebrate difference and make reasonable adjustments to enable children to access learning and engaging to the best of their ability. This approach is informed by formal assessments (e.g. Educational/Clinical Psychologist), EHCP’s, Clinical-Wellbeing Assessments and Plans and getting to know our young people – their likes, dislikes, and how to help them reach their potential. As far as possible, we use a proactive approach to anticipate likely triggers of behaviour.

**7.0 CREATING AN INCLUSIVE COMMUNITY**

* **Clear expectations and consistent boundaries:** We clearly communicate our expectations through speech, visuals and modelling so all staff and students (in line with their ability) are aware of the expectations and boundaries appropriate to their strengths and needs.
* **The Curriculum:** Our behaviour curriculum is part of our Personal, Social, Health and Citizenship / Sex and Relationships curriculums.
* **Routines:** Routines and structure are integral to the school day. For example teachers ensure all lessons start on time, with clear definition of classes having a beginning, middle and ending.
* **Environment**: We create calm, clean spaces, taking into account the sensory sensitivities, of our neurodiverse population.
* **Communication**: We use a total communication approach which aligns with the communication strengths and needs of our neurodiverse population.
* **Emotional understanding**: Many of our Neurodivergent students may experience more intense emotional responses and/or struggle to process, share, and express their emotions. We support our students to develop skills to understand and manage their emotions and behaviour through the use of models, such as, the *Zones of Regulation*. This also supports a shared language approach within the whole school community.
* **What we do not support –** This list is inclusive of, but not exhaustive, the Group does not support talking about children in front of them or others, shouting at one another, swearing, and disrespectful language.

8.0 USE OF REWA**RDS AND RECOGNITION**

* **Recognition -** We recognise and celebrate effort not just achievement and examples of our rewards and reinforcements include praise, ‘Star of the Week,’ days out, unexpected rewards, golden time, certificates. Achievements will be shared with the wider community, such as parents/carers. Rewards are never taken away from a student once they have been earned for the intention of providing a sanction. The use of food as rewards will not be relied upon.
* **Rankings –** Reward systems will not be on public display as we recognise this could be shaming and demotivating for some young people.
* **Unfair incentives** - we have eliminated unfair school incentives, such as attendance awards, as we know neurodivergent young people will have difficult days when they will struggle to attend school and they should be penalised.
* **Use of monetary rewards** – Money will not be used as an incentive for good behaviour.

9.0 PRESCRIBED MEDICATION **- Staff must be familiar with the Medication Policy for schools**

Children and young people within our settings may take prescribed medication. We will work in collaboration with the prescribing professional and those supporting the young person to ensure their needs are well supported, in line with our legal responsibilities. We will support and monitor the impact of this medication. Attendance at school is not dependent on a student taking their medication. We will also support young people in their informed consent around medication.

**10.0 RESPONDING TO DISTRESS AND NEED**

There are times when our students become distressed and may require other sources of support. When a member of school staff becomes aware they respond empathically, predictably, promptly and clearly in line with this policy.

The first priority will be to establish the physical and emotional safety of students and staff and to restore a calm environment. Keeping pupils safe is always the highest priority for all staff.

We will also consider whether the behaviour gives cause to suspect that a pupil is suffering, or is likely to suffer, harm. Staff must be familiar with, and follow, the school’s Safeguarding Policy. All concerns, no matter how small, that a child is being harmed or is at risk of harm must be reported to the school’s Designated Safeguarding Lead (DSL) or Deputy.

The School has the responsibility to respond to pupil’s behaviour outside of the school premises (including online) to such an extent as is reasonable.

The school adopts a range of initial intervention strategies to help pupils support their emotional regulation and behaviour.

**11.0 NATURAL AND LOGICAL CONSEQUENCES**

Positive reinforcement combined with natural and logical consequences are important and necessary to support our whole school culture.

All children require boundaries and consequences that are fair, predictable and understandable.

Natural Consequences occur without the intervention of an adult. For example, allowing a cognitively able student to choose not to wear a coat on a cold day when outside; the natural consequence is feeling cold and the student can when choose whether to change their behaviour in the future.

Logical consequences are adult-led and are linked to the event, and when a natural consequence may not occur or may be a safety hazard. For example, if a student is jumping on a sofa in the classroom, instead of allowing a “natural” consequence in this scenario (fall with a head bump, loose tooth, or broken toe), we offer a logical consequence instead by saying: “we can sit on the couch. It is a place to relax and stretch out. Can you stretch on the couch? If you want to bounce, lets go outside”.

Natural and Logical Consequences will be communicated to the young person in an empathic and collaborative way, never in a shaming way.

Our school does not use punitive sanctions, for example keeping in at breaktimes, detention after school or the removal of privileges.

**12.0 DE-ESCALATION**

De-escalation techniques are our primary responsive strategies, these include:

* our staff teams will use a calm approach with neutral body language
* our staff teams will use minimal verbal interactions during de-escalation
* we will use positive framing language (“kind hands” rather than “stop hitting”)
* we will use planned and proactive positive distraction (for example talk about the young person’s passion)
* we will divert the young person to a different, preferred activity or experience
* change their environment (for example allowing a young person to access a calm room or outdoor safe space)
* we will encourage the young person to engage in a preferred sensory activity
* changes to the team supporting the young person
* use of space and allowing the young person to move and run, perhaps complete a sensory circuit.
* using visual supports to support the young person to process and understand
* any unique strategies that the young person themselves has requested as part of their consultation to their individualised plan that aligns with the Ask, Accept, Develop Strategy

We do not use:

* planned ignoring
* asking a student why they are behaving in a certain way
* any shame based approached
* any language which could be interpreted as threatening, e.g. ‘last chance.’

# 13.0 THE USE OF RESTRICTIVE PHYSICAL INTERVENTION

We are aware that restraint of any kind can have a negative impact on a child’s mental health and damage relationships between children and those who educate for them.

Restraint is only ever used as a last resort response to maximise safety and minimise harm of the child/young person and others.

A reasonable, proportionate and least restrictive course of action is taken when there is an imminent or immediate risk of harm to self or others.

It will always be used for the shortest time possible and only when there is no other alternative to help children and staff to stay safe. Staff are fully trained using CPI and work in line with the Group’s *Use of Restrictive Practices and Restraint Terms of Reference.*

Where possible we consult with all students about their de-escalation plans to ensure their voice is heard and understood in relation to their triggers and how they want their staff team to respond.

**14.0 SEARCHING, SCREENING AND CONFISCATION**

School staff can confiscate, retain or dispose of a pupil’s property in line with the [DFE Guidance on Searching, Screening and Confiscation](https://www.gov.uk/government/publications/searching-screening-and-confiscation) Staff should consider whether the confiscation is proportionate and consider any special circumstances relevant to the case.

Items which contribute to the student’s wellbeing, neurodivergence and sense of safety (for example fidget toys) will never be removed unless there is a risk of significant harm.

**15.0 REMOVAL FROM CLASSROOM**

Removal from a classroom is only ever considered when the safety and wellbeing of the individual, classmates and teaching staff are at risk. We will always additionally consider the potential disruption of others learning opportunities in immediate area. The student will continue to be supervised at a level appropriate to their emotional and intellectual needs. At other times, we may choose to remove the rest of their peers in order to ensure their safety and to cause minimal disruption to their learning.

The Headteacher maintains strategic oversight of any removals, makes sure the reasons that may lead to pupils being removed are transparent and known to all staff and pupils, that removal is for the shortest time possible, in an appropriate place that is resourced to learn and refocus, supervised by trained staff, with a clear process for reintegration of the pupil into the classroom as soon as it is appropriate and safe to do so. Pupils will not be removed from classrooms for prolonged periods of time without the explicit agreement of the Headteacher.

**16.0 SUSPENSION AND PERMANENT EXCLUSIONS**

All pupils are entitled to an education where they are protected from disruption and can learn in a calm, safe and supportive environment. Headteachers can use suspension and permanent exclusion in response to serious incidents or in response to persistent poor behaviour which has not improved following in-school adaptions and support.

This will also be seen as a very last resort, as removing a pupil from school as an environment with trusted adults is rarely likely to be in a pupil’s best interests. We also recognise the impact this might have on and young person and or parent/carers and will work to support the young person and their family/carers. Please refer to the *Suspension and Permanent Exclusion Policy* for more information.

**17.0 DE-BRIEFING**

It is good practice to provide a space for young people to de-brief following a significant incident and to support relationship reparation. This needs to be at a time that is appropriate and timely and when everyone is ready. We can use visual and narrative techniques to support and promote learning during any student de-brief. It is recognised that some neurodivergent students will struggle to reflect as they may not recall memories during a meltdown and therefore, we ensure all de-briefs occur in the student’s best interest.

**17.1 COLLEAGUE WELL BEING**

It is recognised that managing complex needs can be incredibly stressful for individuals and for teams. Supporting colleagues after an incident and/or challenging day occurs in a non-judgemental and empathic safe space. Post incident de-briefs are mandatory.

# 18.0 RECORDING AND REPORTING

The school has a strong and effective system for data capture, including all components of the behaviour culture (Sleuth). This is monitored and objectively analysed regularly by designated staff, with a monitoring and evaluation cycle, with engagement from school leaders and governors. This includes, behaviour incident data, attendance, permanent exclusion and suspension data, incidents of searching, screening and confiscation, and surveys for staff, pupils, governors, proprietors and other stakeholders on their perceptions and experiences of the school behaviour culture.

School leaders and staff analyse and audit data with an objective lens and from multiple perspectives: at school level, group level and individual staff and pupil level. School leaders pose questions to drill down further to identify possible trends and patterns of individual behaviours to proactively prevent future dysregulation. Analysing the data by protected characteristic and using those findings to inform policy and practice help the school ensure that it is meeting its duties under the *Equality Act 2010*.

**Reporting to outside agencies:** Behaviours presented by the young people which are dangerous or criminally harmful will require reporting to outside agencies, such as the police. If concerns are raised about staff, referral to outside agency may be required, such as the Local Authority or police. Staff must follow the process set out in School *Safeguarding Policy* and *Managing Allegations Against Staff Procedure.*

**19.0 ANTI BULLYING**

Children may lack the social skills required to manage relationships, and/or they may not have learnt a way of managing relationships through appropriate role modelling.Staff will remain vigilant to signs of bullying, which could be obvious or subtle, in person or online, and will be dealt with according to the School’s *Anti-Bullying Policy*.

**20.0 CHILD-ON-CHILD ABUSE and SEXUAL HARRASSMENT**

**Please refer to the Child-on-child Abuse Policy**

Following any report or concerns raised of child-on-child abuse or sexual harassment offline or online, the school will follow the School *Safeguarding Policy* and *Child-on- Child Abuse Policy* and notify the Designated Safeguarding Lead (DSL) or Deputy immediately. They should also inform their Clinical well-being lead. The school is clear that sexual violence and sexual harassment are never acceptable, will not be tolerated and that incidents where behaviour falls below expectations will be addressed. All staff are aware of the importance of challenging all inappropriate language and behaviour between pupils. The school will never normalise sexually abusive language or behaviour by treating it as ‘banter,’ an inevitable fact of life or an expected part of growing up. We advocate strenuously for high standards of conduct between pupils and staff; they should demonstrate and model manners, courtesy and dignified/respectful relationships.

It is essential that all victims are reassured they will be supported, kept safe, and are being taken seriously, regardless of how long it has taken them to come forward. Abuse that occurs online or outside of the school will not be downplayed and will be treated equally seriously. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor will a victim ever be made to feel ashamed for making a report or their experience minimised.

**21.0 ONLINE INCIDENTS – Please also see the Staying Safe Online Policy**

The way in which pupils relate to one another online can have a significant impact on the culture at school. Negative interactions online can damage the school’s culture and can lead to school feeling like an unsafe place. Behaviour issues online can be very difficult to manage given issues of anonymity, and online incidents occur both on and off the school premises. The school is clear that even though the online space differs in many ways, the same standards of behaviour are expected online as apply offline, and that everyone should be treated with kindness, respect and dignity.

Inappropriate online behaviour including bullying, the use of inappropriate language, the soliciting and sharing of nude or semi-nude images and videos and sexual harassment will be addressed in accordance with the same principles as offline behaviour, and the process set out in the Sa*feguarding Policy* for reporting must be followed when an incident raises a safeguarding concern. The Designated Safeguarding Lead or Deputy must be informed immediately.

The school will address with pupils when their behaviour online poses a threat or causes harm to another pupil, and/or could have repercussions for the running of / reputation of the school.

**Please also see the school’s Mobile & Smart Technology Policy**

1. **SUSPECTED CRIMINAL BEHAVIOUR**

In cases when a member of staff or headteacher suspects criminal behaviour, the school will make an initial assessment of whether an incident should be reported to the police by gathering enough information to establish the facts of the case. These initial investigations will be fully documented, and the school will make every effort to preserve any relevant evidence. Once a decision is made to report the incident to police, the school will ensure any further action they take does not interfere with any police action taken. However, the school retains the discretion to continue investigations and implement their own consequences so long as it does not conflict with police action.

When making a report to the police, it will often be appropriate to make in tandem a report to the Local Authority. The School’s Safeguarding Policy must be followed, with the Designated Safeguarding Lead (or deputy) being informed immediately.

1. **COMPLAINTS**

Any complaint or concern raised by a young person will be taken very seriously, and staff will be vigilant to obvious and subtle signs of this. A complaint will be dealt within in accordance with the Complaints Policy.

Following an RPI incident or any positive behaviour management strategy all young people have the opportunity to make a complaint should they wish to do so. This can either be raised during a de-brief session or after the incident with a member of staff that the young person feels comfortable with. Underley Garden has a complaints policy that young people are informed of when they first arrive and can be directed to in order to aid them with staff support to view their feelings. All young people will be supported to make a complaint via the appropriate procedure and all efforts will be made to resolve any arising issues.

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**We are part of the Outcomes First Group Family, by working   
together we will build incredible futures by empowering   
vulnerable children, young people and adults in the UK to be   
happy and make their way in the world.**