

Leadership Policy: 'Governance', Check-and-Challenge and Accountability

Clarity Independent School

Bridge Barn Farm
Woodhill Road
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Clarity Independent School is committed to safeguarding...

"Our school is committed to our whole-school approach to safeguarding, which ensures that keeping children safe is at the heart of everything we do, and underpins all systems, processes and policies...We promote an environment where children and young people feel empowered to raise concerns and report incidents and we work hard in partnership with pupils, parents and caregivers to keep children safe."

Clarity Safeguarding Policy September 2025

This is version [3.2]

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Legislation and Statutory Guidance

Governing boards of maintained schools must have an instrument of government which sets out information about how the board is constituted. This requirement is set out in [The School Governance \(Constitution\) \(England\) Regulations 2012, part 5, regulation 28](#).

However, for Independent Schools, there is no statutory requirement to have a Governing body, as stated in the Independent School Standards, which all Independent Schools are legally obliged to satisfy:

34. (1) The standard about the quality of leadership and management is met if the proprietor ensures that persons with leadership and management responsibilities at the school—
(a) demonstrate good skills and knowledge appropriate to their role so that the independent school standards are met consistently;
(b) fulfil their responsibilities effectively so that the independent school standards are met consistently; and
(c) actively promote the well-being of pupils.
(2) For the purposes of paragraph (1)(c) “well-being” means well-being within the meaning of section 10(2) of the Children Act 2004(9).

(Independent School Standards, www.legislation.gov.uk)

In addition, the Independent School Standards Guidance from the DfE, states, in Part 8: Quality of Leadership and Management of Schools, that:

*“Section 94 of the Education and Skills Act 2008 requires that in addition to those matters covered by the standards described above [Parts 1-7], the Secretary of State must prescribe standards relating to the quality of leadership in and management of independent schools. As is the case with the other standards, **the approach behind this standard is to focus on required outcomes**. It is not the intention to tell schools how to govern or manage themselves – i.e. about how they are to go about achieving the required outcomes.”*

(Independent School Standards Guidance, www.assets.publishing.service.gov.uk)

The School agrees that the best standard of leadership is to focus on its impact for pupils and families through achieving the required outcomes, rather than judging the governance itself as the vehicle. Whilst intention and implementation are important, where are they without a successful, fruitful, impact, which is advantageous for all stakeholders?

The Proprietor of Clarity Independent School ('The School') recognises the importance of regular, cohesive, dynamic monitoring of staff and check-and-challenge of leadership, including of the Headteacher (HT) herself, to ensure the highest quality service is provided for all users, and believes it is necessary to demonstrate rigorous accountability processes are in place.

The school's model for accountability is based on several legislative and guidance documents to ensure that all roles are provided for within the School's Governance, Check-and-Challenge and Accountability for Leadership Policy ('This Policy'):

- [Model instrument of government in Annex C of statutory guidance for maintained schools](#), August 2017. DfE.
- The Education (Independent School Standards) Regulations 2014. [Legislation.gov.uk](http://www.legislation.gov.uk).
- The Independent School Standards Guidance for Independent Schools, April 2019. DfE.
- [What Governing Boards Should Expect from Each Other](#), Updated 2022. National Governance Association (NGA).

- [Governance in Academy Trusts Guide](#) and [Maintained Schools Guide](#), updated 7th March 2024. DfE.
- The Competency Framework for Governance, January 2017. DfE (has now been replaced by the two Guides above).
- The Key Support for Leaders Documents (www.schoolleaders.thekeysupport.com):
 - [Governing Boards Statutory Responsibilities](#), reviewed 31st July 2023.
 - [Responsibilities of the Governing Board KeyDoc](#), reviewed 25th March 2024.

Rationale

Getting governance right is important because of the significant impact it has on the quality of educational provision and the opportunity and life chances of children ('What Governors and HT should expect from each other,' National Governance Association, Updated 2022). The aim of a governing body, should a school have one, is to get governance of the school right, by the HT and Governors working together, being mutually supportive and respecting each other's roles and responsibilities.

However, (considering the three elements of effective Governance which can only be applied to the Governors' themselves as being satisfied where there is no governing board) there are five remaining elements to effective governance which are incorporated into the School's robust system for check-and-challenge of leadership to ensure effective accountability is in place.

The eight elements of effective governance



Respective roles of governors and HT

A key aspect of governors (if a school has them) and HT's effective working relationship is respecting the difference between strategic governance and operational management.

- The governing board is expected to concentrate on delivering its core strategic functions.
- The headteacher is expected to implement the strategic priorities of the governing board through their day-to-day management of the school.

In Clarity Independent School, the challenge of not having a governing board, is that the HT as Proprietor, acts both similar to the governing body in strategic governance *and* by implementing the priorities through day-to-day operational management of the school. This is the reason why the School has four (HT + 3 more) full time members of the Senior Leadership Team (SLT) who do not ordinarily teach routine lessons so that there is ample support for the HT in implementing the strategic priorities through all aspects of day-to-day management of the school.

Although this is a challenge, it allows the Proprietor to have strategic oversight of the school priorities and directional strategy, whilst being actively involved and having 'feet on the ground'. All too often, it is easy for leaders to simply forget what it is like to be running on the ground. Also, there is a risk of more 'removed' leaders putting over-ambitious, less relevant, contrary policies and procedures in place, or

simply having ineffective priorities to deliver the best outcomes specifically for the services users themselves, which are the pupils.

Aims

To provide alternative routes to achieve the same high-quality outcomes of accountability as traditional Governance would have in their core functions:

- Ensuring clarity of vision, ethos and strategic direction
- Holding executive leaders to account for the educational performance of the organisation and its pupils, and the effective and efficient performance management of staff
- Overseeing financial performance of the organisation and making sure its money is spent wisely

(*The Key for Leaders*, www.thekeysupport.com)

The HT as Proprietor of the company, meets the 5 remaining core elements of effective leadership stated in 'What Governing Boards and Headteachers Should Expect From Each Other':

- Understanding roles and responsibilities
- Courageous conversations
- Knowing the school
- Asking challenging questions
- Good relationships based on trust

The HT and SLT team have set the School's ethos and vision, which flows into the school's mission statement and informs all of the School's Policies and procedures;

"To provide motivating, fun, tailor-made education, at a level, pace and content specifically matched to meet the children's needs.

To address learning difficulties, not merely accept them as being static and final, rather to provide therapies and interventions, to heal, where possible, to develop improvements in the children's skills, to exceed expected progress and to lessen the impact that learning difficulties can have on the rest of their lives.

To provide a fresh start in learning, where it has previously not been possible.

To provide for the children's needs, to enable them to enjoy learning, love being here, and be excited to come to school each day."

Terminology

We use "Governors" in this document to mean governing bodies in local authority (LA) maintained schools and federations, trust boards in a single academy trust (SAT) and regional or academy level committees, sometimes called the local governing body.

We use 'Headteacher' (HT) to mean those responsible for the overall management of a school, a federation of schools or an academy. This includes the HT of a single school and executive leader of a federation.

Governing is the overseeing of the control and direction of something, in this case, a school. Governing helps to always act in the best interest of the 'business', i.e. to improve the performance, increase the stability and productivity, unlock new opportunities, reduce risks and enable faster growth.

Core Values

The Proprietor agrees to:

- Be mindful that in exercising all their functions, they act with integrity, objectivity and honesty and in the best interests of the school
- Be open about the decisions they make and the actions they take
- Is prepared to explain their decisions and actions to interested parties.
- Be a role model regarding working with all parties involved in supporting the school, in accordance with 'The 7 principles of public life', as set out by Lord Nolan. These principles apply to anyone, locally and nationally, who is elected or appointed as a public office-holder. They are selflessness, integrity, objectivity, accountability, openness, honesty and leadership.
- Make all staff members of the school, and external parties coming to work in the school, aware of the Nolan Principles and requests that they adhere to them.

(The Constitution of Governing Bodies of Maintained Schools, p9 2017, www.gov.uk)

The Proprietor shall make sure they do not fall under any of the restrictions for Governors in which they shall be removed:

- bankruptcy restrictions order
- disqualification order or disqualification undertaking under the Company Directors Disqualification Act 1986; a disqualification order under the Companies (Northern Ireland) Order 2002; a disqualification undertaking accepted under the Company Directors Disqualification (Northern Ireland) Order 2002; or an order made under section 429(2)(b) of the Insolvency Act 1986 (failure to pay under county court administration order)
- has been removed from the office of trustee for a charity by an order made by the Charity Commission or Commissioners or High Court on grounds of any misconduct or mismanagement in the administration of the charity, or under section 34 of the Charities and Trustee Investment (Scotland) Act 2005 from being concerned in the management or control of any body.
- has been removed from office as an elected governor within the last five years.
- is included in the list of people considered by the Secretary of State as unsuitable to work with children or young people
- is barred from any regulated activity relating to children
- is subject to a direction of the Secretary of State under section 142 of the Education Act 2002 or section 128 of the Education and Skills Act 2008
- is disqualified from working with children or from registering for child-minding or providing day care
- is disqualified from being an independent school proprietor, teacher or employee by the Secretary of State
- subject to certain exceptions for overseas offences that do not correlate with a UK offence, has been sentenced to three months or more in prison (without the option of a fine) in the five years ending with the date preceding the date of appointment/election as a governor or since becoming a governor
- subject to certain exceptions for overseas offences that do not correlate with a UK offence, has received a prison sentence of two and a half years or more in the 20 years ending with the date preceding the date of appointment/election as a governor
- subject to certain exceptions for overseas offences that do not correlate with a UK offence, has at any time received a prison sentence of five years or more
- has been convicted and fined for causing a nuisance or disturbance on school or educational premises during the five years ending with the date immediately preceding appointment/election or since appointment or election as a governor

- refuses a request by the clerk to make an application to the Disclosure and Barring Service for a criminal records certificate

(The constitution of governing bodies of maintained schools 2017, www.gov.uk)

Demonstrating Accountability and Check-and-Challenge Through External Professional Audits, Reports and Checklists

The School commissions the following audits / reports / checklists by external professionals and where possible, makes these available for stakeholders to view upon request to the school office. Actions identified are put on action plans, and inform the school development plan, which is updated each year. Action plans are monitored by respective departments within the school half termly, and overseen by the HT.

- Safeguarding audit annually, alternating between internally generated (for ESCB) and externally sourced in March
- Safeguarding audits conducted by Essex LEA through ad hoc monitoring visits, usually annually (verbal feedback, no report generated)
- Accessibility Audit: Every three years, internally generated
- Equality and Diversity Impact audit: Annually, internally generated
- *Curriculum Quality, teaching and learning, audit every 3 years: ISA pre-inspection audit
- *Behaviour management; policy, strategy, practice and records audit every 3 years: ISA pre-inspection audit (no report generated)
- Health and Safety annual audit: Peninsula Consultancy
- Kitchen Audit annually: Food Standards Agency checklist, internally generated
- Sharps audit: Termly in-house audit of every sharp on site
- First aid audit: Termly in-house audit of first aid records and permission slips, including allergies and diagnoses log
- Human Resources (HR) continual check-and-challenge of documentation and practice, plus advice, training, consultancy and accountability: Peninsula HR Consultancy, (no report produced)
- Compliance over all issues (H+S, HR, Safeguarding, Behaviour management, Policies, Insurance etc.): Markel Care Consultancy for insurance purposes (no written report produced)
- Compliance over all issues in preparation for inspection: Independent Schools Association pre-inspection visit every three years. Next visit to be scheduled **spring term 2028** (verbal feedback and actions will be given, no report will be generated)
- Annual audit of whole school against Independent School Standards (ISS) to form School development plan (SDP) completed at self-evaluation of school January, annually
- SEND Meeting Needs on EHCPs: All LEAs SEND Inclusion partners conduct monitoring and annual reviews, written report provided
- Data protection retention – internal audit of disposal of documentation annually

The following are external professional bodies the school uses for advice and consultancy in addition to the above:

- Safeguarding and Early Help Forum: ESCB drop-in sessions run weekly for advice on specific cases
- Social Emotional Mental Health forum: ECC run weekly advice drop-in online sessions to use where necessary
- Legal Advice and oversight: Solicitor Julia Green, Browne Jacobson LLP
- Inspection advice and consultancy regarding compliance, quality assurance and school development: Chris Sanderson, Amadeus Consultancy and Training, cm_sanderson@hotmail.com, Tel. Chris: 07786 493730
- Student wellbeing, mental health strategies and advice: Sue O'Sullivan, SOS Hollistics.
- Speech and Language Therapy, consultancy and advice: C&D Independent Speech & Language Therapy.
- Occupational Therapy, consultancy and advice: The Great Little OT Practice.
- EPHA (Essex Primary Headteachers' Association): Support, advice and networking with other HTs across Essex.
- Small Schools Support Network (networking)
- Networking with other HTs of SEND schools or Independent Schools to tap into knowledge and experience of other HTs.
- Independent Schools Association: member
- Independent Schools Council: member
- The Key Leaders Support: advice and guidance re regulations, policies and documentation
- Trauma Perceptive Practice: ECC training (TPP course) for 2 SLT members, and forums re trauma perceptive practice.
- Social Emotional Mental Health Practice: Eastern Partnership course for 2 SLT members, and forums re SEMH practice.
- Attachment Aware Practice: The HT has done extensive reading and research around attachment difficulties and best practice and conducted the Attachment Aware training towards the bronze award with Laura Dawson, Essex Virtual School, November 2020.

The following table represents the key responsibilities of a Governing board, and illustrates how the School conducts the same tasks, and promotes check-and-challenge by external professionals.



Responsibilities Within the School and Demonstrating Internal and External Accountability

(The Key: Responsibilities of the Governing Board, www.schoolleaders.thekeysupport.co.uk)

Role	Who conducts the task?	Who Monitors the task?	External accountability to...
Admissions			
Review child's paperwork at panel meetings and relay to HT.	Assistant Head and SENDCO	Assistant, SENDCO and HT vote on School's ability to meet child's needs and final decision rests with HT if undecided.	HT liaises with Local Authority. LEA decides who to refer to the School. HT refers School's decision to offer place.
Reviews policy annually to ensure admission arrangements are fair, clear and objective.	HT	N/A	
Admissions register	Business Manager	HT	
Share list of starters and leaves annually with LEAs	Business Manager	HT	Excel template provided by ECC sent each year, by end of Sept and before end of summer term, annually.
Attendance register	Office Manager	Business Manager	Records sent to DfE daily in accordance with their requirements
Pupils on a part-time timetable	Attendance Lead	HT	Records sent to LEA SEND partners half-termly
Persistent absent register (for children absent from education CAFÉ)	Attendance Lead	HT	Attendance Officer at LEA and inspection by regulatory bodies and Local Authorities.
Private fostering register	DSL	HT	List of names sent to Havering LEA.
Behaviour and 'termination of contracts'			
Ensure there is an effective, clear Behaviour	Assistant Head	HT	Therapeutic Thinking Tutor Joel Shaljean;

Policy in place, setting high standards and challenging pupils to develop themselves			training, certification of 3 members of SLT as Accredited Tutors, provides advice and consultancy, annual audit of behaviour records . Inspection by regulatory bodies and Local Authorities.
Promoting good behaviour and discipline	All staff and pupil role models	Pupils: Teaching staff, Assistant. Staff: HT as employer through appraisals. HT: SLT members encouraged to check-and-challenge her role modelling of behaviour to pupils and staff.	HT has 24/7 HR advice from Peninsula HR consultancy.
Ensure school has anti-bullying strategy	Assistant, HT to check-and-challenge. All staff and pupils responsible to implement day to day, observe and report.	Assistant overseas and is accountable to HT. All teaching staff oversee pupils' conduct and report to Assistant.	Parent voice: are pupils being bullied without it being dealt with effectively and prevented? Children's voice: "Am I being bullied and is it being dealt with effectively and prevented?"
Arrange suitable full-time education for child out of school 5+ days (optional for Independent School)	HT supported by SENDCO according to child's needs	N/A	LEA as service users Parents Pupil feedback
Decision about when to terminate a placement	SENDCO, Assistant Head, HT and at least one member of teaching staff collaboratively	HT	LEA as service users through liaison and discussion of needs / continued suitability of placement
Curriculum			

Ensure enough teaching time is allocated to subjects	Assistant Head and subject leads	HT	Parent voice, Pupil voice, LEA as service user, Curriculum consultancy through annual audits and training
Ensure curriculum is broad and balanced	Assistant Head and subject leads	HT	
Ensure the school has an up to date policy for relationships education, or RSE for secondary and consults parents when reviewed or changed	Assistant Head	HT	Inspection by regulatory bodies and LEAs
Ensure pupils y8-13 are provided with independent careers guidance and that there is a range of education and training providers accessible to all pupils y8-13 to inform them about technical educational qualifications and apprenticeships (pupils will have 2 experiences by the end of KS3, another 2 by the end of KS4 and a further 2 by the end of KS5, totalling 6 experiences as per DfE guidance).	Careers Lead	HT	Careers advisor Directions, LEA as service user, Inspection by regulatory bodies and LEAs
Finance			
Comply with company law	Business manager	HT as Proprietor	Accountant Brendon Howlett as Chartered Accountant, Wood-Disney Ltd. Companies House compliancy through annual audit .
Prepare the company's annual financial statement	Business manager to prepare accounts	HT to sign off	
Share company financial information with LEA annually, including per pupil allocation of fees and uplift requests for fees	Business manager to prepare accounts	HT to monitor	HT to liaise with LEA, LEA to approve accounts per pupil and use of school funds if continuing the child's placement at the school.
Set appropriate and cost-effective budget	Business manager	HT to sign off	
Share number of complaints annually with	Business Manager	HT to sign off	LEA SEND departments

LEAs			
Ensure the school has adequate insurance	Business manager	HT	Markel Consultancy conduct an annual audit to ensure compliance and set required actions the school must comply with
Ensure pupil premium funding equivalent is spent on pupils in need	Assistant	HT	Pupil's needs are met in accordance to money spent. Parent voice, LEA satisfaction that money is spent as needed in end of year financial records to LEA.
Ensure all policies and documents are in place and reviewed according to the school's review cycle	HT	HT: check-and-challenge by the Assistant Head, Business Manager and SENDCO for missing / out of date policies	LEA, Regulatory bodies, Parents, Smooth running of the school.
Parents and the community			
Ensure all information necessary is published on the school's website	Business manager + HT	HT	Members of the public feedback, Annual review of website's effectivity with parents.
Ensure 'Get Information About Schools' is up to date	Business Manager	HT	DfE
Ensure suitable complaints procedure policy is in place and implemented effectively	HT		DfE, LEA feedback, Inspection by regulatory bodies
Ensure compliance with Freedom of Information Act and ICO re SARs	HT and Business Manager	HT	ICO, Inspection by regulatory bodies Members of the public and parent feedback
Data protection act 2018 and GDPR compliance	Business Manager	HT	ICO, Inspection by regulatory bodies
Health and Safety			
Health and Safety Policy, making sure school meeting its legal responsibilities	HT		Peninsula Health and Safety Consultancy Annual Audit by Peninsula published on school

Ensuring compliance with Health and Safety at Work etc. Act 1974	Business Manager	HT	website, LEA
Ensuring compliance with Regulatory Reform (Fire Safety) Order 2005	Business Manager	HT	
Ensuring compliance with health and safety requirements set by the LA	Business Manager	HT	
Implementing H+S checks and daily routines	School Site Manager, All staff responsible for conducting themselves safely and keeping pupils safe	HT	
Pupil Wellbeing			
Ensure a staff code of conduct (handbook)	HT as employer		Peninsula as HR consultancy through annual audit of company documentation
Designated person to promote LAC children's progress	DSL	HT	LEA, ESCB audit every two years published for stakeholders to view on website. Termly PEP meetings and updated plans for each LAC pupil in collaboration with the Virtual School, Social care, any other professionals involved and families.
Ensure school complies with Equality Act and Public Sector Equality Duty (PSED) and progress achieved is published	HT		Equality annual audit published for stakeholders to view on website
Policy on supporting pupils with medical needs	HT as First Aid Lead		Inspection by regulatory bodies LEA monitoring
Implementation of the Policy on supporting pupils with medical needs	First aiders (all teaching staff), Emergency first aiders in the workplace (Staff first	HT	Markel Consultancy through annual audit , Health and Safety England

	aiders) DH, RC, SPO (and MD after 1.10.25).		
Records for the above	School office, Teaching staff conducting first aid	HT	
Compliance with food standards	Business Manager, Assistant Head Head of Cookery	HT	
Safeguarding			
Ensure compliance with statutory guidance on safeguarding KCSIE and updates re procedures and practice of the LEA, as part of inter-agency safeguarding procedures set up by your safeguarding partners: Local authority (LEA), Integrated Care Boards (previously known as the clinical commissioning group) within the LEA, Chief officer of police within the LEA	DSL DDSLs	N/A DSL	ESCB through referrals and weekly advice forum
Effective child protection policy in place	DSL	DDSL HT to sign off	Essex LEA through model policy and monitoring. Inspection by regulatory bodies.
Ensure staff compliance with safeguarding procedures, allegations addressed immediately	All peers, whistleblowing procedures to HT. If re HT -> LADO	HT If concerns re HT any staff member goes directly to LADO	LADO
Support for any staff member facing an allegation	HT Staff peer to mentor and support	N/A	N/A
Allegations against other children	DSL / DDSLs	DSL	ESCB

SEND			
Co-operate with LEA in delivering their local offer	HT and SENDCO	N/A	LEA feedback
Making sure pupils with SEND get the support they need, making sure they are each included in all activities.	Class teachers and support staff. Occupational Therapist SALT Wellbeing Therapist SET CAMHS	SENDCO, reports to HT	LEA Inclusion partners, feedback reports following monitoring and Annual Reviews. Parent feedback and target tracking at termly One Plan reviews and Annual Reviews. Specialists feedback children's progress via individual reports, and give advice, training and consultancy.
Keeping parents informed of the SEND provision for their young person	Class teachers, supported by support staff (and SENDCO), during daily / weekly wellbeing calls / emails, at termly One Plan review meetings, Annual Reviews and end of year reports.	SENDCO, reports to HT End of year reports – Assistant, reports to HT	LEA Inclusion partners. Parent satisfaction. SEND Report annually. SEND Policy updated annually.
Ensuring arrangements are made to support pupils with medical needs.	HT – Policy. Teaching and support staff (all first aiders) to administer first aid, medications and put actions on children's IHCP plans into place. School supporter to support re H+S and adaptations needed.	HT and Assistant	Accessibility audit every 3 years, or upon new pupil entry, School nurse team, NHS 111 and A and E, SET CAMHS, Parent feedback, First Aid training contacts at Prospero Training for advice and training. Peninsula H+S annual audit.

	Office to record on Arbor.		
Identifying and responding to SEND	Teaching and support staff, Occupational Therapist, SALT, Wellbeing Therapist, SET CAMHS, HT cognitive assessments	SENDSCO, reports to HT	Annual SEND Report , Accessibility audit , Parent satisfaction, SEND audit , LEA monitoring and Inclusion Partner feedback , Inspection by regulatory bodies,
Record accurately and keep up to date the provision made for SEND	SENDSCO - School's SEND provision map	Reports to HT	
Make sure the school publishes its SEND information report online	SENDSCO SEND Information Report	HT	Members of the Public, SEND Information Report and Accessibility Plan , Parent satisfaction, Inspection by regulatory bodies
Publish information about the arrangements for the admission of pupils with disabilities, the steps taken to prevent them being treated less favourably than others, the facilities provided to assist access, and their accessibility plans	SENDSCO SEND Information Report and Accessibility Plan	HT	
Make sure there is a qualified teacher as SENDSCO	SENDSCO is on SLT, is a qualified teacher and has SENDSCO MA level qualification	HT	LEA monitoring, Inclusion Partners at LEA, Inspection by regulatory bodies
Determine the SENDSCO's approach to using their resources to support the progress of pupils with SEND	SENDSCO, monitored by the Assistant Head	HT	
Person or committee having oversight for the school's arrangements for SEND	SENDSCO supported by class teachers, support	HT	

	staff, Assistant Head and HT		
Make sure the school follows the statutory SEND code of practice	SENDCO and HT	HT	
Staffing and Safer Recruitment			
Establish a panel to appoint the HT where necessary	HT is Proprietor of the company so cannot be appointed as she initiated the company. HT is employed by the company as Director hence why she makes herself accountable to Assistant Heads and Business Manager.	HT appoints Assistant Heads and Business Manager as appropriate	Since the Proprietor of the company is the company owner and has a strong invested interest in it succeeding, responsibility for its success rests with the Proprietor to do everything to the highest standards possible to ensure it succeeds. The Proprietor of a company will have the strongest interest in the school's success due to the passion which initiated the school, and the high stakes involved.
Ensure safer recruiting procedures are applied and Single Central Record is being monitored	HT supported by Business Manager and Office staff	HT	Inspection by regulatory bodies
Make sure at least one person on any appointment panel has done safer recruitment training	HT and Business Manager, Educare (TES) (both updated annually)	HT	
Ensure gender pay gap information is published where applicable (where 250+ employees)	Business Manager but N/A currently	HT but N/A currently	Members of the public Inspection by regulatory bodies
Pay and Appraisal			
Take account of employment law and guidance	HT and Business Manager	HT	Peninsula HR Consultancy
The following responsibilities are not required by Governors for academies and free schools (in addition, Independent Schools are not required to			

have Governors at all); however, further information is provided below to illustrate how the School demonstrates its accountability.

Review and approve a pay policy which sits within the budget, make recommendation on the HT's pay	Business Manager to ensure HT's pay sits within the annual budget, discussed with HT with company security and company durability in mind	Proprietor	Peninsula HR Consultancy. Private company decisions made to ensure security and success of the company as it is not obliged to follow the School Teachers' Pay and Conditions Document
Determine the appraisal period that applies to teachers and adopt a document that sets out the appraisal process for teachers (and support staff)	HT and Business Manager, mini appraisals conducted termly by HT, annual full appraisal by HT	HT	Peninsula HR Consultancy
Ensure the HT carries out their duties in appraising other teachers including recommendations on their pay	HT to conduct these supported by Business Manager and Assistant	N/A	Peninsula HR consultancy
Appoint an external advisor for advice and support on the HT's appraisal, inform the HT of the standards against which their performance will be assessed, set objectives for the HT and appraise them against the standards and objectives	The HT conducts self-reflections against the HT standards, and Independent School Standards as a reflective practitioner. The HT is also the Proprietor of the company; therefore, has a spirited interest in the school succeeding and in providing highest standards to ensure	HT conducts audits in all areas of the school, with the support from external professionals, to ensure robust check-and-challenge takes place so that she is accountable. The HT receives feedback from the staff team via SWOT analysis, during their appraisals, annual staff questionnaire feedback forms, and the	HT has completed the NPQH National Professional Qualification of Headship (July 2024).

	security and longevity of the school and company.	annual whole school self-reflection.	
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Monitoring arrangements for this policy

This policy will be reviewed by the Proprietor annually, with contributions from the Senior Leadership Team (SLT).