Virtus College Policies Index

Acceptable Use of IT Policy

This Acceptable Use Policy sets out the rules for using ICT and devices at Virtus. All students and staff must follow these rules to ensure technology is used responsibly, safely, and for educational purposes only. This policy should be read alongside the E-Safety Policy and the Behaviour Policy.

Acceptable Use

Students are responsible for their actions, conduct and behaviour online, or when using school devices in the same way that they are responsible at all other times. They should also adhere to the following guidelines when using the school network.

The school networks and related devices such as the iPads are the property of Virtus. They have been made available to students to help enrich the learning process and to enable them to become skilled and responsible users of tools that have become part of our everyday lives. Students are expected to use the resources for the educational purposes for which they are provided.

Service Provision

Virtus provides Wi-Fi and network access across the school. Any issues with access should be reported to the IT Manager.

Reporting

Technical issues should be reported to the IT Manager. Teachers can use Slack channel #it-help for maintenance and technical issues while other matters can be reported via email to the IT Manager. A breach of the E- safety policy should be reported to the appropriate member of staff, usually the Headteacher or Deputy Head.

Expectations for Acceptable Use of ICT

Mobile Phones

Mobile phones must not be used on school premises. Phones brought to school should be handed to the form tutor at the start of the day and collected at the end. Students may contact parents via the school office if necessary. This rule reflects guidance in Keeping Children Safe in Education (KCSIE 2025), which highlights the risks of mobile phones in relation to cyberbullying and safeguarding.

Smart Watches

Smart watches are not permitted in school and are banned during examinations in line with JCQ and examination board requirements.

iPads: Ownership & Use

iPads are the property of Virtus and are issued to students in Years 12–13 for educational use only.

All iPads are managed through the school's Mobile Device Management (MDM) system. This allows the school to install updates, distribute subject-specific software, and ensure content is filtered for safe academic use.

Students must not:

- alter or attempt to alter the Virtus profile or operating system;

- download or use unapproved apps or content;

- loan the iPad to others or allow others to access it;

- use the iPad to access or store inappropriate content.

The iPad must be returned immediately if requested by the school. Failure to do so will make parents liable for replacement costs.

iPads: Care & Responsibility

Students must keep the iPad, cover, and charger in good condition, free of graffiti or damage.

Any loss, damage, or malfunction must be reported to the IT Manager immediately.

Parents/carers are financially responsible if the iPad or accessories are lost, stolen, or irreparably damaged through negligence.

Where repairs are possible but not covered by warranty, parents/carers will be charged the repair cost.

The iPad must be returned in good condition at the end of the academic year or when requested by the school.

As a student of the Virtus, they will:

- keep the iPad, cover and charger in good condition without marks or graffiti; report any loss or damage immediately.
- ensure they leave enough memory/space on iPad to allow for the use of educational apps and school work.
- not use the iPad to access inappropriate Internet sites, download, distribute, store or display material or messages that could upset others;
- return the iPad at any time when requested by the school. If a student is unable to do this, their parents are liable for the cost to replace missing items.
- not remove any identifying marks placed on the iPad by the school;
- not loan the iPad to others or allow them to use it;

- not change, or attempt to change, the Virtus profile on the iPad or the original operating system installed.
- return the iPad to the school in good condition when required.

Damage/Loss
- In the event of the iPad and/or its accessories being irreparable,or if it is lost/stolen due to pupil negligence, then the replacement cost will be incurred by parents or carers.
- If the iPad can be repaired without the need to purchase physical items, such as buttons not working, then no cost will be incurred.

- If the iPad requires servicing outside the school and the damage is deemed non-warranty but can be repaired, the cost of the repairs will be incurred by the parents/carers.

Communication:

- Students must use appropriate language in all communication.
- Students must not use social media sites, messaging or chat rooms during school hours.

Behaviour:

Students are **strictly forbidden** to:

- Create, send or post any material that is likely to cause offence or needless anxiety to other people or bring the school into disrepute.
- Attempt to visit websites that might be considered inappropriate or illegal.
- Access other users' files or folders.
- Students should never impersonate others or disrupt video lessons. They should only use the official school log-ons for these applications and they should identify themselves using their first and surnames rather than any nicknames.
- Use the computers, iPads or any ICT devices to disrupt the work of others.
- Attempt to harm or destroy any equipment, or work of another user on the school network system or from another location.
- Receive, send or publish material that violates copyright law.

Students must:
- Report any inappropriate use of the system and/or devices to the IT Manager.

Sanctions:

Where a student breaches the E-Safety Policy, sanctions will be applied in line with the Behaviour Policy and Acceptable Use of IT Policy. Serious or repeated breaches may lead to confiscation, suspension of IT access, or disciplinary measures up to exclusion. Where criminal activity is suspected, the school will inform parents, police, or relevant authorities. The DSL will oversee any child protection concerns..

Security:

- Students must use strong passwords, not share login details, and report any security problems immediately to the IT Manager.
- Make sure their device is locked whenever they leave it and log off their accounts.
- Do not reveal any personal information (e.g. home address, telephone number) about themselves when using the Internet.
- Do not share their login details (including passwords) for online accounts with anyone else. Do not use other people's usernames and passwords.
- Do not download and/or install any unapproved software, system utilities, VPNs or resources from the Internet.
- If they discover a security problem, they should inform the IT Manager immediately via email.

Responsible Online Behaviour:

Students must always act responsibly when using school devices, accounts, or networks. They are expected to:

- Use respectful and appropriate language in all digital communication.
- Use only their official school login details and identify themselves with their real name.
- Report any inappropriate use of ICT systems to the IT Manager.

Students must not:

- Use social media, messaging apps, or chat rooms during school hours.
- Create, send, or share material that is offensive, harmful, or likely to bring the school into disrepute.
- Access or attempt to access inappropriate or illegal websites.
- Access, alter, or interfere with another user's files, folders, or accounts.
- Impersonate others, disrupt online lessons, or interfere with the learning of others.
- Damage, disable, or attempt to hack school equipment, systems, or networks.
- Receive, send, or publish material that violates copyright law.

Students must:

- Report any inappropriate use of the system and/or devices to the IT Manager

Sanctions

Breaches of this policy will be dealt with under the Behaviour Policy. Sanctions may include warnings, confiscation, suspension of IT access, or exclusion. Serious or repeated breaches may be referred to parents, police or relevant authorities. Child protection concerns will always be referred to the DSL.

Linked to the following policies:

- E-Safety
- Safeguarding
- Student Code of Conduct (Shared with students and parents on enrolment)

- Anti-bullying
- Data Protection
- Staff Code of Conduct (Internal policy available on request)

Reviewed: August 2025
Next Review: June 2026

Appendix A: Blocked Websites List

This appendix sets out the list of websites blocked by Virtus College in order to safeguard students and ensure compliance with KCSIE 2025 and Spanish child protection law. The blocklist is reviewed annually by the Designated Safeguarding Lead (DSL) and IT Manager, and updated as required. Categories include social media, streaming, gaming, gambling, adult content, and circumvention tools. Attempts to access blocked sites are logged via Smoothwall by Qoria and reviewed as part of safeguarding monitoring.

1. Social Media & Messaging

- www.instagram.com
- www.twitter.com
- www.tiktok.com
- www.snapchat.com
- web.telegram.org
- www.kik.com
- web.whatsapp.com
- www.reddit.com

2. Streaming & Entertainment

- www.netflix.com
- www.hbo.com
- www.amazon.com
- www.amazon.es
- www.disneyplus.com
- www.twitch.tv
- www.atresplayer.com
- www.mitele.es
- www.rtveplay.com

3. Gaming & Game Platforms

- www.chess.com
- www.lichess.com
- www.ea.com
- www.roblox.com
- www.minecraft.net
- store.steampowered.com

- www.epicgames.com
- www.crazygames.com
- play2048.co

4. Gambling / Fantasy Football
- www.biwenger.com
- www.comunio.es
- apuestas.marca.com
- www.codere.es
- www.sportium.es
- www.bet365.com
- www.pokerstars.com
- www.888casino.com

5. Adult Content
- www.pornhub.com
- www.youporn.com
- www.redtube.com
- www.xhamster.com
- www.xvideos.com
- www.xvideos.es
- pornografia.xxx
- www.onlyfans.com

6. Anonymous Chat / High Risk
- www.omegle.com
- www.chatroulette.com
- www.ome.tv
- www.yubo.live
- www.discord.com

7. Circumvention Tools (VPNs/Proxies/Tor)
- www.torproject.org
- nordvpn.com
- expressvpn.com
- protonvpn.com
- tunnelbear.com
- hide.me
- kproxy.com
- www.tor2web.org

This list is non-exhaustive and may be updated at any time in response to emerging safeguarding risks. Any attempt to bypass filtering, including through VPNs or proxies, will be treated as a breach of the Acceptable Use Policy.

Reviewed: August 2025
Next Review: June 2026

Admissions Policy

Aim

The aim of this policy is to outline the criteria based on which students are accepted to Virtus and to provide a broad overview of the process.

Equality and Diversity

Virtus College, The British Sixth Form does not discriminate on any grounds. We are committed to equality and consider diversity within the student and staff body a strength. Virtus actively promotes equality and seeks to prevent discrimination on any grounds; including but not limited to race, gender, culture, sexuality, religion, social class and learning needs.

SEN

We welcome students with learning needs and would only deny entry to a student whom we could not reasonably meet the needs of.

Admissions Criteria

Admissions to Virtus, The British Sixth Form College is based on entry criteria, school report and a successful interview and assessment.

1.1 Entry Criteria

The entry criteria for Virtus College, The British Sixth Form, are six GCSEs at grades 9-4 or IGCSEs at grades A*-C, including English language and mathematics. A minimum grade 6 at GCSE (or grade B at IGCSE, or equivalent international qualification) is required in the subjects the student wishes to study at A-level.

For certain subjects, higher minimum grades are required due to their academic demands. Students must meet the following criteria at GCSE or IGCSE (or equivalent international qualification):

- Mathematics grade 7 (GCSE) / Grade A (IGCSE)
- Further mathematics grade 8 (GCSE) / Grade A* (IGCSE)
- Biology grade 7 (GCSE) / Grade A (IGCSE)
- Chemistry grade 7 (GCSE) / Grade A (IGCSE)
- Physics* grade 7 (GCSE) / Grade A (IGCSE).

Students selecting physics must also study mathematics.

1.2 School Reports

Virtus College, The British Sixth Form requires submission of the most recent two academic reports (including predicted grades where available) must be submitted, demonstrating satisfactory progress, attainment, and conduct.

1.3 Interview and Assessment

Applicants will undergo an interview and assessment upon application. Based on the outcome of this and the school being satisfied that we are the right place for the applicants, they may proceed to the next stage if the above criteria have been met.

1.4 Outcomes

Possible outcomes:

1. **Conditional offer:** A conditional offer may be given subject to the above criteria being met, at the Headteacher's discretion. The school retains the right to withdraw any offers of admission should an applicant be rejected from their current school based on their conduct. Failure to meet the conditions of the offer such as the entry criteria would mean it is no longer valid.

2. **Waiting list:** Virtus British Sixth Form College is a sought after school and places are limited. On occasions this may mean that applicants are offered a place on our waiting list. If another applicant does not meet the entry criteria, spaces are opened up to those on the waiting list.

3. **Unsuccessful outcome:** No offer given.

An offer of admission is only valid if signed by parents and upon the payment of enrolment fees. The enrollment fee is non-refundable, unless the school withdraws the offer due to the student failing to meet entry requirements, evidence of undisclosed information (such as learning needs or conduct issues), or circumstances beyond the control of the school.

The Process

1. The family and applicant make contact with Virtus College, The British Sixth Form
2. Registration of interest or Application form is completed by parents online
3. Applicants and families are invited in to meet with the Headteacher and offered a tour of the premises.
4. Interview and assessments are undertaken
5. Reviews by SLT
6. Decision made

Disclosure

Parents must disclose any information which can impact the student's education such as special learning needs. Failure to disclose relevant information (e.g. safeguarding concerns,

learning needs, medical conditions) may result in withdrawal of the offer, as this information is essential to ensuring appropriate support and compliance with UK and Spanish safeguarding and educational law.

Spanish Legal Compliance

This policy is written in accordance with the UK Department for Education's Independent School Standards (2025) and Keeping Children Safe in Education (2025), and complies with Spanish education law (LOMLOE, 2020) relating to equality, inclusion, and non-discrimination in schools.

Linked to the following policies:

- Equality, Diversity, Inclusion and Political Impartiality
- SEND
- Safeguarding
- Data Protection
- Complaints

Reviewed: August 2025
Next Review: June 2026

Anti - Bullying Policy

Introduction

Bullying is action taken by one or more children with the deliberate intention of hurting or abusing another child. Bullying can take one of many forms: verbal, emotional, sexual, sexist, physical, cyber (including social websites, mobile phones, text messages, photographs and email), race and religion, cultural, homophobic, special educational needs and disability.

We recognise that bullying may overlap with other safeguarding issues, including child-on-child abuse, sexual harassment, online harm, and exposure to harmful online influencers. Staff must remain vigilant and follow safeguarding procedures where bullying may also be a safeguarding concern.

We are committed to providing a caring, friendly and safe environment for all our students so they can learn in a relaxed and secure atmosphere. Bullying, which can lead to psychological damage, both short and long term, is unacceptable at our school. If bullying does occur, all students should be able to tell and know that incidents will be dealt with promptly and effectively. We are a telling school. This means that anyone who knows that bullying is happening is expected to tell staff.

We believe that every student has a right to enjoy an education free from fear and distress and the purpose of this policy is to set out guidelines and procedures to achieve this important objective. At our schools we have zero tolerance of bullying and have measures in place to prevent all forms of bullying.

Aims & Objectives

- At our school we believe that by developing a school ethos in which bullying is regarded as unacceptable and promoting excellent values, positive behaviour and relationships between all members of the community, we can prevent bullying from arising in the first place.
- All members of the school are expected to treat each other with consideration and respect and to support children who are being bullied, to make them feel safe again, and rebuild their confidence and self-esteem.
- The school will react firmly and promptly to cases of bullying and educate children to understand that bullying is not acceptable and that serious bullying may cause psychological damage and even suicide.
- If instances do occur it is essential that early intervention takes place by staff, students and parents/carers in order to prevent recurring or serious cases.
- Interventions will be applied fairly, consistently and reasonably, taking into account all the facts and circumstances of each case.
- If a serious or recurring case does arise it must be addressed by a member of staff immediately according to the guidelines identified in this policy.

- This policy aims to produce a consistent school response to any bullying incidents that may occur. We aim to make all those connected with the school aware of our opposition to bullying, and we make clear each person's responsibilities with regard to the eradication of bullying in our school.

Procedures

- All staff will be expected to deal sympathetically with minimum delay once an incident is reported, with students who are the victims of (alleged) bullying. Witness statements may be taken and evidence gathered from a variety of sources in order to substantiate or disprove claims. The class/form teacher and senior staff will always be informed of reports of bullying.
- Students who are alleged to be perpetrators of bullying will always be interviewed formally by a senior member of staff. The version of events will be listened to and noted in writing.
- Cyberbullying: where incidents of cyberbullying are reported, including those that occur outside of school hours, the school will intervene, investigate, and take action where the behaviour impacts the well-being of students or the orderly environment of the school. This includes harmful use of social media, image-based abuse, and harassment influenced by online extremist or misogynistic content.
- Disciplinary action, in line with the school's established range of sanctions, will be taken where necessary. Such action may include letters or meetings with parents, internal suspension or exclusion from school.
- We will use the following levels as a guide when dealing with incidents involving bullying:

Low-Level
Teachers deal with the matter and note it in writing. The Deputy Head Pastoral is informed and interviews the victim, bully, and witnesses if necessary.

Medium-Level
Teacher informs the Deputy Head Pastoral who contacts parents of the victim/bully for an interview.

High-Level
The Teacher/Deputy Head informs the Pastoral Deputy Head/Headteacher. The Headteacher informs the parents/authorities for a conference.

Follow-up
It is important that the victim feels they are receiving support and feel safe and comfortable. It is also important that the suspected bullies have had a fair hearing. The Headteacher or Deputy Head will follow-up each case to ascertain if there have been any consequences or re-occurrences. Where bullying amounts to a safeguarding concern, follow-up will also involve the Designated Safeguarding Lead (DSL) in line with the Safeguarding policy.

Prevention

The theme of bullying is an integral part of the PSHE programme. We use the following methods for helping children to prevent bullying, as considered appropriate and relevant by the class/form teacher. These activities may form part of the school's PSHE programme and be dealt with in Assemblies, or may be handled on an individual basis:

- Signing a Code of Conduct
- Sharing stories about bullying.
- Discussions in literature, historical events, current affairs.
- Anti-bullying week.
- Curriculum content addressing respectful relationships, online safety, gender equality, and respectful attitudes in line with the RSHE policy.
- Monthly meeting between Head of Student Affairs, Deputy Head Pastoral and Student Council representatives.

Although incidents of bullying in our school are historically rare, teachers should be aware of the following higher risk areas and times when bullying could occur:

- At break and lunch times.
- Before the start and end of the school day.
- In the corridors and playgrounds.
- On bus journeys and school trips/visits.
- In class
- Outside but near school premises

Raising Awareness

Awareness is raised through training and/or focused meetings, particularly during Induction week. Students are made aware through Assemblies, Special Focus Weeks, Curriculum content (particularly PSHE) and talks from outside agencies.

Staff Training

All staff are trained on Child Protection and Anti- Bullying through online courses through TES online programmes and more information is available in the appendices of this policy. Furthermore, SLT and WLT staff are trained to DSL Level 3, and all of the teachers and support staff receive DSL Level 2 training, which is above the minimum expected requirement of level 1.

Children identified as having SEND (special educational needs and disabilities) are particularly susceptible to bullying and may be more sensitive to teasing and name calling. Teachers should be aware of this and actively promote inclusion and equal opportunities with classwork and particularly in the playground.

Annual refresher training will ensure that staff remain alert to emerging risks such as online misogyny, harmful subcultures, and new forms of digital harassment.

Monitoring, Evaluation & Review

This policy is monitored daily by the DSL. Effectiveness is reviewed annually by SLT in consultation with student representatives, taking into account staff, student, and parent feedback, incident data, and new guidance issued by the UK Department for Education and the Comunidad de Madrid.

This policy takes account of guidance from the following:

- Equality Act 2010

- KSCIE 2025 Safeguarding context (peer on peer abuse, influencers)
- Department for Education "Preventing and tackling bullying: Advice for July 2017
- Department for Education "Behaviour and discipline in schools" Advice for School Leaders, Staff and Governing Bodies and school staff (September 2022)
- Compliance with Comunidad de Madrid Protocol: Our bullying prevention measures align with the Comunidad de Madrid protocol, ensuring that our policies and actions are in accordance with regional guidelines (Cfr: "Guía de actuación contra el acoso escolar en los centros educativos").

Policy Development

This policy was formulated in consultation with students contributing to the development of the policy through the student councils. The policy is also shared with parents and carers annually to ensure transparency and consistency of approach at home and in school.

Links with other policies

- Student Code of Conduct (Shared with students and parents on enrolment)
- Safeguarding
- E-Safety
- Equality, Diversity, Inclusion and Political Impartiality
- Complaints

Reviewed: August 2025
Next Review: June 2026

Attendance and Punctuality Policy

Rationale

At Virtus, we prioritise the academic achievement and personal development of our students. We recognise that regular attendance and punctuality are fundamental to achieving these goals. Our ethos is that our staff have a right to teach, and our students have a right to learn.

We recognise that some students live away from their parents and may rely on guardians or au pairs. The school will ensure that attendance monitoring also serves a safeguarding function, contacting families promptly if concerns arise.

- Academically, there is a clear relationship between attendance and punctuality and final A level grades as missed lessons or disrupted learning impact learning negatively and missed content is difficult to catch up on without the teacher explaining it.
- Time with teachers before exams is crucial for the students' performance and progress towards official A level examinations.
- Attendance and punctuality also benefit the student's wellbeing, in terms of being part of a social group and the feeling of belonging and community which is pivotal for the development of our students.

Therefore, we have established the following policy to ensure that all students understand and adhere to our expectations regarding attendance and punctuality.

Punctuality

Class and Form Time Attendance
Students are expected to arrive promptly for all scheduled classes, study periods and form time sessions. This includes arriving on time for morning registration and promptly transitioning between classes throughout the day.

Sanctions for Lateness
Persistent lateness disrupts the learning environment and demonstrates a lack of respect for others.

- Any lateness to the start of the day, a lesson or form time will result in a same-day lunchtime detention (30 minutes) or an after school detention (30 minutes), whichever comes first. Persistent lateness (3 lates a week or more) may lead to further sanctions such as a Friday detention after school and parents informed..

- Students arriving late <u>may be redirected to a supervised study space at the teacher´s discretion</u> to minimise disruption to the class. They will be required to complete the work missed and will be marked as late. This ensures that students remain supervised at all times and accountable for their learning.

Attendance

Importance of Regular Attendance
Regular attendance is essential for academic progress, engagement in learning activities, and the development of essential skills and knowledge. Students are expected to attend all classes, form time sessions, study periods, co - curriculum and any other scheduled activities as outlined in their timetable.

Monitoring Attendance
The school will closely monitor student attendance records to identify any patterns of absence or lateness. Teachers will take attendance at the beginning of each class, and form tutors will monitor attendance during form time sessions.

Truancy
Failure to attend scheduled sessions including but not limited to, sessions such as tutor time, subject lessons, PSHE, study periods is deemed to be truanting. Truanting is sanctioned by after school detentions, meeting with parents and one day internal isolation for persistent truants.

Final Sanctions

If a **student's attendance falls below 85% despite the above interventions, the school will review the student´s readiness for exam entry with parents**. **Entry may be conditional on evidence of improvement and sufficient coursework completion.** Families will be notified promptly if their child's attendance is a cause for concern. The school will work collaboratively with families to identify any underlying issues affecting attendance and provide appropriate support and interventions to help improve attendance levels.

Communication with Parents/Guardians
Families will receive regular updates regarding their child's attendance and punctuality through the school's reporting system. Any concerns or issues related to attendance will be communicated promptly to ensure that parents/guardians are aware of their child's progress and any necessary interventions.

Where repeated absence raises a safeguarding concern and the school cannot establish contact with parents/guardians, the school may conduct a home visit. This ensures that students living away from their parents remain safe and accounted for. The decision to conduct a home visit will be made by the Designated Safeguarding Lead (DSL).

Rewards for Good Attendance
In addition to addressing concerns related to poor attendance, the school will also recognise and reward students who demonstrate exemplary attendance and punctuality. This may include commendations, certificates, or other forms of recognition to celebrate their commitment to their education.

By adhering to this attendance and punctuality policy, students demonstrate their dedication to their academic success and contribute to a positive and supportive learning environment for themselves and their peers.
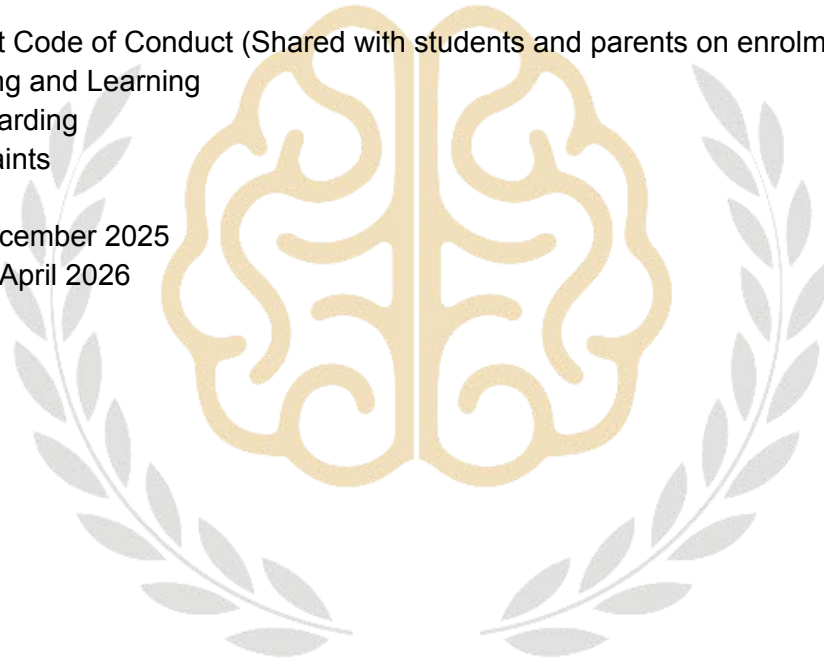
This policy is to be signed by parents and students at the start of every academic year.

Linked Policies:

- Student Code of Conduct (Shared with students and parents on enrolment)
- Teaching and Learning
- Safeguarding
- Complaints

Reviewed: December 2025
Next Review: April 2026

Behaviour Policy

Purpose and Ethos

Virtus College is committed to creating a calm, orderly, and aspirational learning environment in which all students can thrive academically, socially, and personally. High standards of behaviour are essential to safeguarding, wellbeing, and academic success.

This policy sets out the expectations, rewards, sanctions, and procedures that underpin positive behaviour at Virtus College. It reflects our values of discipline, resilience, integrity, vision and enthusiasm, and is aligned with:

- UK statutory guidance on behaviour and discipline
- Spanish education and safeguarding requirements applicable in the Community of Madrid

Scope

This policy applies to student behaviour:

- On the Virtus premises
- During lessons, study periods, and enrichment activities
- On educational visits, trips, and work experience placements
- Online, including misuse of digital platforms, where behaviour impacts the Virtus community or brings Virtus College into disrepute
- In transit to and from Virtus College where behaviour affects the safety or reputation of Virtus

Legal and Regulatory Context

Virtus College operates as a British international school in Spain and therefore aligns its behaviour and disciplinary procedures with both UK and Spanish frameworks, including:

United Kingdom

- Education (Independent School Standards) Regulations
- Department for Education: *Behaviour in Schools* Guidance
- Equality Act 2010
- Keeping Children Safe in Education (KCSIE)

Spain

- Spanish child protection and safeguarding legislation
- Data protection legislation (LOPDGDD and GDPR)
- Relevant requirements of the Community of Madrid

Disciplinary measures are applied lawfully, proportionately, and with due regard to students' rights, dignity, and welfare.

Behaviour Expectations

All students at Virtus College are expected to:

- Treat staff, peers, and visitors with courtesy and respect
- Attend all lessons punctually and fully prepared to learn
- Follow staff instructions promptly and without challenge
- Engage positively in learning and study periods
- Complete all academic work honestly and to the best of their ability
- Behave responsibly during study periods
- Adhere to the Sixth Form Student Code of Conduct and all associated policies

Unacceptable Behaviour

Unacceptable behaviour includes, but is not limited to:

- Disruption to teaching and learning
- Persistent lateness or failure to attend lessons
- Refusal to follow reasonable instructions
- Bullying, harassment, intimidation, or discrimination (including misogyny, racism, homophobia, transphobia, or ableism)
- Inappropriate or abusive language
- Academic dishonesty or malpractice
- Damage to property or the environment
- Behaviour that compromises safeguarding, health, or safety

Rewards and Recognition

Virtus College places strong emphasis on recognising positive behaviour, effort, and contribution to the Virtus community.

The Virtus Rewards Pathway

Positive behaviour is recognised through the following graduated system:

- **Level 1: Verbal Praise**: Immediate in-class recognition
- **Level 2: Positive Points**: Awarded for specific achievements or sustained effort
- **Level 3: Postcard Home**: Formal recognition shared with parents
- **Level 4: Certificates**: Awarded for significant or sustained achievement
- **Level 5: Honours and Prizes**: Annual awards recognising exceptional contribution or attainment

Rewards are recorded and monitored to ensure consistency and equity across Virtus College.

Sanctions and Consequences

Sanctions are designed to be educational, proportionate, and restorative wherever possible. They are applied consistently to support students in improving behaviour and meeting Virtus expectations.

Classroom Conduct: Four Levels of Consequence

- **Level 1: Verbal Warning:** Issued for minor breaches of classroom expectations.
- **Level 2: Second Warning / Negative Comment Recorded:** A formal record is made if behaviour does not improve following an initial warning.
- **Level 3: Detention:** A 30-minute detention issued at lunchtime or after school, depending on the incident.
- **Level 4: Removal from the Classroom:** Used when behaviour significantly disrupts learning or compromises safety.

Whole-Virtus Sanctions Pathway

- **Level 1: Warnings and Detentions**: Minor or isolated breaches of conduct
- **Level 2: Friday Detentions:** Repeated or escalated concerns
- **Level 3: Parental Meetings and Internal Suspension**: Persistent or serious breaches of the Behaviour Policy
- **Level 4: External Suspension or Permanent Exclusion**: Serious misconduct or safeguarding-related incidents

All sanctions beyond classroom level are authorised by senior leaders and formally recorded on Bromcom.

Suspension and Exclusion

External suspension or permanent exclusion is used only in response to serious breaches of conduct, including but not limited to:

- Serious safeguarding concerns
- Violence or threatening behaviour
- Possession or use of prohibited items
- Serious or persistent bullying or harassment

Decisions are taken by the Head, with Board oversight where appropriate and parents are informed in writing.

Bullying and Discriminatory Behaviour

Virtus College operates a zero-tolerance approach to bullying, harassment, and discriminatory behaviour.

All incidents are addressed promptly and managed in accordance with:

- The Anti-Bullying Policy
- The Equality, Diversity and Inclusion Policy
- Safeguarding procedures

Where appropriate, sanctions may bypass lower stages of the sanctions pathway.

Behaviour and Safeguarding

Behaviour management at Virtus College is intrinsically linked to safeguarding and student wellbeing. Staff are trained to:

- Recognise behaviour that may indicate unmet needs or risk
- Apply proportionate and trauma-informed responses
- Refer concerns through established safeguarding channels

No disciplinary action will prevent or delay a safeguarding referral where there is concern for a student's welfare.

Students with Additional Needs

Virtus College recognises its duty to make reasonable adjustments for students with:

- Special educational needs or disabilities
- Identified mental health or wellbeing needs
- Temporary or exceptional personal circumstances

Behaviour expectations remain high, but sanctions will take account of individual context and agreed support plans.

Partnership with Parents

Virtus College values a strong partnership with parents and carers. Virtus will:

- Communicate concerns promptly and clearly
- Offer meetings to support behaviour improvement
- Ensure parents understand the rewards and sanctions systems

Parents are expected to support Virtus in maintaining high standards of behaviour.

Monitoring, Evaluation and Review

Behaviour data is monitored regularly by senior leaders to:

- Ensure consistency and fairness in the application of sanctions
- Identify patterns or emerging concerns
- Inform pastoral and safeguarding interventions

This policy is reviewed annually by senior leadership and the Board of Governors and updated in line with statutory guidance and inspection requirements.
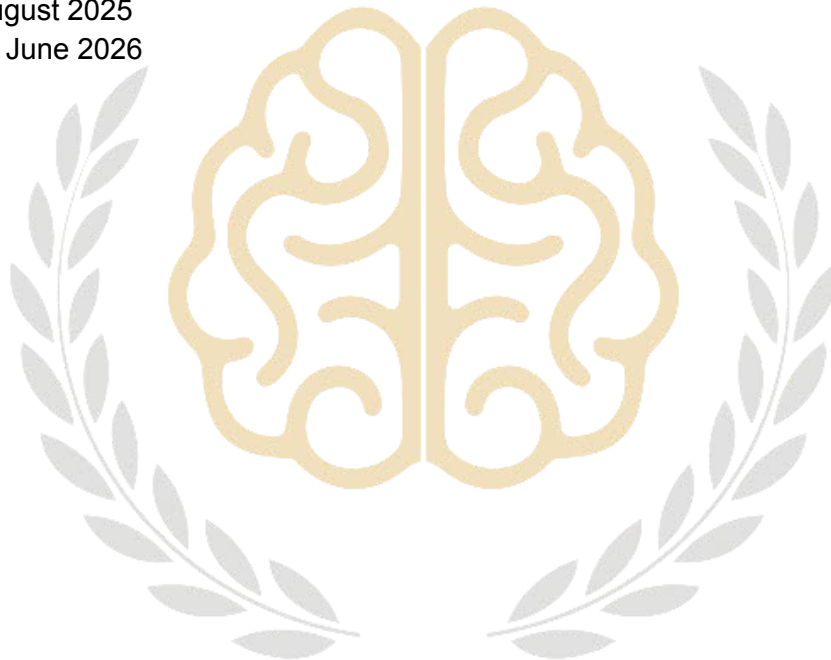
Links with other policies

- Student Code of Conduct
- Safeguarding
- E-Safety
- Equality, Diversity, Inclusion and Political Impartiality
- Complaints

Approved by: Head of Virtus College
Ratified by: Board of Governors

Reviewed: August 2025
Next Review: June 2026

Careers Education, Information, Advice and Guidance Policy

Introduction

Rationale for Careers Education, Information, Advice and Guidance (CEIAG)

Young peoples' careers are forged out of their experience, progress and achievements in learning and work. All students will benefit from a planned curriculum or programme of activities to help them make curriculum choices that are right for them and to develop the personal resources and readiness that will enable them to manage their careers throughout their lives. The careers provision is mapped against the Gatsby benchmarks.

Commitment

Virtus is committed to providing a planned programme of careers education and information, advice and guidance (CEIAG), framed by the Gatsby Career Benchmarks, for all students in Years 12-13.

Development

This policy was developed by the Careers Lead after consultation, discussed with SLT and ratified by the governing board.

Objectives

This policy Virtus aims to;

- ensure the career development of all students through a stable careers programme.

- provide CEIAG that is relevant, timely and sufficient to meet students' needs and integrated into their overall curriculum.

- enable all students to learn from information provided by the career and labour market

- ensure all students have a series of encounters with higher education

- ensure all students are exposed to meaningful encounters with employers

- link the curriculum learning to careers learning and maximise opportunities through the curriculum to enhance students' understanding of careers

- provide each student with guidance by specialist and impartial careers advisors in Year 12 and Year 13

Implementation

Leadership and Management

Leadership and management are secured through the careers leads (Headteacher, DH Pastoral and DH Academic). Membership includes the Head Teacher who chairs the group, Careers Lead who coordinates the day-to-day delivery of the careers programme. He reports to the Head Teacher.

This area is also supported by a governor who is also a member of the careers lead team.

Staffing

All staff are expected to contribute to CEIAG delivery through their roles as subject teachers and support staff. Every subject has embedded careers links in their SoW. Specialist careers education sessions are also delivered by PSHE staff.

The CEIAG programme is planned, monitored and evaluated by the Careers Lead.

Curriculum

The careers programme for each year group is constructed around taught careers education in PSHE for Year 12-13, assemblies for all year groups, events, trips, speakers, work-related learning online and printed information, personal mentoring, group work and individual interviews.

Enrichment programme

The Enrichment programme offers students a diverse range of enriching opportunities beyond the classroom, aligned with students´career ambitions.
There are up to eight different activities to choose from, including F1 in Schools, Young Enterprise, the school newspaper; the Virtus Herald, and the Psychology Club. These programmes encourage students to work independently under the guidance of dedicated teachers, allowing them to design and produce meaningful projects. The tangible outcomes not only enhance their personal learning but also strengthen their university applications by showcasing creativity, initiative, and real-world skills.

Specific university preparation

Oxbridge Plus

Virtus College recognises that some universities are extremely competitive and therefore we have tailored our provision so that these groups receive bespoke and targeted support. This can take the form of the following:

Entry exam lessons
ACT/SAT, ESAT, MAT, STEP, UCAT, Spanish medicine entry exam

USA Prep holistic USA prep
We offer specific lessons on preparation for applications to universities in the USA. Weekly ACT and SATs lessons

High Performance Programme
A tailored academic support programme designed to nurture students critical thinking, study skills and wider reading.

Careers events

The careers curriculum is extended beyond the classroom. There are also events throughout the year including but not limited to;

- University fairs
- Assemblies on different university systems - Uk, Netherlands, Ireland, Spain, US
- AULA (Spanish and European Universities)
- Liaise with universities in Spain such as Navarra
- Liaise with universities in Madrid such as Geneva Business school, Schiller University for a University taster on their premises
- Guest speakers from different career paths - Medicine, Engineering, Finance, HR, Marketing, Law etc.

- A programme of guest speakers from universities from the UK

VIRTUS COLLEGE
The British Sixth Form

Careers Programme/Curriculum Mapping

Careers Map

VIRTUS COLLEGE

Key Words / Skills: Preparing students for life after Sixth Form and the including transition to working life. Mock interviews, CV writing, budgeting, interview techniques, workshops, university visits, matriculation

January: EPQ submission
Spanish universities applications open

March:
Spanish unis fair

April:
Application for spanish universities
PSHE budgeting

February:
Interview preparation

November - December:
Studelink applications
British Physics Olympiad
Mathematical Olympiad

September - October:
Personal Statement focus
Motivational letter

October:
Predicted grades confirmed
Senior Mathematical Challenge

Year 13

September:
Oxbridge / Medicine UCAS application finalised

September - December:
UCAS Mentoring

October - November:
Ireland University workshops
EPQ Deadline

June:
Personal Statement workshops
EPQ Deadline
John Locke Essay competition
PSHE, managing uni budgets
WEX applications
Mock interviews

May:
Commonwealth Essay writing competition
UCAS lessons

March:
Spanish & Holland university lessons
IELTS test

February:
UCAS assembly for UK universities & speaker
Chemistry Olympiad

January:
British Biology Olympiad, ,
IELTS lessons.
Parent Careers Talk

April:
Mentoring
Careers self-assessment

February:
MUN competition
Wider reading

November:
Engineering & Meducators Workshop
British Physics Olympiad
Mathematical Olympiad
Lessons on self-reflection

September:
University visit: IE
UKMT maths challenge

October:
University preparation:
MOOCS, EPQ, Crest Awards
Morgan Stanley Finance competition
Senior Mathematical Challenge

January:
USA sports scholarship talk
Senior Physics Challenge
SATs/ACT lessons
ESAT STEP MAT lessons

Year 12

September:
CV writing, mock interviews, LinkedIn

October:
British Council UK University Fair
University speakers UK and USA
Lessons on Unifrog researching pathways

Work Experience

Virtus College recognises the importance of students gaining real life work experience and are therefore working with companies to offer students placement during the summer.

Assessment and Accreditation

Career learning is assessed using assessment for learning techniques and through the completion of Careers Progress Activities such as CV, MOOCs, evaluation in mentoring meetings, Stretch and Challenge activities, University short lists, reflections and Unifrog.

Impact

Monitoring, Review and Evaluation

The annual CEIAG improvement plan is connected to the school improvement plan. It is reviewed termly by the careers lead team and annually by the senior leadership team. Success of the careers programme is measured on the outcomes of initiatives, destination data and student feedback.

Students are actively engaged in planning career events and are integral in effective evaluation of the programme.

Links with other Policies

The policy for CEIAG is related specifically to

- PSHE
- Equality, Diversity, Inclusion and Political Impartiality
- Special Educational Needs (SEND).
- Work experience policy

Reviewed: June 2025
Next Review: June 2026

Climate Action Policy

Introduction

Virtus College acknowledges the urgent need to address climate change through institutional leadership, curriculum design, operational practice, and community engagement. In line with UK DfE guidance on sustainability and Spain's Law on Climate Change and Energy Transition (Ley 7/2021), we are committed to becoming a low-carbon, climate-resilient institution preparing our students for a sustainable future.

Guiding Principles

Net Zero Commitment: We support the UK government's 2050 net-zero target and will align our operational strategy to reduce Scope 1 and 2 emissions, with increasing visibility of Scope 3 impacts.

Student Partnership: Our students are active partners in climate action, with representation through an Eco-Committee

The Virtus Approach: Sustainability is embedded across governance, operations, curriculum, and community engagement.

Leadership and Governance

- A designated Sustainability Lead (Deputy Head - Pastoral) oversees strategy, compliance, and delivery
- A cross-school Climate Action Team includes students, teachers, operations, and facilities staff
- Net zero targets and a climate risk assessment will be reviewed annually
- We will join recognised schemes such as the Race to Zero for Education and explore accreditation via the Green Gown Awards or EAUC Scorecard

Curriculum and Education for Sustainable Development (ESD)

- Carbon literacy training for staff and students will be delivered annually
- Sustainability themes are integrated across subjects (e.g. renewable energy in physics, ethical consumption in business, climate justice in PSHE)
- Personalised career advice will include green career pathways
- Virtus will participate in initiatives like the Global Goals Teach In and will seek to map curriculum against the UN SDGs using the Responsible Futures framework

Estates and Operations

- Virtus College is not required to comply with SECR legislation, but voluntarily aligns with SECR principles. We monitor and report our carbon emissions (Scope 1, 2, and selected Scope 3), using tools adapted from the DfE, EAUC, and Carbon Trust. This

supports our net-zero ambitions and educates our students in evidence-based climate action.
- Energy use will be monitored using SECR-aligned tools; LED lighting is installed
- No new fossil-fuel dependent systems will be purchased
- Single-use plastics are being phased out; catering offers plant-based options daily
- A full biodiversity survey will be undertaken in 2025-26 to inform green space development
- We will undertake an annual travel survey and promote cycling, walking, and carpooling among staff and students
- International flights for school trips will require carbon-offsetting and justification

Waste, Procurement, and Water

- Print and paper uses are monitored and minimised (duplex printing by default; digital-first communications)
- The canteen will conduct a food waste audit and adopt composting practices
- Sustainable procurement policy priorities local and ethical suppliers

Community and Partnerships

- We aim to work with Madrid City Council on local climate and clean air initiatives
- Student-led campaigns, events, and climate-related service projects will be encouraged
- Communications to parents will include climate updates and progress towards our goals

Data Collection, Reporting and Accountability

- Our Climate Action Dashboard, based on EAUC and AoC templates, tracks emissions, targets, actions, and student engagement metrics
- Annual reporting will be published on the school website and shared with the Board of Governors
- The Head and SLT will review progress termly and adjust plans as needed

Data Collection, Reporting and Accountability

This policy will be reviewed every academic year in July. Progress will be assessed against the benchmarks from the UK DfE Climate Action Plan, EAUC's Sustainability Scorecard, and the Climate Action Roadmap for Colleges.

Linked policies

- Health and Safety
- PSHE
- Teaching and Learning
- Trips and Visits
- AUP

- Data Protection and GDPR
- Admissions

Created: August 2025
Next Review: July 2026

Complaints Policy

Section I: Rationale

As key stakeholders in the education of their children, parents have a right to voice any concerns they might have about their children's education. It is the school's duty and in its best interest to provide a channel for and be responsive to parents' complaints.

Guiding Principles

Parents naturally consider the education of their children of the utmost importance and so it is to be expected that parents will from time to time voice concerns about some aspect of the education provided by the school.

If parents' concerns can be addressed promptly and with care, it will minimise any sense of anger or frustration.

Some concerns may be valid and justified and others may be beyond the scope of what the school can offer. The process of dealing with complaints must distinguish whether something can be done and then prompt action should be taken where it can and parental expectations should be managed where it cannot.

Channels for Complaints:

- The first port of call for any concern parents might have regarding their child's education must be through the Deputy Head Academic or the Deputy Head Pastoral. Safeguarding complaints must always be directed immediately to the Designated Safeguarding Lead (DSL) or, if about the DSL, to the Headteacher.

- The first port of call for any concern regarding administrative matters must be through the Head's PA.

- Complaints about a teacher should be directed to the Deputy Head Academic or Deputy Head Pastoral or to the Headteacher.

- Complaints about the Headteacher should be directed to the Governing Body.

Every reasonable effort should be made to ensure that parents are aware that these channels exist for queries or concerns.

It is the responsibility of the Headteacher to ensure that the procedures for dealing with complaints are understood by all staff and that any complaints do not remain unresolved.

Section II: Procedures

Procedures

Stage 1: Informal

Most complaints are easily resolved informally by discussion with staff at the school. More difficult or complex concerns may require further discussion or action.

Procedure for initial contact by office staff or a member of staff:

1. Listen to, and record, in writing the basic details of the complaint. The complaint should be acknowledged **within two working days** and a target date for a response set: this should normally be within **five working days o**f acknowledgement. This time period is not considering holiday periods when school staff may not reply in accordance with usual expectations.
2. Decide upon the appropriate person to deal with the complaint.
3. An appropriate member of staff (SLT) interviews the complainant or makes telephone contact.
4. Complaint listened to and details recorded.
5. Collect sufficient evidence to make an objective decision about the complaint. (Speak to those involved, speak to witnesses and take written statements (if required).
6. Members of staff (SLT) decide upon action to be taken.
7. Communicate with the complainant and other affected parties normally in writing with a proposed solution.

If the matter remains unresolved then invite the complainant to make a formal complaint, in writing, to the Headteacher.

Should the complaint be about the Headteacher, the complainant should approach the Vice Chair of the Governing Body who is obliged to investigate it.

Stage 2: Formal

If the complaint is unresolved after an informal meeting and discussion, it may move on to the formal stage. The written complaint should outline the nature of the complaint, why the complainant remains dissatisfied and the resolution sought from their perspective.

The Headteacher or another member of SLT will carry out an investigation and respond to the complainant. The complaint will be acknowledged within two working days of receipt of formal notice, and a target date for providing a response will be given. This will normally be within 10 working days. The Headteacher may request to meet with the complainant to gain further information relevant to the complaint. Statements from witnesses will be collected where necessary. When all the relevant facts have been established, the Headteacher should produce a written response to the complainant.

If the complaint is not resolved, the complainant will be given the option to move to Stage 3. The Headteacher should refer the complaint to the Governing Body within five working days.
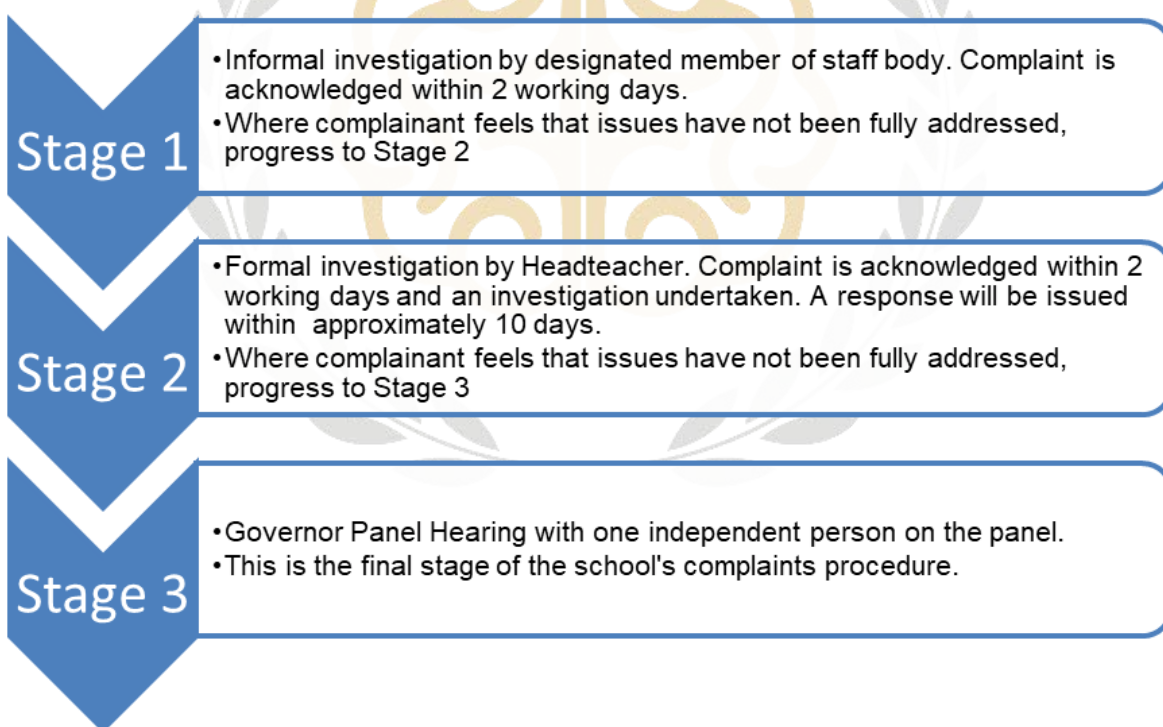
Stage 3: Governing Body

The Governing Body will meet to discuss the complaint and appoint a senior representative of the school who will contact the complainant directly within five working days of the receipt of the complaint. The senior representative will aim to resolve the issue with the complainant in writing, in conversations or face-to-face.

The Governing Body will endeavour to ensure that one of the persons appointed to the panel is independent of the running and management of the school in line with UK independent school guidance.

The complainant is entitled to be accompanied to the hearing. The hearing will be scheduled at the earliest possible convenience for both parties.

A final decision will be made and communicated to the complainant in writing, within five working days of the hearing if practicable.

Stage 1
- Informal investigation by designated member of staff body. Complaint is acknowledged within 2 working days.
- Where complainant feels that issues have not been fully addressed, progress to Stage 2

Stage 2
- Formal investigation by Headteacher. Complaint is acknowledged within 2 working days and an investigation undertaken. A response will be issued within approximately 10 days.
- Where complainant feels that issues have not been fully addressed, progress to Stage 3

Stage 3
- Governor Panel Hearing with one independent person on the panel.
- This is the final stage of the school's complaints procedure.

Recording Complaints

An informal complaint is recorded by the senior member of staff who deals with the complaint and the Headteacher is informed.

A formal complaint is recorded by the Headteacher.

A central complaints log will be maintained by the Headteacher. Records will be kept securely in line with the school's Data Protection policy and retention schedule. Complaints involving safeguarding issues will also be cross-referenced in the Safeguarding record-keeping system (MyConcern).

Where relevant, any judgement made will be sent to the complainant, the person the complaint was about and the Vice Chair of the Governing Body.
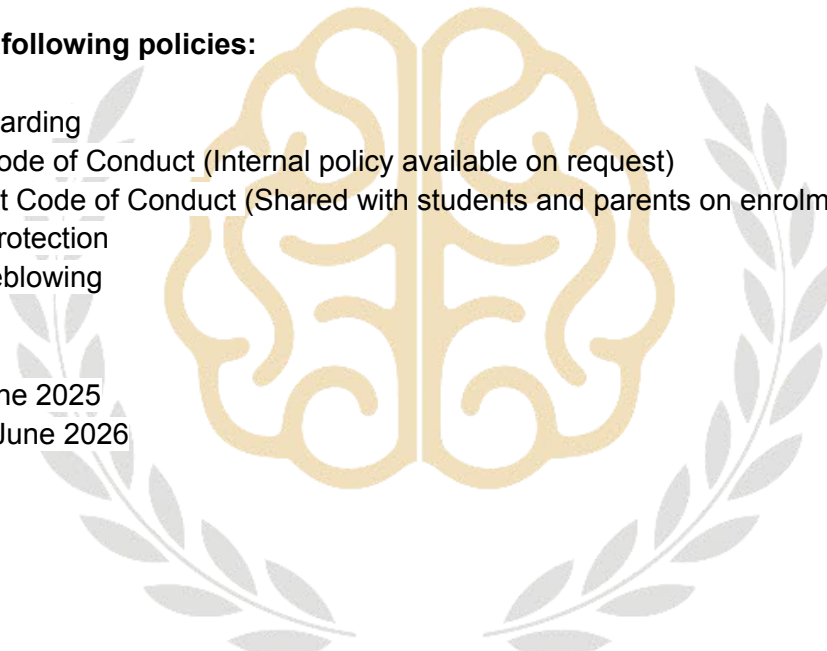
The decision of the Governing Body represents the final stage of the School's internal complaints procedure. The School will not re-open or re-consider aspects regarding the same complaint after it has been considered at all three stages of this policy. Where appropriate, complainants may escalate their concerns to The Schools Trust, with which Virtus holds a chartered relationship. In cases involving safeguarding or child protection, complainants also retain the right to raise concerns directly with the relevant Spanish authorities.

Linked to the following policies:

- Safeguarding
- Staff Code of Conduct (Internal policy available on request)
- Student Code of Conduct (Shared with students and parents on enrolment)
- Data Protection
- Whistleblowing

Reviewed: June 2025
Next review: June 2026

GDPR and Data Protection Policy

Background

Data protection is an important legal compliance priority for **Virtus College, The British Sixth Form.**

Virtus College, The British Sixth Form, collects, stores and processes personal data about staff, students, parents, contractors and other third parties. We act as a "data controller" under both UK and Spanish data protection law. Our obligations arise primarily under the UK GDPR and Data Protection Act 2018, as well as the EU GDPR and Spain's Organic Law 3/2018 (LOPDGDD). Data protection is therefore both a legal and safeguarding priority.

Definitions

Key data protection terms used in this data prᵒotection policy are:

- **Data Controller** – decides why and how data is used (Virtus College).

- **Data Processor** – processes data on behalf of the controller (e.g. Bromcom, MyConcern, Google).

- **Personal Data** – information that can identify a living individual.

- **Special Category Data:** sensitive data (health, safeguarding, ethnicity, etc.).

- **Processing** – any action taken with data (collecting, storing, sharing, deleting).

Scope of this policy

This policy sets out the School's expectations and procedures with respect to processing any personal data we collect from data subjects (including parents, students, employees, contractors and third parties).

Those who handle personal data as employees or governors/trustees of the School are obliged to comply with this policy when doing so. For employees, breaches of this policy may result in disciplinary action. Accidental breaches of the law or this policy in handling personal data will happen from time to time, for example by human error, and will not always be treated as a disciplinary issue. However, failure to report breaches that pose significant risks to the School or individuals will be considered a serious matter.

This policy applies to all personal data processed by Virtus College, whether on campus or through cloud-based systems (including Bromcom, MyConcern, Google Workspace, and any other approved platforms). It covers data of students, parents/guardians, staff, and any other individuals who interact with the school.

Roles and Responsibilities

The Data Protection Officer (DPO) role is held by the HR Officer, who operates independently of safeguarding decision-making. The Designated Safeguarding Lead works closely with the DPO where data protection and safeguarding intersect. The DPO oversees compliance, advises on legal obligations, and is the first contact for any data protection concern. The DPO can be reached at alberto.aparicio@thinkaheadeducation.com

Principles

The GDPR sets out six principles relating to the processing of personal data which must be adhered to by data controllers (and data processors). These require that personal data must be:

1. Processed **lawfully, fairly** and in a **transparent** manner;

2. Collected for **specific and explicit purposes** and only for the purposes it was collected for;

3. **Relevant** and **limited** to what is necessary for the purposes it is processed;

4. **Accurate** and kept **up to date**;

5. **Kept for no longer than is necessary** for the purposes for which it is processed; and

6. Processed in a manner that ensures **appropriate security** of the personal data.

In addition, Virtus College follows the GDPR's broader principle of **accountability**. This means we must be able to demonstrate our compliance at all times. To achieve this, we:

- Maintain records of our data processing activities

- Conduct Data Protection Impact Assessments (DPIAs) for high-risk processing, such as safeguarding records

- Provide regular staff training and audits to ensure compliance.

- Keep an audit trail of key actions (such as updates to privacy notices, responses to data subject rights requests, and handling of data breaches).

Types of Data

The school processes various types of personal data, including but not limited to:

- Student information (names, contact details, academic records).
- Staff information (names, contact details, employment records).
- Parent/guardian information (names, contact details).
- Other data as necessary for the functioning of the school.

In addition, Virtus College also processes:

Student data: identifiers (date of birth, nationality, student ID), attendance and punctuality records, behaviour and disciplinary records, health and medical information (allergies, medications, SEND support needs), safeguarding information (child protection and welfare records), and photographs or video for identification and events.

Parent/guardian data: contact details, custody information, and where applicable, billing and financial arrangements for school fees.

Staff data: employment history, qualifications, payroll and tax information, social security numbers (as required by Spanish law), absence and leave records, vetting information (criminal record checks including the Spanish "negative certificate of sexual offences" and where relevant, DBS or international clearances), and performance records.

Admissions and alumni data: information from applications, references, and prior education records, as well as alumni contact details (retained with consent for maintaining the school community).

Other individuals' data: emergency contacts, visitors (including CCTV images where applicable), and contractors/service providers (contact details and vetting where needed).

Data Processing Activities

Virtus processes personal data for the following purposes:

- Academic and administrative activities.
- Communication with students, parents, and staff.
- Security and safety measures.
- Legal and regulatory compliance.

Lawful Basis

Under the GDPR there are several different lawful grounds for processing personal data. One of these is consent. However, given the relatively high bar of what constitutes consent under GDPR (and the fact that it can be withdrawn by the data subject) it is considered preferable for the School to rely on another lawful ground where possible.

Other lawful grounds include:

- Compliance with a legal obligation, including in connection with employment, engagement of services and diversity;

- Contractual necessity, e.g. to perform a contract with staff or parents, or the engagement of contractors;

- A narrower set of grounds for processing special categories of personal data (such as health information), which includes explicit consent, emergencies, and specific public interest grounds.

Virtus College relies on the following lawful bases for processing:

Contractual necessity: much of our data processing is required to deliver education to students and fulfil our agreements with parents and staff.

Legal obligation: we process data where required by law, such as safeguarding duties, health and safety, and employment reporting. Spanish law also requires specific checks for staff working with minors (e.g. "negative certificate of sexual offences").

Vital interests: in emergencies, we may share data (e.g. health information with medical professionals) to protect the safety of students or staff.

Public interest / safeguarding: processing sensitive safeguarding or welfare data is permitted under substantial public interest grounds.

Legitimate interests: used only where appropriate, for example in using CCTV for security or keeping alumni contact details. Balancing tests are carried out to ensure individual rights are not overridden.

Consent: reserved for specific, optional activities (e.g. use of student photos in publicity, participation in external programmes). Under Spanish law, students aged 14 and older can give consent themselves. Consent can be withdrawn at any time.

Closed-Circuit Television (CCTV)

The school operates Closed-Circuit Television (CCTV) systems in public areas of the premises, including corridors, entrances, the library, and the multi-purpose room. The purpose of CCTV monitoring is to enhance the safety and security of pupils, staff, visitors, and school property. The use of CCTV is carried out in accordance with the UK General Data Protection Regulation (UK GDPR), the European Union General Data Protection Regulation (EU GDPR) and Spain's data protection legislation (Ley Orgánica de Protección de Datos y Garantía de los Derechos Digitales - LOPDGDD).

The lawful basis for this processing is the school's legitimate interest in maintaining a safe environment. Clear signage is displayed in monitored areas to inform individuals of CCTV use. Recorded footage is stored securely, accessed only by authorised personnel, and retained for a limited period unless needed for the investigation of incidents or compliance with legal obligations. Individuals may request access to CCTV recordings in which they appear, subject to applicable data protection and privacy laws.

In line with guidance from the Spanish Data Protection Authority (AEPD), CCTV recordings are normally retained on a rolling 30-day basis unless an incident requires longer retention (e.g. an investigation). Any extracted footage is kept only for as long as necessary.

Access to CCTV is strictly limited to authorised staff. If footage is shared externally (for example, with law enforcement or insurers), this is done only when required by law or under legitimate interest, and the disclosure is logged.

CCTV is never used for employee performance monitoring or any purpose incompatible with safety and security.

Staff Responsibilities

Record-keeping: It is important that personal data held by the School is accurate, fair and adequate. Staff are required to inform the School if they believe that *any* personal data is inaccurate or untrue or if you are dissatisfied with how it is recorded. This applies to how staff record their own data, and the personal data of others, in particular colleagues, pupils and their parents, in a way that is professional and appropriate.

Staff should be aware of the rights set out below, whereby any individuals about whom they record information on School business (notably in emails and notes) digitally or in hard copy files may have the right to see that information. This absolutely must not discourage staff from recording necessary and sometimes difficult records of incidents or conversations involving colleagues or students, in accordance with the School's other policies, and grounds may sometimes exist to withhold these from such requests. However, the starting position for staff is to **record every document or email in a form they would be prepared to stand by should the person about whom it was recorded ask to see it**.

Data Handling: All staff have a responsibility to handle the personal data which they come into contact with fairly, lawfully, responsibly and securely and in accordance with the relevant School policies and procedures (to the extent applicable to them).

All staff (teaching and support) must:

- Complete annual data protection training (with refreshers when laws or systems change)
- Only access personal data necessary for their role and never share it unlawfully.
- Use only official school systems (e.g. Bromcom, MyConcern, Google Workspace) for handling data. Personal email or devices may not be used unless authorised and encrypted.
- Report any suspected data incident or breach immediately to the Data Protection Officer (DPO)
- Respect "digital rights" under Spanish law, including the right to digital disconnection (staff should not be expected to respond to communications outside of working hours).

Temporary and support staff (e.g. IT, catering, cleaning) who may come into contact with personal data are also trained appropriately and must follow the same standards.

Individual Rights

In addition to the School's responsibilities when processing personal data, individuals have certain specific rights, perhaps most significantly that of access to their personal data held by a data controller (i.e. the School). This is known as the 'subject access right' (or the right to make 'subject access requests'). Such a request must be dealt with promptly and does not need any formality, nor to refer to the correct legislation. If you become aware of a subject access request (or indeed any communication from an individual about their personal data), you must tell the HR Manager and Data Protection Officer as soon as possible.

Individuals also have legal rights to:

- Require us to correct the personal data we hold about them if it is inaccurate;

- Request that we erase their personal data (in certain circumstances);

- Request that we restrict our data processing activities (in certain circumstances);

- Receive from us the personal data we hold about them for the purpose of transmitting it in a commonly used format to another data controller; and

- Object, on grounds relating to their particular situation, to any of our particular processing activities where the individual feels this has a disproportionate impact on them.

These rights also include:

- The right not to be subject to decisions made solely by automated means that have significant effects (Virtus does not carry out automated decision-making).
- The right to withdraw consent at any time where processing is based on consent (without affecting processing already carried out on other lawful grounds).

For students, these rights are normally exercised by parents/guardians. However, under Spanish law, students aged 14 and above may exercise rights in their own name if they have sufficient understanding. In practice, older students may make requests directly, but parents are usually involved as well.

Requests to exercise data rights should be sent to the Data Protection Officer (DPO) at Adam.Whitlock@virtuscollege.es We acknowledge requests promptly and respond within one month, extendable by up to two further months if complex. Identification may be requested to confirm the requester's authority.

If an individual is not satisfied with the school's response, they have the right to complain to the Agencia Española de Protección de Datos (AEPD) (www.aepd.es).

Data Security

The School must ensure that appropriate security measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

- No member of staff is permitted to remove personal data from School premises, whether in paper or electronic form and wherever stored, without prior consent of the Head.
- No member of staff should provide personal data of staff, students or parents to third parties, including a volunteer or contractor, unless there is a lawful reason to do so.
- Where a worker is permitted to take data offsite on memory sticks or personal devices it will need to be encrypted.
- Use of personal email accounts by staff for official School business is not permitted.

Virtus College also applies the following security measures:

Access controls: All systems (Bromcom, MyConcern, Google Workspace) require individual logins; staff can only access data necessary for their role. Sensitive systems (e.g. safeguarding records) are restricted to authorised staff only.

Encryption: Data is encrypted in transit (HTTPS/SSL) and, where possible, at rest (e.g. encrypted school laptops). Sensitive documents must be password-protected or sent via secure methods.

Physical security: Paper records (student files, staff HR files) are kept in locked storage. Visitors are supervised in areas where personal information may be visible.

Cloud provider safeguards: Our main providers (Bromcom on Microsoft Azure UK servers, MyConcern UK servers, Google Workspace EU/US) comply with GDPR and use strong technical and organisational security. International transfers are protected by adequacy decisions or Standard Contractual Clauses.

Digital Safeguarding Smoothwall by Qoria: Since September 2025, Virtus College has implemented the Smoothwall digital safeguarding suite, part of the global Qoria family of child safety solutions. This includes tools for:

-   **Content filtering** (real-time, content-aware web filtering across school networks and devices)
-   **Monitoring and early intervention**, including flagged alerts for student wellbeing risks (via products like Monitor, Pulse, and Record Manager)
-   **Reporting and record-keeping** to support safeguarding logs and analysis. All data processed by Smoothwall is handled securely in line with GDPR and Spanish data protection laws, benefiting from Qoria's global trust framework and rigorous security standards (including encryption, identity management, and incident response)

MyConcern is the school's primary and authoritative safeguarding recording system. All safeguarding concerns relating to students are logged, triaged, and managed through MyConcern. Other systems (e.g. Bromcom, Smoothwall/Qoria) support monitoring and alerts but do not replace MyConcern as the formal safeguarding record.

Monitoring and testing: The IT team reviews audit logs and monitors for suspicious activity. Security patches, antivirus protection, and spam filtering are applied to minimise risks. Periodic training includes phishing awareness.

Special protections: Safeguarding records and special category data are stored with additional safeguards (e.g. two-factor authentication, audit logs, restricted access).

Data minimisation: Staff are encouraged to anonymise or pseudonymise data where possible (e.g. using initials instead of full names in presentations).

These measures follow the GDPR's risk-based approach and Spanish AEPD guidelines for schools.

Data Breach

In the event of a data breach, Virtus College will follow a documented breach response plan, including notifying the relevant authorities and affected individuals where required by law. All staff must report any suspected or confirmed data breach immediately to the Data Protection Officer (DPO). Examples include sending an email to the wrong recipient, losing a device containing personal data, or discovering unauthorised access.

The DPO will log and investigate each incident, take immediate steps to contain it, and determine whether notification is required.

- If the breach is likely to result in a risk to individuals' rights and freedoms, the DPO will notify the **Agencia Española de Protección de Datos (AEPD)** within 72 hours, providing the nature of the breach, affected data, and remedial action taken.
- If the breach poses a high risk to those affected (e.g. exposure of sensitive safeguarding data), the school will also inform the individuals concerned without undue delay, in clear and simple terms.
- All breaches are documented, whether or not they require notification, so lessons can be learned to improve future practice.

Unintentional mistakes will be met with remedial training and support, while deliberate or negligent misuse of personal data may result in disciplinary action.

Financial Data Handling

The School complies with the requirements of the PCI Data Security Standard (PCI DSS). Staff who are required to process credit card data must ensure that they are aware of and comply with the most up to date PCI DSS requirements. If you are unsure in this regard, please seek further guidance from the Head of Finance. Other categories of financial information, including bank details and salary, or information commonly used in identity theft (such as national insurance numbers or passport details) may not be treated as legally sensitive but can have material impact on individuals and should be handled accordingly.

Data Retention

Virtus College does not retain personal data indefinitely. We keep it only as long as necessary for educational, safeguarding, employment, or legal purposes. Retention periods are based on legal requirements and good practice guidelines. Key examples:

Student records: kept during enrolment and normally until the student reaches age 25, to cover references and potential claims.

Safeguarding records: retained longer, in line with legal guidance (commonly until the student is 25 or longer if incidents may have legal implications).

Staff records: retained for the period of employment plus 5–7 years after leaving, in line with employment law and potential claims. Payroll/tax records are retained as required by Spanish law (usually 5 years).

CCTV recordings: normally overwritten on a rolling 30-day basis unless extracted for an investigation.

Admissions data: if a student does not enrol, their data is deleted after one year unless consent is given to remain on a waiting list.

Alumni data: kept indefinitely for historical and community purposes, but only with consent; alumni can opt out at any time.

When retention periods expire, data is securely destroyed (shredding paper, secure deletion of digital files, or anonymisation where appropriate).

Training and Review

Training: All staff (including temporary and support staff) receive data protection training as part of induction and attend annual refresher sessions. Training includes secure use of school systems (Bromcom, MyConcern, Google Workspace), recognising phishing or other risks, and handling personal data responsibly. Additional updates are provided when laws or systems change.

Review and Audit: The Data Protection Officer (DPO) monitors compliance, conducts periodic audits, and reports annually to the Headteacher and Board.

Policy Review: This policy is reviewed at least once a year, or sooner if there are changes in law, guidance, or school practice. Updates are approved by school leadership/board and communicated to staff, parents, and students where relevant. The latest version is published on the school website.

Links to other policies

- Staff Code of Conduct (Internal policy available on request)
- Student Code of Conduct (Shared with students and parents on enrolment)
- Safeguarding
- E-Safety
- Acceptable Use of IT (AUP)

Reviewed: August 2025
Next review: June 2026

E-Safety Policy

Virtus College aims to ensure secure access to ICT for all students . It recognises that technology encourages a new collaborative way of thinking and opportunities for exploring information. It also recognises the challenges students face in accessing reliable, appropriate information and in avoiding content and behaviour that is biassed, bullying or exploitative. Virtus College wishes to educate and safeguard students, parents and staff on the best use of ICT and alert them to the risks.

This policy applies to the use of technology on school premises and also any use, whether on or off school premises, during term time or in holidays, which affects the welfare of other students or where the culture or reputation of the school are put at risk.

This policy outlines the acceptable use of Internet and email facilities, file-servers, messaging services, and any networks or hardware, including but not limited to that provided by the school. It applies to any personal devices and other equipment that can be used to access, store or record data or media files.

This policy sits alongside the school's Acceptable Use of IT Policy, which sets out the specific rules for use of devices, accounts and networks. The E-Safety Policy focuses on safeguarding, education, and safe behaviour online.

Acceptable Use

Students are responsible for their actions, conduct and behaviour online, or when using school devices in the same way that they are responsible at all other times. They should also adhere to the following guidelines when using the school network.

The school networks and related devices such as the iPads are the property of Virtus College. They have been made available to students to help enrich the learning process and to enable them to become skilled and responsible users of tools that have become part of our everyday lives. Students are expected to use the resources for the educational purposes for which they are provided.

Monitoring and Safeguards

Monitoring
Virtus College aims to offer students a safe learning environment and this includes its online and digital environment. The school has implemented several safeguards systems in order to restrict and monitor students' access to external sources and protect students. These strategies are in line with KCSIE 2025 and its recommendation for online safety.

The school reserves the right to monitor communications and general network usage in order to:

- Protect students.
- Establish facts.
- Prevent or detect crime or inappropriate behaviour.
- Investigate or detect unauthorised, suspicious or inappropriate use of school ICT systems.
- Ensure the effective and secure operation of the school network and its systems.

The following checks are in place to assist students:

- Teachers can use the Apple Classroom app to monitor student use of devices during lessons.
- If there is a suspicion that devices may be used inappropriately, the school reserves the right to perform random checks on any device brought into school by students.
- The software that allows Internet access through the network maintains a log of all sites visited by all users, including attempts to access sites prohibited by the firewall.
- A detailed blocklist of inappropriate or high-risk websites (including social media, streaming, gaming, gambling, adult, and anonymising services) is maintained as an appendix to the Acceptable Use Policy (AUP). This list is reviewed at least annually by the Designated Safeguarding Lead (DSL) and IT Manager, with governors informed of updates as part of safeguarding oversight.
- The PSHE programme is also used to help support the work of Internet awareness, use of social media and cyber-bullying.
- Virtus College uses Smoothwall by Qoria as its web filtering and monitoring solution. This system blocks inappropriate content, logs all attempts to access blocked sites, and provides keyword detection alerts linked to safeguarding risks (e.g. self-harm, radicalisation, sexual exploitation). Reports are reviewed regularly by the IT Manager and the DSL to ensure compliance with KCSIE 2025 requirements.

Education / PSHE / Parent Support

Students are educated about both the opportunities and risks associated with the use of technology and the internet. They have regular PSHE lessons that cover topics such as online safety, social media, gaming addiction, online gambling, pornography and other matters. Talks by external specialists are regularly organised for pupils and parents to provide further information and guidance.

Links to other policies

- Safeguarding
- Student Code of Conduct (Shared with students and parents on enrolment)
- Anti-Bullying
- PSHE
- RSE
- Acceptable Use of IT
- Data Protection

Reviewed: August 2025
Next Review: June 2026

Early Career Teachers - A Support Policy for Teachers in Training

Introduction

The purpose of this policy is to ensure that new teachers who have recently engaged in their Postgraduate Certificate in Education (PGCE) or iPGCE equivalent, receive comprehensive support and guidance during their training period at our school.

This policy applies to all unqualified teachers or new teachers who are concurrently enrolled in a PGCE program and working at our school, or within their first two years of employment since their PGCE graduation.

We are committed to fostering an environment that supports the professional development and growth of new teachers, and ensure consistency in the quality of teaching provided in every Virtus classroom. Our support structure includes the following key components:

Mentorship Program:

- Each early career's candidate will be assigned an experienced teacher as their mentor.
- The mentor and Early Careers Teaching Lead (ECTL) will observe the candidate's lessons regularly, providing constructive feedback aimed at improving teaching practices. The frequency of these observations will depend on the experience of each candidate.
- The early careers teacher is to provide a lesson plan for each observation in advance of the lesson, using the 'Virtus Lesson Plan' template.

Feedback and Evaluation:

- Early careers candidates will be expected to reflect on their lessons, and complete a reflection form to contribute to the feedback meetings with the observer.
- Feedback will be written up by the mentor during the observation using the 'Virtus Lesson Observation' template, and delivered verbally post observation.
- Observed lessons will adopt the British Teaching Standards as a framework to guide the delivery of feedback, offering feedback on lesson plans, classroom management, AFL, assessment, and pedagogy.
- Periodic evaluations will be conducted to assess the candidate's progress and identify areas for improvement. These will be sent to The Academic Deputy Head for review so that progress can be recognised.

Professional Development:

- The mentor will share best practices in teaching, learning strategies, and classroom management.
- Candidates will have access to professional development sessions and workshops tailored to new teachers.
- At Virtus British Sixth Form College, sharing good practice features regularly in the CPD programme. New teaching candidates will therefore benefit from consistent development and peer teaching.
- Peer observation is a part of the CPD programme so all teachers will be given the opportunity to observe each other. New teachers will therefore benefit from exposure to a wealth of experience and different teaching pedagogy and at least one peer observation per half term is expected of early careers teachers.

Support with PGCE Requirements:

- The mentor, ECTL and school administration will assist the candidate in fulfilling all the requirements of their PGCE programme.
- This includes guidance on completing assignments, managing workload, and meeting the program's academic standards.

Collaborative Learning Environment:

- Candidates are encouraged to collaborate with their mentors and other faculty members.
- A supportive, open environment will be fostered where candidates can seek advice, share experiences, and learn from each other.

Implementation

The Academic Deputy Head will oversee the implementation of this policy, working closely with the (ECTL), ensuring that each PGCE candidate is matched with a suitable mentor and that all aspects of the support system are effectively executed.

Early Careers Teaching Programme overview

	Unqualified Teachers	PGCE Candidates	ECT 1	ECT 2
Mentor observations	Weekly	Fortnightly	Twice for half term 1 Once half termly there after	Half termly
ECT Lead observations	Fortnightly	Fortnightly	Twice for half term 1 Once half termly there after	Half termly
Lesson Plans	Yes	Yes	Yes	Yes
Reflection Forms	Yes	Yes	Yes	Yes
Progress Evaluations	Termly	Termly	Termly	Termly
Peer observations	Weekly	Fortnightly	Half termly	Half termly

NB: Any teacher at any stage of the programme can be asked to have more frequent observations if the ECT lead or their mentor believes they would benefit from additional support. No teacher should ever receive less support than outlined above.

Review

This policy will be reviewed annually to ensure its effectiveness and to make necessary adjustments based on feedback from PGCE candidates and their mentors.

Linked to policies;

- Staff Development
- Teaching and Learning policy

Owner: Ms Polly Reeves- Perrin

Latest review: June 2025
Next review: June 2026

Emergency Policy (First Aid and Fire Evacuation)

Aims

This Emergency Policy outlines procedures to be followed in the event of a medical emergency, fire evacuation, or other critical incident at Virtus, in compliance with UK statutory guidance (including the Health and Safety at Work Act 1974, RIDDOR 2013, and DfE Health and Safety 2024) and Spanish workplace safety law (Ley 31/1995 de Prevención de Riesgos Laborales). It aims to safeguard students, staff, and visitors and ensure swift, coordinated responses to emergencies.

Definition of First Aid Types

There are many types of instances where First Aid needs to be given. Below is an indicative list of types of medical instances and emergencies where First Aid is required:

- **Cardiac Arrest**:
  a. Sudden loss of heart function.
  b. Requires immediate cardiopulmonary resuscitation (CPR) and the use of an automated external defibrillator (AED).
- **Choking:**
  a. Blockage of the airway, preventing normal breathing.
  b. May require abdominal thrusts (Heimlich manoeuvre) to dislodge the obstruction.
- **Severe Bleeding:**
  a. Uncontrolled bleeding from wounds or injuries.
  b. Apply pressure to the wound with a sterile dressing and elevate the injured area if possible.
- **Allergic Reactions:**
  a. Severe allergic reactions (anaphylaxis) can lead to difficulty breathing, swelling, and shock.
  b. Administer an epinephrine auto-injector if available and seek immediate medical attention.
- **Burns**:
  a. Injuries caused by heat, chemicals, electricity, or radiation.
  b. Cool the burn with running water and cover it with a clean, non-stick dressing.
- **Fractures and Sprains**:
  a. Injuries to bones or ligaments.
  b. Immobilise the affected area and provide support, and seek medical assistance.
- **Seizures:**
  a. Uncontrolled electrical activity in the brain.
  b. Ensure the person's safety by moving objects away, cushion their head, and allow the seizure to run its course. Seek medical advice if necessary.
- **Heat Exhaustion and Heatstroke:**
  a. Overheating due to prolonged exposure to high temperatures.
  b. Move the person to a cooler place, provide fluids, and cool their body with

damp cloths.
- **Poisoning:**
    a. Ingestion, inhalation, or absorption of harmful substances.
    b. Contact emergency services and provide information about the substance ingested. Follow specific first aid recommendations for the type of poisoning.

- **Stroke:**
    a. Sudden interruption of blood supply to the brain.
    b. Recognise symptoms such as facial drooping, arm weakness, and slurred speech. Seek emergency medical attention.
- **Insect Stings and Bites:**
    a. Allergic reactions or infections can occur.
    b. Remove the stinger if present, clean the area, and apply a cold compress. Seek medical attention if necessary.

Protocols for First Aid

First Aid Team Hierarchy and Roles:

The First Aid Team is crucial for providing immediate assistance in case of medical emergencies. The team hierarchy and roles are as follows:

- First Aid Coordinator is Mr Whitlock DSL:
    a. Oversees the entire First Aid Team and ensures compliance with policies.
    b. Responsible for coordinating with external Prevention Service company.
- First Aid Responders are Mr Whitlock DSL and Ms Moreno, Deputy DSL:
    a. Trained staff members certified by the external Prevention Service company.
    b. Immediate responders in case of medical emergencies.
    c. Responsibilities include administering first aid, assessing the situation, and activating emergency services.
    d. In the absence of the named responders all staff are trained in basic first aid

Important to note is that all teaching staff are First Aid trained both with TES online, accredited and in accordance with UK law, and by an external accredited Spanish company to ensure dual accreditation and compliance with both UK and Spanish standards.

Immediate Actions:

- In the event of an emergency, First Aid will be provided, and if possible parents contacted immediately. In accordance with Spanish law, written parental consent must be obtained prior to admission, as required by Law 41/2002 on patient autonomy. In emergencies, however, the school is authorised to act in loco parentis if consent cannot be obtained in time.
- If contacting parents is not possible, the school is authorised to seek medical advice and treatment for the student.

Location of First Aid Equipment:

- **AED** (Automated External Defibrillator): AED is located on Floor 2, corridor by the middle exit. Signage is clearly displayed. All trained users have up-to-date certification in AED usage.
- **First Aid Kits:** Placed strategically throughout the school, including The Admin room, the kitchen.

Procedure in the event of contact with blood or other bodily fluid

The school understands the importance of ensuring that the risk of cross-contamination is reduced as far as is reasonably practicable, and the training that staff and first aiders undertake outlines the best practice for this. It is important that the first aider at the scene of an accident or injury takes the following precautions to avoid risk of infection to both them and other students and staff:

- cover any cuts and grazes on their own skin with a waterproof dressing
- wear suitable disposable gloves when dealing with blood or other bodily fluids
- wash hands after every contact
- If the first aider suspects that they or any other person may have been contaminated with blood and/or other bodily fluids that are not their own, the following actions should be taken without delay:
- wash splashes off skin with soap and running water
- wash splashes out of eyes with tap water or an eye wash bottle
- wash splashes out of nose or mouth with tap water, taking care not to swallow the water
- record details of the contamination
- Seek medical advice if appropriate
- Arrange to clear up the spill site

Emergency Services

An ambulance should always be called by staff in the following circumstances:

- a significant head injury
- fitting, unconsciousness, or concussion
- difficulty in breathing and/or chest pains
- a severe allergic reaction
- a severe loss of blood
- severe burns or scalds
- the possibility of a serious fracture
- in the event that the first aider does not consider that they can adequately deal with the presenting condition by the administration of first aid, or if they are unsure of the correct treatment.
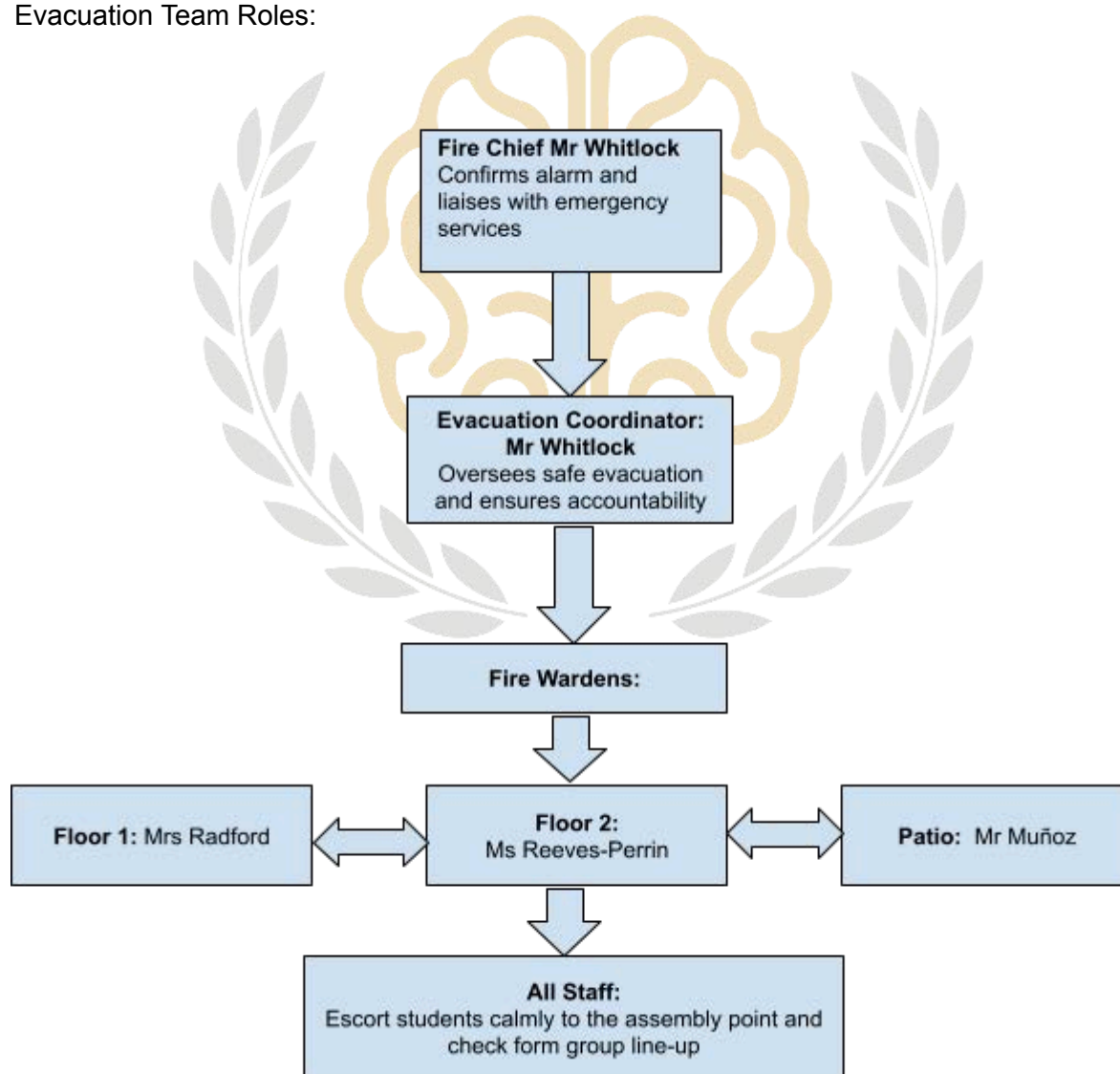
If an ambulance is called, the member of staff in charge should ensure that access to the school site is unrestricted and that the student can be easily accessed by emergency services when they arrive.

Students who are taken to hospital in an ambulance will be accompanied by a member of staff unless parents are able to reach the school site in time to go with their child themselves. Ambulances will not be delayed while waiting for parents to arrive at the school.

Parents will be informed immediately of any medical emergency and told which hospital to go to.

All accidents and injuries must be reported.

Evacuation Procedures

Evacuation Team Roles:

Fire Chief Mr Whitlock
Confirms alarm and liaises with emergency services

Evacuation Coordinator: Mr Whitlock
Oversees safe evacuation and ensures accountability

Fire Wardens:

Floor 1: Mrs Radford

Floor 2: Ms Reeves-Perrin

Patio: Mr Muñoz

All Staff:
Escort students calmly to the assembly point and check form group line-up

Evacuation Coordinator Mr Whitlock:

- Coordinates and oversees evacuation procedures.
- Liaises with emergency services.

Evacuation Wardens:

Trained individuals responsible for guiding students and staff during evacuations. There is an evacuation warden for each floor:
- Floor 1: Mrs Radford (substitute: Ms Sharoff)
- Floor 2: Ms Reeves - Perrin, (substitute: Ms Moreno)
- Patio: Mr Muñoz (substitute: Ms Garrabella)

In the event of an emergency which triggers an evacuation, all staff make their way out to the assembly point, teachers to shepherd students in their class, following the evacuation protocol. Evacuation/Fire wardens stay behind and follow the fire/evacuation protocol which includes checking all rooms, including toilets, are empty and closing all doors to support fire containment and reduce smoke spread.

Evacuation Protocol

Students:

Stay calm, file out of the building quietly, always following the instructions of their teacher or the nearest member of staff or adult. Leave all belongings behind. Exit the building via the nearest exit; either the front exit or the middle exit in a calm, orderly manner.

As soon as they get to the assembly point, line up in form groups so they can easily identify if anyone is missing behind or in front of them. Form tutors will complete a roll call using printed registers delivered to the assembly point by the Receptionist. Any missing students or staff must be reported immediately to the Fire Chief.

Staff:

Upon hearing the fire alarm, staff must:

- Ensure all windows and doors are closed before leaving the room (to help contain fire and smoke) where safe to do so.

- Carefully shepherd students in their class, and any nearby unsupervised students, to the nearest fire exit, either the front exit or the middle exit and closing the doors on their way out. They should make their way to the assembly point and supervise the students going into form groups. Form tutors will receive form registers from the Receptionist.

Firewardens will remain behind and clear the area; making sure all students have evacuated the building, and that rooms are empty, including toilets.

Fire Drill Frequency and Recording

Fire drills are held at least once per term and logged in the Fire Safety Record. Any issues arising from drills are reviewed and actioned by the Fire Chief.

Links to other policies:
- Safeguarding
- Health & Safety
- Invacuation

Reviewed: August 2025
Next Review: June 2026

Equality, Diversity, Politics and Activism Policy

Scope

This policy applies to all students (15–19), staff, governors, contractors and visitors. It is implemented in Madrid under Spanish law and aligned with UK standards and guidance for political impartiality and safeguarding.

Intent

The school is committed to providing equal opportunities to all students, staff, applicants and other members of the community in a safe, happy environment where all can succeed and where cultural diversity is celebrated.

We prohibit discrimination, harassment and victimisation on grounds including sex, race, disability, sexual orientation, religion or belief, gender reassignment, pregnancy and maternity, age, marriage and civil partnership, ethnic or national origin, socio-economic status, and any other protected or comparable characteristic recognised by UK Equality Act 2010 principles and Spanish Law 15/2022 (binding) on equal treatment and non-discrimination.

Any behaviour, comments, attitudes or actions which undermine or threaten an individual's self-esteem on these grounds will not be tolerated.

In a world where political divisions and tensions are growing, the school is to remain politically dispassionate and neutral. All staff, students and other members of the community shall respect this policy and promote the values contained herein.

Virtus is committed to creating a learning environment that values and celebrates equality, diversity, inclusion and respectful civic participation. This policy is guided by Spain's Organic Law 8/2021 (LOPIVI), including prevention, staff training and equality duties (Arts. 4–5, 9, 29), and aligned with UK safeguarding guidance (KCSIE, 2025) as best practice for a British international setting.

Principles:

Non-Discrimination: We prohibit discrimination on the basis of race, gender, ethnicity, religion, disability, sexual orientation, or any other protected characteristic, as outlined in UK legislation.

Equal Opportunities: We are dedicated to providing equal opportunities for all students and staff, fostering an inclusive atmosphere that recognises and respects individual differences.

Accessibility: We will make reasonable adjustments and ensure universal accessibility to premises, curriculum and services in line with Spain's General Law on the Rights of Persons with Disabilities (RDL 1/2013, as amended).

Training and Awareness

We provide regular staff training on equality, inclusion, harassment and bystander intervention, online safety and indicators of radicalisation/extremism, adopting the UK Prevent framework as best practice.

Reporting Mechanisms:

Reports of discrimination, harassment or inequality can be made to: Tutor/Head of Year, Deputy Head (Pastoral/DSL), or Headteacher; staff may also use whistleblowing channels. Concerns will be recorded and acted on promptly in line with our Safeguarding, Anti-Bullying, Complaints and Whistleblowing policies.

Clear channels for reporting discrimination, harassment, or any form of inequality exist and should be scaled directly to DSL for further action. Appropriate actions will be taken to address and rectify such incidents promptly.

Promotion of Activism:

Civic Participation and Respectful Expression
We encourage lawful, peaceful civic participation (e.g., volunteering, charity work, model UN, debates) that does not endorse partisan political campaigns. Activities must be age-appropriate, optional, risk-assessed, and consistent with political impartiality duties.

External Speakers and Materials
Staff must ensure visitors and materials present balanced views on political issues; staff must not promote partisan political views.

Community Engagement
The college will actively engage with the local community to promote diversity, inclusivity, and activism, contributing to a positive and inclusive societal impact.

Aims & Objectives

Our school shall:

- Ensure that all students and staff contribute to creating a happy, safe, caring environment by showing respect for and appreciation of all members of our community.
- Ensure that complaints or evidence of failure to comply with this policy will be dealt with promptly and fully investigated. All forms of discrimination (whether direct, indirect, victimisation or harassment) will be treated seriously.
- Enhance and develop the skills, knowledge, and abilities of existing staff and students to realise their full potential, regardless of background.
- Equip staff and students with the skills to provide personal solutions and practices and to promote anti-discriminatory behaviour generally.
- Ensure that our admission and recruitment procedures do not permit discriminatory grounds to be used as criteria for admission or hiring.

- Ensure that our curriculum is broad and balanced and avoids stereotypes.
- Monitor our admissions and employment practices regarding composition of staff, recruitment trends, promotion patterns, use of complaints procedures, matters of grievances, disciplinary procedures, use of sanctions.
- Ensure appraisals and exit interviews are used to provide further helpful information and feedback.
- Ensure that staff is trained to recognise indicators of radicalisation and extremism by completing courses such as WRAP for the Prevent duty.

Implementation

The Curriculum
Each curriculum subject or area will be kept under review in order to ensure that teaching and learning reflect the principles set out above.

Roles and Responsibilities
This policy and its related procedures are to be implemented and abided by staff. The Headteacher is responsible for implementing the policy; for ensuring that all staff are aware of their responsibilities and are given appropriate training and support; and for taking appropriate action in any cases of unlawful discrimination.

The Deputy Head has day-to-day responsibility for coordinating implementation of the policy.

All staff are expected to:

- Promote an inclusive and collaborative ethos in their classroom
- Deal with any prejudice-related incidents that may occur
- Plan and deliver curricula and lessons that reflect the principles above
- Support students in their class for whom English is an additional language
- Keep up-to-date with equalities legislation relevant to their work
- Prevent discrimination, harassment and victimisation to occur within the school
- Discuss politics only when appropriate, avoiding passionate or personal political opinions and always from a balanced position, recognising and presenting alternative viewpoints.
- When discussing political/current issues, present factual content with due balance, avoid personal advocacy, and signpost alternative viewpoints.

Religious Observance
We respect the religious beliefs and practice of all staff, students and parents, and comply with reasonable requests relating to religious observance and practice.

Staff Development and Training
We ensure that all staff, including support and administrative staff, receive appropriate training and opportunities for professional development, both as individuals and as groups or teams. Training content reflects Spanish legal duties on equality/anti-violence (LOPIVI; Law 15/2022) and UK safeguarding/political-impartiality guidance as best practice.

Breaches of the Policy

Breaches of this policy will be dealt with in the same ways that breaches of other school policies are dealt with, as determined by the Headteacher.

Monitoring and Evaluation

We will monitor incidents, outcomes and reasonable adjustments, analyse trends by protected and comparable characteristics, and report patterns to SLT/governors to inform prevention and staff training. (Data handling per Data Protection policy.)

Links to other policies:

- AUP
- Whistleblowing
- Complaints
- PSHE
- RSHE
- Anti-bullying
- Safeguarding
- Staff Code of Conduct (Internal policy available on request)
- Student Code of Conduct (Shared with students and parents on enrolment)

Reviewed: August 2025
Next Review: June 2026

Health and Safety Policy

Aims

Virtus College is committed to providing a safe and healthy environment for all students, staff, and visitors. This health and safety policy outlines the measures in place to prevent accidents and injuries, comply with relevant legislation, and create a culture of awareness and responsibility. This policy meets the requirements of Spanish law. This policy is a dual aspect design so it outlines the responsibility and processes for student and staff health and safety, as well as safety aspects of the premise, so it will cover actions in the event of incidents of injury and accidents plus distribution of medication.

Overall responsibility for the policy and practice lies with the school owners and Headteacher but it is vital that all members of the school contribute to its formation and help to ensure it is followed effectively and responsibly.

In addition to this the school recognises that under Section 100 of the Children and Families Act 2014 it has an additional duty to make arrangements for supporting students at their school with medical conditions. This is done through the creation of individual healthcare plans by the Deputy DSL. These will be drawn up in consultation with health and social care professionals, students and parents to ensure that the needs of children with medical conditions are effectively supported and that no student, to the extent that it is possible, will be excluded from full access to education, including school trips and physical education on the grounds of their medical condition.

Responsibility

The school's owners and leadership are responsible for implementing and maintaining health and safety standards. Furthermore, all staff members are accountable for adhering to the policy and reporting any hazards, incidents, or concerns promptly.

We will ensure that:

- the buildings, equipment and work systems are safe and without health risks;
- machinery, articles, substances and appliances are kept, maintained and used safely;
- buildings, exits, entrances, grounds and boundaries are properly maintained and in a safe condition;
- the working environment is kept safe and healthy;
- clear information, instructions and supervision are provided.

The risk assessment is carried out on an annual basis in order to fulfil the requirements of Spanish law. The reports are made to the owners but staff have access to the copies in administration.

Staff Training

All staff members are required to complete health and safety training upon joining the school and participate in refresher courses annually. This course includes emergency procedures, hazard recognition, and the use of safety equipment. In addition all staff are trained in First Aid. A record of staff training is maintained to ensure compliance.

Access to the Building

Access to Virtus College is designed with safety and safeguarding as paramount. Access to the premises is monitored via CCTV and controlled through a secure gate and electronic entry system, in line with Spanish security requirements and UK safeguarding standards.

All staff wear Virtus College staff lanyards with a photo, name and title. This lanyard also holds a card opening the main front door and a clicker for the front gate. Access to the premises are strictly controlled.

Organisation and Responsibility

1. The overall responsibility for health, safety and welfare rests with the school owners. The owners have responsibility for ensuring the School complies with Spanish health and safety legislation and publishes the necessary documentation. (See above.)

2. The day-to-day management of these issues will be carried out by the Headteacher. S/he will be responsible for ensuring the policy´s effective implementation and periodic review.

3. The Headteacher will ensure that new, amended or updated information is communicated to staff and that teachers have opportunities for appropriate training;

4. The Headteacher will organise the procedure for reporting defects, hazards, accidents and problems relating to health and safety.

5. The owners will make arrangements for improvement of, or repair to plant, equipment and premises as required.

6. The Headteacher is responsible for organising effective emergency procedures, routine practices and evacuation procedures.

7. The owners are responsible for all contractual and building work.

Staff

Staff are responsible for implementing the health and safety standards outlined under Organisation and Responsibility. This includes carrying out risk assessments where appropriate, ensuring safe use of substances and equipment, reporting hazards promptly, and promoting safe practices among students

Students

Students at the school should be familiar with this policy and should ensure that they are aware of who the school staff first aiders are. Posters are distributed around the school: on bulletin boards in the library, classrooms and corridors. If they are unsure, they should ask a member of staff. Students can help the school ensure first aid provision is effectively put into practice by reporting any medical emergencies or incidents to a member of staff immediately;

- Reporting anything that they feel to be a hazard to health and safety on or near the school premises.
- Taking care of their own safety and the safety of others. Students that put themselves, staff, or any other members of the school community or visitors to the school in danger through reckless behaviour may be dealt with under the Student Code of Conduct. (Shared with students and parents on enrolment)
- Make sure that staff members are aware of any of students' health conditions or ailments that may require first aid assistance *(for example diabetes, epilepsy).* This is particularly important in circumstances where students will be travelling off the school premises, for example for a sports match or a school trip.
- Where a student has a health condition which requires an individual healthcare plan the student will be involved wherever practicable in discussions as to their medical support needs and will be required to act in a way which is compliant with the plan.
- All students are expected to act in a way which demonstrates a positive awareness to the needs of those with medical conditions and be aware of their responsibility for informing a member of staff if a fellow student is unwell.

Parents

Parents can help the school maintain effective health and safety provision by:

- Alerting the school to any ongoing or temporary medical conditions that their child has that may require first aid. This is extremely important, and parents are required to notify the school in writing of such circumstances. Where medicine has been prescribed either for a set timescale or as an ongoing provision, the school must be notified in writing. This medicine will be kept in a separate medicine fridge unless there is a specific reason for the child to have it on them at all times. It is important that parents do not send their children to school with prescribed medicine or other types of medicine without the knowledge of school staff.
- Where their child requires an individual healthcare plan, the parent must approve it and will be involved in the development and review of the plan. They will be expected to carry out any action which they have agreed to as necessary as a part of its

implementation, eg: provision of medicines and equipment, ensuring that they or a nominated adult are contactable at all times etc.

- Working with the school to instil a sense of first aid responsibility in their children. This means being alert of health and safety practicalities, and promoting safe behaviour at home.
- Making the school aware of anything that they feel to be a hazard to health and safety on or near the school premises.
- Familiarising themselves with this policy so that they understand the steps that will be taken if their child requires emergency first aid for any reason.

Information on students

Parents must provide written consent for the administration of first aid and medical treatment by school staff to their child before their child is admitted to the school.

The school takes student privacy and confidentiality very seriously. The school DSL and Deputy DSL will be responsible for sharing medical information to other staff on a need-to-know basis – for example, ensuring that information regarding student allergies is shared with staff taking a class on an off-site trip. Student medical records will be kept locked in the Head´s office. There is a database in the form of Google sheet which provides an overview of students´conditions and medications.

All staff members will be made aware of which students have access to asthma inhalers, EpiPens, injections, or similar medical equipment and for whom individual healthcare plans have been created. This is important in order that all staff are prepared to deal with medical emergencies relating to these conditions no matter where in school the child is.

Visitors to the school

Visitors to the school are expected to take care around school and have reasonable responsibility for the safety of themselves and other members of the school community. All visitors will have access to this Health and Safety Policy. Names of school first aiders are displayed around the school/in each school department. Visitors without a DBS-equivalent check must be accompanied at all times when on school premises

Protocols

Medical incidents and First Aid

All staff are First Aid trained. The DSL and Deputy DSL are the main executors of First Aid and are also responsible for administering medication to students with a previously known medical condition, as per their individual healthcare plan. The school has three First Aid kits which can be used by First Aid trained staff with regards to any medical related incident or the administration of medicines.

Defibrillators

The school has one defibrillator on Floor 2 on which two members of staff have been trained; the Head and the Deputy Head Pastoral / DSL. This equipment is regularly checked by external agencies to ensure compliance.

Fire Precautions and Evacuation protocols

The school has established clear fire protocols, including regular fire drills and evacuation procedures. In the case of fire, staff and students should follow the agreed procedures published in the school's Emergency policy. A copy of the evacuation routes must be displayed in or adjacent to every room. Fire-fighting equipment is available in each area of the school, in accordance with Spanish regulations. Regular evacuation practices will be organised and monitored by the Headteacher, following the established Fire Protocol. For further information, our Evacuation Procedure can be found in the Emergency and Evacuation plan.

Maintenance

Staff should report maintenance requirements through the relevant shared Google document. The Headteacher is to liaise with the appropriate support staff to ensure that maintenance items are fulfilled in a timely manner.

Potential hazards must be reported urgently to the Headteacher. Where necessary, interim action should be taken to avoid or reduce immediate risk.

It is the responsibility of the owners to ensure the fulfilment of all service and maintenance contracts.

Smoking

The school wishes to promote a pollution-free and healthy working environment for everyone. No smoking or vaping is allowed on the school premises or within 100 metres.

Visitors

Any visitors who are permitted must report to visitors reception, sign in and collect a visitors pass. All visitors should be collected from reception by the member of staff who the meeting is with.

Parents are treated in the same way as other visitors to school. If there is an event in school which is supervised by school staff, the organising member of staff may make an arrangement for the attending parents/visitors to attend without signing in. This should only be the case when those visitors are under supervision of the organising staff member and should be organised on a case by case basis.

If staff notices anyone who is not wearing a visitors lanyard they are expected to ask them in a polite and friendly way their reason for being there and escort them back to reception to

sign in and wait for their appointment there. Visitors with or without a pass who are behaving inappropriately should be challenged and/or reported to a senior member of staff immediately. No adult should be in the bathrooms allocated for student use. If you see an adult in a student bathroom, please challenge them and if their behaviour appears suspicious, please report immediately to a senior leader.

Signing in and out of school

All staff are required to sign in and out using the Sign in app.

Working outside school hours

Staff should inform a member of support staff if they intend to arrive early or work in the school building after school hours so that arrangements can be made for this.

Risk Assessments:

Trips and Events:

- Before any off-site trips or events, a thorough risk assessment will be conducted to identify potential hazards and implement control measures.
- Teachers leading trips are responsible for ensuring that students are briefed on safety protocols, emergency procedures, and behavioural expectations.
- Registers of students are taken before any transportation is boarded and before leaving the destination to return to school.
- Emergency contact details for all participants will be carried, and appropriate first aid provisions will be made.

Laboratory Use:

- The science department is responsible for conducting risk assessments for all laboratory activities and experiments. These assessments will be reviewed regularly and updated as necessary.
- The science staff are responsible for conducting risk assessments for the general laboratory guidelines such as the storing of chemicals.
- All staff and students using the laboratory must adhere to safety guidelines and protocols. Protective equipment must be worn as required.
- Chemicals and hazardous materials are stored in professional safety cupboards with ventilation systems and handled according to relevant regulations, and emergency procedures are prominently displayed.
- Portable bunsen and burners are securely stored.
- Secure Handling Instructions for all chemicals stored are kept in a folder in each laboratory.
- The school works with an accredited (under Spanish regulations) chemical waste disposal company that manages the withdrawal and disposal of all hazardous substances.

- All laboratories are equipped with first aid kits, electric circuit breakers, carbon monoxide detectors, fire blankets and eye washers.
- The Biology/Chemistry laboratory has a fume cupboard.
- Posters and signs identifying common hazards are displayed in the laboratory areas.

Obligations of Contractors:

- When the premises are used for purposes not under the direction of the Head Teacher, then, subject to the explicit agreement of the Governing Body, the principal person in charge of the activities will have responsibility for safe practices in the areas under their control.
- All contractors who work on the premises are required to identify and control any risk arising from their activities and inform the Head Teacher of any risks that may affect the school staff, students and visitors.
- All contractors must be aware of the School health and safety policy and emergency procedures and comply with these at all times.
- In instances where the contractor creates hazardous conditions and refuses to eliminate them or to take action to make them safe, the Head Teacher or their representative will take such actions as are necessary to protect the safety of school staff, students and visitors.

Students, in accordance with their age and aptitude, are expected to:

- Exercise personal responsibility for the health and safety of themselves and others.
- Observe standards of dress consistent with safety and/or hygiene.
- Observe all the health and safety rules of the school and in particular the
- instructions of staff given in an emergency.
- Use and not wilfully misuse, neglect or interfere with things provided for their health and safety.

Medical aspects

Policy for students with medical conditions that are known to the school

This covers students with medical conditions such as diabetes, epilepsy and asthma. When the school is notified by a parent or healthcare professional that a student has been diagnosed with a medical condition, or will be transferring to the school or returning after prolonged absence, the Headteacher will instruct the Deputy DSL to draw up an individual healthcare plan. This person is fully First Aid trained by accredited providers.

The school is conscious that it is vital to ensure that all staff are prepared at all times for a medical emergency as far as is practicably possible. The points below outline the provision in place for preparing for this type of emergency. All staff are given up-to-date and regular training.

- A record of students with medical conditions is maintained centrally and reviewed regularly by the DSL/Deputy DSL.

- Individual healthcare plans are created in consultation with health professionals, parents, and students where appropriate.
- In the event of a medical emergency, staff will follow the student's healthcare plan and, if required, contact emergency services immediately.

Managing medicines on school premises

The school is only responsible for administering medicines when not doing so would be detrimental to the student's health or school attendance. Parents must always notify the school of changes to their child's health and of any medication prescribed, including side effects.

- Parents give consent in the school's Terms & Conditions for medical treatment to be provided.
- A record of all medication administered is maintained, including date, time, dosage, and the member of staff responsible.
- No student under 16 will be given prescription or non-prescription medicine without written parental consent, unless in exceptional circumstances where the young person has been prescribed medicine without their parent's knowledge (in which case the school respects confidentiality while encouraging parental involvement).
- No student under 16 will be given aspirin unless prescribed by a doctor and parental consent is obtained.
- Medicines must be in-date, labelled, and in their original container as dispensed by a pharmacist, with clear instructions for administration.
- Wherever possible, medicines should be prescribed at doses that avoid school hours.
- Students should always have immediate access to their own emergency medication (e.g. inhalers, glucose metres, adrenaline pens). These items will not be locked away.
- Controlled drugs are stored in a locked, non-portable container and a record of stock and administration is kept. Competent students may carry their own controlled drug where legally permitted, but must not pass it to others.
- Disposal of medicines is the responsibility of parents. Sharps must be placed in a sharps box for safe collection.

Procedure in the event of an illness

If a student falls ill while in a school lesson they should immediately tell the member of staff in charge, who will assess the situation and decide the best course of action.

If a child who is sent home early is still too unwell to attend school the next day, parents should follow the procedure outlined under the subheading below. Students should remain at home for at least 48 hours after the last episode of sickness or diarrhoea, in line with public health guidance. Staff will work with students who have missed classes to ensure that they are able to catch up on all the classwork that has been done in their absence.

To report an absence parents should email absence@virtuscollegecollege.es.

Reporting continued absence due to illness

Most cases of absence due to illness are short term, but parents will need to make a phone

call to alert the school on *the first day/each day* of absence, following the school´s absence policy. Parents of students absent from school will be contacted by 10am every morning, unless the school is aware of a prolonged illness.

When the child returns to school they should submit evidence of medical causes for any absences- so called ´justificamente´. This is for the school records and to comply with safeguarding regulations.

Procedure in the event of an accident or injury
In the case of an accident or injury, the member of staff in charge should be informed immediately. They will assess the situation and determine whether or not emergency services need to be called.

First aiders should be called. First aiders are not paramedics, and if the first aider feels they cannot adequately deal with the injury then they should arrange for access to appropriate medical care without delay.

Allergens

Legal Framework

The Real Decreto 126/2015 establishes the obligations and responsibilities regarding food safety, including the identification and control of allergens in food establishments. Virtus College is committed to complying with these regulations to ensure the safety and well-being of students and staff. It is imperative that parents inform the school of any allergens their child has as soon as possible.

Identification of Allergens

a. List of Common Allergens: A comprehensive list of students with identified common allergens, as specified in the Real Decreto 126/2015, is maintained by Virtus College, and logged under each student on the school´s MIS. This includes, but is not limited to, cereals containing gluten, crustaceans, eggs, fish, peanuts, soybeans, milk, nuts, celery, mustard, sesame, sulphur dioxide and sulphites, lupin, and mollusks.

b. Menu and Ingredient Documentation: The school's catering services shall provide clear and accurate information about the presence of allergens in all food items on the menu. This includes maintaining detailed records of ingredients used and their allergen content.

Communication with Parents/Guardians

Virtus College College communicates with parents/guardians to collect information about students with known allergies. This information is used to tailor meals and ensure that allergen-free options are available when necessary.

Incident Reporting: All incidents related to allergen exposure are promptly reported and thoroughly investigated. Lessons learned are used to improve allergen management procedures.

Reporting and Communication:

All accidents, incidents, or hazards must be reported immediately to the DSL.

Review and Revision:

This health and safety policy will be reviewed annually to ensure its effectiveness and compliance with current legislation. Any necessary updates will be communicated to all staff members.

Links to other policies:
- Safeguarding
- Emergency
- Invacuation
- Staff Code of Conduct (Internal policy available on request)
- Admissions
- Data Protection

Reviewed: August 2025
Next Review: June 2026

Invacuation Policy

Purpose

This policy sets out procedures for invacuation (moving pupils, staff, and visitors to a place of safety inside the school building) in response to an external or internal threat where evacuation is not appropriate. The aim is to safeguard the community until the situation is resolved and the all-clear is given.

Scope

This policy applies to:

- All staff, students, visitors, contractors and parents on site.
- All areas of the school building, including classrooms, the open-plan study space/library, offices, and communal areas.

Definitions

Invacuation: The controlled movement of people into rooms or safe internal spaces, away from immediate danger.

Lockdown: A full or partial securing of the site, including invacuation, where external access and internal movement are restricted.

Triggers for Invacuation

Invacuation may be activated in situations such as:

- A security threat or disturbance outside the school (e.g. violent incident, protest, police activity).
- Environmental hazards (e.g. toxic gas release, smoke, severe weather).
- Intruder on site where remaining inside locked rooms is safer than evacuation.

Responsibilities

Head/DSL: Decides when to initiate invacuation and communicates "All Clear."
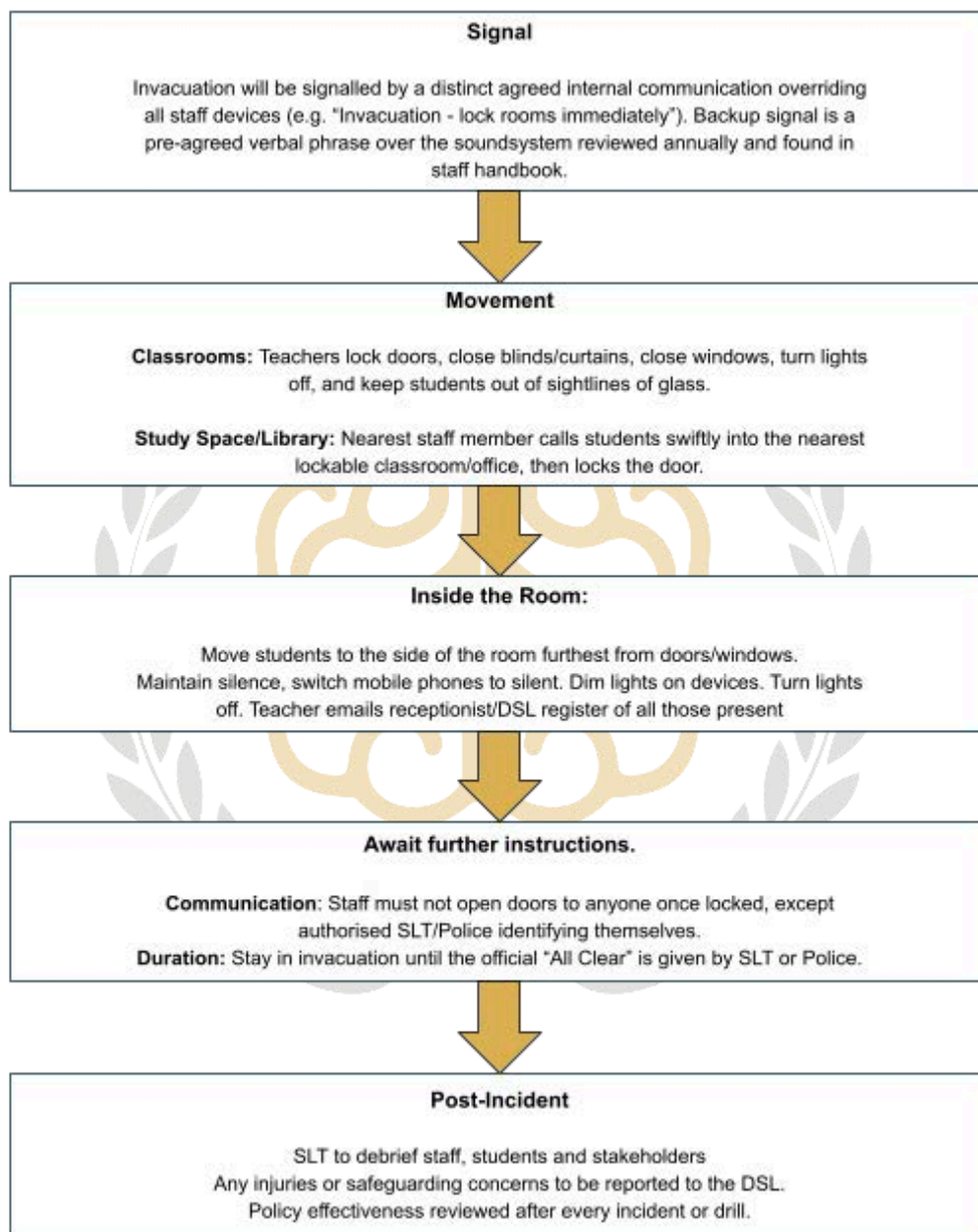
Teachers/Staff:

- Secure doors immediately using the key kept in the top drawer of each teacher's desk.
- Move students away from glass panels and windows - where able flip desk and crouch behind them
- Maintain calm and silence.

Reception/Admin Team: Secure the main entrance and contact emergency services if required.

Students: Follow staff instructions promptly and silently.

Procedure

Signal

Invacuation will be signalled by a distinct agreed internal communication overriding all staff devices (e.g. "Invacuation - lock rooms immediately"). Backup signal is a pre-agreed verbal phrase over the soundsystem reviewed annually and found in staff handbook.

Movement

Classrooms: Teachers lock doors, close blinds/curtains, close windows, turn lights off, and keep students out of sightlines of glass.

Study Space/Library: Nearest staff member calls students swiftly into the nearest lockable classroom/office, then locks the door.

Inside the Room:

Move students to the side of the room furthest from doors/windows. Maintain silence, switch mobile phones to silent. Dim lights on devices. Turn lights off. Teacher emails receptionist/DSL register of all those present

Await further instructions.

Communication: Staff must not open doors to anyone once locked, except authorised SLT/Police identifying themselves.
Duration: Stay in invacuation until the official "All Clear" is given by SLT or Police.

Post-Incident

SLT to debrief staff, students and stakeholders
Any injuries or safeguarding concerns to be reported to the DSL.
Policy effectiveness reviewed after every incident or drill.

Training and Drills

Staff will be trained annually in invacuation procedures. Students will take part in at least one invacuation drill per academic year (in addition to fire evacuation drills).

Drills will include scenarios where students are in classrooms and in open study/library spaces.

Links to other policies:

- Safeguarding
- Health and Safety
- Security
- Emergency
- Student Code of Conduct (Shared with students and parents on enrolment)
- Staff handbook

Reviewed: August 2025
Next Review: June 2026

Relationships, Sex and Health Education (RSHE) Policy

Introduction

Virtus College, The British Sixth Form is committed to providing a safe and supportive learning environment for all students. As part of our duty to safeguard and promote the well-being of students, we recognise the importance of delivering comprehensive relationship and sexual health education.

This policy is based on the statutory guidance: ¨*Relationships, Sex and Health Education: Statutory Guidance (DfE, July 2025), effective from 1 September 2026* but has been adopted early at Virtus*.

https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education

Aims & Objectives

At Virtus College, RSHE aims to equip students aged 15-19 with the knowledge, skills, and confidence to navigate relationships, consent, sexual health, and online safety as they transition into adulthood.

Specifically, our RSHE curriculum aims to:

- Promote healthy, respectful relationships including friendships, romantic and committed partnerships
- Provide factual, age-appropriate information on sexual health, contraception, consent, and the law (UK and Spanish)
- Develop students´critical awareness of online harms, including pornography, coercive behaviour, and misogyny
- Build self-esteem, resilience, and the confidence to delay or decline sexual activity where appropriate
- Ensure students know how and where to seek support for themselves or others

Knowledge about Safer Sex and Sexual Health

- Provide factual, non-judgemental information on contraception, STIs, consent and how to access sexual health services
- Address the impact of pornography, sexting, and violent sexual content online, ensuring students understand the distinction between real and fictionalised behaviours
- Explore how misogynistic narratives and online influencers can distort understanding of healthy relationships
- Emphasise respect, consent, and communication as foundational elements of all sexual relationships

Curriculum Content

Holistic Approach:

- Teach about intimate relationships in the broader context of friendships, family dynamics, and preparing for adult life
- Enable students to distinguish between content and experiences that exemplify healthy relationships and those that are distorted or harmful

Benefits of Healthy Relationships:

- Emphasise the benefits of healthy relationships to mental well-being and self-respect
- Empower students to identify unhealthy relationships and understand the lasting negative impact on mental well-being

Comprehensive Approach:

- Address grooming, sexual exploitation, and domestic abuse, including coercive and controlling behaviour, sensitively and clearly.
- Provide guidance on recognising and addressing unhealthy or abusive relationships, including neglect, emotional, sexual, and physical abuse, violence, honour-based violence, and forced marriage.
- In line with Part Five of Keeping Children Safe in Education 2025, the RSHE curriculum addresses child-on-child sexual violence and harassment. Students are taught what constitutes inappropriate or abusive behaviour and how to report concerns safely.
- Educate students on the legal, cultural and safeguarding issues surrounding Female Genital Mutilation (FGM), and how to access help
- Empower students with strategies to manage unhealthy relationships and access support for themselves or others at risk
- Ensure students understand their legal rights and protections under UK and Spanish safeguarding law, including the right to bodily autonomy and freedom from coercion

Internet Safety:

- Teach students how to evaluate online content, identify risks, and understand data privacy in a digital age
- Address the influence of online pornography, body image pressure, ´choking´ and other violent sexual content, and the risk of radicalisation via influencers or incel communities
- Ensure students know how to report abusive or unsafe online behaviour and where to seek help
- Students are taught about the risks of generative AI, including deepfakes, AI-generated sexual imagery, and impersonation. They learn how to critically assess digital content and know how to report concerns.
- Students are also taught to identify and critically evaluate misinformation, disinformation (including fake news), and conspiracy theories, recognising these as

safeguarding risks that can distort healthy understanding of relationships, politics, or society.

Addressing Harmful Behaviours:

- Recognise that students may be exposed to online content that normalises harmful or misogynistic behaviours (e.g., via social media influencers). Provide critical tools to question, reject, and report such content

Teaching Sensitive and Contested Concepts

Gender Identity:

At Virtus College, gender identity is not taught as a scientific or factual concept. Where the topic arises, it is presented as a belief or perspective held by some individuals. Teaching is evidence-based, age appropriate, and aligned with both the Equality Act 2010 and the RSHE Statutory Guidance (July 2025).

All students are taught to respect others, including those with the protected characteristic of gender reassignment, while also understanding the biological basis of sex. Discussions on gender identity are conducted with sensitivity, neutrality, and without ideological bias.

Sexual Orientation:

At Virtus College, students are taught about sexual orientation as a protected characteristic under the Equality Act 2010. Teaching includes factual information about the diversity of sexual orientation in society and the legal rights of individuals to live without discrimination or harassment.

The aim is to promote understanding, tolerance, and respect for others, regardless of sexual orientation. Teaching will not promote any particular lifestyle or personal belief but will foster a culture of inclusion, kindness, and respect.

Discussions will always be age-appropriate, evidence-based, and delivered in a way that encourages respectful dialogue and upholds the values of a tolerant democratic society.

Delivery of Education

Qualified Staff:

All RSHE staff receive training on the July 2025 RSHE guidance and Keeping Children Safe in Education 2025, including how to respond to disclosures and online harms. RSHE content is reviewed annually to reflect new safeguarding risks and government guidance.

Involvement of Parents and Carers:

All RSHE materials used at Virtus are available to parents upon request, and the school is committed to transparency in all aspects of curriculum delivery. However, students aged 16 and over have the legal right to decide whether to participate in sex education. Parental withdrawal rights apply only to students under 16.

Role of the School in Support:

- Virtus is a place of consistency and safety for students who may be experiencing or have experienced unhealthy or unsafe relationships at home or socially
- Virtus encourages an environment where students can easily speak to trusted adults, report problems, and find support
- Virtus recognises its safeguarding duties under both UK and Spanish law, and ensures that all disclosures made during RSHE are handled with sensitivity and in line with our safeguarding procedures
- The school signposts students to trusted support services including the Lucy Faithfull Foundation's Shore Space, the Centre of Expertise on Child Sexual Abuse, and Childline/ANAR Teléfono del Minor. These resources are included in our Safeguarding Policy and RSHE teaching materials.

Linked policies

- Safeguarding
- Anti-bullying
- PSHE policy
- Student Code of Conduct (Shared with students and parents on enrolment)
- Equality, Diversity, Inclusion and Political Impartiality
- E-Safety

Reviewed: August 2025
Next Review: June 2026

Safe Recruitment and Selection Policy

Introduction

This policy has been developed to embed safer recruitment practices and procedures and to support the creation of a safer culture by reinforcing the safeguarding and well-being of young people in our care. All successful candidates for paid or volunteer employment will be made aware of these documents.

This policy is an essential element in creating and maintaining a safe and supportive environment for all pupils, staff and others within the school community and aims to ensure both safe and fair recruitment and selection of all staff and volunteers.
It aims to:

- Attract the best possible applicants to vacancies.
- Deter prospective applicants who are unsuitable for work with children or young people.
- Identify and reject applicants who are unsuitable for work with children and young people.

Inviting Applications

Advertisements for posts, whether in newspapers, journals or online, application forms and school websites will include a statement that explicitly describes the commitment of the school to safeguarding and promoting the welfare of children. Applicants must be prepared to undergo stringent child protection screening including checks with past employers and an enhanced DBS is required.

We are an equal opportunities employer.

Prospective applicants will be supplied with or made aware of the following:

- A statement of the school's commitment to ensuring the safety and well being of the pupils.
- Job description and person specification.
- A school application form.
- The selection procedure for the post.

Identification of the Recruitment Panel

The school's HR Manager, who leads the Recruitment Panel, has successfully completed recognised training in safer recruitment and child protection, repeating the course every two years as required.

Short - Listing & References

Candidates will be shortlisted against the person specification for the post.

Two references, one of which must be from the applicant's current/most recent employer, will be taken up before the final offer stage so that any discrepancies may be probed during this stage of the procedure.

References will be sought directly from the referee, and where necessary, will be contacted to clarify any anomalies or discrepancies. Detailed written records will be kept of such exchanges.

Where necessary, previous employers who have not been named as referees may be contacted in order to clarify any such anomalies or discrepancies. Detailed written records will be kept of such exchanges.

Referees will be asked specific questions about the following:

- The candidate's suitability to work with children and young people.
- Any disciplinary warnings, including time-expired warnings, relating to the safeguarding of children and young people.
- The candidate's suitability for the post.

Reference requests will include the following:

- Attendance record.
- Disciplinary record.

All appointments are subject to satisfactory references, vetting procedures and DBS clearance, or equivalent.

Applicants should be aware that the vetting process may include a review of the applicant's social media activities for safeguarding purposes.

The Selection Process

Selection techniques will be determined by the nature and duties of the vacant post, but all vacancies will require an interview of shortlisted candidates. Where possible, interviews will be face-to-face.

Candidates will always be required:

- To explain satisfactorily any gaps in employment.
- To explain satisfactorily any anomalies or discrepancies in the information available to recruiters.
- To declare any information that is likely to appear on a DBS disclosure.

- To demonstrate their capacity to safeguard and protect the welfare of children and young people.

Invitation to Interview

Candidates called to interview will receive:

Written confirmation of the interview and any other selection techniques. Details of the interview day including details of the panel members.

Details of any tasks to be undertaken as part of the interview process. The opportunity to discuss the process prior to the interview

Employment Checks

All successful applicants are required to provide the following documents (please note, originals and/or certified/legalised/apostilled copies may be required):

- Show proof of identity.
- Provide proof of professional status.
- Provide actual certificates of qualifications.
- Police criminal background check from any country the candidate has resided in the past 5 years, which must also include a check from their native country.
- In case of UK nationals, the certificate required will be DBS Enhanced Level check. All checks must be dated as of the year the employee joins the school. Should a reasonable explanation exist for an inability to obtain a full background criminal check, this explanation must be documented and enhanced reference checks must be carried out.
- Provide at least two references, one being from the current employer. The requirement to obtain references can be discretionary in cases of support staff, staff with no prior work experience, interns or members of staff that have previously worked for the organisation or are known to board or headteacher.
- Declaration of medical fitness is a voluntary offer (included in the employment contract).
- Evidence of permission to work in the host country (candidates must fulfil set immigration criteria in order to be granted permission to work in the host country, see appendix).

Any further documents or checks as may be deemed appropriate including medical checks.

All checks will be:

Confirmed in writing.
Documented and retained on the personnel file. Recorded on the school's Single Central Record.
Followed up if they are unsatisfactory or if there are any discrepancies in the information received.

Induction

All new school staff will receive induction training that will include the school's safeguarding policies and guidance on safe working practices.

All successful candidates will undergo a period of monitoring and will:

Meet regularly with the Deputy Head Academic and Educational Lead.
Attend any appropriate training.
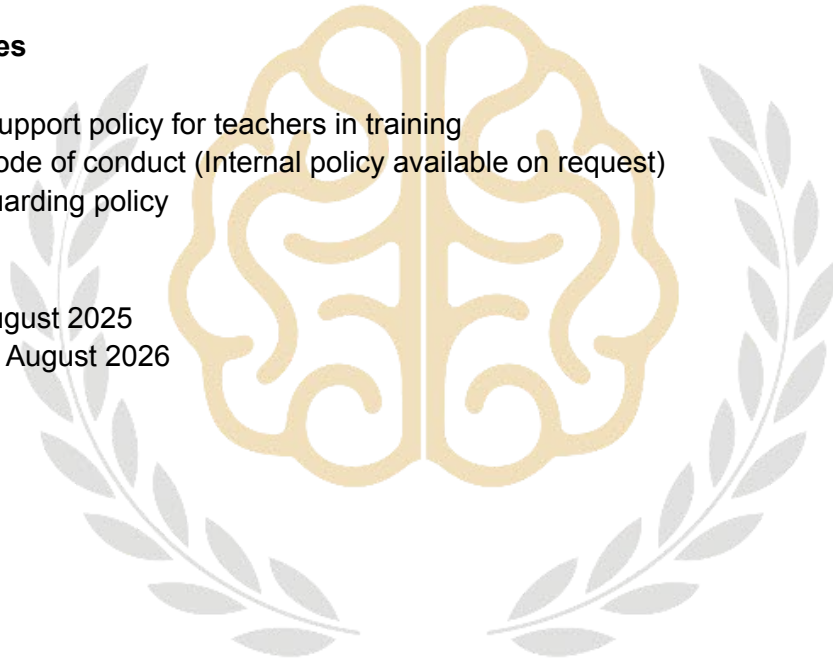Attend teacher meetings.
Liaise with an appointed buddy.

The school's Administrative staff will check for updated relevant information about staff every 3 years. The Governing Body shall be consulted on any issues of potential concern which arise from any stage of the recruitment process.

Linked policies

- ECT Support policy for teachers in training
- Staff code of conduct (Internal policy available on request)
- Safeguarding policy

Reviewed: August 2025
Next Review: August 2026

Safe Use of AI Policy 2025 - 2026

General vision and objectives

At Virtus, we recognise that the use of artificial intelligence (AI) can help to positively affect teacher workload, develop pupils' intellectual capabilities and prepare them for how emerging technologies will change workplaces. While there are many benefits to the use of AI tools, the content they produce may not always be accurate, safe or appropriate, and could lead to malpractice.

Through the measures outlined in this policy, the school aims to ensure that AI is used effectively, safely and appropriately to deliver excellent education that prepares our pupils to contribute to society and the future workplace.

For the purposes of this policy, the following terms are defined as:
- AI – The theory and development of computer systems able to perform tasks normally requiring human intelligence, e.g. visual perception, speech recognition, decision-making.
- Generative AI – A category of AI algorithms that generate new outputs based on the data they have been trained on.
- Misuse of AI – Any use of AI which means that pupils have not independently demonstrated their own attainment.

Roles and responsibilities

The governing board will be responsible for:
- Ensuring that this policy is effective and complies with relevant laws and statutory guidance.
- Reviewing this policy on an annual basis.
- Ensuring their own knowledge of the use of AI tools in the school is up-to-date.
- Ensuring all staff undergo child protection and safeguarding training, including online safety, at induction and at regular intervals.
- Ensuring the school follows the DfE's digital and technology standards.

The headteacher will be responsible for:
- Ensuring that staff receive regular, up-to-date training on how to use AI tools in school.
- Ensuring that the use of AI tools in the school is integrated into relevant policies and procedures, the curriculum and staff training.
- Communicating with parents to ensure they are kept up-to-date with how AI tools are being used in the school, how this will impact pupils' education and how the school is ensuring the tools are being used safely and effectively.
- Working with the governing board to review and update this policy on an annual basis.
- Ensuring that AI practices are audited and evaluated on a regular basis.

ICT technicians will be responsible for:
- Providing technical support in the development and implementation of the school's AI practices, policies and procedures.
- Implementing appropriate security measures.
- Ensuring that the use of AI tools is taken into consideration when creating policies and procedures regarding online safety, child protection and safeguarding, and data protection.

The DSL will be responsible for:
- Taking the lead responsibility for online safety in school.
- Undertaking training so they understand the risks associated with using AI tools in school.
- Liaising with relevant members of staff on online safety matters.
- Maintaining records of reported online safety concerns relating to the use of AI tools, as well as the actions taken in response to concerns.
- Reporting to the governing board about the use of AI tools on a termly basis and how it links to safeguarding.

All staff members will be responsible for:
- Adhering to the Acceptable Use Agreement and other relevant policies.
- Taking responsibility for the security of the AI tools and data they use or have access to.
- Modelling good online behaviours when using AI tools.
- Maintaining a professional level of conduct in their use of AI tools.
- Having an awareness of the risks that using AI tools in school poses.
- Reporting concerns in line with the school's reporting procedure.
- Where relevant to their role, ensuring that the safe and effective use of AI tools is embedded in their teaching of the curriculum.
- Familiarising themselves with any AI tools used by the school and the risks they pose.

Pupils will be responsible for:
- Adhering to the Acceptable Use Agreement and other relevant policies.
- Seeking help from the relevant school staff if they are concerned about an experience that they or a peer has experienced while using AI tools.
- Reporting concerns in line with the school's reporting procedure.
- Familiarising themselves with any AI tools used by the school and the risks they pose.
- Submitting work that is demonstrably their own.

Data protection & cybersecurity

The school is aware of the data privacy and cyber-security implications that come with using generative AI tools, and will ensure that all AI tools are used in line with the school's Data Protection Policy and Cyber-security Policy. The school will follow the procedures in these policies to continue to protect pupils from harmful online content that could be produced by AI tools.

The school will use data anonymisation techniques, e.g. by using pseudonyms, to ensure that any pupil data processed through AI tools for administrative purposes is not identifiable. Data audits will be carried out on a quarterly basis to ensure that AI tools are not capturing or processing personal data inadvertently.

Only authorised staff members will be permitted to use AI for data-related activities.

All staff will be made aware that generative AI tools are able to create believable content of all kinds, for example credible email scams requesting payment, and that the content AI produces may seem more authoritative and believable than usual scams. All staff will apply their best judgement and common sense to manage cyber-security risks effectively and ensure that the DfE's cyber standards are followed at all times.

The school will:
- Protect personal and special category data in accordance with data protection legislation.
- Be aware of intellectual property (IP) implications in line with the below section.
- Review and strengthen cyber security by referring to the DfE's cyber standards.
- Ensure that the school's response to cyber security breaches considers AI-specific issues, e.g. data leakage from AI-generated output.
- Be mindful that generative AI could increase the sophistication and credibility of cyber attacks.
- Ensure that pupils are not accessing or creating harmful or inappropriate content online, including through AI tools.
- Be mindful of the data privacy implications when using AI tools and will take steps to ensure that personal and special category data is protected in accordance with data protection legislation.

If it is necessary to use personal and special category data in AI tools, the school will ensure that the tools comply with data protection legislation and existing privacy policies to protect the data.

The school will be open and transparent whilst ensuring that data subjects understand their personal or special category data is being processed using AI tools.

Intellectual property (IP) implications

The school will ensure that all uses of generative AI tools adhere strictly to IP laws and best practices.

The school will recognise the importance of being aware of the IP implications when using these technologies, and only use IP materials to train AI if explicit permission from the copyright holder has been granted, or if a statutory exception applies.

Materials created by pupils and teachers will be recognised as copyright material, provided they meet the statutory standard for copyright. This standard is considered to be low and does not depend on the quality of the work produced.

The school will understand that copyright law is distinct from data protection law, and any consents or data processing agreements for personal data are separate from issues of compliance with copyright legislation.

The school will remain mindful that many free-to-access generative AI tools may use the inputs submitted by users to further train and refine their models. In contrast, certain paid tools may allow users to opt out of their inputs being used for such purposes. The school will evaluate the terms of use for each AI tool to ensure compliance with copyright and intellectual property laws.

Examples of Original Creative Work

The school will recognise the following as examples of original creative work that may be protected by copyright:

- Essays, homework, or any other materials written or drawn by a pupil (not including responses to multiple-choice questions, as these are less likely to constitute copyright work).
- Lesson plans created by a teacher.
- Prompts entered into generative AI tools that produce substantial content.

Permission to Use

The school will not allow or cause pupils' original work to be used to train generative AI models unless explicit permission is obtained, or an exception to copyright applies. Permission will need to be granted by:
- The pupil, as the copyright owner.
- The pupil's parent or legal guardian, if the pupil is unable to consent independently.

The school will ensure that any use of pupil or teacher-created content is handled with full compliance with copyright laws. Where exceptions to copyright may apply, the school will seek legal advice to ensure lawful usage.

Secondary Infringement Awareness

The school will be vigilant in avoiding secondary infringement of intellectual property. This could occur if AI-generated products are trained on unlicensed materials and are then used in educational settings or published more widely—for example, on the school's website.

The school will acknowledge the following as potential risks associated with secondary infringement:

- Publishing a policy generated by an AI tool that used input derived from another school or college's policy without obtaining permission.
- Using an image created by an AI tool that was trained on copyrighted material without the copyright holder's consent.

The school will put measures in place to verify the intellectual property rights of any AI-generated outputs before their use in public or educational contexts.

Using AI tools

The school will ensure that AI tools are used appropriately to achieve the following aims:
- To reduce workload
- To free up teachers' time
- To assist with the production of high-quality and compliant administrative plans, policies and documents
- To support the teaching of a knowledge-rich computing curriculum
- To teach pupils:
   How to use emerging technologies safely and appropriately.
   About the limitations, reliability and potential bias of AI tools.
   How information on the internet is organised and ranked.
   How online safety practices can protect against harmful and misleading content.

To identify and use appropriate resources to support their education, including age-appropriate resources and preventing over-reliance on a limited number of tools or resources.

Whilst recognising that AI tools can be used appropriately and with benefit to teaching and learning, the school will keep in mind that the content produced by AI tools can be:
- Inaccurate.
- Inappropriate.
- Biased.
- Taken out of context and without permission.
- Out of date or unreliable.

AI tools will not be used for educational resources without appropriate fact-checking and quality assurance measures in place.

Where AI tools are used to produce administrative plans, policies and documents, all staff members will understand that the quality and content of the final document remains the professional responsibility of the staff member who produced it. Staff members using AI tools to create documents will not assume that AI output will be comparable with a human-designed document that has been developed in the specific context of the school.

Pupils will be made aware of the importance of referencing AI tools correctly when using AI tools to produce work, especially if the work is for an assessment, in order to allow teachers and assessors to review how AI has been used and whether it was appropriate. Pupils'

references to AI sources will show the name of the AI source and the date that the content was generated.

Pupils will retain a copy of the questions and AI generated content for reference and authentication purposes in a non-editable format, e.g. a screenshot. Pupils will also provide a brief explanation of how AI tools have been used.

When using AI tools, staff and pupils will ensure that any content produced is scrutinised and cross-checked for its appropriateness and accuracy.
Staff members will be aware that AI tools return results based on the dataset it has been trained on – it may not have been trained on the national curriculum, and may not provide results that are comparable with a human-designed resource developed in the context of the national curriculum. Staff members will be mindful of this in their teaching and marking of pupils' work.

Pupils and staff members will be reminded that using AI tools cannot replace the judgement and deep subject knowledge of a human expert. Staff members will stress the importance of pupils acquiring their own knowledge, expertise and intellectual capability rather than relying on AI tools in their work.

The school will not allow or cause pupils' original work to be used to train AI tools unless it has appropriate consent or exemption to copyright. Consent will be sought from students over 18; however, for pupils under 18, consent will be sought via their parents.

Misusing AI tools

Preventing misuse

The school acknowledges that misuse of AI tools can happen both accidentally and intentionally, and that education and awareness is key to preventing misuse. The school will consider taking the following actions to prevent the misuse of AI tools:

- Restricting access to online AI tools on school devices and networks, especially on devices used for exams and assessments
- Setting reasonable deadlines for submission of work and providing pupils with regular reminders
- Allocating time for sufficient portions of pupils' work to be completed in class under direct supervision, where appropriate
- Examining intermediate stages in the production of pupils' work to ensure that work is being completed in a planned and timely manner, and that work submitted represents a natural continuation of earlier stages
- Introducing classroom activities that use the level of knowledge and understanding achieved during lessons to ensure the teacher is confident that pupils understand the material
- Engaging pupils in verbal discussions about their work to ascertain that they understand it and that it reflects their own independent work

- Refusing to accept work that is suspected to have been generated through misuse of AI tools without further investigation
- Issuing tasks which are, wherever possible, topical, current and specific, and require the creation of content which is less likely to be accessible to AI models
- Investing in educating and training staff, pupils and parents on the use of AI tools and raising awareness of the risks and issues that come with its use

Identifying misuse

Staff members will continue to use the skills and observation techniques already in use to assure themselves that pupils' work is authentically their own when attempting to identify a misuse of AI tools.

When reviewing pupils' work to ensure its authenticity, staff members will compare it against other work created by the pupil. Where the work is made up by writing, the staff members will make note of:
- Spelling and punctuation.
- Grammatical usage.
- Writing style and tone.
- Vocabulary.
- Complexity and coherency.
- General understanding and working level.
- The mode of production, i.e. whether the work was handwritten or word-processed.

Staff members will be aware of and look out for potential indicators of AI use, which include:
- A default use of American spelling, currency, terms and other localisations.
- A default use of language or vocabulary which might not appropriate to the working or qualification level.
- A lack of direct quotations and/or use of references where these are required or expected.
- Inclusion of references which cannot be found or verified.
- A lack of reference to events occurring after a certain date, reflecting when an AI tool's data source was compiled.
- Instances of incorrect or inconsistent use of first-person and third-person perspective where AI generated text has been left unaltered.
- A variation in the style of language evidenced in a piece of work, if a pupil has taken specific portions of text from an AI tool and then amended it.
- A lack of graphs, data tables or visual aids where these would normally be expected.
- A lack of specific, local or topical knowledge.
- Content being more generic in nature.
- The inadvertent inclusion of warnings or provisos produced by AI tools to highlight the limits of its ability or the hypothetical nature of its output.
- The submission of pupil work in a typed format, where this is not usual, expected or required.
- The unusual use of several concluding statements throughout the text, or several repetitions of an overarching essay structure within a single lengthy essay.
- The inclusion of confidently incorrect statements within otherwise cohesive content.

- Overly verbose or hyperbolic language that may not be in keeping with the pupil's usual style.

Staff members will remain aware that AI tools can be instructed to employ different languages and levels of proficiency when generating content, and some are able to produce quotations and references.

Where necessary, the school will make use of the following programmes and services that are able to analyse content and determine the likelihood that it was produced by AI:

- Copyleaks
- GPTZero
- Sapling

Staff members will be mindful that the above tools will give lower scores for AI-generated content which has been subsequently amended by pupils and should spend time getting to know how the detection tools work to understand their capabilities. Teachers will also use their own understanding of pupils' past work to gain a holistic oversight of the authenticity of work that has been submitted.

Exams and assessment

The school will continue to take reasonable steps where applicable to prevent malpractice involving the use of generative AI tools regarding exams and assessments. The school will follow the Assessment and Examination Policy, Non-examination Assessment Policy and the Exam Preparation Policy at all times, and ensure that these policies address the appropriate and inappropriate use of AI tools.

Pupils will be made aware of the school's approach to plagiarism and malpractice, appropriate and inappropriate uses of AI tools, and the consequences of its misuse. Pupils will be made aware that it is not acceptable to submit work that has been produced with an AI tool. Pupils will also be made aware of the risks of using AI tools to complete exams and assessments, which include:

- Submitting work that is incorrect or biased.
- Submitting work that provides dangerous and/or harmful answers.
- Submitting work that contains fake references.

The school will ensure that pupils are issued with, and fully understand, the JCQ Information for Candidates. The school will also ensure that parents are issued with a letter informing them of the risk of using AI tools, what constitutes misuse, and the school's approach to malpractice.

Teachers, assessors and other relevant staff members will discuss the use of AI tools and agree on a joint approach to managing pupils' use of AI tools in the school.

Pupils will only be permitted to use AI tools to assist with assessments where the conditions of the assessment permit the use of the internet, and where the pupil is able to demonstrate that the final submission is the product of their own independent work and thinking.

Pupils will be required to sign a declaration to confirm that they understand what AI misuse is, and that it is unacceptable. Pupils will be made aware of the consequences of submitting a false declaration, and any AI misuse that is detected after a declaration has been signed will be reported to the relevant awarding organisation. The misuse of AI constitutes malpractice, as defined in the JCQ's guidance. Pupils will be made aware that possible sanctions for committing malpractice through the misuse of AI tools include disqualification and debarment from taking qualifications for a number of years, and that their marks may also be affected. Misuse of AI tools includes, but is not limited to, the following:

- Copying or paraphrasing sections, or whole responses, of AI generated content
- Using AI to complete parts of the assessment so that the work does not reflect the pupil's own work, analysis, evaluation or calculations
- Failing to acknowledge the use of AI tools when they have been used as a source of information
- Incomplete or poor acknowledgement of AI tools
- Submitting work with intentionally incomplete or misleading references and/or bibliographies

The school will not, under any circumstances, accept work which is not the pupils' own.

Safeguarding

The school acknowledges that generative AI tools can be used to produce content that is dangerous, harmful, and inappropriate. The school will follow the procedures set out in the Child Protection and Safeguarding Policy and the Online Safety Policy to ensure that pupils are not able to access or be exposed to harmful content.

Pupils will be taught about the risks of using AI tools and how to use them safely. Pupils will be made aware of how to report any concerns or incidents involving generative AI, and who to talk to about any issues regarding the use of AI tools.

The school will engage with parents via letter to inform them of the safeguarding risks that come with using AI tools, and how the school is protecting pupils online. The school will ensure that parents are aware of who to speak to about any concerns or issues regarding the use of AI.

The school will ensure that the appropriate filtering and monitoring systems are in place to protect pupils online, following the DfE's filtering and monitoring standards.

All staff members will receive training on the safe use of AI as part of their online safety training, which is regularly updated.

Teaching pupils about the safe use of AI

Teaching about the safe and appropriate use of AI will ensure that pupils benefit from a knowledge-rich curriculum which enables them to become well-informed users of technology

and understand its impact on society. Pupils will gain strong foundational knowledge which ensures they are developing the right skills to make the best use of AI tools.

The school will:
- Prepare pupils for changing workplaces.
- Teach pupils how to use emerging technologies, including AI tools, safely and appropriately.
- Raise awareness of the limitations, reliability and potential bias of AI tools.
- Help pupils to understand how information on the internet is organised and ranked.
- Include online safety teaching in the curriculum and how to protect against harmful or misleading content.
- Raise awareness and understanding of protecting intellectual property rights.
- Encourage the safe and responsible use of digital content.
- Teach about the impact of technology, including disruptive and enabling technologies.
- Include teaching about how computers work, connect with each other, follow rules and process data in the curriculum.

Pupils will be supported to identify and use appropriate resources to support their ongoing education through the use of age-appropriate resources, which may include AI tools, whilst preventing over-reliance on a limited number of tools or resources.

Review

This policy will be reviewed annually to ensure its effectiveness and to make necessary adjustments.

Linked to policies;

- Student Code of Conduct (Shared with students and parents on enrolment)
- Staff Code of Conduct (Internal policy available on request)
- Safeguarding Policy

Latest review: August 2025
Next review: February 2026

Safeguarding Policy

Designated Officer	Position	Contact Information
Sandra Radford	Headteacher	head@virtuscollege.com
Adam Whitlock	Deputy Headteacher Pastoral and Co-Curricular (Designated Safeguarding Lead)	adam.whitlock@virtuscollege.com
Natasha Sharoff	Deputy Head Academics and Operations	natasha.sharoff@virtuscollege.com
Fátima Moreno	Head of Student Affairs and Deputy Pastoral Head	fatima.moreno@virtuscollege.com
Toxicology Emergency Number		915620420
National telephone numbers for information and advice on children's ' issues - advice service		900202010 or 116111 (for young people)
Fundación Anar advice for adults concerned about young people		917260101 or 600505152

	National Authority	
Guardia Civil Women and children's support services team - Comandancia Tres Cantos for all of Madrid area		91 5146979 Ext. 4809
Policia Local Alcobendas		636605318
National Police Emergency		112

UK National Contacts NSPCC 24/7 Helpline Email: help@nspcc.org.uk	Tel: 0808 800 5000
NSPCC Text line	88858
NSPCC ChildLine	Tel: 0800 1111
NSPCC FGM helpline Email: fgmhelp@nspcc.org.uk	Tel: 0800 028 3550
NSPCC Whistleblowing helpline Email: help@nspcc.org.uk	Tel: 0800 028 0285 (8am – 8pm)
DfE Prevent helpline for schools & parents	Tel: 020 7340 7264 (non-emergency) Email: counter.extremism@education.gsi.gov.uk
The Lucy Faithfull Foundation (LFF) Email: help@stopitnow.org.uk www.parentsprotect.co.uk	Tel: 0800 1000 900
UK National Bullying Helpline	Tel: 0845 22 55 787
UK Safer Internet Centre helpline for School Staff	Tel: 0844 381 4772 Email: helpline@saferinternet.org.uk
Internet Watch Foundation hotline for reporting criminal content	www.iwf.org.uk
Educate Against Hate	http://educateagainsthate.com

Introduction and Policy Statement

'Safeguarding is Everyone's Business'

The school fully recognises its responsibilities for safeguarding and promoting the welfare of children and young people in our care. Our students' welfare is at the forefront of what we do. Our school's ethos and in everything we do is in accordance with relevant UK and local law and guidance. It is essential that everybody working in the school understands their responsibilities. This policy details our procedures for safeguarding and child protection.

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002 (as amended), the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015 and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended).

All action taken by Virtus College, The British Sixth Form will be in accordance with statutory, national, and local guidance – this includes:

- [Working Together to Safeguard Children (2025)](#) which sets out the multi-agency working arrangements to safeguard and promote the welfare of children and young people and protect them from harm; in addition, it sets out the statutory roles and responsibilities of settings.

- ['What to do if you are Worried a Child is Being Abused' 2015 - Advice for Practitioners](#)
- [Keeping Children Safe in Education (KCSIE, 2025)](#) is statutory guidance issued by the Department for Education (DfE) which all schools and colleges must have regard to when carrying out their duties to safeguard and promote the welfare of children.

In child protection matters, the school will follow the inter-agency and child protection procedures laid down by the relevant Local Safeguarding Board in Spain.

Spanish Legislation and Links

This policy also aligns with Ley Orgánica 8/2015 (protection of children and adolescents) and Ley Orgánica 8/2021 (comprehensive protection from violence), which strengthen mandatory reporting duties and prevention of all forms of violence against children.

Ley Orgánica 1/1996, de 15 de enero, de Protección Jurídica del Menor, de modificación parcial del Código Civil y de la Ley de Enjuiciamiento Civil (BOE no 15, de 17 de enero)

- *Artículo 13, Obligaciones de los ciudadanos y deber de reserva, establece la obligatoriedad de todos los ciudadanos de comunicar una situación posible malos tratos a una persona menor de edad: "**Toda persona o autoridad, y especialmente aquellos que por su profesión o función, detecten una situación de riesgo o posibledesamparo de un menor, lo comunicarán a la autoridad o sus agentes más próximos, sin perjuicio de prestarle el auxilio inmediato que precise**.*

● *Artículo 262 de la Ley de Enjuiciamiento Criminal (LECrim) establece: "**Los que por razón de sus cargos, profesiones u oficios tuvieren noticia de algún delito público, estarán obligados a denunciarlo inmediatamente al Ministerio Fiscal, al Tribunal Competente, al Juez de instrucción y, en su defecto, al municipal o al funcionario de policía más próximo al sitio**, si se tratare de un delito flagrante".*

The UN Convention on the Rights of the Child: Article 19 (protection from all forms of violence) of which host country Spain is a signatory. Article 19 stipulates that governments must do all they can to ensure that children are protected from violence, abuse, neglect and mistreatment by their parents or anyone else who looks after them.

This policy should be read in conjunction with the following policies:

● Recruitment
● Whistleblowing & Managing Allegations
● Staff Code of Conduct (Internal policy available on request)
● Behaviour policy
● E-safety
● Health & Safety

Ethos and Commitment

We believe that the school should provide a caring, positive, safe and stimulating environment that promotes social, physical, spiritual and moral development enabling all children to thrive.

We recognise the importance of providing an environment within our school that will help children feel safe and respected. We recognise the importance of enabling students openly and to feel confident that they will be listened to. We recognise that both mental and physical health are relevant to safeguarding and the welfare of children.

We recognise that all adults within the school, including permanent, supply staff, temporary staff, volunteers, parents and governors, have a full and active part to protect students from harm.

We operate safer recruitment procedures in line with statutory checks on the suitability of staff to work with children.

All staff receive information about the setting safeguarding arrangements, the setting's safeguarding statement, staff behaviour policy (code of conduct), Safeguarding and Child Protection policy, the role and names of the Designated Safeguarding Lead (DSL) and their deputy Designated Safeguarding Lead (DDSL), and Keeping Children Safe in Education 2025 part 1 .

All staff receive annual safeguarding and child protection training (including online safety). This includes induction, refreshers, and regular updates. The DSL and Deputies are trained to advanced level and updated at least every two years, in line with KCSIE 2025 and

Spanish safeguarding protocols. Training is regularly updated as required, and at least annually to continue to provide staff with relevant skills and knowledge to safeguard children effectively. All members of our teaching staff are trained in and receive regular updates in online safety and reporting concerns.

All members of staff maintain a zero-tolerance approach to sexual violence and sexual harassment.

Curriculum and PSHE

Through PSHE and RSE, the school ensures that safeguarding themes are embedded into the curriculum. Students are taught about:

- respectful relationships and consent;
- the impact of online pornography;
- harmful online influencers and the promotion of misogynistic or sexist attitudes, including content that encourages disrespect towards women or reinforces harmful gender stereotypes;
- the risks of subcultures such as incel ideology;
- the criminal offence of creating, forwarding, or possessing indecent images, including those generated using artificial intelligence.

These elements are delivered in a developmentally appropriate way and form part of the school's wider safeguarding culture.

Aims

- To provide staff with the framework to promote and safeguard the wellbeing of children and in doing so ensure they meet their statutory responsibilities.
- To ensure consistent good practice across the setting and ensure that safeguarding follows a whole setting approach.

We will work proactively with parents to build a solid understanding of the school's responsibilities to ensure the welfare of all children.

Principles

All students have the right to protection, regardless of age, gender, ethnicity, disability, sexuality or beliefs. This responsibility is underpinned by the following aims:

- To protect children from harm and maltreatment
- To prevent impairment of children's health and development
- To ensure children grow up in circumstances consistent with the provision of safe and effective care

- To take action to enable all children to have the best outcomes
- Keep children safe by employing rigorous recruitment procedures for all paid and unpaid staff to check their suitability to work with children.

- Raise awareness of child protection issues and equip children with the skills needed to keep them safe.
- Train all staff in basic Child Protection awareness.
- Ensure that all staff have read and understand the Child Protection Policy and are aware of the indicators of child abuse and how to respond to concerns.
- Establish a safe environment in which children can learn and develop whilst valuing them, listening to and respecting them.
- Adopt positive child protection practices by developing clear procedures and a code of conduct for staff, volunteers and visitors.
- Develop and implement an effective social media / e-safety policy and related procedures.
- Provide effective management for all staff and contractors through supervision, support and training.
- Share information about child protection and good practice with students, parents, and staff outside providers, interns, volunteers and visitors.
- Share concerns with agencies who need to know and involve parents and students appropriately

Furthermore, we recognise that:

- Some students are at increased risk of abuse.
- Some students face additional barriers with respect to recognising or disclosing abuse.
- The school is committed to recognising diversity and ensures anti-discriminatory practices. We ensure that all students have the same protection while recognising that some students are more vulnerable, for example those who are;
- Have special educational needs (SEN) or disabilities (further information is in Section 20).
- Are young carers.
- Show signs of mental health problems.
- Are missing education.
- May experience discrimination due to their race, ethnicity, religion, gender identification, or sexuality.
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.

Procedure

The school should follow established procedures as stated in this policy.The school must make the Safeguarding procedures easily accessible to staff and highlighted in the school management system. Printouts of The Safeguarding Protection of children must also be posted in key areas of the campus, including but not limited to staff rooms, resource rooms, notice boards and admin areas.

Legal Framework

This policy complies with:

- The Education (Independent School Standards) Regulations 2014
- Keeping Children Safe in Education (DfE, 2025)
- Working Together to Safeguard Children (DfE, 2025, statutory guidance)
- Working Together to Improve School Attendance (DfE, 2025 – now statutory)
- Ley Orgánica 8/2015 and 8/2021 (Spain)
- GDPR (EU) and LOPDGDD 3/2018 (Spain)

It is also informed by DfE advice, 'What to do if you are worried a child is being abused – advice for practitioners' (2015).

Policy Scope

This policy is applicable to the whole school community including:

- The Headteacher, teachers and non-teaching staff
- Governing body
- Volunteers and Visitors
- Parents
- Students
- External agencies
- Contractors

Safeguarding and promoting the welfare of children is everyone's responsibility, whether they work or volunteer in the school.The school adopts a whole-school approach to safeguarding children where all staff and volunteers put the best interests of the child first.

Roles and Responsibilities DSL

The Designated Safeguarding Lead is on our school's leadership team and their role of Designated Safeguarding Lead will be explicit in their job will have the appropriate authority and be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and to take part in strategy discussions and inter-agency meetings – and/or to support other staff to do so – and to contribute to the assessment of children. The designated lead (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.

An annual child protection report to the Governing Body is delivered by the Designated Safeguarding Lead and this is supplemented by updates as necessary. Child protection and safeguarding will be touched upon in all main Governing Body meeting agendas.

The DSL is responsible for leading safeguarding risk assessments, including:
- Risks posed by individual students to self or others.
- Risks of discrimination against pupils with protected characteristics.
- Oversight of safer recruitment judgements (e.g. delayed checks, overseas references).

Headteacher

The Headteacher will ensure that the policies and procedures adopted by the Governing Body are fully implemented and sufficient resources and time are allocated to members to discharge their safeguarding responsibilities. All staff and other adults are clear about procedures where they are concerned about the safety of a child.

Governing Body

Our students' welfare is our paramount concern. The Governing Body will ensure that our school will safeguard and promote the welfare of students and work together with agencies to ensure that our school has adequate arrangements to identify, assess and support those children.

Staff

Staff know how to recognise signs and symptoms of abuse, how to respond to students who disclose abuse and what to do if they are concerned about a child. All teaching staff are trained to a minimum of DSL Level 2. All staff should know what to do if a child tells them he/she is being abused or neglected and how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the Designated Lead or the Deputy Headteacher or Headteacher) and children's social care.

Staff should never promise a child that they will keep anything confidential about a report of abuse, as this may ultimately not be in the child's best interest. Safeguarding issues can manifest themselves via child-on-child abuse. This may include, but not limited to: bullying (including cyber bullying), gender based harassment, sexual violence and assaults, harmful sexual behaviour and sexting. Staff should recognise that children can abuse other children. Any staff member who is concerned about a child's welfare should follow the school's procedures (see below).

Safeguarding Procedures

Handling a disclosure made by a child

It is extremely rare for a child to make up an allegation of abuse. If a child makes such a disclosure staff must:

- Be accessible and receptive
- Listen carefully and uncritically and at the child's pace
- Reassure the child that they are right to tell them
- Tell the child that you must pass this information on.
- Avoid leading questions
- Only use open questions such as, "Can you show me?" or "Explain to me what happened"

- Write down, word for word, the account of the child if possible
- Complete a safeguarding digital record (see section on Record Keeping and Storage of Information)
- Immediately notify the DSL officer

For children with communication difficulties or who use alternative/augmented communication systems, you may need to take extra care to ensure that signs of abuse and neglect are identified and interpreted correctly, but concerns should be reported in the same manner as for other children.

Handling concerns as a result of behaviour or signs of abuse or neglect;

- Speak to the DSL office without delay. Do not speak with anybody else about the concerns.
- Complete a safeguarding digital record (see section on Safeguarding Record Keeping).

In either a disclosure or a cause for concern, staff should NEVER:

- Take photographs or examine an injury
- Investigate or probe aiming to prove or disprove possible abuse, never ask leading questions.
- Make promises to children about confidentiality or keeping secrets.
- Assume that someone else will take the necessary action.
- Confront another person (adult or child) allegedly involved.
- Offer opinions about what is being said or about the persons allegedly involved
- Jump to conclusions or react with shock, anger or horror.
- Speculate or accuse anybody.
- Ask a child to sign a written copy of the disclosure
- Use email or email attachments as a form of a written record

Key points for staff to remember for taking action are:

- In an emergency take the action necessary to help the child, for example, call the Police.
- Complete the safeguarding digital form as best you can and immediately notify the DSL officer.
- Do not start your own investigation
- Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- Where a child is in immediate danger or at risk of significant harm, and the DSL or senior leader is not available, a referral should be made to children's social care and/or the police immediately.
- Where staff have a concern about a student that does not raise an issue of either immediate harm or a risk of significant harm, the staff member should not delay but, in the first instance, speak to DSL or Deputy DSL.

- After notifying a safeguarding concern you should expect feedback and follow up. If this follow up does not happen it is your duty to request information or escalate the matter.

Safeguarding Procedure - DSL Action and Follow Up

Upon notification of a safeguarding concern, the DSL will:

- Ensure the allegation is acted on immediately, no later than within the same school day.
- Should a cause for concern exist, a process of investigation and consultation should be initiated, and only where appropriate, discussing with the Headteacher, lead classroom teacher, school psychologist, SEN officer and other staff members who can help determine an initial assessment.

Determining the most appropriate course of action:

- All intervention must be articulated in agreement with the parents, legal representatives or guardian of the student and managed in a way as to always preserve the student's and the family's right to privacy. Parental agreement should try to be obtained but it is not mandatory before referring to the Child Protection Services or the Police. If the matter is urgent, the School may bypass parental agreement altogether although it should always try to obtain their cooperation, even if only after the referral is submitted.
- Where the allegation reveals a risk of significant harm or evidence of a crime or the student is in immediate danger, the DSL will refer the matter to the police and/or child protection services.
- If in doubt of whether to refer the matter to the authorities, the DSL should seek advice from the authorities or school lawyer on an anonymous basis, respecting the privacy of the child and family.

Where the matter is considered to be less serious and lower risk, the DSL may opt to seek a resolution through an internal action plan in consultation with the parents, or alternatively continue to monitor the situation to ascertain if further actions are warranted. Finally, if it is determined that there is no further cause for concern, the DSL will mark the Safeguarding incident as Review Complete, documenting the conclusions of the investigation.

Safeguarding Procedure - Allegation against a staff member

Allegations of abuse made against staff, whether historical or contemporary, should be handled by the Headteacher (if the allegation is against the Headteacher then the person receiving the allegation should immediately inform the Board, without notifying the Headteacher first).

If an allegation is received by the Headteacher he/she needs to consider whether the professional has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates unsuitability to work with children.

When an allegation of abuse is made against staff, it is referred directly to the Board by the Headteacher for consultation and advice. This initial conversation will establish the validity of any allegation and if:

- A formal referral to the authorities is required, in which case it should be made within 24 hours. In case of doubt of whether formal referral is required, the school should consult with a lawyer or contact the authorities on an anonymous basis.
- The matter is to be handled internally by the school, which should only be in cases where the allegation is ascertained to be of Low- Level concern.

A low level of concern would be where, for example, a member of staff behaved in a way that is inconsistent with the staff code of conduct (Internal policy available on request), but it isn't considered serious enough to refer to the authorities, such as a staff member being over-friendly with children, using inappropriate language, favouring a child or picking on a child, making inappropriate social media posts, making fun of a child's work, making fun of a child in front of other children, or accompanying a child home from an event alone (albeit with the parent's consent).

In all cases when the allegation against the staff is made by a child at the school, the parents or guardians of that child should be immediately informed.

A school employee who is the subject of an allegation of abuse may be asked to take leave of absence or may be suspended without prejudice pending the outcome of the investigation. This is decided by the Headteacher. If the allegation involves the Headteacher then the Designated Governing Body member makes this decision in consultation with the Child Protection Services. Suspension is determined under the applicable legislation and would not be a disciplinary sanction and would be on full pay. Suspension will not be an automatic response to an allegation.

If a member of staff offers to resign, this does not stop investigations taking place. It is the responsibility of the Child Protection Officer/Headteacher to ensure that, if deemed serious enough, a report is made with local authorities and in cases of UK nationals, to the Disclosure and Barring Service (DBS) within one month of leaving the school. This applies to any person, whether employed, contracted, a volunteer or student, whose services are no longer used because he or she is considered unsuitable to work with children.

Low-level concerns (as defined in KCSIE 2025) must be logged and monitored. While the DSL may manage the process, the Headteacher remains the ultimate decision-maker. The

Headteacher must be kept informed of all low-level concerns in a timely manner. Examples include

over-familiarity, inappropriate humour, or humiliating pupils, the latter may in fact exceed 'low-level' and must be escalated

Training

Newly appointed staff will have initial training in child protection as part of their induction programme, this will be carried out by a reputable training provider and/ or Deputy DSL in the school. Training sessions are to be registered in the school management system for record keeping.

Schools to include:

- Staff induction and training schedules
- Provider
- Where attendance and completion are recorded

Recordkeeping and Storage of Information

Whenever there is a safeguarding concern relating to a child, a digital form must be completed in Bromcom, the school management system. This record is always private and will only be accessible to the staff member that wrote the report and approved DSL Officers.

All reports should:

- name of child/staff, date of birth of the child, class/ year group
- State who was present, time, date and place; if a child is involved, use his/her words wherever possible
- Be factual/state exactly what was said
- Differentiate clearly between fact, opinion, interpretation, observation and/or allegation

- Do not state own opinion
- Body maps should be used to document and illustrate visible signs of harm and physical injuries

Well-kept records are essential when handling any safeguarding concerns.

Information Sharing and Data Protection

We recognise that all matters relating to Safeguarding are confidential.

The Headteacher or the DSL will disclose any information about a student to other members of staff on a need-to-know basis only.

All staff members must be aware that they cannot promise a child to keep key information a secret or to themselves which might compromise the child's safety or all staff members have

a professional responsibility to share information with other agencies in order to safeguard children when asked by the Headteacher, DSL

All staff members who come into contact with children will be given appropriate training to understand the purpose of information sharing in order to safeguard welfare.

We will ensure that staff members are confident about what they can and should do under the law, including how to obtain consent to share information and when shared without consent.

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be aware that information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

Information Sharing:

At school we offer advice to staff which includes the seven gold information and considerations with regard to the Data Protection Act 2018 and General Data Protection Regulation (GDPR). If in any doubt about sharing information, speak to the designated safeguarding lead or a deputy. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare of children. (KCSIE 2025)

Policy Review Date

This policy and the procedures will be reviewed every academic year. All other linked policies will be reviewed in line with the policy review cycle. The designated safeguarding lead (DSL) needs to ensure that staff members, including volunteers and sessional workers are made aware of any amendments to policies and procedures. Additional updates to the appendix will take place when needed.

Related Policies

This Safeguarding and Child Protection policy link to related policies, including:

- Anti-bullying policy
- Safer Recruitment Policy
- Health and Safety policy
- Data Protection policy
- E-Safety policy
- Whistleblowing and Complaints Policy
- Trips and Visits policy
- Equality, Diversity, Politics and Activism Policy

These policies are available to parents on request.

Safer Recruitment

The Headteacher is responsible for overseeing and approving all recruitment and appointment decisions at Virtus College. The Headteacher may liaise with the Designated Safeguarding Lead (DSL) to ensure that safeguarding requirements are met throughout the recruitment process.

All appointments, including staff, volunteers, governors and contractors, require pre-appointment checks in line with KCSIE 2025 and COBIS guidance for British Schools Overseas. Where checks (e.g. DBS or overseas police checks) are delayed, a risk assessment signed by the DS**L** must be recorded, renewed fortnightly, and retained in both the staff file and the Single Central Record (SCR).

Overseas police checks must cover any period of three months or more spent abroad in the past ten years. Where these cannot be obtained, the Headteacher will determine whether appointment can proceed following a documented risk assessment, informed by additional references and safeguarding advice from the DSL.

Safer recruitment includes verification of identity, right to work, professional qualifications, prohibition from teaching and management orders, medical fitness, and reference checks. Online checks (such as a search of publicly available material) may also be undertaken where appropriate to safeguard pupils. These measures ensure that all adults working with students are suitable and safe.

Responsible: Headteacher (with safeguarding oversight provided by the DSL Adam Whitlock, Deputy Headteacher - Pastoral)

Reviewed: August 2025
Next Review: August 2026

APPENDIX 1: KEY TERMINOLOGY AND DEFINITIONS

In this policy, a 'child' means all children and young people below 18 years of age.

Safeguarding

Safeguarding children is defined in Working together to safeguard children as:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

Child Protection

The way that we respond to harm against children.

Types of abuse

Physical Abuse:

May include hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm to a child including the fabricating deliberately causing) ill health to a child.

Emotional Abuse:

Is the persistent emotional ill-treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. This may involve they are worthless, unloved or unvalued or developmentally inappropriate expectations are made or causing children to frequently feel frightened or the exploitation of children. It may include not giving the child opportunities to express their views, deliberately silencing them or making fun of what they say or how they communicate, or developmentally inappropriate expectations being imposed on children.

These may include interactions that are beyond the child's developmental capability, and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill treatment involves serious bullying (including Cyber Bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some are involved in all types of maltreatment of a child, though it may occur alone.

Sexual Abuse:

Involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. Such activities may involve sexual acts (penetrative) or may include involving children in watching or taking part in pornographic material or to encourage children to behave in sexually inappropriate way.

Neglect:

Is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development s adequate food, shelter (including keeping children safe), clothing, or neglect of or unresponsiveness to a child's basic emotional needs.

Self-harming:

Includes cutting, burning, bruising, scratching, hair-pulling, poisoning and overdosing. There are many reasons why children and young people try to hurt themselves. Self-harm isn't usually a suicide attempt or a cry for attention. Instead, it's often a way for young people to release overwhelming emotions. Whatever the reason, it should be taken seriously. The

exact reasons why children and young people decide to hurt themselves aren't always easy to work out. Quite often a child or young person who is self-harming is being bullied, under too much pressure to do well at school, being emotional, having relationship problems with family or friends. Incidences of self-harming must be reported in the same way as any other

form of abuse as it is a Child Protection issue because if left alone it can lead to feelings of hopelessness and in worst cases, suicidal attempts.

Radicalisation and extremism:

It is commonly recognised that children at risk of radicalisation may display changes in behaviour, show different signs or seek to hide their views. Staff are advised to exercise professional judgement in identifying children.

Trafficking, child sexual exploitation or child criminal exploitation.

Definition: Where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity such a drug trafficking factory, shoplifting or pickpocketing. It may also include serious violent crime. One of the main signs is a child going missing from education, particularly repeatedly. Boys and girls can both be involved and may present different signs.

Child sexual exploitation occurs when individuals or groups take advantage of the individual, coerce, manipulate or deceive a child under 18 into sexual activity. It can be a one off or a series of acts, opportunistic or planned. The victim can be male or female when it comes to trafficking. The child might be a victim even if it appears consensual because children do not always understand that they are being exploited and sexually abused.

Child on Child abuse:

Sexual violence and sexual harassment can occur between children of any age and sex. It can occur through a single child or a group of children sexually assaulting or sexually harassing a single child or group of children.

Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying) abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')

- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)

- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse

- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)

- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and

- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Domestic abuse:

This can have a long lasting emotional and psychological impact on children. It refers to any incident or pattern of incidents of controlling, coercive, threatening behaviour between those aged 16 or over who are, or have been, intimate partners or family members, regardless of gender or sexuality. It can occur in relationships between friends as well.

FGM:

Female genital mutilation (FGM) is an act of child abuse and violence against women. Teachers are required to report to the police "known" cases of FGM in the course of their professional work.

Grooming:

A process by which a person prepares a child, significant adults and the environment for the abuse of the child.

Recognising Child Abuse

Although these signs do not necessarily indicate that a child has been abused, they may help adults recognise that something is wrong. The possibility of abuse on a child shows a number of these symptoms, or any of them to a marked degree. This is not an exhaustive list:

- Unexplained injuries or burns
- Improbable excuses for injuries
- Refusal to undress for PE
- Fear of medical examinations
- Constant hunger
- Constant hunger
- Poor hygiene
- Constant tiredness
- Poor state of clothing

- No social relationships
- Compulsive scavenging
- Destructive tendencies
- Admitting to being 'punished'
- Sudden speech disorders

- Extreme fear of new situations
- Overreaction to mistakes
- Neurotic behaviour (rocking, hair twisting, self-mutilation)
- Extremes of being passive or aggressive
- Regressing to babyish behaviour – thumb sucking, bringing out old cuddly toys
- Acting out as an animal
- Constantly putting things in the mouth, sucking, chewing
- Isolation

A child may be subject to a combination of different kinds of abuse. It is also possible that a child may show no outward signs and hide what is happening.

Staff must challenge any form of derogatory, prejudicial and sexualised language or behaviour.

Sexualised Behaviour

Staff should be vigilant to sexualised behaviour. DfE guidance situates sexual violence, sexual harassment and harmful sexual behaviour in the context of a safeguarding culture, where sexual misconduct is seen as unacceptable, and not 'banter' or an inevitable part of growing up.

Groups at particular risk include girls, students who identify as Lesbian, Gay, Bisexual, Transgender+ (LGBT+), or are perceived by peers to be LGBT+, and students that these children can be targeted by other children, so it is vital your school provide a safe space for these children to speak out and share their concerns wit are protected from upskirting,

bullying (+ cyber), homophobic, biphobic and transphobic behaviour, racism, sexism, and all other forms of discrimination.

Our school acknowledges the need to treat everyone equally, with fairness, dignity and respect. Any discriminatory behaviours are challenged, and children are how to treat others with respect. We also have a duty to report and record any of the above incidents.

All incidents should be immediately reported to the Designated Safeguarding Lead (DSL). Victims of harm should be supported by the school's pastoral system.

Prevention of Sexual Abuses:

Education and Awareness:

Regular training sessions will be conducted for staff and students to enhance awareness of sexual abuse prevention, in compliance with Spanish legislation. Emphasis will be placed on recognising signs and promoting a safe and respectful environment.

Reporting Mechanism:

An accessible and confidential reporting system, adhering to Spanish privacy laws, will be in place for individuals to report concerns or incidents related to sexual abuse. Reports will be promptly investigated, and appropriate action taken in accordance with Spanish legal requirements.

Reparation Protocol:

In the unfortunate event of sexual abuse, a dedicated support system will be activated to provide immediate assistance, counseling, and access to external resources. The school is committed to facilitating the necessary steps for the repair and recovery of victims, complying with Spanish legal standards.

Mental Health

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. If not addressed this can lead to long term negative consequences, and in worst case, suicide.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Teaching staff and Mentors, however, are well placed to observe and identify those students whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and notify designated safeguarding lead or a deputy.

If a child makes a disclosure about having suicidal thoughts then staff needs to immediately contact the DSL.

UKHSA and NHS England mental health in schools guidance helps schools promote children's mental health and wellbeing.
https://www.gov.uk/guidance/mental-health-and-wellbeing-support-in-schools-and-colleges

Prevention of Suicide and Self-Harm:

This Safeguarding Policy is subject to regular review to align with Spanish legal requirements and best practices. The safety and well-being of our community members are paramount, and we remain committed to creating a secure and supportive learning environment while respecting Spanish legislation.

<u>Early Intervention:</u>

Staff will undergo training to identify signs of distress and potential self-harm or suicidal ideation, ensuring compliance with Spanish privacy laws. Early intervention strategies will be implemented to provide timely support.

<u>Mental Health Resources:</u>

Access to mental health resources, including counselling services, will be available to students and staff, aligning with Spanish regulations. The college will actively promote a culture of openness regarding mental health while respecting privacy laws.

<u>Suicide Prevention Protocol:</u>

A clear protocol for handling suicide risks will be implemented, involving collaboration with mental health professionals and appropriate Spanish authorities to ensure a comprehensive and timely response in compliance with local legislation.

Digital Safety

Safeguarding risks now explicitly include misinformation, disinformation and conspiracy theories (KCSIE 2025). Filtering and monitoring is reviewed annually using the DfE's *Plan Technology for your School* tool. We also recognise risks arising from AI-generated content and require staff vigilance when images, videos, or written material may have been falsified using artificial intelligence.

There is an E-Safety policy, which covers the use of mobile phones, cameras and other digital recording devices e.g., i-Pads. The policy reinforces the importance including making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online) and we can reasonably do to limit children's exposure to the risks from the school's IT system and ensure there are appropriate filters and monitoring systems in place.

The full list of blocked websites is maintained as an appendix to the E-Safety / Acceptable Use Policy. This list is reviewed at least annually by the Designated Safeguarding Lead (DSL) in partnership with the IT Manager and governors, to ensure filtering and monitoring remain effective and proportionate to the age group (15–19).

The leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate causes of concerns to the relevant authorities.

The policy for remote learning demonstrates an understanding of how to follow safeguarding procedures when planning remote education strategies and schools maintain the capability to provide remote education when it is necessary due to government directive.

https://www.gov.uk/government/publications/providing-remote-education-guidance-for-schools

Missing Children - Child missing from education

A child missing from education is a potential indicator of abuse or neglect or sexual exploitation. If the school becomes aware of a child having run away from home, this will be dealt with as a child protection matter.

If a child goes missing during the school day, the school follows its procedures for student absence should a student not appear for morning registration. If a student was on site but has subsequently become unaccounted for, then the school will immediately investigate.

Attendance and Safeguarding

In line with *Working Together to Improve School Attendance* (DfE, 2025), persistent absence or lateness is treated as a safeguarding concern. Patterns of absence are monitored closely and escalated to the DSL where they may indicate neglect, exploitation, or other risks. The DSL reports termly to governors.

Sensible Precautions

Staff should ensure that personal contact with children minimises the risk of any situation arising in which misunderstandings can occur. The following sensible guidelines are detailed below when working alone with children:

- Work in a room where there is a glass wall in the door or leave the door open
- Make sure that other adults visit the room occasionally
- Avoid working in isolation with children unless thought has been given to safeguards

- Never give out personal mobile phone numbers, private email addresses or social media details to students
- Do not give students lifts home in cars
- Do not arrange to meet them outside of school hours
- Do not chat to students on the social websites
- Under the Sexual Offences Act 2003 it is a criminal offence for anyone working in an education setting to have a sexual relationship with a student even when they consent. Staff are educated in these aspects and this is covered in the Staff Code of Conduct (Internal policy available on request). Regardless of local laws, the school will report any such instance to the authorities in the UK.

Physical Restraint

- In exceptional circumstances it may be essential to physically restrain a student to protect them from physical harm or physically harming another person. A reasonable restraint against students will be documented. If it is necessary to use physical action to prevent a child from injury to themselves or others, parents must be informed.
- Children will not be punished under any circumstances by any form of hitting, slapping, shaking or other degrading treatment.

Invacuation and Site Security

In addition to fire evacuation drills, the school maintains invacuation procedures in line with DfE site security guidance. Termly invacuation drills are conducted and risk assessments consider the impact on vulnerable students (e.g. those with high-anxiety SEND).

Additional Resources

- DfE Keeping Children Safe in Education 2025: https://assets.publishing.service.gov.uk/media/686b94eefe1a249e937cbd2d/Keeping_children_safe_in_education_2025.pdf

- Working together to safeguard children 2025:
- https://assets.publishing.service.gov.uk/media/6849a7b67cba25f610c7db3f/Working_together_to_safeguard_children_2023_-_statutory_guidance.pdf

- Regulation for Independent schools: https://www.gov.uk/government/publications/regulatingindependent-schools

- Safer recruitment overseas:

- Prohibition Order Checks from COBIS: https://www.cobis.org.uk/our-services/prohibition-orderchecks

- International Child Protection Certificate: https://www.acro.police.uk/icpc/

- NPSA Guidance on overseas criminal records checks: https://www.npsa.gov.uk/resources/how-obtain-overseas-criminal-records-check-briefing-sheet

- UK Home Office guidance on overseas criminal records checks: https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants

Security Policy

Aims

Virtus, The British Sixth Form College is committed to providing a safe and secure environment for students, staff, and visitors. This policy sets out the commitments and expectations Virtus offers all visitors, staff, students, parents and other stakeholders.

Access to the Building

CCTV

Access to Virtus is designed with safety and safeguarding as paramount. To enhance security measures, CCTV cameras have been installed at the front gates and main front door of the building, in order to monitor and control access to the school premises. The purpose of this CCTV monitoring is to deter unauthorised access and enhance overall security, provide a visual record of individuals entering and exiting the school premises. The Senior Leadership Team (SLT) have access to CCTV on their work phones and can control access to the gates remotely. Control of the front gates and main front door is also executed by the receptionist who ensures that she can see all visitors with her own eyes before allowing access to the premises.

Furthermore, CCTV cameras are installed in the corridors, the library, multipurpose hall a in order to safeguard and protect all students and staff.

In line with GDPR (UK) and LOPDGDD (Spain), CCTV footage is stored securely, retained for no longer than 30 days unless required for investigation, and accessible only to authorised personnel.

Alarms

There are professional security alarms installed on the premises which are programmed to specific times. The Senior Leadership Team (SLT) have access to the alarm on their work phones and can dissemble the alarm remotely.

Staff Security

All staff wear Virtus staff lanyards with a photo, name, academic year of employment and title. This lanyard also holds a card opening the main front door and a clicker for the front gate. Access to the premises are tightly controlled. All staff must visibly wear their lanyard at all times while on site. Replacement lanyards are issued immediately if lost to maintain site integrity.

Visitor Access

All visitors must sign in, record their time of arrival and departure, and wear a visitor badge visibly at all times. Visitors are accompanied by staff while on site.

Only those visitors who have undergone an appropriate background check (e.g. UK DBS, Spanish *Certificado de Delitos de Naturaleza Sexual*, or equivalent) and have presented valid photo ID and reviewed safeguarding protocol may be permitted unaccompanied access. The school maintains a record of these checks. All other visitors are chaperoned at all times

Emergency Protocol

Virtus has a clear and strict protocol for emergencies such as evacuation and invacuation. Drills take place regularly to ensure that all staff and students are up to date and confident in the procedures. Further details can be found in our Emergency and Invacuation policies.

In strict adherence to the legal requirements outlined in the Real Decreto 39/1997 of 17 January, which approves the regulation of prevention services, our school places the utmost importance on the safety and well-being of our students, staff, and visitors.

To ensure the effective implementation of safety measures and compliance with regulatory standards, we have engaged a reputable third-party service specialising in the provision of prevention services. This external entity is responsible for overseeing and managing various aspects of our security protocols, including risk assessments, emergency response planning, and ongoing safety training for our school community.

Dismissal Procedure

At Virtus, student safety is paramount. Our dismissal protocol at the end of every school day is executed without fail. Students gather into tutor groups at 4.20pm, and each group is dismissed separately, ensuring there is no crowding of staircases. Supervising staff have walkie talkies to communicate effectively.

Students walk out of front gates following the yellow grid to prevent accidents with cars.

Linked to the following policies:

- Safeguarding
- Health & Safety
- Emergency
- Invacuation
- Data Protection
- Staff Code of Conduct (Internal policy available on request)

Reviewed: June 2025
Next Review: June 2026

Trips and Visits Policy

Rationale

To support students' academic, social, cultural, and personal development through safe, purposeful, and inclusive educational visits that complement the curriculum and wider aims of the school.

Content

- School sporting activities
- Day or part-day visits using transport or on foot
- Residential activities
- Concerts / Plays
- Cultural activities
- Subject enrichment and curriculum-related activities

Safety is of paramount importance

The underlying basis of health and safety is to control risks through risk assessment by; identification of hazards; who might be affected; how can risks be reduced to an acceptable level; can these measures be implemented; what contingency plans can be put into place if all else fails. All risk assessments must be completed, approved by the Headteacher (or Deputy Headteacher Pastoral), and recorded on the central Google Drive before communication with parents/carers.

All off-site visits, outdoor adventure and residential activities must be authorised by the Headteacher. The trip leader (qualified teacher) has full responsibility for the safe running of the activity including prior agreement for the activity to take place.

They must:
- Decide on the trip and what impact it will have on student learning.
- Obtain costs for activities and travel. School bus to be booked with Admin.
- Completed risk assessment must be done by the teacher in charge of the trip.
- A letter must go to parents at least 2 weeks in advance of the trip, one month in instances of residential outings.

For sixth form visits (aged 15–19), the ratio is normally 1 adult per 15 students, with a minimum of two staff present and of both sexes for a residential trip. Ratios will be adjusted according to risk assessment (e.g., higher supervision for higher-risk activities).

At least one English-speaking member of staff and one fluent Spanish-speaking member of staff must be present on all trips to ensure effective communication with students, parents, and local services.

For residential visits, an information meeting will be held for parents/carers to review the itinerary, supervision, safeguarding, and medical arrangements. For residential or international visits, a temporary WhatsApp group may be set up using the school mobile phone to provide general updates to parents. This group will not be used to share sensitive personal data (e.g. medical or safeguarding information). All essential records and communications will be maintained through the school's official systems. The group will be deleted once the trip has concluded.

Trip finances must be arranged through the school's finance office. Staff should not use personal funds except in emergencies, and all expenditure must be receipted.

The school mobile phone must be taken along with relevant phone numbers.

Emergency Procedures

While it is impossible to plan for all contingencies prior to the start of a visit, documented emergency procedures should have been established which are understood by all concerned.

Depending on the type of visit, consideration should be given to the following factors:

- Before the commencement of each activity, pre-arranged meeting points should be established in the event of group members becoming separated.
- Prior to the visit, the Headteacher and Deputy Head will have all parental numbers in case of emergency.
- If through an accident or other circumstances it is necessary to discontinue the trip or visit, there should be arrangements for the return of the party.
- All personal data (student lists, medical information, passports) must be handled in line with UK GDPR and Spanish data protection law (LOPDGDD). Information must be stored securely and only accessed by staff directly involved in the trip.

The Headteacher (or Deputy Headteacher Pastoral) must be able to contact the trip leader at all times. Trip staff must carry a charged school mobile phone and provide updates where necessary.

Procedures following an emergency

If an accident happens, the priorities are to:
- Attend to the person in trouble.
- Safeguard the remainder of the group.
- Inform everyone who needs to know quickly and in the appropriate manner: emergency services, Head Teacher.

The following information will usually be required:
- Name
- Nature, date and time of incident
- Location of incident
- Details of injuries
- Name and telephone numbers of those involved Action taken so far
- Telephone numbers for future communication

In all circumstances, the bilingual staff member should be the one to stay with the party member in trouble in order to liaise with emergency services. As soon as possible relevant details of the incident should be recorded including names and addresses of witnesses and added to the management system so that details can be shared with the Headteacher and the Deputy Head (Safeguarding leads).

Safeguarding

Trips and visits must comply with the school's Safeguarding policy, including safer recruitment checks for external providers and appropriate staff–student boundaries.

Airports

Groups will be split with one adult to 15 students. Each adult in charge of the group will be in charge of the tickets for that group. For international travel, parental consent forms, passports, European Health Insurance Cards (EHIC/TSI in Spain), and any required notarised documents must be checked and confirmed by the Administration team in advance.

Groups must head to their gate and use this as their meeting point. If students require the toilet, they will go with teachers dependent on gender. Luggage and requirements for bags will have been stated prior to the trip being organised. One suitcase for the hold will always be taken for medication and liquids.

Linked policies:
- Safeguarding
- Health and Safety
- Emergency
- Invacuation
- Student Code of Conduct (Shared with students and parents on enrolment)
- Data Protection

Reviewed: August 2025
Next Review: June 2026

Whistleblowing Policy

Introduction

Virtus College, The British Sixth Form (the School) is committed to the highest standards of quality, honesty, openness and accountability.

As part of that commitment, the School encourages employees or others with genuine concerns about any aspect of work to come forward and express those concerns. We recognise that employees will need to come forward on a confidential basis.

This policy applies to all employees, governors, contractors, agency staff and volunteers working with the School.

Purpose of the Policy

Employees, governors, and volunteers are often the first to identify that something may be seriously wrong. Speaking up helps protect students, colleagues, and the wider community, and it will never be treated as disloyalty. The School recognises that individuals may fear harassment or victimisation, and it is committed to protecting all who raise concerns. Everyone working with the School has both the right and the duty to report any improper actions or omissions in order to uphold the highest standards of integrity and safety.

Scope of the Policy

This policy is not intended for grievances relating to an individual's own employment, which should be raised under the School's grievance procedures. The Whistleblowing Policy covers serious concerns that fall outside those procedures. It aligns with the UK Public Interest Disclosure Act 1998 and the Spanish Law 2/2023 on the protection of persons who report regulatory infringements and corruption.

A protected disclosure is a disclosure made in the public interest by an employee, governor, contractor, agency worker, or volunteer who reasonably believes that one of the following has occurred, is occurring, or is likely to occur:

- a criminal offence;
- a miscarriage of justice;
- an act creating risk to health and safety;
- an act causing damage to the environment;
- a breach of a legal obligation; or
- the deliberate concealment of any of the above.

Whistleblowing means the confidential reporting of concerns within the School. This may include illegal, immoral, irregular, dangerous, or unethical activity. Examples include mismanagement, bribery, fraud, safeguarding failures, and health and safety risks.

Safeguarding Against Harassment or Victimisation

Protection from detriment or dismissal is guaranteed under the UK Employment Rights Act 1996 (as amended) and Spanish Law 2/2023. The School will take a zero tolerance approach to any act of harassment or victimisation (including informal pressures) and will take appropriate action to protect staff when they raise a genuine and legitimate concern.

Unsubstantiated Allegations

Any employee who makes an allegation that turns out to be unfounded will not be penalised for being genuinely mistaken. If an allegation is knowingly false, malicious or made for personal gain, it may result in disciplinary action.

Confidentiality

All concerns will be treated in confidence but, at the appropriate time, the whistleblower may be asked to come forward as a witness, and this will be discussed with them.

All records will be handled in line with GDPR and Spanish data protection law (LOPDGDD).

Anonymous Allegations

The School encourages staff, governors, contractors and volunteers to identify themselves when raising concerns, as this makes it easier to investigate and provide feedback.

However, anonymous concerns will always be considered seriously. While anonymity can make it more difficult to investigate fully, the School will review all anonymous disclosures where there is sufficient information to enable further action.

In deciding how to proceed, the School will take into account:

- the seriousness of the issue raised;
- the credibility and detail of the information provided; and
- the likelihood of confirming the concern from other reliable sources.

Whistleblowers who remain anonymous will still be protected under UK and Spanish whistleblowing legislation.

How to raise concerns

In most cases you should be able to raise your concerns with your immediate manager or another manager. If, for some reason, this is not possible you should speak to the Headteacher or one of the Deputy Headteachers. Concerns may be raised verbally or in writing. Where concerns cannot be raised internally, staff may report to the governors. In Spain, external reports can also be made through the Independent Whistleblowing Authority (Autoridad Independiente de Protección del Informante).

The earlier the concern is expressed the easier it is to take action. In order to assist with the investigation employees should provide as much detail and supporting evidence as possible regarding their concern. Although staff are not expected to prove beyond doubt the truth of the allegation, it will need to be demonstrated to the person contacted that there are sufficient grounds for concern for the person who raises them to have a reasonable belief that they exist.

How the school will respond

When a concern is raised, the School will review it promptly and thoroughly. The person receiving the concern must ensure a clear written record is made, including the nature of the concern, any supporting information, and the date it was received. This record will form the basis of the initial assessment and investigation.

Managers and senior staff handling concerns must:

- Take the concern seriously and treat it as a priority.
- Consider the matter fully, fairly, and objectively.
- Recognise that raising a concern can be difficult and reassure the individual of protection from victimisation.
- Maintain strict confidentiality at all stages, in line with GDPR and Spanish data protection law.
- Provide acknowledgement of receipt within 7 days and an initial response on how the matter will be handled within 10 working days, in line with Spanish Law 2/2023.

Where appropriate, staff will be kept informed of progress and outcomes, subject to legal and confidentiality requirements.

Monitoring Arrangements

Confidential records will be kept of all matters raised through the Whistleblowing Policy and the Governing Body will receive an annual whistleblowing report as part of safeguarding and compliance monitoring.

Linked policies:

- Safeguarding
- Staff Code of Conduct (Internal policy available on request)
- Complaints
- Health & Safety
- Data Protection

Reviewed: August 2025
Review Date: June 2026*

This policy will be reviewed annually, or sooner if legislative or regulatory changes require.

Work Experience Policy

Purpose of the Policy

The purpose of this policy is to outline the principles, processes, and responsibilities related to work experience placements for Sixth Form students. Work experience provides students with the opportunity to gain insight into the world of work, develop key employability skills, and inform future career or educational choices.

Scope

This policy applies to:

- All Sixth Form students at Virtus College
- Staff supporting or organising placements
- Employers and placement providers involved in the programme
- Parents and carers of participating students

Aims and Objectives

The work experience programme aims to:

- Enhance students' understanding of the working world
- Provide meaningful experiences aligned with students' interests and career aspirations, forming an integral part of Virtus College's career programme
- Develop employability and transferable skills for life
- Support informed decision-making about career and education pathways
- Promote independence, resilience, and professionalism

Work Experience Model

- **Year Group**: Year 12
- **Duration**: Typically 1 weeks, or agreed set number of days through flexible arrangements
- **Timing**: Summer Term, post-AS Exams
- **Format**: In-person placements preferable

Responsibilities

a. Students

- Proactively seek placements (with support from the school)
- Complete application and submit to Virtus College careers team
- Attend interview

- Submit parental consent forms
- Support the school in providing required information relating to insurance where requested.Employers are responsible for holding appropriate Employer's Liability and Public Liability insurance for student placements. Virtus College will not approve or place students with employers who do not meet legal insurance requirements. Families are not responsible for securing employer-side statutory insurance.
- Attend pre-placement briefing sessions if applicable
- Contact placement company for introductory email
- Follow all placement rules and codes of conduct
- Represent the school appropriately at all times: e.g. appearance, punctuality, manner

b. Parents/Carers

- Support students in identifying and securing placements
- Provide relevant medical/emergency information
- Complete parental consent forms
- Support the school in providing required information relating to insurance where requested.
- Ensure students travel safely to and from placements

c. School

- Provide guidance and resources to assist placement search
- Vet placements for health, safety, and safeguarding compliance
- Maintain a record of placements
- Conduct risk assessments where required
- Liaise with employers to confirm arrangements
- Monitor attendance and student welfare during placements

d. Employers

- Provide a safe and inclusive working environment
- Designate a supervisor or mentor for the student
- Offer a meaningful programme of tasks or shadowing
- Ensure a Health & Safety induction is included
- Report concerns to the parents immediately
- Provide feedback on the student's engagement and performance
- Handle student information in compliance with the Spanish Data Protection Act (LOPDGDD), ensuring any personal data is used only for the purpose of the placement and stored securely

Health, Safety and Safeguarding

- All placements must comply with current Health and Safety legislation
- Risk assessments must be completed for all non-school arranged placements
- Employers may be asked to provide:

    - Public liability insurance/ Employer's liability insurance

    - Safeguarding policy or statement/ Risk assessment

- Students should never be placed in situations where they are left unsupervised with vulnerable individuals unless appropriate DBS checks are in place

Insurance and Liability

- Employers must hold appropriate insurance to cover student placements
- The school will not place students with employers who do not meet legal insurance requirements

Monitoring and Evaluation

- Students will complete a reflective log or report post-placement
- Employers are encouraged to provide feedback via a school form
- The school will review placements annually to ensure quality and relevance
- Feedback from students, parents, and employers will inform future planning

Equal Opportunities

- All students will have equal access to support in finding work experience placements
- The school will make reasonable adjustments to accommodate students with SEND or additional needs

Links to other policies:

- Safeguarding
- Health and Safety
- Student Code of Conduct (Shared with students and parents on enrolment)

Policy Review

This policy will be reviewed annually or in response to updated statutory guidance or

school priorities.

Reviewed: August 2025
Next Review: August 2026