

COGNITA



Breaside Preparatory School

Behaviour Policy

September 2026

1 Introduction

- 1.1 This policy is designed to foster a school ethos that promotes high quality teaching and learning to support the wellbeing of our pupils in order for them to thrive in an environment of respect and collaboration. The implementation of this policy supports the fair and transparent treatment of all pupils. The School aims to encourage pupils to adopt the highest standards of behaviour, principles and moral standards and to respect the ethos of the School.
- 1.2 This policy applies to all pupils [including those in the Early Years], parents/carers and staff.
- 1.3 We are committed to promoting and protecting the safety and well-being of all our pupils and staff and take great pride in the behaviour and conduct of all our pupils. We provide a safe and affirming place for children where they can develop a sense of belonging and feel able to trust and talk openly with adults about their problems.
- 1.4 In keeping with Education (Independent School Standards) (England) Regulations 2014/British School Overseas Standards (as amended), our policy outlines our Code of Conduct for pupils, as well as the use of sanctions and rewards to ensure our high standards are maintained. We have a duty to ensure arrangements are made to safeguard and promote the safety welfare of children.
- 1.5 The Headteacher is responsible for developing this policy within the framework set by Cognita as proprietor. This means that the Headteacher decides and sets the standard of behaviour expected of all pupils in our school. This includes how the standards will be achieved, the school rules, any sanctions for breaking the rules, and rewards for good behaviour. The measures in our policy aim to promote good behaviour, self-discipline and respect, and ensure that pupils complete assigned work and regulate conduct. **Teachers have the power to discipline pupils for misbehaviour which occurs in school and, in some circumstances, outside of school (including online).**
- 1.6 This policy should be read in conjunction with the School's other applicable policies including, but not limited to, our:
 - Anti-bullying Policy
 - Safeguarding and Child Protection Policy
 - Suspension, Expulsion and Removal in Other Circumstances Policy
 - Drug and Alcohol Policy
 - SEND Policy
 - Staff Code of Conduct
 - IT Policy
 - Use of Reasonable Force, Restrictive Intervention, an/ or Restraint Policy (incorporating Searching, Screening and Confiscation)
 - Child Absent from Education, Child Missing Education, and Attendance Policy
- 1.7 The School takes its duties under the Equality Act 2010 seriously and makes appropriate reasonable adjustments for pupils with special educational needs and disabilities (SEND) or certain health conditions. We are mindful that not all pupils requiring support with behaviour will have identified SEND.

- 1.8 If any pupil's behaviour is considered by the Headteacher to be criminal or to pose a serious threat to a member of the public, then it will always be reported to the relevant Police authority. If any misbehaviour is considered to be linked to any child experiencing, or being likely to experience, significant harm, then our Safeguarding and Child Protection Policy will be rigorously followed, and action will be taken in accordance with the relevant local Safeguarding Partners referral procedures. *If any child is in immediate danger or is at risk of harm, a referral should be made to children's Social Care and/or the Police immediately in accordance with the provisions of the Safeguarding and Child Protection accordingly.*
- 1.9 We publish our policy for parents/carers, pupils and staff. It can be found on our website. We review this policy at least annually. This policy is referred to in our Parent Contract accordingly.
- 1.10 We support pupils at times when difficult events happen in their lives, such as domestic abuse, bullying, accidents, transition, loss of friendships, divorce and separation, loss and bereavement. This helps pupils to build coping strategies and build resilience, which helps to prevent mental health problems from occurring later in life.

2 Our approach

- 2.1 Good behaviour is essential for effective learning to take place. Our school policy presents a fair, consistent and transparent approach towards behaviour management, which combines appropriate discipline with support and encouragement delivered within our caring school environment.
- 2.2 We work in partnership with our parents/carers, pupils and staff to create an atmosphere of mutual respect and understanding. Our written policy reflects this approach in that we balance discipline and sanctions with a strong commitment to encouraging and supporting positive behaviour. We expect our staff, parents/carers and pupils to understand and respect the rules of the school and the expectations and responsibilities outlined in this policy. We expect both staff and parents/carers to model positive behaviours at all times so that our pupils can benefit fully from their experiences in school.
- 2.3 It is important that our staff follow this policy at all times to ensure that it is implemented consistently and effectively. We understand that this will ensure that our pupils feel they have been treated fairly compared to others.
- 2.4 Should any child display severe emotional, behavioural and social difficulties, it is our role to support them to be resilient and mentally healthy, and to ensure that all children are properly included in the educational experiences and opportunities provided whilst the learning of their peers is not impeded.

Where needs emerge, we will ensure that this is communicated to the child's parents/carers from the outset, and that the child receives early help via external support such as via early help services, from medical professionals working in specialist Child and Adolescent Mental Health services (CAMHS), voluntary organisations and local GPs. This is in conjunction with, internal targeted support in school.

- 2.5 Staff work closely with the Special Educational Needs Coordinator (SENCo) and Designated Safeguarding Lead (DSL) to ensure we have a good understanding of the mental health support services available in our locality, both through the NHS and voluntary/private organisations/professionals.

3 School Principles

Good schools encourage good behaviour through a mixture of high expectations, clear policy and an ethos which fosters discipline and mutual respect between pupils, and between staff and pupils.

- 3.1 The quality of learning, teaching and behaviour are inseparable issues and are the responsibility of all staff.
- 3.2 The School Principles:
 - School staff and pupils should all show respect for one another;
 - Good behaviour should be the expectation and in parallel with support for all those involved, sanctions should always be applied consistently for unacceptable behaviour, including all forms of child-on-child abuse, including but not limited to bullying, inappropriate/harmful sexual behaviour, and violence (see the Safeguarding and Child Protection Policy for further information);
 - Appropriate and preventative action should be taken to reduce the risk of poor behaviour occurring, including particular action to prevent a disproportionate number of behaviour issues arising amongst more vulnerable groups of pupils, for example, but not limited to those with special educational needs or disabilities;
 - Pupils whose behaviour and attendance may deteriorate through events such as bereavement, abuse/neglect/exploitation, or through the divorce or separation of parents should be identified and those children supported;
 - All pupils should be listened to and responded to;
 - All pupils are entitled to learn in a safe and secure environment;
 - Pupils should act as appropriate ambassadors for the school on, for example, school trips, work placements, sports events and journeys to and from the school;
 - All School staff should model positive behaviour and promote it through active development of pupils' social, emotional and behavioural skills; and
 - All members of the School community should understand and accept the principles on which this policy is grounded.

4 Expectations and Responsibilities

- 4.1 Behaviour is the way we act and respond to people and to situations in which we find ourselves. Our aim is that all of our pupils should be able to behave in socially acceptable ways.
- 4.2 Teachers have authority in our school to discipline pupils for misbehaviour which occurs in school and this power applies to all paid staff with responsibility for pupils on /off site; unless the Headteacher says otherwise.
- 4.3 To be socially acceptable, we believe that our pupils should be able to:
 - Treat other pupils and staff with respect and kindness;
 - Speak politely to other people; and
 - Have self-confidence and high self-esteem.
- 4.4 To encourage this, the staff will:
 - Treat all pupils and adults with respect and kindness;
 - Speak politely to other people;
 - Praise all pupil's efforts and achievements as often as they can;
 - Explain to pupil's what they should have done or said when they get it wrong;

- Encourage self-reflection to pupil's when they get something wrong to encourage learning;
- Tell parents/carers in a timely manner about their child's efforts and achievements, any concerns around behaviours, and explain any concerns about risk to self/others arising from the behaviour; and
- Avoid using critical, belittling or sarcastic language towards all pupils and adults.

4.5 We will not accept the following behaviour from pupils or adults (including staff):

- Use of unkind or rude language;
- Hitting, kicking, biting or other such physical responses; or
- Racist, sexist or homo/bi/transphobic remarks, or other discriminatory comments towards anyone including those with protected characteristics (Equality Act 2010).

4.6 The role of the teacher

- Teachers are responsible for ensuring that the School's behaviour policy is enforced in their class, and that their classes behave in a responsible manner during lesson time;
- Incidents of poor behaviour may (where appropriate) be discussed by the teacher with the class, e.g. during circle or pastoral time;
- Every teacher enforces the classroom code consistently and treats each pupil fairly and equally;
- Staff should always make it clear that they are upset about the pupil's behaviour, not the pupil. They should always use private, not public, reprimands, so that when a sanction is applied the pupil can make a fresh start.
- If a pupil misbehaves in class, the teacher will keep a record using the school behaviour recording system of all such incidents; dealing with the matter themselves in the first instance. However, if the behaviour continues, they must seek help and advice from the senior member of staff named at the front of this document, including a conversation with the parent/carer to seek improvements and the use of appropriate strategies;
- Any behaviour which constitutes a safeguarding concern will be escalated to the Designated Safeguarding Lead (DSL) who take any required action.
- The teacher reports to parents/carers about the progress of each pupil for whom they are responsible, in line with our School policy. The teacher/DSL may also contact a parent/carer if there are concerns about the behaviour or welfare of any pupil, with reference to the School's Safeguarding and Child Protection Policy as appropriate;
- A record is made of any incident involving a pupil, or staff member which results in personal injury or damage to property. These include loss or theft, deliberate damage and any other serious incident. These are reported to the Headteacher and parents/carers. We record all details fully and accurately. Incident forms are kept in school and records maintained in the child's personal file and the incident book;
- Obey all health and safety regulations in classrooms, around the School and in all off site educational activities including helping to keep the School clear of clutter and litter;
- Never make racist, sexist, homo/bi/trans phobic or other abusive or humiliating remarks, including to those with protected characteristics (Equality Act 2010);
- Never resort to physical interventions to manage behaviours (other than in situations where there is risk of harm/danger)
- The use of reasonable force and restrictive interventions, including the use of seclusion, may be used exceptionally and only to prevent injury to pupils, staff, damage to property or to prevent pupils committing an offence. Only the minimum restraint is used for the briefest length of time. The action taken is recorded by the person who undertook the intervention, the parents/carer must be informed the same day and provided with the school record of the intervention as soon as practical. Please see our separate policy on the Use of Reasonable Force, Restrictive Intervention, and/or Restraint (incorporating searching, screening and confiscation) for further details;

- Comply fully with the Safeguarding and Child Protection Policy, Staff Code of Conduct and the IT Policy.

4.7 Expectations of pupils in our school

- Arrive on time to lessons/ classes with all the equipment needed for the lesson;
- Listen respectfully when a staff member is giving instructions;
- Follow instructions promptly and accurately;
- Follow the staff member's instructions about moving around the classroom;
- Treat others with respect, kindness and consideration at all times;
- Adhere to and exemplify the Breaside Core Values;
- Dress cleanly and neatly in the specified uniform for the activity;
- Obey all health and safety regulations in classrooms and around the school including helping to keep the school clear of clutter and litter;
- Move sensibly and calmly around the buildings and grounds;
- Never make racist, homo/bi/trans phobic or other abusive or humiliating remarks, including to those with protected characteristics (Equality Act 2010); sexist or other abusive or humiliating remarks;
- Never resort to physical violence; and
- Comply fully with the Digital Safety Agreements.

The above list is not exhaustive.

4.8 Mobile Phones

The school follows the DfE guidance (January 2026) which states that 'all schools should be mobile -phone free environments by default; anything other than this should be by exception only.'

Mobile phone usage is prohibited during the school day for pupils up to and including Year 6. This includes during lessons, between lessons, at breaktimes and lunchtimes and in clubs before, during and after schools, as well as school visits and trips that take place during typical school hours. Exceptions to this may be made, but this must be agreed between the school and parents prior to the device being used in school and will only be approved for exceptional cases. The school recognises its duties under the Equality Act 2010 and will consider reasonable adjustments where a pupil requires a device for medical monitoring or other agreed support related to a disability, health condition or learning need. Any exceptions must be documented within the pupil's healthcare plan or learning support plan. Devices permitted under such arrangements must only be used for the agreed purpose, and where access to a personal device can be supervised and/or provided by school staff through the school day. Smart watches and other wearable devices capable of communication, internet access, photography or recording are treated in the same way as mobile phones. Pupils must not use or wear these devices during the school hours.

Staff must never use their personal mobile phones when pupils are present, may not wear smart watches and must only use work devices (see Code of Conduct and IT Policy). If mobile phone usage is necessary for work purposes or medical reasons staff usage must be kept to a minimum.

The school does not condone the ownership of smart phones for pupils. If mobile phone ownership is deemed necessary for pupils by their parents/carers, it is preferable that this should be a basic phone/brick phone/flip phone not a smart phone. Parents/carers should make informed decisions about the age at which their child should obtain a smart phone and follow up to date government guidance, which at the time of writing is not recommended below the age of 14.

Pupils are encouraged to leave mobile phones at home and not bring them into school, unless it has been agreed by the Headteacher and parent that a Year 6 child will be travelling to and from school during the summer term.

All pupil phones will be signed in and out by a member of staff. Upon arrival, any pupil who has a mobile phone must turn off their phone and hand it over directly to their class teacher who will sign their phone in and store phones in a lockable draw in the year 6 classroom until the end of the school day. Upon dismissal, class teachers will sign out phones, making it clear to children they must not turn them on until they reach the school gate (supervised by a member of SLT at the school gate). If a child is attending a club, they must arrange with the class teacher to collect and sign out their phone from the school office when leaving, who will again supervise them turning the phone on before exiting the premises.

The school will direct the use of pupil mobile phones on residential trips and trips outside of the normal hours of the school day. This will be communicated to parents/carers as part of the trip's communication.

Confiscation

The school reserves the right for all staff to confiscate pupil's mobile phones should this policy be breached, for example where a mobile phone is used by a pupil or is heard ringing in a pupil's bag. The law protects staff from liability in any procedures brought against them for any loss or damage to items they have confiscated as a sanction, providing they have acted lawfully.

In considering whether a confiscation is a proportionate penalty, the schools will consider what disciplinary outcome the confiscation is intended to achieve and whether there are other ways to achieve the same outcome, as well as the pupil's individual circumstances such as age and SEND status.

The Headteacher is supported by DfE to confiscate mobile phones and similar devices, if they consider it proportionate, for whatever length of time they deem proportionate.

The school will consider whether misbehaviour regarding the use of mobile phones gives cause to suspect that a pupil is experiencing, or may be at risk of abuse, neglect and /or exploitation. Where this may be the case as set out in part 1 of keeping children safe in education, school staff will follow the school's Safeguarding and Child Protection Policy and speak to the Designated Safeguarding Lead (or deputy). They will consider if pastoral support, an early intervention or a referral to children's Social Care is appropriate. Where necessary referrals will be made.

4.9 Expectations of parents

Parents/carers who accept a place for their child at the School undertake to uphold the School's policies and regulations, including this policy, when they sign the Parent Contract. The School values a close relationship with parents/carers and encourages them to work in partnership with the School to assist in maintaining high standards of behaviour both inside and outside of School. In particular, the School expects parents to support the School's values in matters such as attendance and punctuality, behaviour and conduct, uniform/dress and appearance, standards of academic work, extra-curricular activities, and homework/private study.

In the event of any behaviour management issue the School will liaise closely with parents where practical and, if relevant, other support agencies.

5 Policy on rewards and sanctions

5.1 Our rewards – promotion of good behaviour

Non-exhaustive examples:

- All staff praise, reward and sanction consistently;
- Younger children are given stars and stickers for good work. They share their work with other teachers and members of the Senior Leadership Team.
- Younger children use a Good to Be Green chart system, encouraging all children remain on Green for following the class and school expectations;
- The Headteacher, Deputy Headteacher and Assistant Headteachers awards a 'Head/Deputy/Assistant Head Teacher Award' for outstanding achievement / effort to individual children at Celebration Assembly.
- Children who display one or more of the Breaside Core Values may be nominated by a member of staff for a Breaside Values You Award which would be presented during Celebration Assembly;
- House points are awarded (as Dojo Points) for good effort, work, attitude to learning, displaying Breaside Core Values, adhering to school expectations, etc. The points are collected each week and celebrated with the class achieving the highest number of points being recognised and awarded an additional playtime using the trim trail and table tennis table. At the end of each term and the house with the highest points wins the House cup in a House Assembly; and
- Celebration assemblies take place to support our positive approach and reinforce good behaviour, thereby celebrating all children's achievements, raising self-esteem and self-confidence.

5.2 Strategies and support

The following outline a range of strategies for use in school to reinforce desirable behaviour:

- changes in classroom organisation, seating, etc;
- using different resources;
- setting small and achievable targets;
- short periods of supervised time for personal reflection;
- positive rewarding systems with no comments for undesirable behaviour;
- use of certificates for positive qualities;
- acclaiming good behaviour when it is seen in class;
- involving parents at an early stage to make an action plan together;
- peer mediation and peer mentoring;
- restorative justice approach;
- sessions with school Mental Health and Well Being Leads to help pupils with social, mental or emotional health difficulties;

- social skills training;
- referral to CAMHS and/or educational psychology services/professionals; and
- referral for family support and/or therapy to help the pupil and family better understand and manage behaviour.

5.3 Our sanctions

All staff generally deals with minor breaches of discipline in a caring, supportive and fair manner. A pupil's individual needs will always be considered carefully. However, if there are any times when children transgress from the acceptable boundaries in our school, they will be spoken with so that they understand the boundaries and what is expected of them.

Corporal punishment is illegal and is never used or threatened at our School. Physical methods to manage a pupil's behaviour at home by parents/carers is a safeguarding issue and will be dealt with under the School's Safeguarding and Child Protection Policy.

Examples of sanctions that are used in the School include:

- Verbal reprimand from a member of staff;
- Letter to parents/carers to advise of the misbehaviour;
- Additional schoolwork or repeating unsatisfactory work until it meets the required standard;
- The setting of written tasks as punishments, such as writing lines or essays;
- Detention
- Withdrawal of privileges;
- Confiscation of property that is being used inappropriately or without consideration;
- School based service or imposition of a task, under the supervision of a member of staff;
- Assistance with domestic tasks, such as collecting litter;
- Regular reporting, including academic performance reporting, early morning reporting, scheduled uniform, and other behaviour checks, or being identified for behaviour monitoring; and
- Withdrawal from a lesson, school trip or team event.

All misbehaviour or disciplinary incidents will be dealt with as soon as practicable.

- 5.3.1 We consider whether the behaviour under review gives cause to suspect that a pupil is experiencing, or is likely to experience, significant harm. Where this may be the case, staff will follow our Safeguarding and Child Protection Policy and refer the conduct to the DSL for advice and support before determining any sanction. We will consider whether continuing disruptive behaviour might be the result of unmet educational, SEND, or other needs such as trauma. At this point, we will consider whether a referral to Early Help or other agency is needed to support the child/family.
- 5.3.2 Parents/carers will be involved at the earliest stage when needs arise, are persisting or recurring.
- 5.3.3 It should be noted that, in most cases, the school's sanctions are used in a hierarchical manner. Where cases of serious misbehaviour are evident, the Headteacher reserves the right to use any sanction, including suspension, expulsion and removal in other circumstances, without first using lower-order strategies.

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- 5.3.4 Any sanction must be reasonable in all the circumstances and account must be taken of relevant factors which may include the pupil's age, any special educational needs or disability they may have, and any religious requirements affecting them. These include the following:

5.3.5 Breaside uses the follow Behaviour ladder when dealing with negative behaviour;

Behaviour	Possible Positive Strategies	Agreed Sanctions
<u>Level 1</u> -Low-level disruptive behaviour (class, lunch-hall, moving around the school). E.g, Calling out, unnecessary travelling around classroom, disrupting others, inappropriate travelling around school. -inappropriate playground behaviour -Name calling	In isolated cases: -Seek out and praise good behaviour. Remind of right choice/appropriate behaviour. Praise nearby pupils for right choices. Give clear instructions Reward small steps If behaviour is repeated again: -remind of appropriate behaviour/right choices. Give clear instructions -remind of classroom/playground rules	-Visual or Verbal warning given. -Written warning in form of name on board / moved to yellow on the Good to Be Green chart Moved to another seat in the class.
<u>Level 2</u> -Persistent Level 1 behaviour (more than 2 incidents) -Intentional inappropriate/unsafe playground behaviour.	Remind of appropriate choices. Seek out positive behaviour as examples. -Time out of playtime to calm down – 5/10 mins as appropriate. Teach self-regulation strategies to be used in future. Enable restorative justice to take place between peers if appropriate.	-Move to another class and/or miss next playtime (whichever is appropriate for immediate sanction) -Name and incident logged on school behaviour log.
<u>Level 3</u> -Persistent Level 2 behaviour (more than 2 incidents recorded on behaviour log within a short time frame)	Positive reinforcement of appropriate behaviour. Discuss with Form Teacher ways to motivate appropriate behaviour (sticker/reward charts etc) Enable restorative justice to take place between peers if appropriate. Seek support from SENCO or Mental Health and Well Being leads.	Part or whole of play / lunch time missed, supervised by Early Years Lead, Assistant or Deputy Head Teacher. <u>Parents Notified</u>

Level 4 Physical/Verbal Aggression Fighting Bullying Racism Homophobia Inappropriate personal/sexual remarks Swearing Direct refusal to follow instructions given by an adult in school	Set up Behaviour Plan with Deputy or Headteacher alongside the form teacher and parents. Report cards/charts – checking in with SLT daily (Junior Children) Rewards charts checking with with Class Teachers daily (Younger children)	Name and incident logged in Behaviour log. Immediate withdrawal (from playground / classroom) Internal Exclusion – time spent with a member of SLT (during play or lunchtime or lesson time) A member of SLT to meet with child and inform/meet with parents. Parents Notified
Level 5 Repeated Level 4 behaviour Physical Assault		Name and incident logged in <u>Behaviour Log</u> As Level 4 Immediate removal from class. Parents called to meet with Headteacher. Possible Suspension Possible Expulsion

6 Suspension and Expulsion

- 6.1 The Headteacher reserves the right to suspend, expel or remove pupils from the school. Suspension and expulsion will be dealt with in accordance with our Suspension, Expulsion and Removal in Other Circumstances Policy, which includes examples of behaviour that may warrant those sanctions.

7 Allegations of Harmful Sexual Behaviour (HSB) and child on child abuse

- 7.1 Allegations of a pupil demonstrating Harmful Sexual Behaviour (HSB) and/or child on child abuse are taken seriously and dealt with in a fair and consistent manner that provides effective protection for the victim and supports the person about whom the allegation has been made, and always in consultation with the Designated Safeguarding Lead. All allegations will be dealt with in accordance with the Safeguarding and Child Protection Policy. The school will, in most cases, engage with both the victim and the alleged perpetrator's parents/carers when there has been a report of HSB/child on child abuse, unless to do so will heighten risk to the victim/alleged perpetrator. All parties involved will be provided with appropriate support and guidance and schools will carefully consider what information is shared with respective parents/carers to ensure that confidentiality is maintained. Every effort will be made to ensure confidentiality is maintained while an investigation is underway, to the extent appropriate. Referrals to children's Social Care/Police will be made as appropriate, in line with the Safeguarding and Child Protection Policy.

8 Complaints Procedure

We hope that any difficulty or concern with this Policy can be sensitively and efficiently handled and resolved informally before it reaches the formal complaints stage. We expect our parents/carers to share any concerns informally with us so that we can continuously improve the quality of education at our school.

- 8.1 The School's Complaints Procedure [(which apply equally in the EYFS setting)] is on our website and sets out how current parents/carers can raise a formal complaint and how the School will handle it.

9 Monitoring and Evaluation

- 9.1 The School will record all behavioural incidents (including child on child abuse, including, but not limited to bullying) and sanctions in accordance with this policy which will be used to monitor behavioural issues within the School and to evaluate the effectiveness of this policy. [Major sanctions for boarders are kept together with those for day pupils.] The Headteacher is responsible for ensuring these records are appropriately maintained.
- 9.2 The School will consider whether there are patterns of concerning, problematic or inappropriate behaviour among pupils [including within boarding houses] which may indicate that there are possible cultural issues within the School [or boarding house] which may be enabling inappropriate behaviour to occur. When patterns are identified, the School will decide an appropriate course of action, which may include more staff training, incorporating learning points into pupil's PSHE/RSE lessons, or amending this policy.
- 9.3 The Headteacher is responsible for the implementation of this policy and for reviewing from time to time to evaluate its implementation and impact.
- 9.4 Headteachers report on behaviour and bullying at governance meetings. This forms the monitoring and evaluation function of the proprietor.
- 9.5 Where there are concerns regarding the school's approach to dealing with behaviour, these will be explored by the European Director of Education.

Behaviour Policy

Ownership and consultation	
Document Sponsor	Group Director of Education
Document Author / Reviewer	Director of Education, Europe and USA Sarah Kanani – Deputy Head Teacher (Breaside)
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Spain	No
Switzerland	No
Italy	No
Greece	No
USA	No
Austria	No
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Related documentation	Anti-Bullying Policy Exclusion Policy Safeguarding and Child Protection Policy Use of Reasonable Force, Restrictive Intervention and /or Restrain Policy IT Policy Code of Conduct