BLENHEIM SCHOOLS

# SUSPENSION, PERMANENT EXCLUSION & REQUIRED REMOVAL POLICY

# Suspension, Permanent Exclusion and Required Removal Policy

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**IMPORTANT NOTE:**

**This policy forms part of the contract between the school and parent(s)/those with parental responsibility. This contract is the source of the school's authority to suspend, permanently exclude or require the removal of a pupil. Where this policy and the Terms and Conditions conflict, the Terms and Conditions shall ordinarily prevail. Nothing in the Terms and Conditions or this policy shall override the School's obligations under applicable law and any such conflict must be reported to the Operations Director for resolution.**

## 1. PURPOSE AND SCOPE

1. This policy sets out how [SCHOOL NAME] manages suspension, permanent exclusion and required removal in a way that is lawful, fair, proportionate and consistent with the school's relational and inclusive approach to behaviour.
2. It applies to all registered pupils at the school, including pupils below compulsory school age in the early years provision, pupils above compulsory school age, boarders where applicable, and pupils placed or funded by a local authority or other placing authority.
3. It applies to conduct on the school site, on school transport, during school-organised activities off site, and to conduct outside school where the Terms and Conditions permit the school to act. The school's authority over conduct outside school is contractual, not statutory.
4. This policy is published on the school website and is made available free of charge on request, in accordance with paragraph 32(3)(a) of the Independent School Standards.

## 2. LEGAL AND REGULATORY BASIS

The school is an independent school registered with the Department for Education and inspected by [ISI / OFSTED]. It is not a maintained school, academy or pupil referral unit.

The statutory exclusion framework in section 51A of the Education Act 2002 and the School Discipline (Pupil Exclusions and Reviews) (England) Regulations 2012, and the associated Department for Education statutory guidance on suspension and permanent exclusion, **do not apply to this school. The school does not operate governing board reinstatement reviews or independent review panels under that framework.**

The school's power to suspend, permanently exclude or require removal derives from its contract with parents/ those with parental responsibility. The following legal and regulatory requirements do apply and are reflected in this policy:

| Source | Relevance to this policy |
|---|---|
| Contract between the school and parents/ those with parental responsibility (the Terms and | Source of the power to exclude or require removal; fairness and transparency of terms; notice, fees and deposit consequences |

| Source | Relevance to this policy |
|---|---|
| Conditions), read with the Consumer Rights Act 2015 | |
| Education and Skills Act 2008, Part 4 Chapter 1, and the Education (Independent School Standards) Regulations 2014 | Registration and the Independent School Standards, in particular paragraphs 9, 10, 15, 16, 16A, 32(3)(a) and (d), 32A and 33 |
| School Attendance (Pupil Registration) (England) Regulations 2024 | Admission and attendance registers, lawful grounds for deletion from roll, attendance coding, returns to the local authority, record retention |
| Equality Act 2010, in particular sections 15, 20 and 85, and Schedule 13 | Prohibition on discrimination arising from disability; duty to make reasonable adjustments; claims lie to the First-tier Tribunal (SEND) |
| Children and Families Act 2014, Part 3 | Applies where a local authority names the School in an Education, Health and Care plan. The school is not a section 41 approved institution |
| Keeping Children Safe in Education (from 1 September 2026, the 2026 edition) and Working Together to Safeguard Children | Safeguarding duties, allegations against staff, child-on-child abuse, information sharing on transfer |
| Working Together to Improve School Attendance | Attendance expectations for independent schools, registers, and local authority notification |
| Human Rights Act 1998 and the Data Protection Act 2018 / UK GDPR | Right to education and to a fair process; lawful processing and retention of exclusion records |
| Independent School Standards Guidance (DfE, April 2026) | Departmental interpretation of the standards, used by inspectors |
| Behaviour in schools: advice for headteachers and school staff (DfE, non-statutory) | Referred to as good practice. There is no duty on independent schools to have regard to it |

This policy should be read alongside the school's:

- Relational and Inclusive Behaviour Policy
- Anti-Bullying Policy
- Safeguarding Policy
- SEND Policy
- Attendance Policy
- Restrictive Interventions Policy
- Complaints Policy & Procedure
- Privacy Notice and Terms and Conditions

## 3. DEFINITIONS

| Term | Meaning in this policy |
|---|---|
| Suspension | A disciplinary sanction under which a pupil is temporarily required not to attend the school for a specified and fixed number of school days. The pupil remains on the admission register throughout |
| Permanent exclusion | A disciplinary sanction under which a pupil is permanently required to leave the school and their name is deleted from the admission register in accordance with regulation 9 of the 2024 Regulations |
| Required removal | A non-disciplinary contractual step under which the school requires a pupil to be withdrawn, on the grounds set out in section 10. It is not a permanent exclusion and is recorded separately |
| Precautionary absence | A short, non-disciplinary period during which a pupil is asked not to attend, or attends under altered arrangements, in order to allow a safeguarding concern or allegation to be managed safely. It is not a sanction and must not be described as a suspension |
| Internal isolation | A sanction under which the pupil attends school but is educated apart from their usual class. Governed by the *Relational and Inclusive Behaviour Policy*, recorded, and reported in the data set at section 15 |
| Parent | Any person with parental responsibility and any person who has care of the pupil, together with any fee payer under the Terms and Conditions |
| Head | The Headteacher, Head or Principal of the School, or a person formally acting in that role |
| Proprietor | Blenheim Schools, part of Outcomes First Group, as proprietor of the school |

## 4. PRINCIPLES

The school is committed to a safe, calm, inclusive and supportive environment in which pupils can learn, belong and succeed. Its approach is relational and inclusive. It seeks to understand behaviour as communication, to respond with dignity and care, and to help pupils understand, learn and repair harm.

Suspension and permanent exclusion are disciplinary sanctions. They are used only where necessary and proportionate, and only after other reasonable approaches have been considered. Permanent exclusion is a last resort. The school will not apply either sanction punitively, retributively or as a substitute for support the pupil needs.

The following apply in every case:

- The school will not use informal or unlawful exclusion. Pupils will not be sent home to cool off, given an unrecorded day at home, or asked to stay away without a decision being taken, recorded and notified under this policy.
- The school will not use a reduced or part-time timetable as a behaviour management tool. A temporary part-time timetable may only be arranged where the conditions in regulation 11(6) of the 2024 Regulations are met, meaning exceptional circumstances, agreement with a parent the pupil normally lives with, agreed attendance times and dates, a defined end date and a written record. Absence under such an arrangement is coded C2.
- The school will not encourage or accept a withdrawal in order to avoid recording a permanent exclusion, and will not offer withdrawal as an alternative in terms that make it the only realistic option. Any withdrawal offered must be genuinely optional, in writing, and recorded with the reason.
- No sanction under this policy is imposed because of a protected characteristic, or because of behaviour arising in consequence of a pupil's disability where the school has not first made the reasonable adjustments it is required to make.

## 5. GROUNDS

The Head may consider suspension or permanent exclusion where there has been a serious breach, or persistent breaches, of the *Relational and Inclusive Behaviour Policy* or the Terms and Conditions, or where allowing the pupil to remain in school would seriously harm the safety, welfare or education of the pupil or of others.

Permanent exclusion will normally be reserved for:

- a single serious breach where the pupil's continued presence would present an unacceptable risk to others; or
- persistent and serious breaches where the school has exhausted the reasonable support, adjustment and intervention available to it, and this has been documented.

## 6. AUTHORITY TO DECIDE

Only the Headteacher may decide to suspend or permanently exclude a pupil. In the Headteacher's absence, only a person formally appointed to act in that role may do so. This authority may not be further delegated.

Before a decision to permanently exclude is taken, the Head must consult the Operations Director. A decision to suspend for longer than the limits in section 8 also requires the prior authorisation of the Operations Director.

Consultation does not transfer the decision. The decision remains that of the Headteacher, who must be able to demonstrate that it was their own and was properly reasoned.

## 7. INVESTIGATION AND PROCEDURAL FAIRNESS

Before any decision to suspend or permanently exclude, the Headteacher must be satisfied that a fair process has been followed. This means, as a minimum:

1. The alleged facts have been investigated proportionately by a member of staff who is not the decision maker where practicable, and written notes of interviews and evidence considered have been retained.
2. The pupil has been told, in terms they can understand and with any communication support they need, what they are said to have done, and has been given a fair opportunity to give their account before the decision is made.
3. The pupil has been offered the presence of a trusted adult or advocate during any meeting at which the allegation is put to them.
4. Parents have been informed of the allegation and given an opportunity to make representations before a decision to permanently exclude is taken, save where an immediate step is required to protect safety, in which case a precautionary absence under section 12 should be used and representations invited before the disciplinary decision.
5. The Headteacher has decided the facts on the balance of probabilities, on the evidence available, and has recorded the reasoning.
6. The Headteacher has considered the matters at section 9 (equality, SEND and vulnerability) and recorded that consideration.
7. The Headteacher has considered whether the sanction is lawful, reasonable, proportionate and consistent with how comparable cases have been treated.

Where the matter is also the subject of a police investigation or a safeguarding referral, the school will take advice before proceeding and will record the decision on timing. A police decision not to charge does not prevent the school from reaching its own conclusion on the balance of probabilities.

## 8. SUSPENSION

### 8.1 Length

A suspension must be for a specified and fixed number of school days. Open-ended or indefinite suspension is not permitted.

The Blenheim limits, which are set by the Proprietor and are not statutory, are:

- a maximum of 10 school days for any single suspension; and
- a maximum of 20 school days in total in any school year.

Any proposal to exceed either limit requires the prior written authorisation of the Operations Director and a documented review of whether the placement remains appropriate.

### 8.2 Notification

Parents must be informed on the same day, by telephone or in person, and in writing by the end of the next school day. The written notification must state:

- the behaviour that led to the decision and the evidence relied on in summary;
- the length of the suspension and the precise date and time of return;
- the arrangements for education and support during the suspension;
- the arrangements for reintegration;
- the right to make representations and to request a review under section 13, with the timescale; and
- a named contact at the school.

Where the pupil is looked after, has a social worker, has an Education, Health and Care plan, or is placed by a local authority, the school must also notify the placing authority, the allocated social worker and the Virtual School Head as applicable, without delay.

### 8.3 Attendance recording and fees

Absence during a suspension is recorded in the attendance register using code E. The pupil remains on the admission register. No deletion return is made.

The fee position during a suspension is governed by the Terms and Conditions. Fees remain payable unless those terms provide otherwise. The written notification must not state or imply anything different.

### 8.4 Education and support during suspension

The school will set and mark work that allows the pupil to keep pace with the curriculum, will make it accessible to the pupil, and will maintain contact with the pupil and family. For any suspension of more than two school days the school will confirm in writing what work has been set and how it will be reviewed.

Where the pupil is looked after, has a social worker, has an Education, Health and Care plan or is otherwise vulnerable, the school will work with the relevant professionals so that support is co-ordinated.

### 8.5 Reintegration

A reintegration meeting will normally be held on or before the day of return. It may include a restorative conversation, a review of support, an updated risk and needs assessment, trusted adult check-ins, reasonable adjustments, family liaison and targeted pastoral support. The purpose is to help the pupil feel valued, understand what happened, repair where appropriate and return to learning.

A pupil will not be prevented from returning to school solely because a parent is unable or unwilling to attend a reintegration meeting.

## 9. EQUALITY, SEND AND VULNERABILITY

Before deciding to suspend or permanently exclude, the Headteacher must consider and record:

- whether the behaviour arises in consequence of a disability, and if so whether the sanction can be justified as a proportionate means of achieving a legitimate aim under section 15 of the Equality Act 2010;
- whether the reasonable adjustments the school is required to make under section 20 have in fact been made, implemented and reviewed, and what evidence exists of this;
- whether the behaviour may be linked to unmet need, identified or emerging SEND, trauma, anxiety, communication or sensory need, a medical need, a safeguarding concern or another vulnerability;
- whether support strategies, pastoral input, restorative work, family engagement, risk and needs assessment, an individual support plan or external professional advice have been used and reviewed;
- the pupil's views, taking account of age, understanding and communication needs;
- the views of parents and of relevant professionals; and
- the impact on other pupils and staff, including their safety and welfare.

A decision that fails this consideration is not to be taken. Where the consideration identifies a gap in support, the Head must record what will be done about it, whether or not the sanction proceeds.

The school notes that a claim of disability discrimination in relation to exclusion may be brought against the Proprietor in the First-tier Tribunal (SEND).

### 9.1 Pupils with an Education, Health and Care plan

Where a local authority names the school in an Education, Health and Care plan, the school cannot bring the placement to an end by its own decision alone. The pupil remains on the admission register until the plan is amended to name another setting, the plan ceases, or the pupil is registered at another school. In those circumstances the school will:

- notify the local authority immediately and request an emergency annual review;

- set out in writing what it has done to meet the pupil's needs and why it considers the placement is no longer appropriate; and
- continue to make provision, with a risk and needs assessment and any interim arrangements agreed with the authority, until the position is resolved.

The school will not serve notice on the local authority until the early annual review has taken place and the authority has had a reasonable opportunity to identify alternative provision. Before deciding to serve notice, the Headteacher must complete and record the consideration at section 9, because a decision to end a placement for reasons connected with a pupil's disability engages section 15 of the Equality Act 2010 regardless of whether it is taken as a disciplinary sanction or as a contractual step.

Where notice is served, it is served in accordance with the contract between the school and the Local Authority. The placement ends on the date specified in the notice. On that date the pupil ceases to be a pupil at the school and their name is deleted from the admission register under regulation 9(1)(n) of the 2024 Regulations, or under regulation 9(3)(a) or (b) for a pupil below compulsory school age. The deletion is made on that date and not before, and a deletion return is made to the local authority under regulation 13(4) stating the ground relied on. Section 14 applies.

Serving notice does not amend the plan. Responsibility for amending the plan and for securing alternative provision under section 42 of the Children and Families Act 2014 rests with the local authority. Where the school does not know where the pupil will be educated after the end date, it will notify the authority in writing before that date so that children missing education procedures can be followed, and will record having done so.

Ending a placement by this route is recorded as a required removal under section 10, not as a permanent exclusion, and is reported in the data set at section 15.

Throughout this process the school will work with parents, keep them informed at each stage, and seek and record the pupil's views in a way that is appropriate to their age and understanding.

## 10. REQUIRED REMOVAL

Required removal is a contractual step, not a disciplinary sanction, and is available only where the Terms and Conditions provide for it. It must not be used to avoid recording a permanent exclusion. The grounds are:

1. The school, having taken proper advice and having considered reasonable adjustments, concludes that it cannot meet the pupil's needs. Because a conclusion that the school cannot meet a pupil's needs will frequently concern needs arising from a disability, the consideration at section 9 must be completed and recorded in full before this ground is relied on, whether or not the pupil has an Education, Health and Care plan. Where the pupil has such a plan, section 9.1 applies and the removal cannot take effect unilaterally.
2. The conduct of a parent is such that, in the reasonable opinion of the Head, it seriously harms or is likely to seriously harm the working relationship with the school, the welfare of staff or pupils, or the pupil's or other pupils' progress. Before relying on this ground, the

school will normally have issued a written warning setting out the conduct, the effect and what must change. The Head must also consider and record whether a lesser measure directed at the parent rather than the pupil would meet the concern, including restricting the parent's access to the site or to school events, a single point of contact arrangement, or a written communications protocol, and why any such measure was judged insufficient.

A required removal must be decided by the Head, notified in writing with reasons, and is subject to the same review route at section 13. The notice period and fee consequences are those in the Terms and Conditions.

The process at section 7 applies to a required removal as it applies to a permanent exclusion, adjusted so that, where the ground relied on is the conduct of a parent, the representations invited are those of the parent and the school separately records the impact of the proposed removal on the pupil.

Both grounds are applied objectively and on the evidence, and not at the unfettered discretion of the Head. The school will honour the notice period in the Terms and Conditions. This reflects the requirement under the Consumer Rights Act 2015 that a contract term relied on to bring the agreement to an end must be fair and transparent.

Required removals are recorded separately from permanent exclusions and are reported in the data set at section 15.

## 11. PERMANENT EXCLUSION

Before taking a final decision, the Head must be satisfied that the process at section 7 has been followed, that the considerations at section 9 have been recorded, and that all reasonable alternatives have been explored and documented, including additional support, reasonable adjustments, specialist advice, a change of provision within the school, or a planned transfer to another setting.

Planned transfers must be genuine, agreed in writing with the receiving setting and the family, and must not be trialled informally with the pupil remaining on the school's roll while attending elsewhere without a proper record.

Written notification to parents must state:

- that the pupil is permanently excluded and the date the decision takes effect;
- the behaviour relied on, the findings of fact and the reasons for the decision;
- the alternatives considered and why they were not adopted;
- the right to request a review under section 13, the deadline for doing so and how to do it;
- the arrangements for the return of belongings, records and references; and
- the fee and notice position under the Terms and Conditions.

The school will also notify the placing local authority, allocated social worker and Virtual School Head where applicable, and will comply with section 14.

## 12. PRECAUTIONARY ABSENCE FOR SAFEGUARDING REASONS

There are circumstances in which a pupil needs to be kept apart from the school community, or from a particular pupil, while a safeguarding concern or allegation is assessed. This is not a disciplinary sanction and must not be recorded, described or notified as a suspension.

The primary basis for this power is contractual, supported by the school's safeguarding and health and safety obligations.

Unlike a maintained school, which holds a power under section 29A of the Education Act 2002, and unlike an academy, which was placed on the same statutory footing by the Education (Educational Provision for Improving Behaviour) (Application to Academies and Pupil Referral Units and Minor Amendments) Regulations 2026, the school is not a public body and holds no statutory power to direct a pupil off site. The contractual basis for requiring non-attendance must therefore be identified from the Terms and Conditions before the step is taken and recorded on the case file.

The duty to educate the pupil during a precautionary absence remains with the school. The local authority duty under section 19 of the Education Act 1996 that operates for maintained schools and academies in these circumstances does not provide an equivalent safety net for a privately funded pupil. Fees continue to be payable in accordance with the Terms and Conditions.

Where a precautionary absence is used:

- it must be authorised by the Head, in consultation with the Designated Safeguarding Lead;
- a written risk and needs assessment must be completed by the Designated Safeguarding Lead before the step is taken, or immediately afterwards where the step cannot safely be delayed, and must address the needs of the child alleged to have been harmed, the child alleged to have caused harm, and any other child affected;
- it must be for the shortest period necessary and reviewed at least every two school days. A precautionary absence may not continue beyond five school days without the written authorisation of the Operations Director and a documented plan for resolving the position;
- the school must first consider whether the concern can be managed by adjusted arrangements on site, such as supervised movement, timetable separation or an alternative teaching space. Keeping Children Safe in Education provides that, where there is a criminal investigation into rape, assault by penetration or sexual assault, the child alleged to have caused harm should be removed from any classes shared with the child alleged to have been harmed, and that the school should consider how best to keep them a reasonable distance apart on the premises. The school will consider these measures before requiring non-attendance;
- the school must make arrangements for the pupil’s education during the absence;
- parents must be told in writing that this is a precautionary and non-disciplinary step, what is being assessed, and when it will be reviewed.

Where the concern involves an allegation against a member of staff, the Safeguarding Policy and the LADO (or local equivalent) referral process apply. Where it involves child-on-child abuse, the school will safeguard and support both the pupil who is alleged to have been harmed and the pupil who is alleged to have caused harm and will keep those duties separate from the disciplinary process.

## 13. REVIEW OF A DECISION

A parent may request a review of a suspension, a permanent exclusion or a required removal. Decisions under this policy are dealt with under this section and not under the School's Complaints Procedure. Complaints about the manner in which the process was handled, as distinct from the decision itself, are dealt with under the Complaints Procedure.

| Stage | What happens | Timescale |
|---|---|---|
| Request | Parents write to the Head or the Proprietor's nominated contact, stating the grounds on which the decision is challenged | Within 10 school days of the written notification |
| Acknowledgement | The Proprietor acknowledges the request, confirms the panel arrangements and provides the evidence pack the panel will consider | Within 5 school days of the request |
| Panel hearing | A Review Panel of at least three people considers the decision. None has been directly involved in the matters complained of, and at least one is independent of the management and running of the School. Parents may attend and may be accompanied. The pupil may attend or make representations, with support, where age appropriate | Within 15 school days of the request wherever practicable |
| Outcome | The panel may uphold the decision, or direct that it be reconsidered, or direct reinstatement. Written reasons are given to parents and to the Head | Within 5 school days of the hearing |

The panel's decision is the final stage of the school's internal process. A permanent exclusion or required removal does not take effect until the review period has expired without a request, or the review has been determined or withdrawn, unless the Headteacher has determined in writing that the risk to others requires immediate effect. Where immediate effect is applied, a precautionary absence under section 12 runs in the meantime and the review still proceeds.

A written record of the panel hearing, the evidence considered, the decision and the reasons is retained under section 16.

## 14. REGISTRATION, ROLL AND NOTIFICATION DUTIES

These duties are statutory. Failure to comply with the 2024 Regulations is a criminal offence under section 434(6) of the Education Act 1996 and is treated by inspectors as a safeguarding failure.

| Requirement | What the School must do |
|---|---|
| Grounds for deletion | A pupil's name may only be deleted from the admission register on a ground in regulation 9. The relevant grounds are regulation 9(1)(o) (permanently excluded, compulsory school age), regulation 9(3)(e) (permanently excluded, below compulsory school age) and regulation 9(1)(n) (ceased to be a pupil at a school that is not maintained and not an academy), which covers required removal and withdrawal |
| Timing | The deletion is made when the ground arises, and not before. A name cannot be deleted retrospectively. Where a review under section 13 is pending and the decision has not taken effect, the pupil remains on roll |
| Deletion return | A return must be made to the local authority under regulation 13(4) whenever a name is deleted, giving the prescribed information and stating which regulation 9 ground was the basis. This applies to independent schools |
| Attendance coding | Suspension is coded E. An agreed temporary part-time timetable is coded C2. The code to be used for a precautionary absence under section 12 is code E, which in Table 3 of the 2024 Regulations covers a pupil excluded from the school for any reason and is not limited to disciplinary exclusion, or code Y7, unable to attend because of any other unavoidable cause, where regulation 10(6) requires the nature of the cause also to be recorded]. Whichever code is adopted must be applied consistently across all Blenheim schools, and the reasoning must be recorded in a file note held by the Operations Director. Use of code E does not convert a precautionary absence into a disciplinary sanction |
| Registers | Registers are kept electronically, backed up at least monthly, and every amendment records the original entry, the amended entry, the reason, the date and the person making it |
| Retention | Every register entry is preserved for six years from the day it was made |
| Children missing education | Where the School does not know the pupil's destination, it will notify the local authority so that children missing education procedures can be followed |

| Requirement | What the School must do |
|---|---|
| Information to a receiving setting | The school will share the pupil's educational and safeguarding records with the receiving setting promptly, in line with Keeping Children Safe in Education |

## 15. RECORDING, MONITORING AND GOVERNANCE

The school keeps a record of the sanctions imposed for serious misbehaviour, as required by paragraph 9(c) of the Independent School Standards. For each case under this policy the record includes the decision, the behaviour relied on, the findings of fact, the evidence considered, the support offered and the reasonable adjustments made, the pupil and parent voice, professional advice obtained, the equality and SEND consideration at section 9, the notifications made, and the reintegration or transfer arrangements.

The school maintains and reports termly to the Proprietor a data set covering:

- suspensions, by number, length and reason;
- permanent exclusions and required removals, separately identified, with reasons;
- any pupil taken off roll and the reason, with the regulation 9 ground relied on;
- precautionary absences and their duration;
- use of internal isolation;
- use of alternative provision and any pupil on a planned transfer;
- incidents of bullying, harassment and discriminatory or prejudiced behaviour; and
- recorded incidents of restrictive intervention, cross-referenced to the Restrictive Interventions Policy and paragraphs 16A and 32A of the Standards.

This is the data set that ISI and Ofsted request. Leaders analyse it for patterns, including in relation to SEND, disability, age, sex, ethnicity, looked-after status and social worker involvement. That analysis is carried out on an aggregated and anonymised basis. Where disproportionality or a pattern is identified, leaders review practice, including whether reasonable adjustments and support arrangements are effective, and take recorded action.

## 16. RECORDS, RETENTION AND DATA PROTECTION

Records created under this policy are processed in accordance with the school's Privacy Notice and Records Retention Schedule. Data relating to SEND, disability, health, ethnicity and safeguarding is special category data and is processed only where a lawful basis and an Article 9 condition apply.

Register entries are retained for six years. Case files relating to suspension, permanent exclusion and required removal are retained in line with the Records Retention Schedule, and safeguarding records in line with the Safeguarding Policy.

Parents and, where appropriate, pupils may make a subject access request. Requests are handled under the school's data protection arrangements, including the requirement to

acknowledge data protection complaints to investigate without undue delay and to communicate the outcome promptly in accordance with the School's Data Protection Policy and applicable data protection legislation.

## 17. STAFF TRAINING AND IMPLEMENTATION

The Head and all staff with a role in investigation, decision making or record keeping under this policy receive training on it at induction and at least annually. Training covers the distinction between suspension, permanent exclusion, required removal and precautionary absence, procedural fairness, the equality and SEND considerations at section 9, and the registration duties at section 14.

The Operations Director will sample cases across the Blenheim portfolio at least annually to test that the policy is applied consistently and that records support the decisions taken.

## 18. POLICY REVIEW

This policy is reviewed annually, and sooner where there is a change to legislation, statutory or non-statutory guidance, the Terms and Conditions, the school context or Group policy. The review considers learning from cases, pupil and parent voice, staff feedback, safeguarding themes and equality monitoring.

## Annex A: Decision checklist

To be completed and retained on the case file for every suspension, permanent exclusion or required removal.

| # | Check | Done |
|---|---|---|
| 1 | Allegation investigated proportionately; notes and evidence retained | |
| 2 | Pupil told the allegation, with communication support, and given a fair chance to respond | |
| 3 | Pupil offered a trusted adult or advocate | |
| 4 | Parents informed and, for permanent exclusion or required removal, invited to make representations | |
| 5 | Facts decided on the balance of probabilities; reasoning recorded | |
| 6 | Section 9 equality, SEND and vulnerability consideration completed and recorded | |
| 7 | Reasonable adjustments evidenced as made, implemented and reviewed | |
| 8 | Alternatives to the sanction considered and recorded | |
| 9 | Sanction checked as proportionate and consistent with comparable cases | |
| 10 | Operations Director consulted (permanent exclusion, required removal, or suspension beyond the limits) | |
| 11 | Written notification issued with all required content, including review rights and deadline | |
| 12 | Placing authority, social worker and Virtual School Head notified where applicable | |
| 13 | Attendance coded correctly (E, C2 or other as applicable) | |
| 14 | Deletion from roll made on a regulation 9 ground, and only when the ground arose | |
| 15 | Regulation 13(4) deletion return made to the local authority, stating the ground | |
| 16 | Records placed on file and entered in the termly data set | |
| 17 | Reintegration or transfer arrangements confirmed in writing | |

Completed by: _____ Role: _____

Date: _____

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Suspension & Permanent Exclusion Policy

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Operations Director

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