



Safeguarding Welfare Data Parents

Pass 11 Plus Grammar · PASS my GCSEs

Online & In-Person Tuition · Edgbaston, Birmingham

Our children, our future, our responsibility.

Policies & Procedures 2026–27

How we keep every child safe, supported and learning — in our Edgbaston classrooms and in our live online classes.

20 policies

Reviewed every September

SAFEGUARDING

BEHAVIOUR

DATA & AI

FEES & COMPLAINTS

Year 3

to A-Level, all taught
to the same
standards

2 ways

to learn: in person
and live online

20

published policies

**Sept
2027**

next full review

Our commitment

Our children, our future, our responsibility.

For around thirty years, Pass 11 Plus Grammar has helped children across the West Midlands prepare for grammar school entry, and PASS my GCSEs now carries that same care through to GCSE and A-Level. Families trust us with their children's time, ambitions and wellbeing. These policies set out how we honour that trust.



They cover how we keep children safe, how we expect everyone to behave, how we support students with additional needs, how we look after personal information, how we deal fairly with bookings, fees and complaints, and the standards we hold our own team to. Each policy opens with a short summary and the one rule that matters most, followed by the detail and, where it helps, a flowchart.

All policies are reviewed every September, or sooner if the law or guidance changes. Enrolled families also sign our Enrolment Terms and Conditions, which set out the agreement between us; where that document and these policies differ, the Enrolment Terms and Conditions apply, except on personal data, where Policy 12 applies.

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In the classroom and online

The same standards, wherever your child learns

We teach in person at our Edgbaston centre and live online, often at the same time. **Every policy in this document applies to both.** Where a rule works differently online, the policy says so – mainly in Safeguarding and Child Protection (sections 6 and 7), Behaviour and Conduct, the Classroom Code, Mobile Phones, and Attendance.

Safeguarding across every part of the centre

Safeguarding isn't one person's job or one room's rule. It runs through every service and every space where we work with a child:



Arrival and collection

Every student signs in and out. Children in Year 6 and below are released only to an adult the family has named.



Classrooms

Specialists never leave a class unsupervised; clear rules displayed in every room.



Online classes

Centre-managed Zoom, waiting room and passcode; a parent at home; no private contact.



One-to-one lessons

Agreed with parents in advance, visible or logged, never arranged privately.



Mock exams and events

Registers, supervision and phone rules apply wherever the event is held.



Resources and publications

Age-appropriate content, checked by a specialist before any child sees it.



Website, social media and marketing

Children's photos, names or results only with written consent.



Enrolment and records

Only the information we need, kept securely, seen only by those who need it.



Staff, specialists and volunteers

Enhanced DBS checks, references, safeguarding training and a written code of conduct.



Visitors and contractors

Signed in, escorted, and never left alone with students.

Key contacts

Who to speak to

If you are worried about a child's safety, contact the Designated Safeguarding Lead the same day. If a child is in immediate danger, call 999.

Role	Name	Contact them about
Director	Jag Singh	Overall responsibility for the centre and its policies; formal complaints
Designated Safeguarding Lead	Deepak Singh	The first person to contact with any concern about a child
Deputy Designated Safeguarding Lead	Leandro Shaun L. Lumanog	Covers safeguarding whenever the DSL is unavailable
Data Protection Lead	Deepak Singh	Data requests, privacy and consent
Office team	Hannah Leigh Balino · Alleya Taylaran	Enrolment, attendance, collection and general enquiries
Independent Safeguarding Adviser (external)	Queene Durdas	Independent of the centre; receives any concern or complaint about the Director
Health and Safety: First Aider, Fire Marshal, Premises and Safety Lead	Jag Singh	First aid, fire evacuation and premises safety
Deputy Fire Marshal and Deputy Premises and Safety Lead	Leona Ka Yee	Covers fire and premises safety when the Fire Marshal is not on site

Visit or write to us: 208 Beech House, 1a Greenfield Crescent, Edgbaston, Birmingham B15 3BE ·
info@pass11plusgrammar.com · 0121 740 1008 · 07871 008108 · pass11plusgrammar.co.uk · passgcse.uk

01

SAFEGUARDING

Safeguarding and Child Protection Policy

How every concern about a child is recognised, recorded and acted on – in the centre and online.



POLICY OWNER

Designated Safeguarding Lead

APPLIES TO

All staff, specialists (employed and self-employed), volunteers, office staff

THE ONE RULE TO REMEMBER

Any concern about a child goes to the DSL the same day. Never promise a child secrecy.

1. Purpose and standard adopted

We teach children from Year 3 to A-Level, in person at the Edgbaston centre and live on Zoom. We are a private out-of-school provider, so the statutory duties placed on schools do not apply to us. We nonetheless adopt the standards of *Keeping Children Safe in Education* voluntarily, and we follow the Department for Education's non-statutory guidance *Keeping children safe in out-of-school settings*. Every adult who works with our students has a duty to keep them safe.

2. Key people

Role	What they do
Designated Safeguarding Lead (DSL)	Receives every concern; decides on referral; keeps safeguarding records separately and securely; trains staff.
Deputy DSL	Covers all DSL duties when the DSL is absent or the concern involves the DSL.
Director	Handles allegations against staff and specialists; leads safer recruitment.
Independent Safeguarding Adviser	External. Receives any concern about the Director.

3. Recognising a concern

Staff watch for changes in behaviour or appearance, unexplained injuries, a child seeming frightened of going home or of being collected, signs of neglect (hunger, poor hygiene, tiredness), inappropriate knowledge or language, and anything a child tells us directly. Online, staff also watch what is visible in a child's background, who else is in the room, and any messages a child sends privately.

We stay alert to specific forms of harm as well as general welfare, including:

Harm from adults

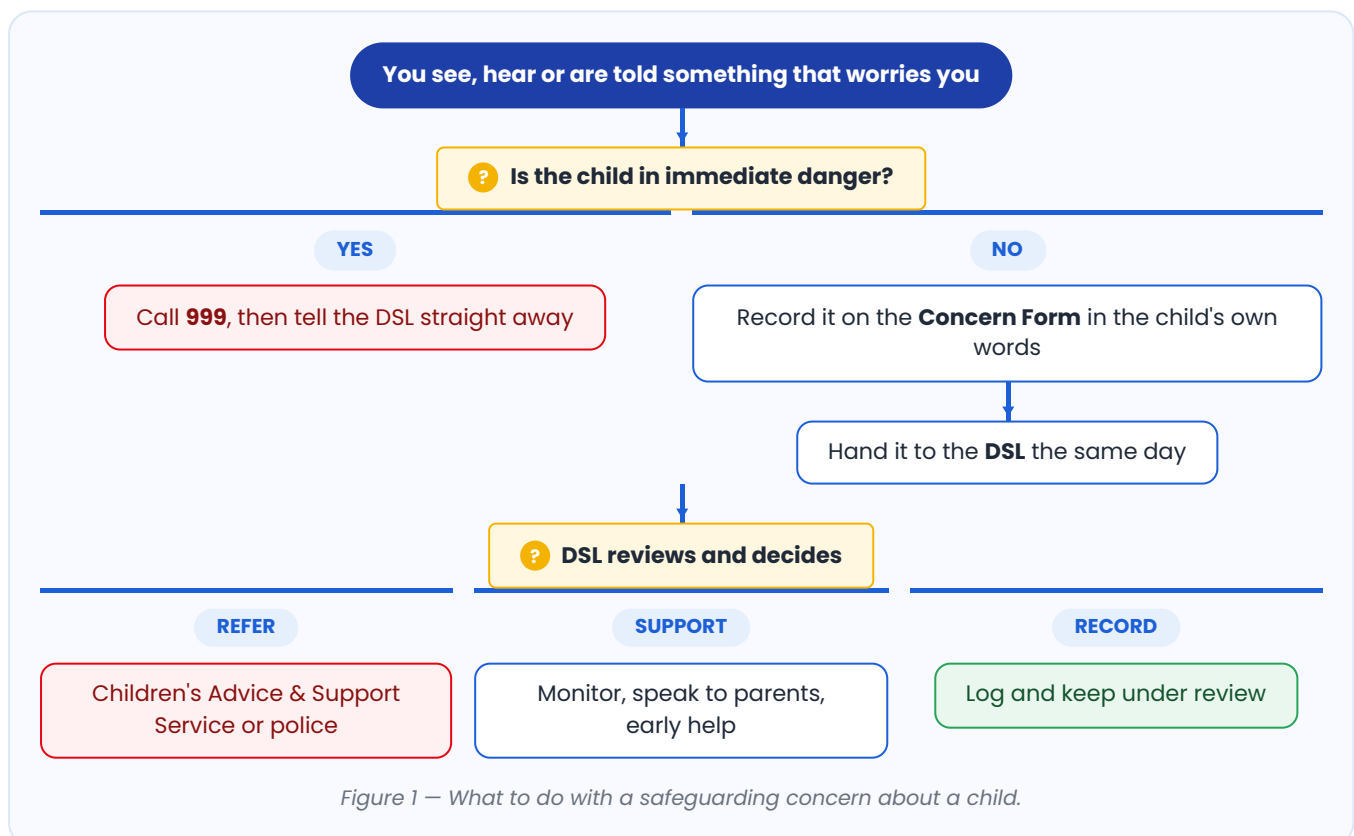
- Physical, emotional or sexual abuse, and neglect
- Domestic abuse witnessed or experienced at home
- Grooming, online or in person
- Exploitation, including criminal exploitation and county lines
- Radicalisation and extremism
- So-called honour-based abuse, forced marriage and female genital mutilation

Harm between children

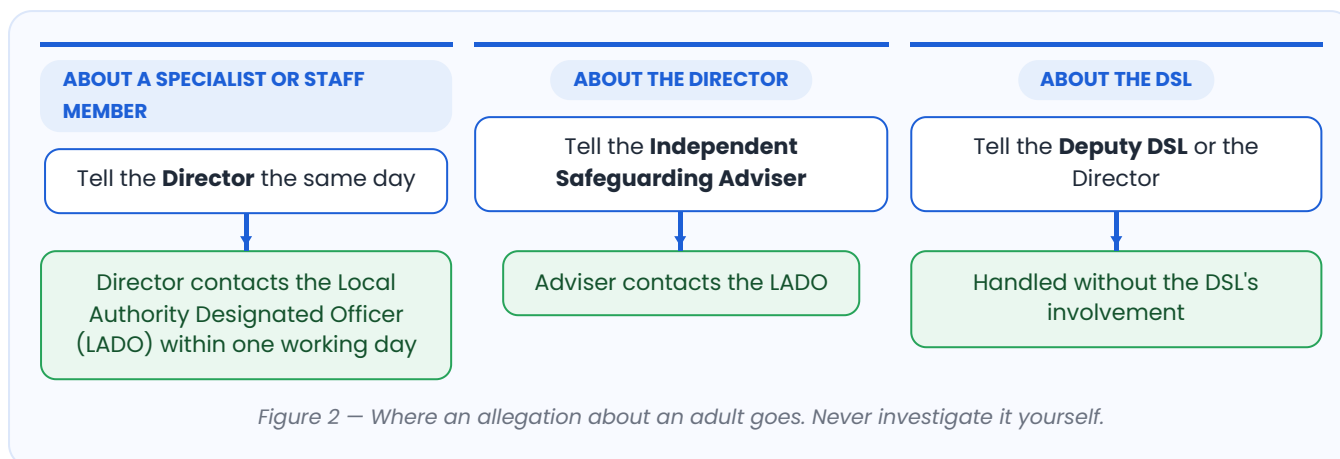
- Bullying, including online bullying (Policy 6)
- Physical abuse such as hitting, kicking or restraining
- Sexual harassment, sexualised language and unwanted touching
- Sharing nude or semi-nude images
- Initiation or hazing, and humiliation
- We never dismiss child-on-child abuse as banter or part of growing up

4. If a child tells you something

- Stay calm, listen, and let the child talk. Don't ask leading questions.
- Tell them you will need to share it with the person whose job is to help keep them safe. Never promise to keep it secret.
- Write down what was said in the child's own words, with the date, time and your signature, on the Safeguarding Concern Form.
- Pass it to the DSL the same day. If the child is in immediate danger, call 999 first.



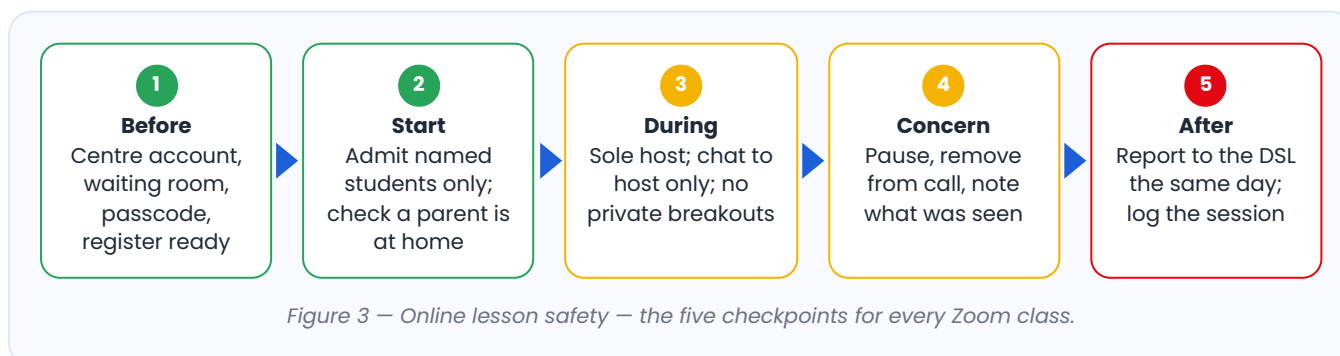
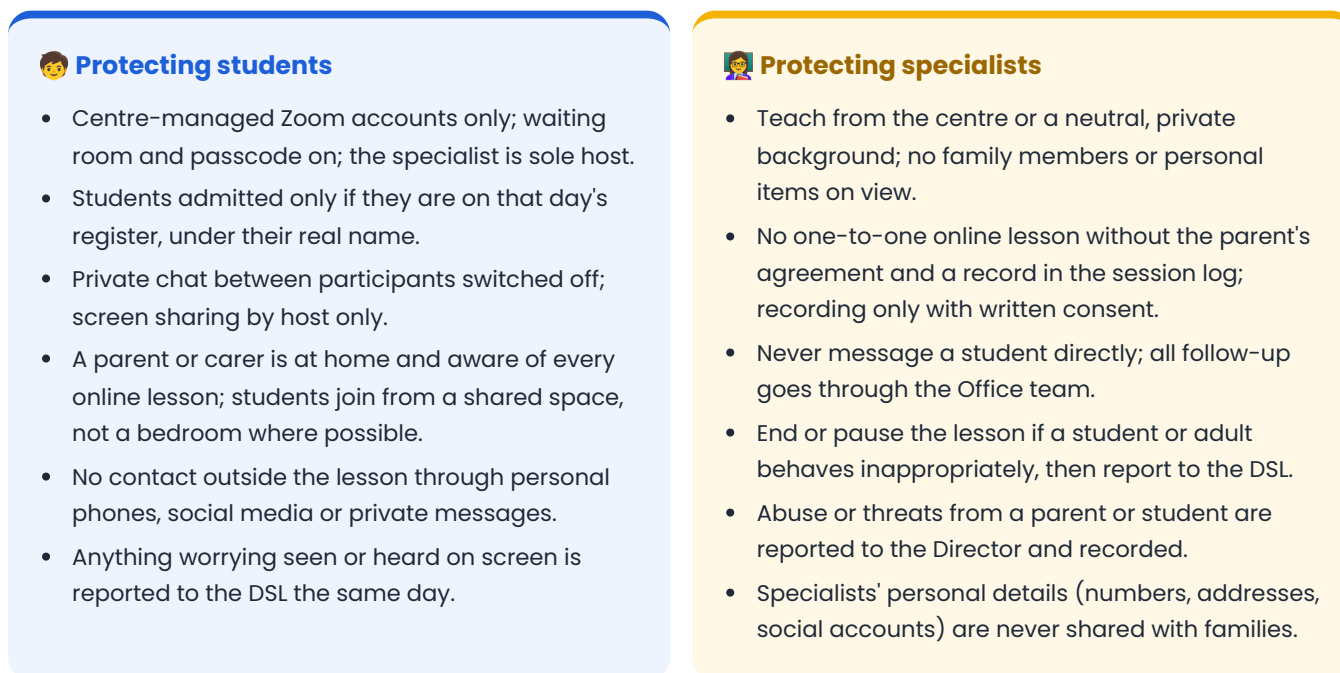
5. Concerns about an adult



Not every worry about an adult meets that threshold. Concerns that fall below it – a specialist whose manner with a child feels wrong, a rule bent, something that simply does not sit right – are still reported, to the DSL, and are handled under Policy 20.

6. Online lessons – protecting students and specialists

Online and in-person classes run at the same time. Online safeguarding protects the child from harm, and protects the specialist (the tutor teaching the class) from risk, misunderstanding and false allegation.



7. When online and in-person classes run at the same time

- Each class has its own named specialist; one person never supervises both a room and a Zoom call unsupervised.
- Where a lesson is streamed from the classroom, the camera faces the board, not the in-room students, unless photo consent is on file.
- The DSL or Deputy DSL is reachable by phone throughout every session, in person or online.
- Registers for both groups are completed within the first 10 minutes.

8. Safer recruitment

Everyone in regular contact with students holds an enhanced DBS with barred-list check before starting. For self-employed specialists the centre applies for the check on their behalf. References, identity and right-to-work are checked, and a single central record is kept by the Director. Conduct expected of everyone who works with our students is set out in Policy 20.

9. Contacts

Service	Contact
Birmingham Children's Advice & Support Service (CASS)	0121 303 1888 (Mon–Thu 8.45am–5.15pm, Fri 8.45am–4.15pm) CASS@birminghamchildrenstrust.co.uk
Out of hours – Emergency Duty Team	0121 675 4806
Birmingham LADO (allegations against adults)	Through Birmingham Children's Trust, within one working day
Police – emergency / non-emergency	999 / 101
NSPCC helpline for adults	0808 800 5000

02

SAFEGUARDING

Whistleblowing Policy

How staff and specialists raise a concern about wrongdoing, safely and without fear of reprisal.



POLICY OWNER

Director

APPLIES TO

Employees, self-employed specialists, volunteers, contractors

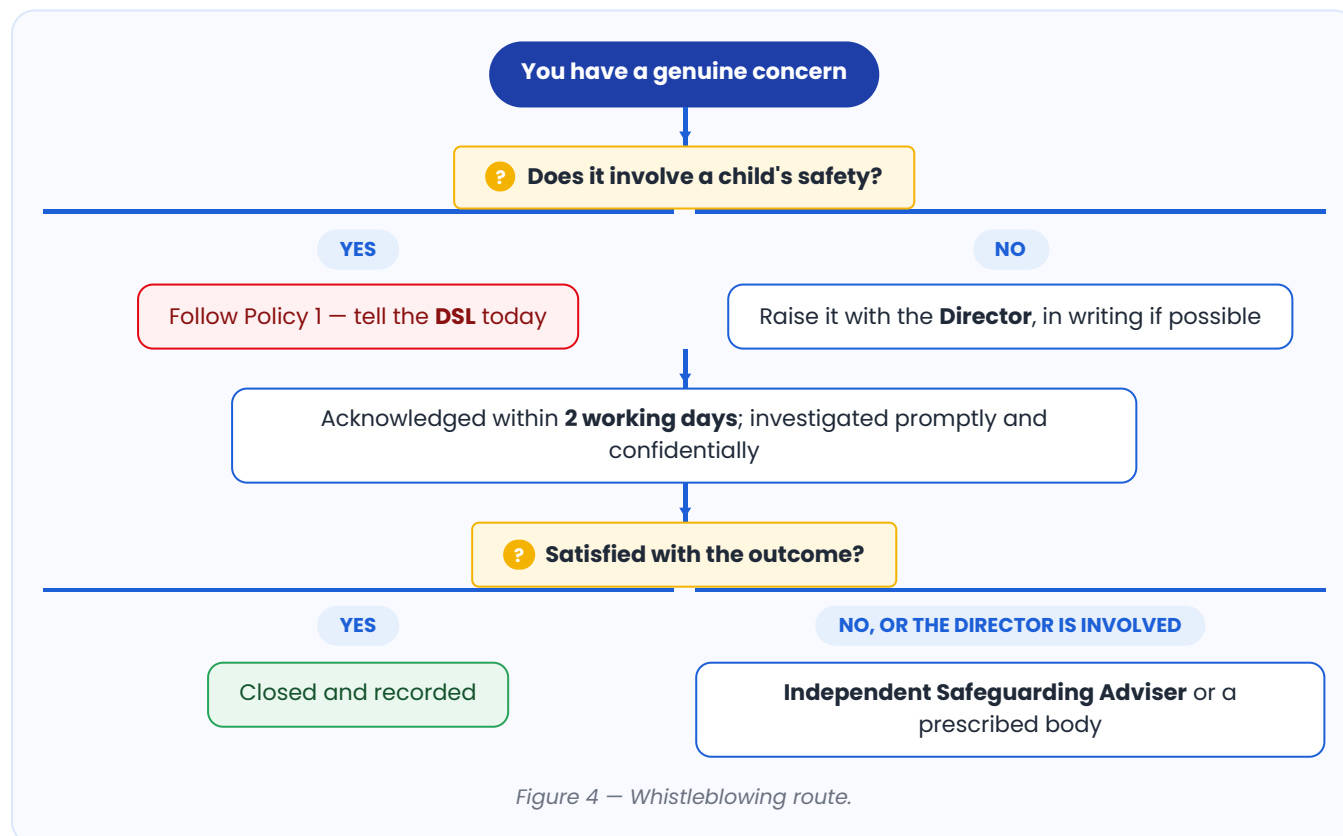
THE ONE RULE TO REMEMBER

Speak up early. You need a reasonable belief, not proof.

1. What counts

A concern made in the public interest that there has been, or is likely to be: a criminal offence; a breach of a legal duty; a danger to anyone's health or safety; sexual harassment; damage to the environment; a miscarriage of justice; or a cover-up of any of these. At our centre this includes fraud or misuse of fees, falsifying registers or results, unsafe premises, and any breach of our safeguarding or data protection rules. Personal grievances about your own pay or contract are not whistleblowing and go through your contract or terms of engagement.

2. How to raise it



3. External prescribed bodies

Nature of concern	Where to go
Child protection	Birmingham LADO; NSPCC Whistleblowing Advice Line 0800 028 0285
Data protection	Information Commissioner's Office (ico.org.uk)
Health and safety	Health and Safety Executive (hse.gov.uk)
Fraud or financial wrongdoing	Action Fraud or HMRC, as appropriate

4. Protection

No one will be dismissed, lose work, or be treated less favourably for raising a genuine concern. Victimising a whistleblower is a disciplinary matter. Knowingly false or malicious allegations will also be treated seriously. Advice is available from the charity Protect (protect-advice.org.uk).

03

HEALTH, SAFETY & PREMISES

Health and Safety Policy

Keeping everyone safe and well at our centre, in mock exam venues and during online lessons.



POLICY OWNER

Director

APPLIES TO

Everyone at the centre: students, parents, staff, specialists, visitors and contractors

THE ONE RULE TO REMEMBER

If you see a hazard, report it straight away, and make it safe if you can do so without risk.

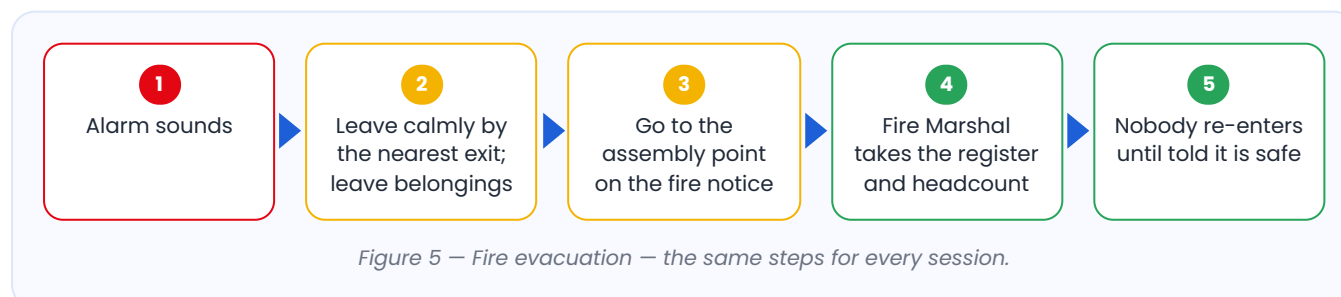
1. Our commitment

We provide a safe and healthy environment for everyone who learns, works or visits here, in line with the Health and Safety at Work etc. Act 1974, the Management of Health and Safety at Work Regulations 1999, the Regulatory Reform (Fire Safety) Order 2005 and RIDDOR 2013. This policy is reviewed every September.

2. Responsibilities

Role	Responsibilities
Director	Overall responsibility; makes sure resources, training and insurance are in place
Premises and Safety Lead	Monthly safety checks, hazard log, risk assessments, electrical checks; takes unsafe equipment out of use
First Aider	On site for every in-person session; treats injuries; records accidents; keeps first aid kits stocked
Fire Marshal and Deputy	Lead evacuations, take the register to the assembly point, run fire drills
Specialists and staff	Supervise students, follow safe practice, report hazards and incidents the same day
Students and parents	Follow instructions, use equipment properly, and tell us about health needs

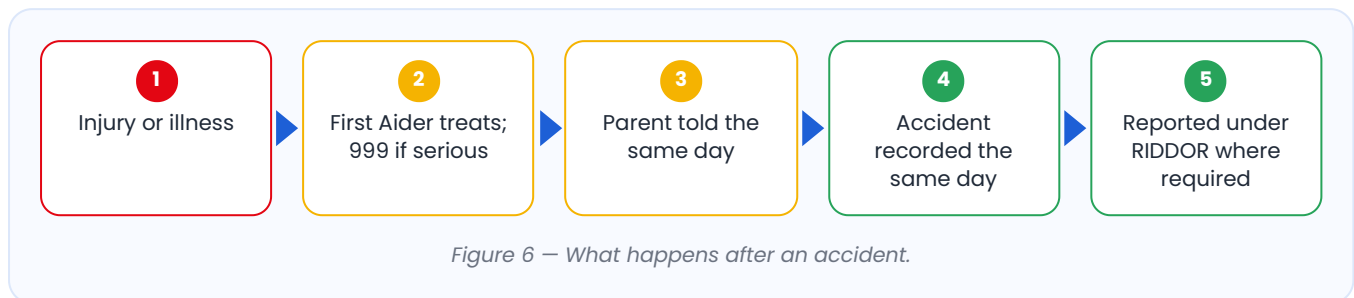
3. Fire safety



- Fire exits and walkways are kept clear at all times; fire notices are displayed in every room.

- A fire drill is held at least once a year and recorded.
- Students with mobility needs have a Personal Emergency Evacuation Plan (Policy 10).

4. First aid and accidents



5. Medical needs, medication and illness

- Tell us about any medical condition or allergy at enrolment, and whenever it changes. We need this to keep your child safe, and we handle it under Policy 12.
- Emergency medication, such as inhalers or adrenaline auto-injectors, must be clearly labelled and brought to every session. We do not give any other medicine without written agreement.
- Please keep your child at home if they are unwell or infectious, in line with NHS guidance. They may be able to join online if well enough.
- If a child becomes unwell during a lesson, we contact the parent to collect them.

6. Premises and equipment

- Monthly safety checks and a hazard and near-miss log.
- Electrical equipment is checked regularly; faulty equipment is taken out of use immediately.
- Written risk assessments for the centre, mock exam venues and any off-site activity.
- Visitors and contractors sign in and are escorted; they are never left alone with students.

7. Online lessons

For online lessons, parents are responsible for a safe space at home, and an adult must be at home for the whole lesson. We build in screen breaks and encourage good posture.

04

HEALTH, SAFETY & PREMISES

CCTV Policy

How and why we use CCTV, and how we protect the images we record.

**POLICY OWNER****Director, with the Data Protection Lead****APPLIES TO****Everyone at the centre: students, parents, staff, specialists and visitors****THE ONE RULE TO REMEMBER****CCTV is there to keep people safe. It is never used where privacy is expected.**

1. Why we use CCTV

- To keep students, staff and visitors safe, and to support our safeguarding duties.
- To prevent and detect crime, and protect our premises and equipment.
- To help investigate incidents, accidents and complaints fairly.

We use CCTV under legitimate interests, in line with UK GDPR, the Data Protection Act 2018 and the Information Commissioner's guidance. A risk assessment was completed before cameras were installed and is reviewed every year.

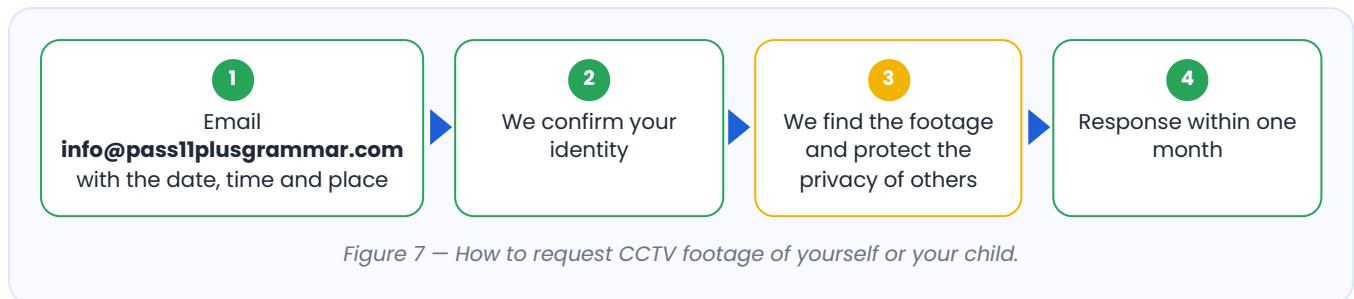
2. Where cameras are and what they record

- Cameras cover the entrance, reception, corridors and teaching rooms.
- There are never cameras in toilets or anywhere people would expect privacy.
- Signs at the entrance show that CCTV is in use and who to contact.
- CCTV records images only; audio recording is not used.
- CCTV is not used in online lessons, and is never used covertly.

3. Storage, access and sharing

- Recordings are stored securely and automatically overwritten after up to 30 days, unless needed for an incident or investigation.
- Only the Director, the Designated Safeguarding Lead and the Data Protection Lead may view recordings, and every viewing is logged.
- Footage is shared only with the police or other authorities when lawfully requested, or where needed to protect a child. It is never posted publicly or on social media.

4. Requesting footage



Please ask promptly, as recordings are normally overwritten after 30 days. Complaints about our use of CCTV are handled under our Complaints Policy (Policy 18), and you can also contact the Information Commissioner's Office.

05

STUDENT WELFARE & BEHAVIOUR

Behaviour and Conduct Policy

High expectations, applied calmly and consistently — in the classroom and on Zoom.



POLICY OWNER

Director

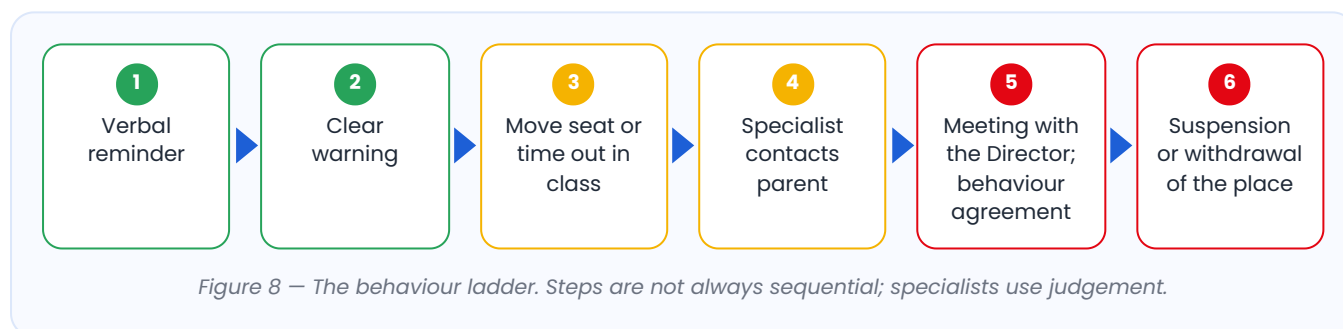
APPLIES TO

All students, in person and online

THE ONE RULE TO REMEMBER

Every step is recorded. Serious incidents go straight to the Director.**1. What we expect**

Students arrive on time and prepared, listen when others are speaking, try their best, and treat everyone with respect. The Classroom Code (Policy 7) sets out the day-to-day rules. Good work and effort are recognised through praise, merit stickers, certificates and positive messages home.

2. Stepped response

Straight to the Director: violence or threats; bullying or discriminatory language; damage to property; leaving the centre without permission; recording or photographing others; inappropriate behaviour online (e.g. sharing Zoom links, offensive chat).

3. Respect for our staff

We expect every student **and every parent** to treat our specialists and Office team with respect and courtesy at all times — at the centre, online, by phone, email or message. Abusive, threatening or discriminatory behaviour towards staff is not tolerated and may lead to the family's place being withdrawn.

4. Care of equipment and property

Students look after all equipment and property belonging to or used by the centre, in person and online. Where damage is caused deliberately or carelessly, the cost of repair or replacement is the responsibility of the student's parent or guardian.

5. Online behaviour

Students join with their real name, keep cameras on and microphones muted unless asked, and use the chat only for the lesson. A specialist may move a student to the waiting room if behaviour disrupts the class, and will tell the parent the same day.

6. Withdrawal of a place

A place may be withdrawn for repeated disruptive behaviour, persistent failure to complete homework (Policy 7), or failure to follow our safeguarding and conduct policies. It is a last resort, decided by the Director after a meeting with the parent. The fee position follows the Fees, Payments and Cancellations Policy (Policy 16). Where behaviour may indicate a safeguarding concern, the DSL is informed before any sanction is applied.

7. Physical intervention

Staff never use physical force except the minimum necessary to prevent a child harming themselves or others. Any such incident is recorded and reported to parents and the Director the same day.

06

STUDENT WELFARE & BEHAVIOUR

Anti-Bullying Policy

Bullying is never acceptable here — in class, online, or in group chats connected to the centre.



POLICY OWNER

Director (with DSL where there is harm)

APPLIES TO

All students

THE ONE RULE TO REMEMBER

Take every report seriously, and tell parents of both children.

1. Definition

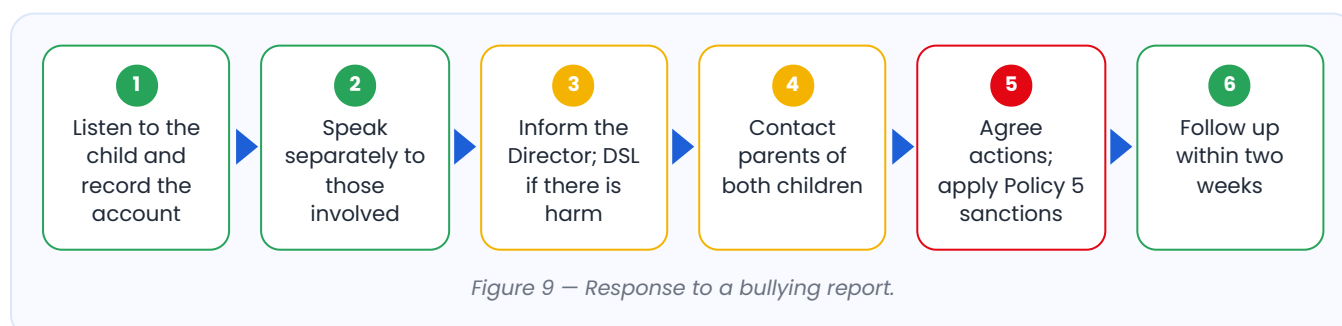
Bullying is deliberately hurtful behaviour, repeated over time, that leaves the target feeling frightened, powerless or isolated. It can be physical, verbal, social (exclusion, rumours) or online, and includes prejudice-based bullying linked to race, religion, disability, sex, sexual orientation or gender identity. Bullying is one form of child-on-child abuse; the wider forms are listed in Policy 1.

A fall-out	Bullying
Happens occasionally, between equals	Repeated, with an imbalance of power
Both sides upset; usually resolved	One side targeted and hurt
Handled by the specialist	Recorded and escalated to the Director

2. Where it applies

At the centre, on Zoom, in any mock exam venue, and online wherever it involves our students and affects their time with us. We do not run or endorse student WhatsApp groups; centre communication goes through official channels only.

3. How we respond



07

STUDENT WELFARE & BEHAVIOUR

Classroom Code

Four expectations for every lesson, with separate rules for the classroom and for Zoom.



POLICY OWNER

Director

APPLIES TO

All students and specialists

THE ONE RULE TO REMEMBER

Punctual, prepared, listening, respectful – in the room and on screen.**Punctual**

Arrive before the start time. On Zoom, join five minutes early.

Prepared

Bring the right stationery and your completed homework to every lesson.

Listening

When the specialist or a classmate is speaking to the class, everyone else is quiet.

Respectful

Treat everyone's ideas, belongings and time with respect.

**In-person classroom rules**

1. Sign in at the office on arrival, and sign out when you leave; wait inside until collected.
2. Sit in your allocated seat; bags under the desk, walkways clear.
3. Phones switched off and handed in or kept in bags (Policy 8).
4. Hand up to speak or ask a question.
5. Water at your desk; food only at agreed breaks.
6. Ask before leaving the room; never leave the building without staff agreement.
7. Look after resources and furniture; leave your desk tidy.
8. Know the fire exit and assembly point.

**Online classroom rules**

1. Join from the link sent by the centre only, under your real first name and surname.
2. Camera on and face visible for the whole lesson; microphone muted unless asked.
3. Sit at a table in a quiet, shared space, not a bedroom where possible; an adult at home.
4. Use "raise hand" or the chat to the specialist; chat is for the lesson only.
5. No other apps, games or tabs open during the lesson.
6. Never share the meeting link or passcode.
7. No screenshots, photos or recordings of the lesson, specialist or classmates.
8. Book, pencil and paper ready; if you lose connection, rejoin straight away.

**What to bring to every lesson**

- Pen and pencil
- Ruler and rubber
- Calculator (Maths, Science and 11+ sessions)
- Dictionary (English and 11+ sessions)
- Lined paper and an A4 ring binder
- A bottle of water

**Homework**

- Homework, including work uploaded for online classes, is part of the course and must be completed on time.
- Specialists mark it and use it to plan each child's next steps.
- If homework is repeatedly missed, we contact the parent. Continued non-completion may lead to a review of the place and, if necessary, suspension (Policy 5).

Rules for specialists

In person	Online
Take the register in the first 10 minutes	Admit only students on the register; take it in the first 10 minutes
Keep the door visible or ajar when with one student	Sole host; waiting room and passcode on; chat to host only
Never leave the class unsupervised	Never leave the call open unattended; end the meeting for all
Report concerns to the DSL the same day	Report anything seen or heard on screen to the DSL the same day

In mock exams (both modes) – see also Policy 17

- Silence from the moment papers are handed out; no talking until all papers are collected.
- Online mocks: camera shows the student and desk; no other devices within reach.

08

STUDENT WELFARE & BEHAVIOUR

Mobile Phones and Devices Policy

Phones stay away in lessons; parents contact the centre, not the child.



POLICY OWNER

Director

APPLIES TO

All students; staff when teaching

THE ONE RULE TO REMEMBER

Phones off and out of sight. No photos or recordings of anyone.

- Students may bring a phone for travel safety, but it is switched off and kept in a bag or handed in at the start of the session. The centre is not liable for loss or damage.
- In mock exams, phones and smartwatches are handed in before papers are given out.
- No student may photograph, film or record anyone at the centre or on Zoom.
- If a parent needs to reach their child during a session, they call the centre office; the Office team passes on the message.
- A student who is unwell tells the specialist; staff contact home, not the student.
- Specialists do not use personal phones to photograph students or contact them.
- A phone used against these rules is held by staff until the end of the session and the parent is told.

09

STUDENT WELFARE & BEHAVIOUR

SEND and Inclusion Policy

Every child with additional needs is known, supported and able to show what they can do.



POLICY OWNER

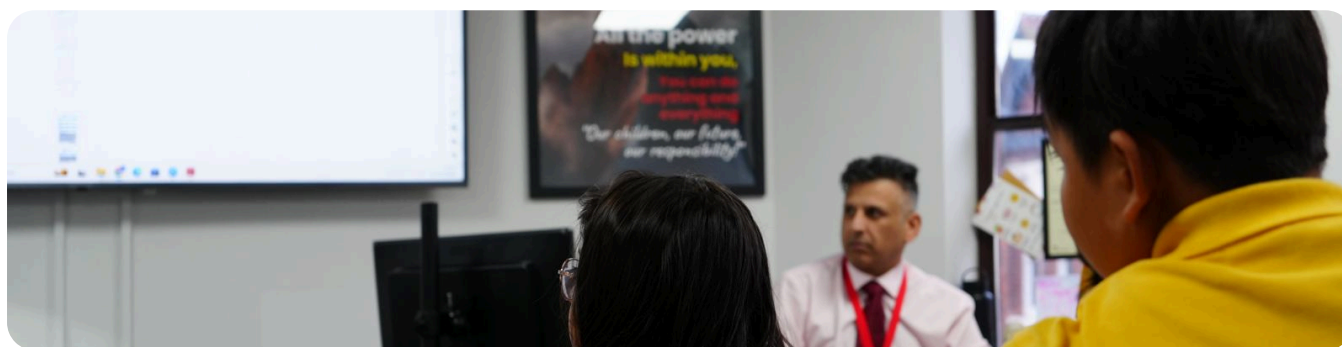
Director, with the Office team

APPLIES TO

Students with special educational needs or disabilities

THE ONE RULE TO REMEMBER

Ask at enrolment, record the adjustment, tell the specialist before the first lesson.

**1. Our approach**

We are a tuition centre, not a school, so we do not assess or diagnose special educational needs and we do not hold statutory duties under the SEND Code of Practice. We do make reasonable adjustments under the Equality Act 2010 so that students with needs such as dyslexia, ADHD, autism, anxiety, or a sensory or physical impairment can learn well with us.

2. The pathway

Figure 10 — Support pathway for a student with additional needs.

3. Adjustments we commonly make

- Seating near the front, away from distractions; movement breaks.
- Enlarged or coloured-paper resources; clear, uncluttered worksheets.
- Extra time or rest breaks in mock exams, mirroring any access arrangements the child will have in the real exam.
- Advance notice of changes to routine; a quiet space if overwhelmed.

If a specialist notices signs that might suggest an unidentified need, they share observations with the parent through the Office team and suggest the parent speaks to the child's school or GP. Specialists never offer a diagnosis.

10

STUDENT WELFARE & BEHAVIOUR

Accessibility Policy

Making the centre, our lessons and our information accessible to disabled students and parents.



POLICY OWNER

Premises and Safety Lead

APPLIES TO

Students, parents and visitors

THE ONE RULE TO REMEMBER

Ask what would help – and plan it before the visit, not on the day.

1. Our centre

Our centre is at 208 Beech House, Edgbaston. If you, your child or anyone visiting with you has access needs, please tell us at enrolment or before your visit so we can plan the best arrangements for arrival, seating, toilets and movement around the building. Our access arrangements are reviewed every year.

Any student who would need help to leave the building in an emergency has a Personal Emergency Evacuation Plan, agreed with their family.

2. Lessons and information

- Online lessons are available for students who find travel difficult.
- Large-print or digital copies of resources on request.
- Parent information in alternative formats; interpreters arranged where needed for meetings.

11

STUDENT WELFARE & BEHAVIOUR

Attendance, Punctuality and Collection Policy

Knowing where every child is — from drop-off to collection, and on every Zoom register.



POLICY OWNER

Office team

APPLIES TO

All students and parents

THE ONE RULE TO REMEMBER

If a child expected in class hasn't arrived, we find out why — within 15 minutes.

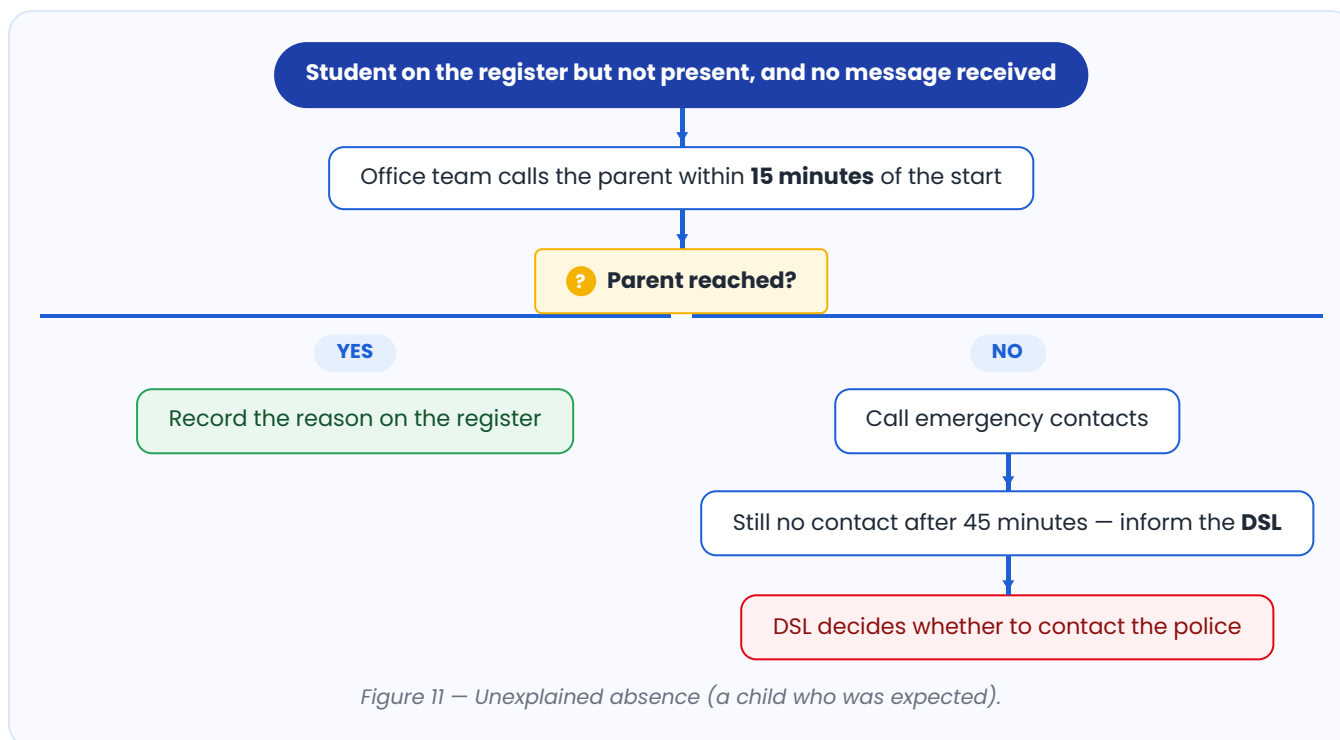
1. Parents' part

- Attendance at every lesson, and completion of uploaded work for online classes, is expected.
- Escort your child to the main entrance of the centre; our staff then guide students to their classrooms.
- Tell the Office team of any absence before the session starts, by phone, email or the centre message line.
- Drop off shortly before the session and collect on time; name any other adult collecting in advance and agree a collection password.
- Your child keeps their place until you give one month's notice (Policy 16). Lesson fees are charged whether or not your child attends.

2. Our part

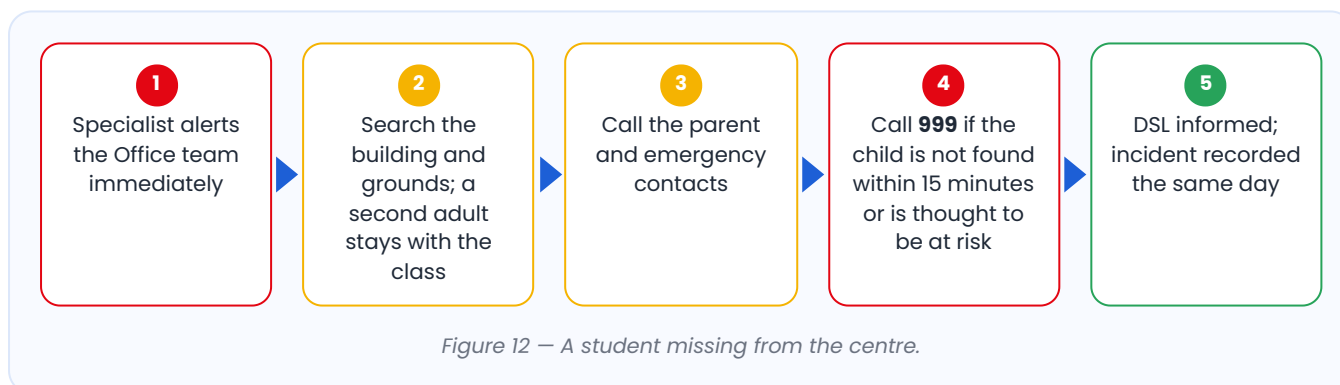
- Every student signs in on arrival and signs out on leaving, in person; online, the register is taken in the first 10 minutes of the session.
- Students who arrive late sign in at the office in the same way, so we always know who is on site.
- Children in Year 6 and below are only released to a named adult unless the parent has given written permission to leave alone.
- Where a lesson is missed, we provide catch-up material wherever we can.

3. A student hasn't arrived

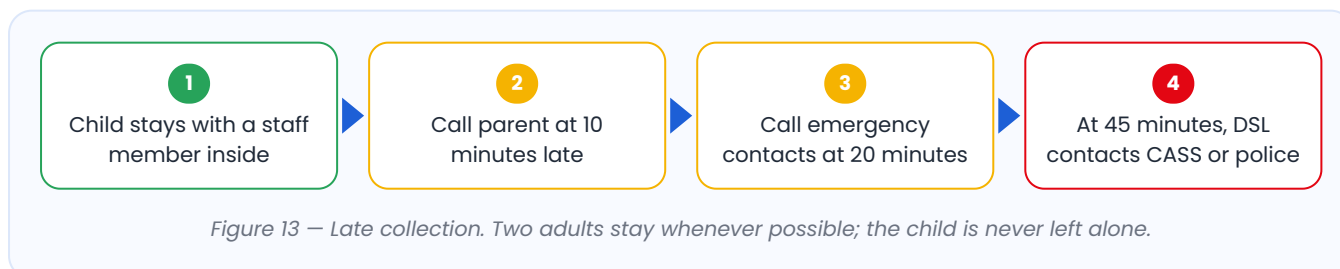


4. A student goes missing from the centre

If a student who signed in cannot be found, or leaves the building without permission:



5. Late collection



Late collection charge: after a 15-minute grace period, a charge of £10 is made for every further 15 minutes, for all classes, courses, workshops and one-to-one sessions.

6. Patterns

Where a student misses several sessions in a half-term, or is often late, the Office team contacts the parent to talk about what would help. Repeated absence can also be a safeguarding signal and is shared with the DSL.

Persistent absence without notice may lead to a child being unenrolled, after we have spoken with the family.

7. Centre closures

If the centre has to close, for example in severe weather, we will tell families as early as possible and move lessons online wherever we can (see Policy 16).

12

DATA & TECHNOLOGY

Data Protection Policy and Data Processing Procedures

Collecting only what we need, keeping it secure, and respecting every family's rights.



POLICY OWNER

Data Protection Lead

APPLIES TO

Everyone who handles personal data for the centre

THE ONE RULE TO REMEMBER

Only the minimum data, only to people who need it, deleted when no longer needed.

1. Rules

1. JMS Publishers and Providers Ltd is the data controller and pays the annual data protection fee to the ICO.
2. Parents receive a clear privacy notice at enrolment explaining what we hold, why, and for how long.
3. We collect only what we need: contact details, emergency contacts, school year, test results, and any needs or medical information the parent shares.
4. Registers, test scores and records in Google Sheets are shared only with staff who need them; access is removed the day someone leaves.
5. Photos, videos, testimonials and results used in marketing need separate, written, opt-in consent, which can be withdrawn at any time.
6. Marketing emails and messages go only to parents who have opted in.
7. Safeguarding records are kept separately by the DSL.
8. Records are deleted in line with the retention schedule.
9. Personal data is never entered into a public AI tool (Policy 14).
10. Children should not submit personal information to us through our website; parents and guardians provide it on their behalf.
11. Where our Terms and Conditions and this policy differ on personal data, this policy applies.

2. Requests from individuals

A parent, student or staff member may ask for a copy of their data (a subject access request), for corrections, or for deletion. Requests go to the Data Protection Lead (info@pass11plusgrammar.com) and are answered within **one month** (extendable by two months for complex requests). Before sharing a child's data we confirm the requester's identity and parental responsibility.

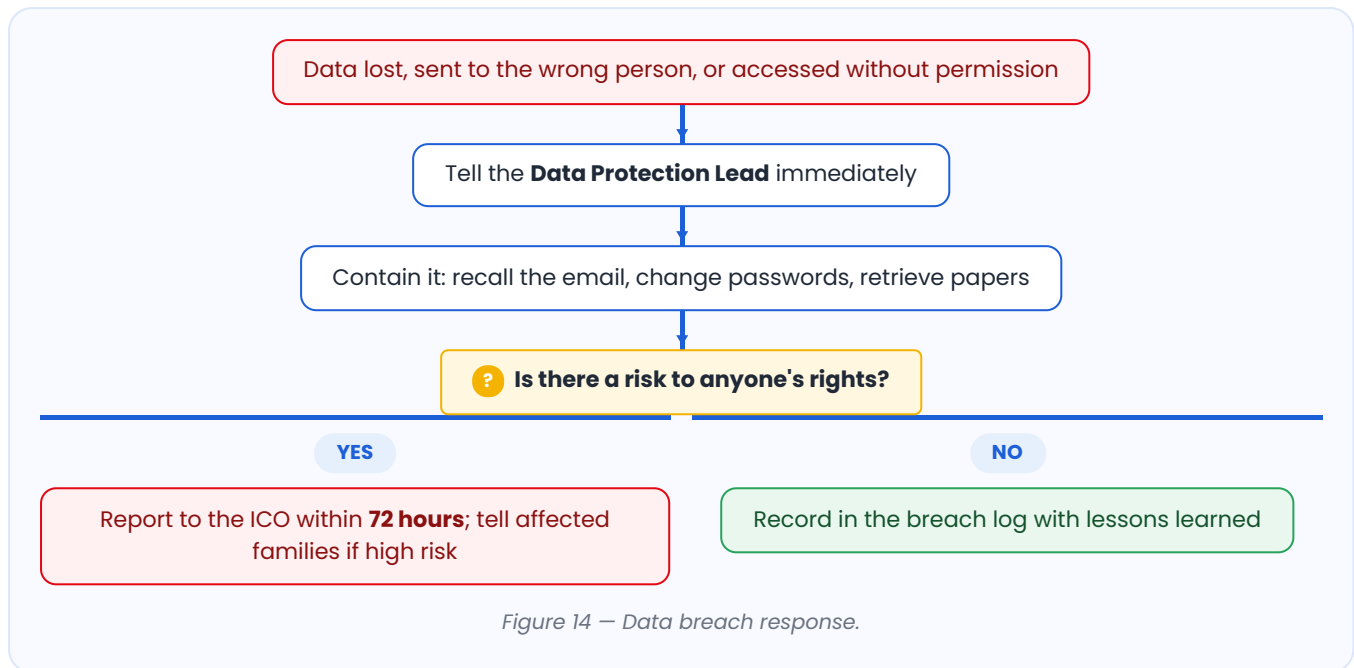
3. Data processing procedures

The table below sets out the main personal data we process, why, the lawful basis under UK GDPR, and how long we keep it. Records are securely deleted or anonymised at the end of each period.

Data	Why we use it	Lawful basis	Kept for
Parent and child contact details, emergency contacts, programme	Enrolment, teaching, communication	Contract (parent); legitimate interests (student)	While enrolled + 1 year
Registers, homework, test and mock results	Tracking progress and attendance	Contract; legitimate interests	While enrolled + 1 year
Invoices and payment records	Fees and accounts	Contract; legal obligation	6 years
Health, allergy and additional-needs information	Keeping children safe; reasonable adjustments	Legitimate interests and vital interests; Art 9(2)(c) and DPA 2018 Sch 1 para 18 (safeguarding)	While enrolled
Accident records	Health and safety	Legal obligation	Until the child is 21
Safeguarding records	Protecting children	Substantial public interest (safeguarding)	Until the child is 25
CCTV images	Safety and security (Policy 4)	Legitimate interests	Up to 30 days
Photos, testimonials, published results	Marketing	Consent	Until consent is withdrawn
Staff and specialist DBS details	Safer recruitment	Legal obligation; employment	Duration of engagement + 6 years

- **Who we share with:** only trusted service providers acting on our instructions under contract (for example video-conferencing, cloud storage and payment providers), and authorities where the law or safeguarding requires it. We never sell personal data.
- **Transfers outside the UK:** where a provider stores data abroad, we make sure UK-approved safeguards are in place.
- **Security:** password-protected devices and accounts, access limited by role, locked storage for paper records, and staff training.
- **New systems:** any new system or use of personal data is assessed for risk before it starts.

4. Data breaches



5. Complaints

Data protection complaints follow the stages and timescales in our Complaints Policy (Policy 18): acknowledged within 5 working days and answered within 15. Anyone unhappy with our response can complain to the Information Commissioner's Office (ico.org.uk, 0303 123 1113).

13

DATA & TECHNOLOGY

Special Category Data Statement

The short "appropriate policy document" covering the most sensitive data we hold.



POLICY OWNER

Data Protection Lead

APPLIES TO

DBS records, health and needs information

THE ONE RULE TO REMEMBER

Sensitive data is locked away, seen by the fewest people, and kept for the shortest time.

We hold some special category and criminal offence data: information about students' health, allergies and special educational needs (shared by parents), and DBS check outcomes for staff and specialists. We process it under the safeguarding and employment conditions in Schedule 1 of the Data Protection Act 2018, which require this appropriate policy document.

Principle	How we meet it
Lawful, fair, transparent	Explained in the privacy notice; used only to keep children safe and to meet safer-recruitment duties.
Purpose limitation	Health data used only for care and adjustments; DBS data only for recruitment decisions.
Data minimisation	We record a DBS certificate number, date and outcome, not a copy of the certificate.
Accuracy	Parents asked to update health information each term.
Storage limitation	Deleted in line with the retention schedule in Policy 12.
Security	Restricted folders, password-protected devices, locked cabinet for paper.
Accountability	Reviewed yearly by the Data Protection Lead.

14

DATA & TECHNOLOGY

Artificial Intelligence Policy

Using AI to help make great resources — without risking students' data or accuracy.



POLICY OWNER

Data Protection Lead

APPLIES TO

Staff, specialists and students

THE ONE RULE TO REMEMBER

AI drafts; a human checks. No personal data in public AI tools.

Green — allowed

Drafting practice questions, explanations and parent newsletters; checking spelling; generating ideas. Every output checked by a specialist before use.

Amber — ask first

Any new AI tool; AI used to mark or give feedback on student work; AI images in marketing.

Red — never

Entering names, scores, reports, safeguarding or health information into a public AI tool; AI note-takers in parent or safeguarding meetings; letting AI make decisions about a child.

Figure 15 — AI traffic light for staff and specialists.

Rules for staff

- Every AI-produced question, answer or explanation is checked against our content standards before it reaches a student.
- Use centre-managed accounts where provided, with the setting that stops the provider training on our content switched on.
- Respect copyright: do not paste in whole published papers or third-party material.

Rules for students

Homework is the student's own work unless the specialist says AI may be used. In the 11+ and GCSE exams AI is not available, so we build the skills without it.

15

PARENTS & ADMINISTRATION

Website and Service Terms

The terms for using our website, booking with us, and our resources.



POLICY OWNER

Director

APPLIES TO

Everyone using our website; every family booking a service

THE ONE RULE TO REMEMBER

A booking is confirmed only when you receive our official acceptance email.

1. About us

These terms are between you and JMS Publishers and Providers Limited, trading as Pass 11 Plus Grammar and PASS my GCSEs ("we", "us", "our"), 208 Beech House, 1a Greenfield Crescent, Edgbaston, Birmingham B15 3BE. By using our website or booking our services you agree to these terms and to the policies they refer to, in particular Policies 5, 7, 11, 12, 16 and 17.

Which document applies: enrolled families also sign our Enrolment Terms and Conditions. Where these terms and the Enrolment Terms and Conditions differ, the Enrolment Terms and Conditions apply, except on personal data, where Policy 12 applies.

2. Using our website

- Our website is open to visitors of all ages. Parents and guardians are responsible for supervising their children's use of it; content-filtering software can help.
- Content in our children's areas, and any links from them, is reviewed by our specialists.
- Information on the site is for general guidance. We work to keep it accurate and current, and correct errors as quickly as we can, but it may occasionally be out of date.
- Links to other websites and third-party tools are provided for convenience. We are not responsible for their content; please read their own terms and privacy policies.
- We may limit or decline access to our website or services where necessary.

3. Booking a place

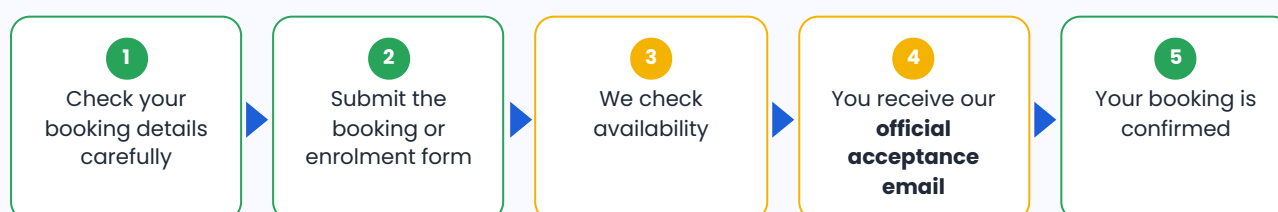


Figure 16 — How a booking becomes a contract.

- All bookings are subject to availability at the time of confirmation.

- If a price, date or description on our site contains an error that affects your booking, we will contact you promptly to discuss your options before going ahead.
- Online sessions are for registered children only. Sharing access with anyone else may lead to the place being withdrawn.
- Please give us accurate, up-to-date information and tell us of any changes.

4. Continuing enrolment and natural progression

A place with us is not a one-off booking. Enrolment is continuous: your child keeps their place from term to term and moves up through our courses as they grow, so their learning carries on without a gap. **This natural progression continues until you advise us to stop by giving one month's notice under Policy 16.**



- A child preparing for the 11+ who sits and passes the test moves up into our Year 6 group, covering SATs and preparation for secondary school.
- From there they continue into GCSE preparation with PASS my GCSEs, and on to A-Level where we offer the subject.
- A child who does not pass, or who is still preparing, continues in the group that best fits where they are.
- We tell you before your child moves group, including the day, time and fee for the new group. The new fee applies from their first lesson in that group.
- Until we receive notice under Policy 16, tuition continues and invoices are issued as normal.

5. Our resources and intellectual property

All our resources, mock exam papers, questions, recordings and website content belong to us. They are provided for your child's personal educational use only. Please do not copy, alter, sell or share them with anyone who is not authorised, and let us know if you see our materials being used elsewhere. Mock exam papers are not released to parents (Policy 17).

6. Our responsibilities

- We provide our services with reasonable care and skill, using experienced specialists who hold enhanced DBS checks.
- We do not guarantee any exam result or school place.
- We are not responsible for losses that were not reasonably foreseeable, or for interruptions caused by events outside our control, such as internet or platform outages.
- Nothing in these terms limits our liability for death or personal injury caused by our negligence, or anything else that cannot be limited by law. Your statutory rights are not affected.

7. Notices

Sent by	Treated as received
Hand delivery	On the day of delivery
First-class post to the correct address	72 hours after posting
Email to the most recently used address	24 hours after sending, unless a delivery failure is received

Notice to end an enrolment is different: it takes effect on the date we receive your email, under Policy 16.

8. Changes to these terms

We may add to, amend, replace or withdraw any part of these terms at any time, as the company sees fit – for example to reflect changes in our costs, in the law, in exam specifications, or in how we deliver lessons.

- The current version is always the one published at pass11plusgrammar.co.uk, and it replaces every earlier version.
- Where a change affects you, we will tell you by email, giving at least one month's notice before it takes effect.
- If you do not accept a change, you may end your enrolment under Policy 16. Your child's place continues on the updated terms until you do.

9. General

If any part of these terms is found to be unenforceable, the rest continues to apply. If we delay in enforcing a right, we do not give it up. Headings are for convenience only. These terms are governed by the law of England and Wales, and disputes are subject to the courts of England and Wales.

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PARENTS & ADMINISTRATION

Fees, Payments and Cancellations Policy

Clear, fair terms for invoices, payments, notice periods and refunds.



POLICY OWNER

Director

APPLIES TO

All families and bookings

THE ONE RULE TO REMEMBER

Invoices on the 24th, direct debit on the 28th. A place continues until one month's notice is received.

1. Invoices and payment

1

24th

Invoice issued for the following month

2

28th

Direct debit collected (other approved methods must reach us by the 28th)

3

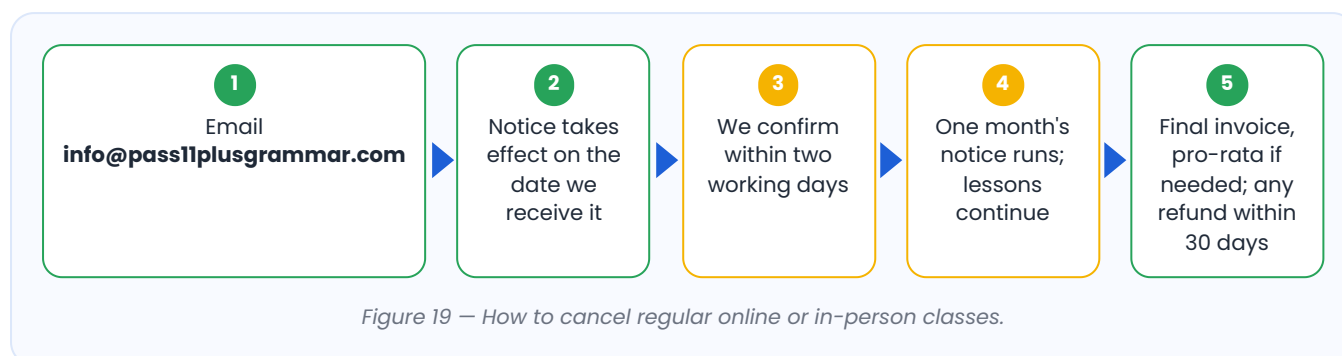
Late

Late payment fee applies

Figure 18 — The monthly payment cycle for regular classes.

- Enrolment is continuous. A place, and the monthly invoice for it, continues until you give one month's notice under section 2 — there is no end date and no need to renew.
- Current fees are published on our website and confirmed at enrolment. Registration fees are non-refundable, subject to your cooling-off rights (section 5).
- If a direct debit fails or payment is not received by the 28th, a late payment fee of 10% of the amount overdue applies, up to a maximum of £60.
- Lesson fees are charged whether or not your child attends. Where a lesson is missed, catch-up material is provided wherever we can.
- Where applicable, a sibling discount of up to 10% may be offered to families with more than one child enrolled.
- Payments cannot be transferred, exchanged or carried forward to another course, class or booking (except mock exam transfers, section 4).
- When your child moves up to the next group as a natural progression (Policy 15), we tell you first, and the new group's fee applies from their first lesson in it.
- If fees for an ongoing course need to change, we give at least one month's written notice, so you can decide whether to continue.

2. Notice to cancel regular classes



If you have not had our confirmation within two working days, please contact us so we can check it arrived.

3. Notice periods for other services

Service	Notice to cancel	Also note
Regular classes (online or in person)	One month, by email	Pro-rata final payment where applicable
Intensive courses and booster courses	One month, in writing	Late collection charges apply
Workshops	Two weeks	Late collection charges apply
One-to-one sessions	Two weeks	Late collection charges apply
Individual mock exam bookings	Two weeks	Less than two weeks' notice is non-refundable; transfer to another date £20

Eligible refunds are processed within 30 days of confirmation.

4. Mock exam transfers

A confirmed mock exam booking may be moved to another available date for a £20 administration fee. See Policy 17.

5. Your cooling-off rights

If you book online, by phone or by email, you may cancel within 14 days of booking for a full refund. If you ask us to start lessons within those 14 days, we will charge for the lessons already provided.

6. If we cancel or the centre closes

If we cancel a lesson or the centre has to close, we will offer an online alternative wherever possible. If we cannot, the lesson will be rescheduled or credited.

7. Free trial lessons

- Available at the Office team's discretion, online or in person, when places allow.
- One hour, and one trial per child, however many subjects they study.
- Booked only through the online free trial form.

8. Hardship

Families facing financial difficulty can speak to the Director in confidence about a payment plan.

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PARENTS & ADMINISTRATION

Mock Exams Policy

How our mock exams are booked, run and reported – in the centre and online.



POLICY OWNER

Director

APPLIES TO

Families booking mock exams; all candidates

THE ONE RULE TO REMEMBER

A mock shows how ready a child is. It never guarantees a school place.

1

Book and receive
confirmation

2

Exam day: escort to the
entrance; phones
handed in

3

Papers marked by our
specialists

4

Results within 10
working days

Figure 20 – From booking to results.

1. Booking

Mock exams can be booked individually or as part of a course. Cancellation needs two weeks' notice; bookings cancelled with less notice are non-refundable. A booking may be moved to another date for a £20 administration fee (Policy 16).

2. On the day

- Parents escort candidates to the main entrance and collect them on time. Late collection charges apply (Policy 11).
- Exam conditions apply from the moment papers are handed out: silence, hand raised for help, and no phones or smartwatches (Policies 7 and 8).
- For online mocks, the camera must show the candidate and desk, with no other devices within reach, and the meeting link and passcode are issued by the centre and must not be shared (Policy 1).

3. Results

- We aim to release results within 10 working days. If you have not received them by then, please contact us.
- Scores, rankings and statistics are for guidance only and are not a guarantee of success in the real exam.
- Taking our mock exam does not guarantee entry to any grammar or independent school.

4. Our papers

Every paper is written by experienced specialists and reflects the latest available information about the eleven-plus. Questions are exclusive to Pass 11 Plus Grammar and are not sold in shops or online. To protect them, papers are not shared with or sent to parents.

18

PARENTS & ADMINISTRATION

Complaints Policy

Most concerns are resolved with a conversation. When they aren't, a clear three-stage route.



POLICY OWNER

Director

APPLIES TO

Parents, students and members of the public

THE ONE RULE TO REMEMBER

Raise it early; we reply in writing at every formal stage.

1

Stage 1 · Informal

Speak to the specialist or Office team.
Aim to resolve within 10 working days.

2

Stage 2 · Formal

Written complaint to the Director, by letter or to info@pass11plusgrammar.com.
Acknowledged in 5, answered in 15 working days.

3

Stage 3 · Review

Reviewed by someone not involved before.
Final written response within 20 working days.

Figure 21 — Complaint stages and timescales.

Details

- Complaints should be raised within three months of the event.
- **Complaints about the Director** go straight to the Independent Safeguarding Adviser, who is external to the centre, at Stage 2, and are reviewed by them at Stage 3. They are never handled by the Director.
- Data protection and CCTV complaints follow these same stages and timescales (Policies 12 and 4).
- Safeguarding concerns are never handled as complaints; they go to the DSL under Policy 1.
- A parent may bring a friend or interpreter to any meeting.
- If still unhappy, parents may seek advice from Citizens Advice or use an alternative dispute resolution service.
- All complaints and outcomes are logged so we can learn from them.

19

PARENTS & ADMINISTRATION

Equality, Diversity and Inclusion Policy

Every child and family is welcome, included and treated fairly.



POLICY OWNER

Director

APPLIES TO

Students, parents, staff, specialists and applicants

THE ONE RULE TO REMEMBER

Every child is welcome and treated fairly.

We serve a diverse community across the West Midlands and are proud of it. Under the Equality Act 2010, as a service provider and as an employer and engager of specialists, we will not discriminate against, harass or victimise anyone because of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation.

Our commitments

- Admission to classes is open to all, subject to space and year group.
- Reasonable adjustments for disabled students and parents (Policies 9 and 10).
- Resources that reflect a range of cultures, names and backgrounds.
- Prejudice-based language or behaviour is challenged and dealt with under Policies 5 and 6.
- Specialists are recruited and paid on merit.
- Staff and specialists receive equality and inclusion training, and challenge stereotypes in the classroom.
- Information can be provided in alternative formats, and interpreters arranged for meetings where needed.

What we will check each year

- Complaints and incidents involving discrimination.
- Parent feedback on whether families feel welcome.
- Take-up of hardship support (Policy 16).

Raising a concern

If you feel you or your child have been treated unfairly, please tell us. Concerns are handled under our Complaints Policy (Policy 18) and taken seriously.

20

STAFF AND SPECIALISTS

Staff and Specialist Code of Conduct

The professional standards every adult working with our students is held to.



POLICY OWNER

Director

APPLIES TO

Employed and self-employed specialists, office staff, volunteers and contractors

THE ONE RULE TO REMEMBER

If a situation could be misread, change it — and tell the DSL rather than hoping it passes.

1. Who this applies to and why

This code applies to everyone who works with or around our students, however they are engaged. It sets the professional boundaries that keep children safe and protect you from misunderstanding or false allegation. Accepting work with us means accepting this code; it sits alongside Policy 1 and your contract or terms of engagement.

2. Professional boundaries

✓ Always

- Keep all contact with students and families on centre channels — centre email, the centre phone, centre-managed Zoom.
- Stay visible: door ajar or window uncovered when alone with a student, and a logged session online.
- Use the student's name, speak respectfully, and keep conversation on the lesson.
- Report any concern about a child to the DSL the same day (Policy 1).
- Tell the Director about anything in your own life that may affect your suitability to work with children.

⊘ Never

- Share personal phone numbers, social media or home addresses with students or families.
- Meet, message or tutor a student privately outside centre arrangements.
- Give lifts, gifts or money, or accept anything beyond a small token of thanks.
- Photograph or record a student on a personal device.
- Use physical contact beyond what is necessary for safety, or any form of physical punishment.
- Discuss a student or family on social media, or in any public place.

3. Teaching standards

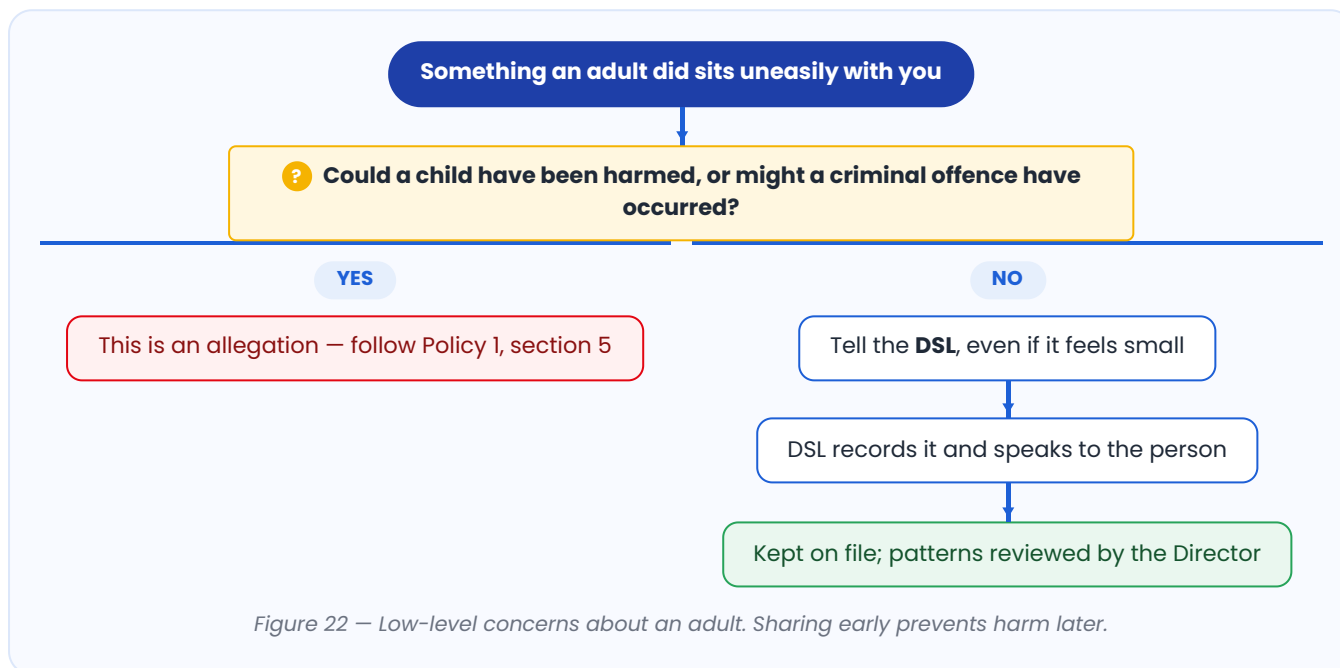
- Arrive prepared, start on time, and teach the planned content to the standard in our schemes of work.
- Take the register within the first 10 minutes of every session, in person and online (Policy 11).
- Set, collect and mark homework, and use it to plan the next steps (Policy 7).
- Apply the Classroom Code and the behaviour ladder consistently (Policies 7 and 5).
- Check every AI-assisted resource before a student sees it (Policy 14).
- Keep student information confidential and handle it under Policy 12.

4. Conduct outside work

What you do in your own time is your own business, unless it calls into question your suitability to work with children or brings the centre into disrepute. Tell the Director promptly about any police caution, charge, conviction or investigation, or any concern raised about you by another setting.

5. Low-level concerns

Not every worry about an adult is an allegation. A low-level concern is any behaviour by an adult that sits uneasily with this code but does not meet the threshold for referral to the LADO – a joke that went too far, favouritism towards one student, a rule bent for convenience, a message sent from a personal phone.



Low-level concerns are recorded, kept confidentially, and reviewed together. A single record may look minor; several about the same person rarely are. No one is penalised for raising one in good faith (Policy 2).

6. If this code is not followed

Breaches are dealt with by the Director, proportionately – a conversation and a note on file for a first, minor lapse; withdrawal of work or termination of engagement for anything serious. Where a breach may amount to harm to a child, Policy 1 takes over and the LADO is contacted within one working day.