

Crudgington Primary School



Crudgington Primary
A LEARNING COMMUNITY TRUST ACADEMY

Behaviour Policy

Crudgington Primary School Behaviour Policy Document Status				
Date of policy creation	11.11.24	✓	Named responsibility	Hannah Gharu
Date of policy review	October 2026	✓	Named responsibility	Hannah Gharu
Date of adoption by the LGB	October 2025	✓	Named responsibility	LGB

At Crudgington Primary School we take a preventative approach to behaviour management. Every adult in our school is encouraged to look beyond behaviour and to be curious about children's needs. All children will be offered compassion and co-operative learning with a caring adult. Our vision is that we will support children to feel heard and understood and that this will allow them to develop the skills to overcome obstacles as they grow. We have a positive and inclusive approach to managing emotions and well-being, which is built on recognising that all behaviours are driven by emotions. With this in mind, we work hard to develop emotional intelligence leading to our pupils developing emotional literacy.

We believe that no child wants to behave in a negative way. It is our aim to develop a child's capacity to manage their behaviours by educating them about the emotions they are experiencing. Each classroom environment is designed around supporting self-regulation and will allow our children to develop greater self-awareness in social and emotional aspects of learning. Children will be encouraged and supported to explore their emotions, how this impacts on their behaviour and the behaviour of others and strategies they can employ to self-regulate. This is supported through the use of strategies such as emotion coaching and restorative practice.

Aims

This policy builds upon many years of good practice at the school and promotes good and outstanding behaviour for learning.

Our school community will:

- feel, happy, safe and secure at our school
- respect one another and ensure all pupils have full access to the curriculum
- understand that all members of the school community have high expectations of pupils and each other
- represent the school well in the community

This policy is to enable these aims to be achieved by ensuring Governors, staff, parents and pupils are all clear about the facilitation and promotion of good behaviour and the consequences of inappropriate, unsafe or disruptive behaviour.

Consistency in Approach

The basis of the school's strategies for promoting good behaviour will be to follow the agreed acronym of **SHINES**:

Safe actions

Help others

Include all

Eyes on the speaker

Smile

In addition to this we promote learning skills that support good behaviour for learning in years EYFS-Foundation Stage:

- Playing and exploring
- Active Learning
- Creating and thinking critically

The school rules are expected to promote a happy, safe environment to work in.

School Leadership and Responsibilities

The governing body is responsible for setting down the general principles for standards of discipline and behaviour and reviewing their effectiveness. The governors support the headteacher in carrying out these principles.

The headteacher has the day-to-day authority to implement the school behaviour and discipline policy with the support of the Governing Body.

The Governors should advise the headteacher of their views on specific measures for promoting good behaviour. This might include such issues as bullying, racial or sexual harassment, and maintaining regular attendance. The governing body also has a general duty to ensure the school follows policies to promote good behaviour and discipline among pupils.

The headteacher is responsible for promoting good behaviour and discipline in line with the governing body's statement of general principles. Within this policy, the head teacher will draw up the school's written discipline policy which may include making and enforcing the school rules to:

- promote self-discipline and proper regard for authority among pupils;
- encourage good behaviour and respect for others, and prevent all forms of bullying among pupils;
- ensure pupils' standard of behaviour is acceptable and regulate pupils' conduct.

The headteacher should implement effective strategies against bullying, which are developed and implemented by everyone in the school, including pupils. In addition, governing bodies should regularly review their school's anti-bullying policy.

The headteacher is responsible for ensuring that new members of staff are fully informed of this policy and can implement it during their induction.

The Role of teachers and Support Staff

Classroom Management

Strong and engaging teaching that is personalised to pupils by providing stimulating contexts and work differentiated to an appropriate level of challenge is one of the most effective ways of maintaining good behaviour.

Staff should have systems in the classroom to maintain the day-to-day running and the organisation of their classroom.

School rules will be reiterated during assemblies at least termly. In addition, learning skills will be repeated more regularly through daily classroom practice.

Good behaviour should be consistently promoted. For example, children should be praised for following rules and instructions as this will model the correct behaviour to their peers.

If a child does not adhere to school rules, they should be informed of which rule they have broken, and staff should employ the appropriate consequences for the pupil.

Staff should inform parents of good behaviour through one of the school's reward systems, written reports, assembly awards, Dojo messages and at report evenings.

At the early stages of concern over behaviour, parents should be informed by the class teacher, and the headteacher should be aware of this communication.

If pupils show disrespect or insubordination to adults, act violently toward other pupils or staff, or are found not to be telling the truth, they should be sent to the headteacher or in their absence, the Deputy Head, at the earliest opportunity.

If a pupil's behaviour is endangering themselves, other pupils or staff, the class teacher should ensure the safety of other pupils and inform the most senior member of staff on site immediately.

Staff should support one another in employing a consistent approach by praising good behaviour and identifying incorrect behaviour of all pupils in the school.

Teaching staff should share information with all other staff to promote good behaviour with pupils with particular needs, including preparing information for supply teachers to enable consistency and transition.

Information regarding classroom routines should also be left for supply teachers to enable consistency.

Teaching staff take responsibility for pupil behaviour at the start of the school day, as published in the school prospectus, and give the responsibility back to parents at dismissal.

The conduct of staff in their interactions with parents should support the promotion of positive behaviour around the school, and all meetings should be conducted professionally. This may include asking parents to make an appointment

Crudginton Primary School employs an open-door policy for discussion with parents at the end of the day, but these times may not be appropriate for all discussions. In such cases, an appointment will need to be made.

If staff feel a colleague is not behaving in a manner that supports the expectations of behaviour in this policy, they can report this to the headteacher as per the Local Authority's Speak Up policy. The headteacher will investigate and respond in line with the Speak up Policy. All staff must read and confirm understanding of KCSIE annually.

Staff must report concerns about child-on-child abuse, online risks, or safeguarding to the DSL.

If the concern is about the headteacher, contact should be made with the school's chair of governors, Mrs Karen Pankhurst.

The Role of Parents and Carers

The school is required to have a Home School Agreement that parents are asked to sign. This outlines the responsibilities of the parent and the school, including those concerning behaviour and attendance. The school seeks to develop a partnership with parents so that parents are supportive of the school's behaviour policy when incidents occur. Parents/Carers have a clear role in ensuring their child is well-behaved at school. If they do not, the school may ask them to sign a parenting contract.

Whilst on the school site, parents are expected to model good behaviour to the children. This includes not using profanity, treating others with respect, and acting in a manner to maintain safety around the school. If parents are concerned by any behaviours, they should report these to a staff member as soon as possible. Parents/Carers are responsible for ensuring their children behave well upon arrival and collection from school and their journey home. If a child is excluded (see section 15 – consequences), their parents/carers must take responsibility and ensure that they are not in a public place without good reason during school hours within the first five school days of any exclusion. The local authority may issue a £60 penalty if they do not.

Parents are expected to attend a reintegration interview following any fixed period exclusion from school. This is to ensure a smooth start back to school with all stakeholders engaged.

Parents do not have an automatic right to access school grounds; therefore, if their conduct does not support this policy, the headteacher can remove the implied licence to enter school grounds while a review is undertaken.

Any long-term or permanent ban would be subject to the Governing Body's approval.

The Role of Pupils

Pupils are expected to follow the school rules as these aim to produce a happy, safe environment to work in. Older pupils are expected to model good behaviour to younger pupils.

Pupils should take responsibility and;

- Not join in with behaviour that they know breaks school rules.
- Report behaviour they see breaking the rules to the supervising member of staff

If pupils do not follow the school rules, they are expected (with support) to recognise which rules they have broken and reflect on their actions

When lined up or travelling around school or outside during a fire drill, pupils are expected to be quiet to maintain their full attention for safety reasons.

Pupils are expected to employ the learning skills to develop their behaviour for learning and become more independent in their learning.

Anti-bullying

The school does not tolerate any bullying. All incidents of reported bullying will be investigated.

The school has adopted the Local Authority's Anti-bullying policy. This was published by the safeguarding team and is updated every year. Paper copies are always available, and it is also posted on the school website.

The school will continue to educate pupils about anti-bullying during the anti-bullying week, the PSHE curriculum and the work of the Super Safeguarding Squad. Any pupil caught bullying will face severe consequences.

Break & Lunchtimes

Pupils are expected to follow the school rules at break times and lunchtimes, particularly on acting safely. Supervisors will follow all staff's expectations during lunchtime and break time to promote good behaviour. If necessary, they have the power to discipline pupils and carry out restorative conversations with pupils.

Extended Services, including after-school clubs

School staff and external providers may run after-school clubs at the Crudginton. All clubs will manage behaviour within the framework of the school behaviour policy.

External providers will have the expectations for behaviour shared with them when arrangements for the club to commence are made. The providers will maintain discipline at their club. If there are concerns over this, parents will raise the issue with providers in the first instance. If they continue to have problems, they should contact the headteacher.

If there is a concern over safety at a club, the headteacher should be contacted in the first instance.

If external providers request that pupils do not participate in clubs because of poor behaviour that contravenes the school rules, the headteacher will consider giving a warning or, if necessary, ceasing the child's participation.

To participate in teams that represent the school, pupils will be expected to behave well in school. Representing the school may be a privilege that is removed if children do not behave in school.

Activities offsite

Pupils are expected to follow school rules in activities offsite.

Staffing ratios should always ensure enough staffing available so behaviour can be managed effectively.

Inappropriate behaviour, notably refusing to follow instructions or putting themselves or others in danger, could result in the activity being cut short for the pupil and the parent, or carer, may be called to collect them.

Inappropriate behaviour, which prevents effective planning of provision for a child on an offsite activity, may mean the pupil cannot participate.

E-safety and Behaviour on the internet

Pupils are expected to follow the school's rules when engaging with online platforms and digital tools, including safeguarding their login credentials and using technology responsibly. Staff play a key role in educating pupils about the four Cs of online risk: Content (exposure to harmful or inappropriate material), Contact (interactions with potentially unsafe individuals), Conduct (their own behaviour online), and Commerce (risks related to online purchases and scams). These risks are addressed through a comprehensive approach that includes PSHE lessons and digital literacy education, where pupils learn to critically evaluate online information, recognise misinformation and harmful content, and develop safe and respectful online habits. This proactive strategy supports the school's commitment to creating a safe digital environment and aligns with national safeguarding guidance.

Behaviour beyond the School Gate

Pupil misconduct beyond the school gate, particularly on the journey to or from school, or that could affect the school's reputation will be dealt with as per the strategies in this policy.

Behaviour Systems

Here at Crudgington, we always seek to change disruptive behaviour positively, e.g. praising children demonstrating expected behaviour, catching them being good, giving friendly reminders, and moving children to a space where they would be more focused, however, should a child continue to misbehave and not respond to positive behaviour management strategies, then these steps are followed:

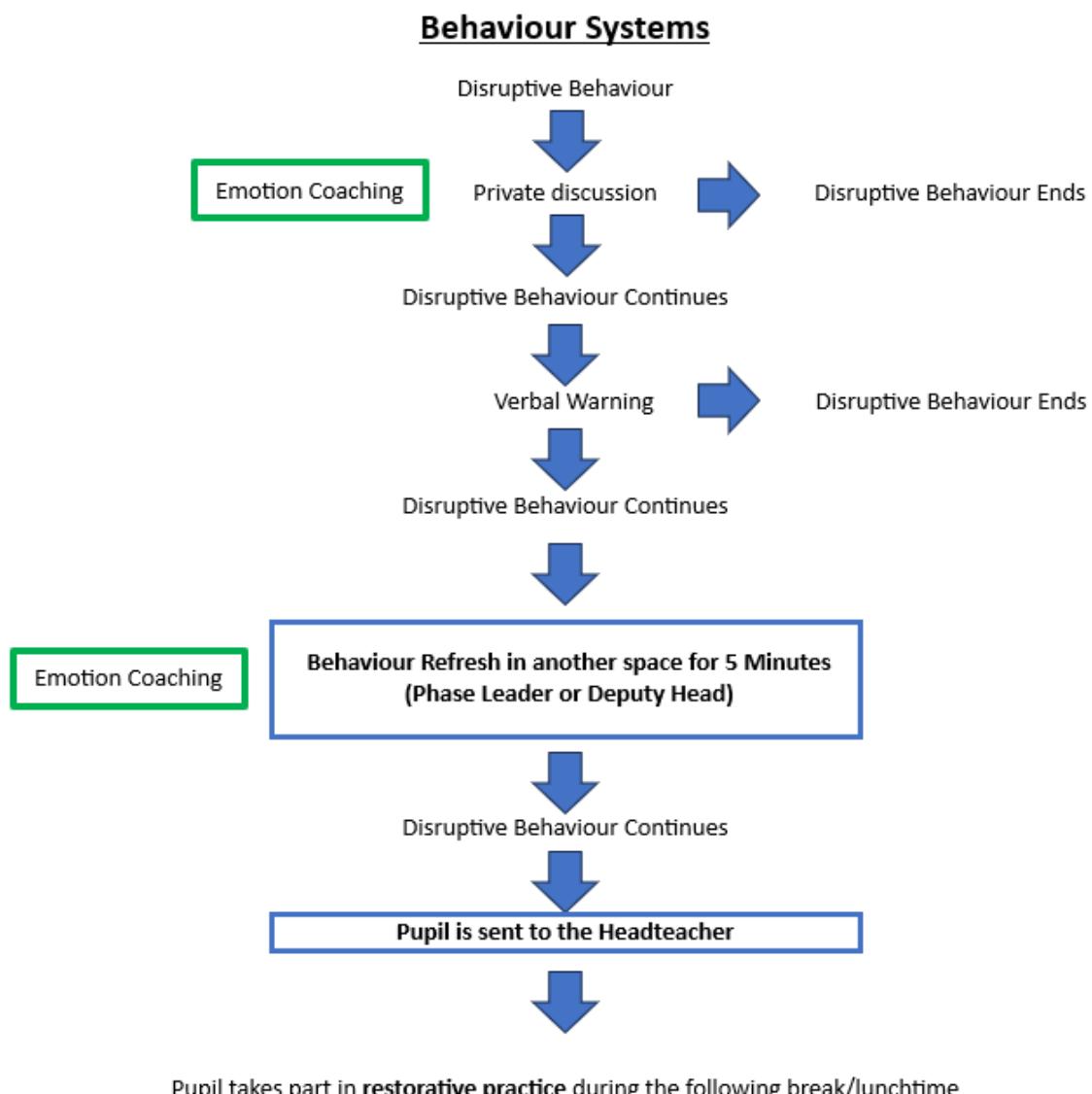
The adult in charge of the class, or the supervisor on duty will speak one-to-one with the child and explain the behaviour that needs to stop, addressing the school rules which are not being adhered to and following the emotion coaching stages.

If the disruptive behaviour continues, a clear verbal warning will be given to the child, reminding them of the previous discussion and highlighting the behaviour that needs to change.

If the disruptive behaviour continues, the child will be sent to the phase leader (Mrs Nicholls – KS1. Mr Thomas – KS2), or Deputy Headteacher for a 5-minute behaviour refresh. During the 5-minute refresh, the pupil will complete emotion coaching with a supportive adult.

Rejoining the class:

Any other disruptive behaviour will lead to the pupil being sent to the Headteacher and a possible red card being issued. A red card is severe and will not be given easily – children in school clearly understand that a red card is



issued for serious behaviour concerns.

Emotion Coaching

Emotion coaching encourages all adults in a school to look for indicators of negative emotions (often reflected through pupil's behaviour or body language) and to empathise with, label and validate those emotions as they occur.

The key steps of emotion coaching are:

1. *Empathy.*
2. *Labelling and validation of the emotion*
3. *Limit-setting (if needed).*
4. *Support with problem-solving*

Restorative Practice

Restorative practice is a set of principles and practice that encourages children to take responsibility for their behaviour by thinking through the causes and consequences. In a rules-led system, the tendency is for the teacher to tell the child what they've done wrong, and how they will be punished for it. However, we believe that in such a system, children do not learn about the responsibility they had in that situation and how it affected other people, because it is an adult who has intervened and told them what they have done wrong.

Restorative practice, on the other hand, involves helping the child think through their behaviour, its consequences and what they can do to make it better. At Crudgington Primary School, our vision involves developing, maintaining and repairing relationships, building a community based around empathy and self-learning, where children take responsibility for their own behaviour.

Restorative practices centre around a set of key questions that help children think about their behaviour and understand how they can correct it:

1. *What happened?*
2. *What were you thinking and feeling at the time?*
3. *What have you thought about it since?*
4. *Who has been affected and in what way?*
5. *How could things have been done differently?*
6. *What do you think needs to happen to make things right?*

Restorative conversations will happen daily with the headteacher during lunch/breaktime. Any pupil who has been removed from class after receiving a clear verbal warning will complete restorative practice at the next available session.

Zero Tolerance

This policy recognises that all children and staff have the right to feel safe and respected. Occurrences of behaviour which directly contradict this, will not be tolerated and will result in the automatic involvement of a senior leader. Parents will be informed and invited to meet with staff to discuss next steps, including consequences and plans to support their child to prevent further occurrences of this behaviour.

Behaviour which is not tolerated includes:

- Striking a member of staff
- Physical aggression ➤ Fighting
- Bullying
- Racism
- Vandalism/Damage to property
- Theft

Where one of the above occur, one of the following consequences will apply (depending on the behaviour displayed):

- Involvement of headteacher/ a senior leader and a red card issued
- Phone call with parents / meeting with parents
- Exclusion – lunchtime/temporary/permanent. Personal support plan will be implemented to support the pupil and to prevent future occurrences of the behaviour
- Involvement of any appropriate outside agencies.
- Temporary placement at an alternative education provider to avoid permanent exclusion.

School staff and governors always have full regard to the latest DfE Exclusions Guidance and related documentation when dealing with any exclusion matters.

Child-on-child abuse (Bullying)

Child-on-child (bullying) is defined as the repetitive, intentional harming of one person or group by another person or group, where the relationship involves an imbalance of power.

Child-on-child (bullying) is, therefore:

- Deliberately hurtful
- Repeated, often over a period of time
- Difficult to defend against

Child-on-child (bullying) can include:

Type of abuse	Definition
Emotional	Being unfriendly, excluding, tormenting
Physical	Hitting, kicking, pushing, hair pulling, shaking, taking another's belongings, any use of violence
Racial	Racial taunts, graffiti, gestures
Sexual	Explicit sexual remarks, display of sexual material, sexual gestures, unwanted physical attention, comments about sexual reputation or performance, or inappropriate touching. Upskirting. Online sexual harassment
Direct or indirect verbal	Name-calling, sarcasm, spreading rumours, teasing
Cyber-bullying	Bullying that takes place online, such as through social networking sites, messaging apps or gaming sites

All staff are aware that children can abuse other children we refer to this as child-on-child abuse. This can happen inside or outside of our setting and online. If staff have any concerns regarding child-on-child abuse, even if there are no reports in our setting, they should still speak to a DSL. All staff are expected to challenge inappropriate behaviours between children, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

All staff will be trained in our school policy and procedures with regards to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

We will actively seek to raise awareness of and prevent all forms of child-on-child abuse by:

- educating all governors, its senior leadership team, staff, children, and parents about this issue;
- educating children about the nature and prevalence of child-on-child abuse, positive, responsible and safe use of social media, and the unequivocal facts about consent, via the curriculum;
- engaging parents on these issues;
- supporting the on-going welfare of the student body by drawing on multiple resources that prioritise pupil mental health, and by providing in-school counselling and therapy to address underlying mental health needs;

- working with governors, senior leadership team, and all staff, children and parents to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the school community;
- creating conditions in which our children can aspire to, and realise, safe and healthy relationships fostering a whole-school culture;
- responding to cases of child-on-child abuse promptly and appropriately;
- ensure that all child-on-child abuse issues are fed back to the DSL and deputies so that they can spot and address any concerning trends and identify children who may be in need of additional support.

We will actively engage with TWSP in relation to peer child-on-child abuse, and work closely with, for example, children's social care, the police and other schools. The relationships our setting has built with these partners is essential to ensuring that we are able to prevent, identify early, and appropriately handle cases of child-on-child abuse. The DSL's will regularly review behaviour incident logs which can help to identify any changes in behaviour and/or concerning patterns or trends at an early stage.

We recognise that any child can be vulnerable to child-on-child abuse due to the strength of peer influence, especially during adolescence, and staff should be alert to signs of such abuse amongst all children. Individual and situational factors can increase a child's vulnerability to abuse by their peers. We know that research suggests:

- child-on-child abuse may affect boys differently from girls (i.e. that it is more likely that girls will be victims and boys perpetrators). However, all child-on-child abuse is unacceptable and will be taken seriously;
- children with Special Educational Needs and/or Disabilities (SEND) are three times more likely to be abused than their peers.
- some children may be more likely to experience child-on-child abuse than others as a result of certain characteristics such as sexual orientation, ethnicity, race or religious beliefs.

Within the curriculum, child-on-child abuse will be dealt with in Personal, Social and Health Education, but may also be covered in other subjects, eg English and ICT.

In non-curriculum areas staff constantly supervise pupils and the respective members of staff will deal with issues involving any child-on-child abuse. This process of 100% supervision of pupils greatly reduces pupils' opportunities to either be a perpetrator or to be a victim.

1. All child-on-child abuse /bullying incidents will be reported by all staff.
2. The abusive / bullying behaviour or threats of abuse/bullying will be investigated and dealt with appropriately.
3. At the discretion of the Head Teacher parents will be informed and may be asked to come to a meeting to discuss the problem.
4. Children who represent the school in events and attend after school clubs will have such honours removed if behaviour continues to be a problem.

Rewards

At Crudgington Primary school, we seek to recognise, praise and reward good behaviour in and around school, as well as instances of much-improved behaviour

We also recognise, praise and reward good behaviour for learning and academic achievement. We seek to reward children on these merits regardless of their starting point.

The school employs a house point system which staff can use during lessons to reward good behaviour, learning behaviours and academic achievement. House point results are collated and presented in weekly achievement assemblies.

Recognition of good behaviours can also be acknowledged through the presentation of achievement certificates. These are presented during achievement assemblies and can act as interim reports to parents on good behaviour as these are taken home.

Crudgington Primary School will also recognise through its achievement assemblies and newsletters those children who have represented the school well in the community through sports or other endeavours.

Achievements that pupils have made out of school can also be recognised in achievement assemblies if the children inform staff they wish to do so and it is deemed appropriate.

The Power to Discipline

The Education and Inspections Act 2006 included, for the first time, a specific power for teachers to discipline pupils – for breaking a school rule, failure to follow instructions or other unacceptable behaviour. It applies at any time a pupil is in school or elsewhere under the charge of a teacher, including where a pupil is participating in an educational visit. The power also applies to other staff with responsibilities for controlling pupils, such as teaching assistants.

The Act also states schools' discipline and behaviour policies may allow teachers to regulate the conduct of pupils when they are off school premises and not under the control of school staff.

SEND

Pupils with Special Educational Needs that affect their behaviour will have strategies to use and targets to achieve in their individual provision map.

Therefore, they may be treated differently in the consequences they receive as to pupils who do not have special needs regarding behaviour. Behaviour strategies are applied consistently but with sensitivity to individual circumstances, particularly for pupils with SEND or those facing vulnerabilities. The school actively fosters a culture of respect, tolerance, and belonging through its curriculum, assemblies, and restorative practices, ensuring that every child feels valued and understood.

Alternative Provision

In line with updates to Keeping Children Safe in Education (KCSIE) 2025, Crudginton Primary School recognises its responsibility to ensure that any alternative provision used for pupils meets the highest safeguarding standards. Where pupils are placed in alternative educational settings, the school will obtain written confirmation that all staff working with our pupils have undergone the appropriate safer recruitment checks, including enhanced DBS checks and barred list checks where applicable. Furthermore, the school will conduct half-termly reviews of each pupil's placement to assess its continued suitability, safety, and effectiveness in meeting the pupil's educational and behavioural needs. These reviews will involve input from the pupil, parents or carers, and relevant staff, and will be documented to ensure transparency and accountability. This approach ensures that all pupils remain safeguarded and supported, regardless of the educational setting, and reflects the school's commitment to maintaining high standards of care and oversight in line with statutory guidance.

Equality Duties

Crudginton Primary School is committed to promoting equality and preventing discrimination in all aspects of behaviour management, in line with the Equality Act 2010 and the strengthened expectations outlined in KCSIE 2025. The school recognises that inclusive safeguarding is essential to creating a safe and supportive environment for all pupils, regardless of their background, identity, or individual needs. Staff are trained to understand how factors such as race, gender, sexual orientation, disability, and socio-economic status can influence a child's experience of school and behaviour. Behaviour strategies are applied consistently but with sensitivity to individual circumstances, particularly for pupils with SEND or those facing vulnerabilities. The school actively fosters a culture of respect, tolerance, and belonging through its curriculum, assemblies, and restorative practices, ensuring that every child feels valued and understood. Discriminatory behaviour is challenged promptly, and incidents are recorded and monitored to identify patterns and ensure appropriate support and intervention. This inclusive approach underpins the school's ethos and supports the development of emotionally literate, socially responsible pupils.

Searching and Confiscation

On the very rare occasion when we may need to, the headteacher, and staff they authorise, have the right to search children, with consent, for any item which is banned by the school rules. We follow the DfE Guidelines 2023. Banned items include: Knives and weapons, alcohol, illegal drugs, stolen items, tobacco, cigarettes or vapes, fireworks, pornographic images. Illegal drugs, weapons and stolen objects will be handed directly to the police.

[**Searching, Screening and Confiscation \(publishing.service.gov.uk\)**](https://publishing.service.gov.uk)

The member of staff conducting the search must be of the same gender as the child/children and there must always be a witness present. A DSL will be present to support where needed. Reasonable force may be used by the person carrying out the search if they feel that there is risk of harm to the child or others. School is not required to inform parents/carers before a search takes place or to seek their consent to search a child. Parents/carers will be informed where alcohol, illegal drugs or potentially harmful substances are found and ask them immediately in to school. If there are any complaints regarding searching, they are dealt with through our complaints procedure which is accessible on our website.

The use of Reasonable Force

Identified staff members are trained in managing actual and potential aggression with the aim of minimising the need to hold a child. Staff have the authority to use reasonable force to prevent children committing an offence, injuring themselves or others or causing major damage to property. Members of staff are trained how to use physical intervention with a child where needed always with the aim of preventing harm and holding a child for the minimum time possible. Any incidents of when physical intervention is used by staff with children is recorded in the 'Bound and Numbered' book and parents notified on the same day.

In some circumstances, staff may use reasonable force to restrain a pupil to prevent them:

- Causing disorder
- Hurting themselves or others
- Damaging property, eg doors, walls and large ICT equipment
- Incidents of physical intervention must:
 - Always be used as a last resort
 - Be applied using the minimum amount of force and for the minimum amount of time possible
 - Be used in a way that maintains the safety and dignity of all concerned
 - Never be used as a form of punishment

Communication of the Policy

The ethos of this policy will be included within the home-school agreement, agreed upon by governors and shared with pupils, parents and staff.

Any parents who join the school during the school year will receive the school prospectus and information on how to locate policies.

Reminders of behaviour will be published in the school newsletter at the beginning of every term.

The policy sections required for day-to-day classroom management will be published in the school handbook for staff.

Monitoring of the Policy

The headteacher and senior leadership team will review the behaviour policy yearly. It will be reviewed by the LGB every year

This policy is based on advice from the Department for Education (DfE) on:

- Behaviour and discipline in schools
- Searching, Screening and Confiscation (publishing.service.gov.uk) (Jul-23)
- The Equality Act 2010
- Use of reasonable force in schools

- Supporting pupils with medical conditions at school
- Keeping children safe in education - GOV.UK (www.gov.uk)

It is also based on the special educational needs and disability (SEND) code of practice.

In addition, this policy is based on:

- Schedule 1 of the Education (Independent School Standards) Regulations 2014; paragraph 7 outlines a school's duty to safeguard and promote the welfare of children, paragraph 9 requires the school to have a written behaviour policy and paragraph 10 requires the school to have an anti-bullying strategy
- DfE guidance explaining that academies should publish their behaviour policy and anti-bullying strategy online
- This policy complies with our funding agreement and articles of association

