



AP and Private Tuition

FULL COMPANY POLICIES AND

PROCEDURES

Updated July 2026

(Aligned to KCSiE 2026)

ALPHABETICAL MASTER POLICY INDEX

1. **Accidents and Incidents Policy:** Covers immediate care, documentation, and statutory reporting of accidents and behavioural incidents.
2. **Admissions Policy:** Details alternative provision, private tuition, and specialist school admissions, including multi-agency transition panels.
3. **Attendance Policy:** Outlines daily monitoring, "First Response" call-ins, and multi-agency tracking for absenteeism.
4. **Careers Education, Information, Advice, and Guidance (CEIAG) Policy:** Covers KS3/KS4 careers support, the Gatsby Benchmarks, and statutory provider access (Baker Clause).
5. **Complaints Policy:** Details the three-stage complaints procedure, including informal resolution, formal investigation, and independent panel reviews.
6. **Conflict of Interest Policy:** Manages disclosures regarding corporate gifts, exam impartiality, and safer recruitment bias.
7. **Curriculum, Assessment, and Wellbeing Mentoring Policy:** Explains the holistic progress matrix, individual learning plans (ILPs), and wellbeing mentoring frameworks.
8. **Data and ICT Security Management Policy:** Outlines network security, acceptable use, web filtering, and safe asset disposal.
9. **DBS Positive Disclosure Policy:** Details the risk assessment and LADO consultation protocols for candidates with criminal or safeguarding disclosures.
10. **Enforcing Authorities Notification Policy:** Explains the 14-day mandatory reporting windows to Ofsted and local authorities.
11. **Enrolment and Learner Support for Formal Qualifications Policy:** Outlines pre-enrolment suitability benchmarking and academic/pastoral support for qualifications.
12. **Equality and Diversity Policy:** Protects individuals against discrimination.
13. **Fire Safety and Evacuation Policy:** Details emergency fire evacuation actions, staff training, and assembly point checks.
14. **Gender-questioning Policy:** and details support for SEND and gender-questioning learners.
15. **Health, Safety, and Vulnerable Learner Policy:** Covers risk assessments, COSHH, first aid, and infection control.
16. **Healthy Relationships and Sex Education (HRSE) Policy:** Outlines the curriculum for relationships, health, and sex education, as well as parental withdrawal rights.
17. **Induction Policy:** Details the process for baseline assessments, safeguarding integration, and building trusted relationships for new learners.

18. **Learner Assessment, Baseline, and Progress Tracking Policy:** Defines the systematic approach to baseline assessments, SMART targeting, and termly progress reviews.
19. **Looked-After and Previously Looked-After Children (LAC/PLAC) Policy:** Explains targeted support, mentoring, and multi-agency PEP reviews for highly vulnerable learners.
20. **Mobile Phone Use Policy:** Outlines the default mobile-free environment, neurodiversity-affirming reasonable adjustments, and confiscation protocols.
21. **Online Safety and AI Policy:** Details the safe, human-led use of AI tools and explicit safeguards against digital harms like deepfakes and radicalisation.
22. **Restrictive Interventions Policy:** Ensures reasonable force and seclusion are used only as a last resort, prioritizing de-escalation.
23. **Safe Storage, Disposal, and Breach Management Policy:** Outlines GDPR compliance, Subject Access Requests (SARs), and the 4-step breach response framework.
24. **Safeguarding and Child Protection Policy:** The overarching child protection framework covering reporting, self-harm, child-on-child abuse, and secure online tuition.
25. **Safeguarding Policy:** Outlines the structured, tiered supervision framework.
26. **Supervision Policy:** details child-centred reviews, reflective practice, and 48-hour crisis debriefs to support staff wellbeing and case accountability.
27. **Safer Recruitment Policy:** Details pre-employment vetting, online checks, and the maintenance of the Single Central Record (SCR).
28. **Special Educational Needs and Disabilities (SEND) Policy:** Commits to reasonable adjustments, EHCP alignment, and safeguarding vigilance for disabled learners.
29. **Staff Code of Conduct (Incorporating Low-Level Concerns):** Establishes professional boundaries, digital communication rules, and the 24-hour reporting mandate for low-level concerns.
30. **Suspension and Exclusion Policy:** Defines lawful grounds, SEND vetting criteria, and reintegration frameworks for excluding or suspending a learner.
31. **Trip Policy:** Covers risk assessments, inclusive adjustments, financial contributions, and managing behaviour on off-site visits.
32. **Whistleblowing Policy:** Provides a protected pathway for staff to report malpractice or safeguarding failures internally and to external bodies like the LADO or NSPCC.

OUR PHILOSOPHY

Our Philosophy

At **CSPE**, we are deeply dedicated to offering compassionate, flexible, and tailored alternative provision and support for children with Special Educational Needs and Disabilities (SEND)—with a specialised focus on neurodiverse learners. Founded and run by educators and parents with direct, personal experience raising and teaching neurodiverse children who faced major hurdles in mainstream settings, we truly understand the journey.

We bridge the crucial gap between mainstream and specialised SEND schooling, providing vital alternative provision for children experiencing **EBSNA** (Emotionally Based School Non-Attendance) or accessing **EOTAS** (Education Otherwise Than At School). Beyond our daytime provision, **we also offer targeted private tuition in the evening** to enhance and reinforce what students learn during their school day.

Core Principles & Approach

- **Individualised & Phased Support:** Packages are built entirely around the child's current needs, engaging at their pace. We work closely with students, parents, and education authorities to create realistic, adaptable plans backed by regular reviews.
- **Child-Centred Growth & Wellbeing:** We specialise in helping children recover from burnout, rebuild self-esteem, and celebrate their unique strengths. We teach practical strategies for executive functioning and coping with challenging situations.
- **Empathetic & Skilled Staffing:** We believe the most vital reasonable adjustment is the attitude, deep SEND knowledge, and relational approach of our team. Listening to both parent and student voices is central to everything we do.

Ultimately, we offer authentic inclusion and unwavering support—helping every child feel understood, build confidence, and create a clear pathway toward reaching their full potential.

Policy for Accidents and Incidents

Document Title	Policy for Accidents & Incidents	Document Ref.	POL-ACC-001
School/Provision	Clear Steps Plus Education		
Version/Status	V1.0 Approved	Effective Date	July 19, 2026
Approved By	Executive Leadership Team	Review Cycle	Annual (July 2027)
Target Audience	All Academic Staff, Directors, Designated Safeguarding Leads (DSLs), and Administrative Staff.		

1. PURPOSE & SCOPE The purpose of this Policy is to ensure that any accident or incident that takes place within our centre is dealt with appropriately, rapidly, and safely. CSPE has a strict commitment to the safety and well-being of the learners, staff, parents/carers, and visitors who come to our centre. This policy works directly in conjunction with our Behaviour Management and Safeguarding policies.

2. POLICY & LEGAL CONTEXT This Policy operates in strict alignment with UK regulations and statutory frameworks, including:

- **The Health and Safety at Work etc. Act 1974.**
- **RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations).**
- **Keeping Children Safe in Education (KCSIE) 2026.**
- **Ofsted and Care Inspectorate statutory reporting requirements.**

3. THE CLEAR STEPS PLUS HOLISTIC ACCIDENT & INCIDENT FRAMEWORK To protect our learners and ensure total transparency, CSPE manages accidents and incidents across four core operational domains:

Domain	What We Implement	Primary Rationale
1. First Response Care	Administration of first aid and securing the immediate environment.	To stabilize the individual and prevent any further harm or injury.
2. Immutable Recording	Documenting serious events in permanent ink on formal reports.	To prevent critical health or safety records from being edited or erased.
3. Parental Communication	Immediate or end-of-session notification regarding any physical or behavioural event.	To ensure families are fully informed of injuries, existing marks, or behavioural crises.
4. Statutory Escalation	Direct reporting to Ofsted, the Care Inspectorate, the HSE, or Social Services.	To fulfil legal obligations regarding hospitalizations, severe injuries, or safeguarding breaches.

CRITICAL PRINCIPLE *"Immutable Documentation and Escalation." Serious accidents, hospitalizations, or severe behavioural incidents must be written up immediately in an Incident/Accident Report in pen so they cannot be edited or erased and must be reported centrally to the Head of Ofsted, Safeguarding & Compliance.*

4. INTENT & STRUCTURE (DEFINING ACCIDENTS VS. INCIDENTS) To ensure accurate reporting, staff must distinguish between an accident and an incident:

- **Accidents:** Unintentional physical injuries or medical emergencies occurring on-site. Staff should also generate an accident report if a learner arrives at the centre with a pre-existing injury.
- **Incidents:** Any event causing concern for welfare that is *not* accidental, regardless of whether it results in an injury. This includes situations where physical restraint is used, deliberate harm is caused, verbal abuse occurs, a learner attempts to escape, unauthorised removal occurs, safeguarding breaches happen, or theft/vandalism takes place.

5. STEP-BY-STEP OPERATIONAL PROCESS To ensure immediate response and legal compliance, staff must adhere strictly to the following workflow:

- **1. Immediate Care & Control:** Staff must address the immediate medical or emotional needs of the individuals involved, utilizing the centre First Aid Box if necessary.
- **2. Formal Reporting:** Staff must complete the Accident or Incident Report detailing: the date, time, and location; names of individuals involved; circumstances of the event; description of any injuries (or lack thereof); actions taken; and a staff witness signature.
- **3. Parent/Carer Sign-Off:** The signature of the parent/guardian collecting the learner (or the adult to whom the accident happened) must be obtained on the report.
- **4. Unaccompanied Departures:** If an involved learner has permission to leave the centre independently, the Directors must telephone the parent/carers to notify them of the event and confirm that it has been formally recorded. Staff must ensure the parent signs the form upon their next visit.
- **5. Retention of Unsafe Learners:** If a learner has been involved in an accident or incident and staff do not feel it is appropriate or safe for them to leave on their own, staff will call the parent/carers and mandate that they collect the learner.

6. RECORDING, DATA MANAGEMENT & SECURITY

- **Pen Mandate:** All serious accident and incident records must be made in pen to guarantee data integrity.
- **External Auditing:** CSPE staff will explicitly record whether a specific incident requires reporting to Social Services or enforcing authorities (Ofsted/Care Inspectorate).
- **School Settings:** When operating within a host school setting, CSPE staff will adhere to the specific accident and incident policies and procedures pertinent to that school.

7. ROLES & RESPONSIBILITIES

Role	Specific Accident & Incident Responsibilities
Directors	• Responsible for reporting accidents, diseases, and dangerous occurrences (RIDDOR) to the HSE. • Telephones parents/carers if an involved learner is leaving the centre independently.
Head of Ofsted, Safeguarding & Compliance	• Receives and centrally reviews all formal written reports regarding serious accidents, hospitalizations, or severe incidents.
All CSPE Staff & Tutors	• Administer immediate care, complete the detailed written reports, and secure parent/carer signatures upon collection.

8. QUALITY ASSURANCE, MODERATION, & REVIEW To ensure the integrity of our safety systems, the school implements the following oversight protocol:

1. Post-Incident Review: Following an incident, CSPE staff will actively review the learner's behaviour with the parent and the learner to agree on the best course of action.

2. Annual Policy Review: This Policy framework is reviewed at least annually by the SLT to incorporate updated statutory guidelines from the HSE and Ofsted.

Policy for Admissions (in preparation for the independent specialist school)

Document Title	Policy for Admissions	Document Ref.	POL-ADM-001
School/Provision	Clear Steps Plus Education		
Version/Status	V1.0 Approved	Effective Date	July 19, 2026
Approved By	Executive Leadership Team	Review Cycle	Annual (July 2027)
Target Audience	All Academic Staff, Directors, Designated Safeguarding Leads (DSLs), Parents/Carers, and Commissioning Partners.		

1. PURPOSE & SCOPE The purpose of this Policy is to define the structured systems, rigorous controls, and multi-agency safeguards utilized by CSPE to manage admissions across Alternative Provision, Private Tuition, and Specialist School placements. Our mission is to deliver flexible, compassionate, and neurodiversity-aware education that supports reintegration into suitable education wherever possible, specifically supporting EOTAS learners, EBSNA learners, and those awaiting specialist SEND allocation.

2. POLICY & LEGAL CONTEXT This Policy operates in strict compliance with the legal requirements and expectations set out in:

- **Keeping Children Safe in Education (KCSIE) 2026.**
- **The Children and Families Act 2014.**
- **The SEND Code of Practice 0 to 25 years.**
- **The Equality Act 2010.**
- **The Data Protection Act 2018 & Data (Use and Access) Act 2025.**

3. THE CLEAR STEPS PLUS HOLISTIC ADMISSIONS FRAMEWORK To maximize safety and ensure every placement is appropriately tailored, CSPE deploys a multi-layered admissions framework divided into core operational domains:

Admissions Domain	What We Implement	Primary Rationale
1. Pre-Admission Vetting	Reviewing EHCPs, safeguarding chronologies, and social worker status.	To ensure safe, appropriate, and fully informed placement planning.
2. Safety & Risk Planning	Multidisciplinary meetings and personalised risk assessments prior to entry.	To mitigate risks of child-on-child abuse, violence, or online harms from day one.

3. Attendance Tracking	Daily vetting and joint missing education procedures.	To prevent learners from becoming hidden from education or exposed to exploitation.
4. Substantive Transitions	A quorate Transition Panel evaluating capacity, EHC plans, and safety.	To ensure the placement meets the child's SEND profile without compromising existing pupils.

CRITICAL PRINCIPLE *Safeguarding Continuity: A referral cannot be finalised without a full safeguarding chronology. If safety concerns are identified, a personalised risk assessment and safety plan must be functional from day one. For substantive placements, the child's confidential Child Protection File must be securely transferred within 5 days.*

4. ADMISSIONS INTENT & STRUCTURE (DEFAULT EXPECTATIONS) CSPE works strictly in tandem with commissioning schools and Local Authorities, who retain ultimate responsibility for ensuring the placement safely meets the child's individual needs.

- **Phased Integration:** Provisions may start on a reduced, phased timetable and scale up gradually based on the learner's state of well-being, engagement, and safety requirements.
- **Departure Safeguards:** Learners are only released to authorised individuals; unaccompanied dismissal requires explicit written parental consent and is only permitted for Key Stage 5 (Ages 16–18).
- **Court Orders:** Parents/carers are legally required to notify the Directors immediately of any active family court orders or non-molestation orders to prevent an unauthorised release.

5. STEP-BY-STEP OPERATIONAL PROCESS (THE ADMISSIONS PIPELINE) To ensure consistency and safety, all staff and commissioners must adhere strictly to the following workflow:

1. Information Gathering: Commissioning entities must provide the learner profile, SEND status, and comprehensive safeguarding/social worker details. CSPE reciprocally provides written confirmation of staff safer recruitment checks.

2. Multidisciplinary Meeting & Safety Planning: Before admission, a meeting is held with the learner, parents/carers, and referring bodies to review needs and establish immediate risk mitigation strategies.

3. Transition Panel Assessment: For specialist school places, a quorate multi-disciplinary panel (including the Headteacher, SENCO, Directors, and DSL) reviews EHC plans, child protection logs, and behaviour plans to formulate formal placement recommendations.

4. Secure File Transfer: Upon placement acceptance, the DSL ensures the secure transfer of the confidential Child Protection File separately from the main academic file within 5 days to ensure risk-management profiles are immediately functional.

5. Daily Controls & End-of-Day Sweeps: Upon arrival, attendance is logged immediately. At dismissal, staff conduct a complete physical sweep of all classrooms, sensory zones, and auxiliary rooms to ensure all children have safely departed.

6. RECORDING, DATA MANAGEMENT & SECURITY

- **Secure Portals:** Consultation files, minutes, and risk frameworks are maintained securely using data portals fully compliant with the Data Protection Act 2018 and the Data (Use and Access) Act 2025.
- **Written Outcomes:** All formal Transition Panel outcomes (offers, phased transition arrangements, or detailed explanations of a decision to decline a placement) are issued in writing to the local authority and parents within agreed statutory timescales.

7. ROLES & RESPONSIBILITIES

Role	Specific Admissions Responsibilities
Executive DSL	• Retains explicit authority to review whether the placement can safely manage the candidate's child protection profile. • Interfaces with placing schools to ensure secure transfer of Child Protection Files within 5 days.
Directors	• Oversees the Transition Panel alongside the SENCO to evaluate educational capacity. • Ensures staff conduct physical sweeps of the centre upon dismissal.
Commissioning Entities	• Must provide a complete safeguarding chronology and explicit notification of active social worker status prior to referral finalization.

8. QUALITY ASSURANCE, MODERATION, & REVIEW To ensure the integrity of our admissions framework, the school implements the following oversight protocol:

- 1. Continuous Placement Reviews:** Alternative provision placements are subject to robust, continuous evaluation at least half-termly to ensure the provision continues to effectively meet the child's shifting needs safely. #
- 2. Panel Quorum Safeguards:** The Transition Panel is only quorate when core roles (Headteacher, SENCO, Directors, DSL) are fully represented to ensure rigorous evaluation of both educational capacity and child safety.
- 3. Annual Policy Review:** This Policy is subject to mandatory review annually by leadership and governors, or sooner if statutory DfE alternative provision regulations shift.

Policy for Attendance

Document Title	Policy for Attendance & CME	Document Ref.	SOP-ATT-001
School/Provision	Clear Steps Plus Education		
Version/Status	V1.0 Approved	Effective Date	July 19, 2026
Approved By	Executive Leadership Team	Review Cycle	Annual (July 2027)
Target Audience	All Academic Staff, Tutors, Administrative Staff, Designated Safeguarding Leads (DSLs), and SENCOs.		

- 1. PURPOSE & SCOPE** The purpose of this Standard Operating Procedure (SOP) is to ensure that all learners at CSPE attend regularly and on time, as consistent attendance is vital for learning, personal development, and safety. This policy applies to all learners enrolled at CSPE, their parents/carers, commissioning schools, and all staff involved in tracking and supporting attendance.
- 2. POLICY & LEGAL CONTEXT** This SOP operates in strict alignment with UK education and safeguarding regulations, including:
- **Keeping Children Safe in Education (KCSIE) 2026.**
 - **DfE Statutory Guidance:** *Working together to improve school attendance.*
- 3. THE CLEAR STEPS PLUS HOLISTIC ATTENDANCE FRAMEWORK** Because our alternative provision cohort faces complex special educational, emotional, or social needs affecting their ability to attend, CSPE rejects a purely punitive approach to absence. Our attendance framework is driven by three core domains of action:

Attendance Domain	What We Enforce	Primary Rationale
1. Person-Centred Safety	Understanding individual emotional/SEND barriers to attendance.	Recognizing that prolonged, unexplained, or repeat absence is a critical safeguarding warning sign (indicating neglect, exploitation, or mental health distress).
2. Early Intervention	Immediate problem-solving support, multi-agency collaboration, and flexibility.	To prevent attendance patterns from escalating into persistent absenteeism.
3. Stakeholder Accountability	Clear, fluid communication between families, commissioning schools, and Local Authorities.	To ensure every child remains visible and accounted for during school hours.

CRITICAL PRINCIPLE *Unexplained absence is a critical safeguarding warning sign. We must ensure every child remains visible and accounted for during school hours through immediate, trauma-informed intervention and multi-agency collaboration.*

4. DAILY REGISTRATION INTENT & STRUCTURE (DEFAULT EXPECTATIONS)

- **The Attendance Register:** Staff on duty must update the official centre register daily at the beginning of each morning and afternoon session.
- **Distinguishing Codes:** All absences must be categorized accurately using distinct codes that clearly separate authorised absences (verified medical appointments/certified illness) from unauthorised absences.
- **Late Arrival Controls:** Learners are expected to arrive on time. Tutors will constructively challenge persistent lateness to evaluate root causes and engage parents/commissioners to implement practical solutions (e.g., reviewing timetabling or coordinating transport).

5. STEP-BY-STEP OPERATIONAL PROCESS ("FIRST RESPONSE") To ensure consistency and safety, all staff must adhere strictly to the following workflow when a learner is absent:

- **1. Immediate Identification:** Tutors and administrative staff check the register daily; all "no-show" learners must be identified and followed up immediately by the designated First Response staff member.
- **2. Emergency Contact Controls:** The First Response staff member will contact the primary parent/carer to secure a formal reason for the absence. If unreachable, staff will systematically dial the secondary and tertiary numbers (CSPE requires a minimum of two emergency contacts per learner).
- **3. Active Social Worker Priority:** If a learner is subject to a Child in Need or Child Protection Plan, or is a Looked After Child, any unauthorised absence will trigger a priority phone call to their designated statutory Social Worker on the same morning.

6. RECORDING, DATA MANAGEMENT & SECURITY

- **The First Response Log:** A detailed chronology of all communication attempts, parent explanations, and final resolutions must be logged instantly inside the dedicated centre First Response system.
- **Commissioning School Notification:** CSPE will immediately email an attendance flash-report to the commissioning school's SENCO and DSL if a vulnerable learner fails to arrive.

7. RESPONDING TO PERSISTENT ABSENCE & CME Where a learner experiences persistent barriers to attendance, CSPE will deploy targeted interventions rather than relying solely on sanctions:

- **Joint Reasonable Enquiries:** If a learner is absent without authorisation for prolonged periods, CSPE will work directly with the commissioning school and Local Authority to conduct joint "reasonable enquiries" to establish the child's whereabouts and prevent Children Missing Education (CME).

- **Home Visits ("Sight of the Learner"):** When unauthorised absence continues and cannot be verified by phone, the Directors or DSL may coordinate a home visit to maintain "sight" of the child and satisfy the school's duty of care.
- **Targeted Support Strategies:** Interventions include creating Individual Attendance Plans, utilizing temporary phased reintegration for learners returning from severe EBSNA (Emotionally Based School Non-Attendance), welfare check-ins, and multi-agency case reviews.

8. ROLES & RESPONSIBILITIES

Role	Specific Attendance Responsibilities
Directors	• Reviews attendance and punctuality trends consistently to isolate emerging local or cultural indicators of risk. • Convenes formal panel meetings with commissioners and parents to establish stricter attendance contracts if required.
Designated Safeguarding Lead (DSL) / First Response Staff	• Executes the "First Response" call-in procedure and logs all communication attempts. • Triggers priority phone calls to statutory Social Workers on the same morning for LAC/CP/CIN learners. • Coordinates home visits to maintain visual verification of a child.
Class Teachers / Tutors / Admin	• Update the official centre register daily at the beginning of each morning and afternoon session. • Constructively challenge persistent lateness to evaluate root causes.

9. QUALITY ASSURANCE, GOVERNANCE, & REVIEW To ensure the integrity of our safeguarding and attendance tracking, the school implements the following oversight:

- 1. Trend Analysis Review:** Attendance and punctuality trends are reviewed consistently by the senior leadership member responsible for attendance tracking.
- 2. Formal Escalation:** If targeted support packages do not improve attendance, CSPE will convene formal panel meetings with commissioners and parents.
- 3. Annual Policy Review:** This policy will be formally reviewed annually, or sooner if national DfE school attendance legislation or local safeguarding partner protocols change.

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

Document Title	Policy for CEIAG	Document Ref.	POL-CEI-001
School/Provision	Clear Steps Plus Education		
Version/Status	V1.0 Approved	Effective Date	July 14, 2026
Approved By	Executive Leadership Team	Review Cycle	Annual (July 2027)
Target Audience	All Academic Staff, Careers Leaders, SENCOs, and Tutors.		

1. PURPOSE & SCOPE This Policy sets out how CSPE provides high-quality Careers Education, Information, Advice, and Guidance (CEIAG) tailored for neurodivergent young people. Our inclusive community provides opportunities for all young people to excel, celebrating the unique strengths neurodivergent individuals bring to the workforce, such as profound attention to detail and diverse perspectives. This policy ensures our students gain necessary employability and self-advocacy skills, empowering them to transition successfully into adulthood and meaningful employment without being disadvantaged by systemic barriers.

2. POLICY & LEGAL CONTEXT This Policy operates in strict alignment with UK regulations and statutory frameworks, including:

- **Keeping Children Safe in Education (KCSIE) 2026.**
- **The Education Act 2011.**
- **The Skills and Post-16 Education Act 2022** (The Provider Access Legislation / Baker Clause).

3. THE CLEAR STEPS PLUS HOLISTIC CEIAG FRAMEWORK To challenge the systemic barriers that currently result in only one in four autistic young people accessing education or training beyond school, our approach is guided by the Gatsby Benchmarks and operates across four core themes:

CEIAG Domain	What We Implement	Primary Rationale
1. Engaging Stakeholders	Collaborative efforts involving multiple stakeholders.	Starting support as soon as a young person enters our setting.
2. Curriculum Planning	Embedding an understanding of the working world.	Teaching necessary life skills within timetabled lessons.
3. Workplace Experiences	Providing tailored insights, visits, and encounters.	Helping students think about career choices, develop self-advocacy skills, and understand workplace rights.

4. Transition Planning	Preparing early for post-16/18 transitions and partnering with parents.	Mitigating the daunting reduction of support in the workplace compared to education.
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CRITICAL PRINCIPLE *"Start, stay, and succeed."* Aligned with the Buckland Review of Autism Employment, our ultimate goal is to create pathways that enable neurodivergent individuals to start, stay, and succeed in their chosen careers.

4. CEIAG INTENT & STRUCTURE (STUDENT ENTITLEMENT) All students at CSPE will have access to a range of opportunities to support their development:

- **Independent Advice:** Access to an independent careers advisor trained specifically in understanding autism and neurodivergent needs.
- **Differentiated Resources:** Specialised guidance for students accessing a personalised or non-GCSE curriculum, alongside those studying mainstream subjects.
- **Statutory Encounters (Baker Clause):** In compliance with legal requirements, CSPE will provide **at least six encounters** with providers of approved technical education qualifications or apprenticeships.
- **Sensory Adaptations:** Providers are supported to adjust delivery styles for our neurodivergent cohort; live online encounters can also be broadcast to reduce sensory overload.

5. STEP-BY-STEP OPERATIONAL PROCESS To ensure consistency and safety, all staff must adhere strictly to the following workflow:

1. Key Stage 3 (Foundational Understanding): In Year 7, students identify personal strengths and set lifelong learning goals. In Year 8, they explore different career pathways and core skills. In Year 9, students manage expectations, explore progression routes, and make informed option choices for KS4.

2. Key Stage 4 (Practical Exposure): In Year 10, students engage in visits to aspirational Further/Higher Education providers and attend inclusive careers fairs. In Year 11, focused support is given for post-16 applications, including independent guidance interviews and detailed teaching on self-advocacy and workplace rights.

3. Provider Access Management: Requests for access are directed to the designated Careers Lead, with encounters taking place during assemblies, timetabled lessons, or specific Careers events.

4. Safeguarding and Vetting (KCSIE 2026): All external visitors and training providers are subject to strict safer recruitment checks, must be vetted, recorded on the visitor system, and always accompanied by CSPE staff to protect against grooming or exploitation.

6. RECORDING, DATA MANAGEMENT & SECURITY

- **Tracking Intentions:** CSPE uses the Careers and Enterprise Company's Compass+ tool to track student intentions, career aspirations, and our progress toward the Gatsby Benchmarks.

- **Destination Data:** We closely monitor destination data and provide targeted individual support for students at risk of becoming NEET (Not in Education, Employment, or Training) by liaising with additional needs teams at FE providers and local skills teams.
- **Data Protection:** Providers do not have permission to collect personal data, contact details, or social media handles from learners. All follow-up communications must be brokered transparently through the CSPE Careers Leader.

7. ROLES & RESPONSIBILITIES

Role	Specific CEIAG Responsibilities
Careers Leader	• Coordinates all provider requests and works closely with providers to ensure facilities and delivery styles are appropriate and sensory-friendly. • Brokers all follow-up communications between providers and learners.
Tutors and Staff	• Apply professional curiosity during external encounters to protect learners from grooming, exploitation, or exposure to extremist work environments. • Support early transition planning and embed understanding of the working world directly within timetabled lessons.
Parents/Carers & Alumni	• Partner in transition planning, participate in work shadowing, and serve as neurodivergent role models to inspire current students.

8. QUALITY ASSURANCE, MODERATION, & REVIEW To ensure the integrity of our careers provision, the school implements the following oversight protocol:

1. Annual Evaluation: The CEIAG provision and Provider Access Policy are evaluated annually via the personal development and wellbeing department, taking into consideration feedback from students, parents, and local authority destination data.

2. Professional Development: The CPD needs of the Careers Leader, SENCO, and other staff are identified annually, encouraging specialised training (e.g., Careers Education Framework for autistic youth) to ensure staff remain current with best practices for neurodivergent youth.

Policy for Complaints

Document Title	Policy for Complaints	Document Ref.	POL-CMP-001
School/Provision	Clear Steps Plus Education		
Version/Status	V1.0 Approved	Effective Date	July 19, 2026
Approved By	Executive Leadership Team	Review Cycle	Annual (July 2027)
Target Audience	All Parents, Carers, Commissioning Schools, Directors, and Academic Staff.		

1. PURPOSE & SCOPE The purpose of this Policy is to provide a transparent, fair, and efficient framework for managing, investigating, and resolving complaints raised by parents, carers, schools, or alternative provision commissioners. CSPE views complaints as an essential mechanism for quality assurance and continuous organisational improvement.

2. POLICY & LEGAL CONTEXT This Policy operates in strict accordance with UK regulations and statutory frameworks, including:

- **Keeping Children Safe in Education (KCSIE) 2026.**
- **Ofsted Voluntary Childcare Register Requirements.**
- **Education Regulations** (where applicable to alternative provision oversight).

3. THE CLEAR STEPS PLUS HOLISTIC COMPLAINTS FRAMEWORK To proactively address concerns and protect our community, CSPE manages complaints across four core domains:

Complaints Domain	What We Implement	Primary Rationale
1. Informal Resolution	Direct, open, and professional dialogue with the centre Directors.	To resolve the majority of concerns rapidly and collaboratively.
2. Formal Investigation	Detailed written investigations completed within a statutory 28-day window.	To address severe concerns and ensure regulatory alignment with Ofsted requirements.
3. Independent Review	Convening a panel featuring at least one completely independent member.	To guarantee an unbiased, transparent review process if initial outcomes are contested.
4. Safeguarding Escalation	Bypassing standard timelines for any allegations of harm or abuse.	To ensure immediate protection and compliance with LADO referral protocols.

CRITICAL PRINCIPLE *Any complaint or expression of concern that involves allegations of harm, abuse, or inappropriate conduct by a member of staff, tutor, volunteer, or contractor must **completely bypass** standard complaint handling timelines. Such matters must immediately be handled under the Safeguarding and Child Protection Policy and referred directly to the Trafford Local Authority Designated Officer (LADO) within 24 hours.*

4. COMPLAINTS INTENT & EXTERNAL ESCALATION CSPE aims to resolve all complaints internally through our transparent three-stage process. However, if a complainant is not satisfied with the final internal decision, or reasonably believes the internal processes are compromised, they have a statutory right to escalate their complaint directly to the appropriate enforcement or inspecting authority:

- **Ofsted Complaints Line:** 0300 123 4666.
- **Care Inspectorate Complaints Line:** 0345 600 9527. *(Note: Complaints escalated to Ofsted regarding a registered provider may be referred back to the provider for internal investigation under Ofsted oversight.)*

5. STEP-BY-STEP OPERATIONAL PROCESS (THE THREE-STAGE PROCEDURE) To ensure consistency and fairness, all complaints follow this strict workflow:

- **1. Stage 1 - Informal Resolution:** In the first instance, parents, carers, or schools are encouraged to discuss their concerns or reasons for complaint regarding service quality directly with the centre Directors. Most concerns can be resolved rapidly through open, professional dialogue at this stage.
- **2. Stage 2 - Formal Written Investigation:** If an informal resolution is not achieved, or if the nature of the concern is severe, a formal complaint must be submitted in writing or via email to the Directors. The complaint will be fully investigated and resolved within **28 working days** of receipt.
- **3. Written Outcome Response:** The complainant will receive a formal written response containing a detailed account of the findings of the investigation and a clear outline of any corrective actions taken as a result.
- **4. Stage 3 - Independent Panel Review:** If the complainant remains unsatisfied with the Stage 2 outcome, they have the right to request an Independent Panel Review. CSPE will convene a panel consisting of at least three individuals who have not been directly involved in the matters detailed in the complaint, with at least one panel member completely independent of the management and running of CSPE. The complainant may attend and be accompanied by a trusted adult.

6. RECORDING, DATA MANAGEMENT & SECURITY

- **Central Record:** CSPE maintains a central, secure written record of all formal complaints. To comply with regulatory audits, each file must log the exact nature of the complaint, the steps taken to investigate, the formal outcome, any disciplinary/policy actions implemented, and verification that the findings were provided within the 28-day window.
- **Access & Transparency:** Redacted, data-protected summaries of complaint reports are made available to parents and Ofsted on request.
- **Retention Limits:** Formal complaint records are kept securely on Nextcloud for **ten years** from the date of resolution. However, if a complaint relates in any way to a safeguarding incident, the record must be preserved securely until the individual reaches the age of 25.

7. ROLES & RESPONSIBILITIES

Role	Specific Complaints Responsibilities
Head of School / Directors	• Manages Stage 1 informal resolutions and leads Stage 2 formal written investigations. • Ensures written outcomes are provided within the statutory 28-working-day window.
Designated Safeguarding Lead (DSL)	• Immediately intercepts and redirects any complaint involving allegations of harm or abuse directly to the LADO within 24 hours.
Independent Panel Members	• Conduct unbiased Stage 3 reviews for complainants unsatisfied with internal findings, remaining completely independent of centre management.

8. QUALITY ASSURANCE, MODERATION, & REVIEW To ensure the integrity of our organisation, the school implements the following oversight protocol:

1. Corrective Action Tracking: Any operational actions, policy adjustments, or disciplinary measures implemented as a result of a complaint investigation are formally logged.

2. Annual Policy Review: This Policy framework is reviewed annually to incorporate updated statutory guidelines from KCSIE and Ofsted standard regulations.

Policy for Conflict of Interest

Document Title	Policy for Conflict of Interest	Document Ref.	POL-COI-001
School/Provision	Clear Steps Plus Education		
Version/Status	V1.0 Approved	Effective Date	July 14, 2026
Approved By	Executive Leadership Team	Review Cycle	Annual (July 2027)
Target Audience	All Directors, Academic Staff, Tutors, and Administrative Staff.		

1. PURPOSE & SCOPE The purpose of this policy is to protect the absolute integrity, fairness, and credibility of CSPE’s alternative provision operations, educational assessments, and safeguarding practices. This framework ensures that all directors, tutors, and staff operate with complete transparency, free from personal, financial, or institutional bias.

2. POLICY & LEGAL CONTEXT This Policy operates in strict alignment with UK regulations and statutory frameworks, including:

- **Keeping Children Safe in Education (KCSIE) 2026:** Specifically mandating strict personal relationship declarations, safer recruitment conflict controls, and the prevention of bias in external assessment paths.
- **JCQ (Joint Council for Qualifications) General Regulations:** For the management of examinations and assessments.

3. THE CLEAR STEPS PLUS HOLISTIC CONFLICT OF INTEREST FRAMEWORK To proactively protect the integrity of our operations and safeguard our learners, CSPE manages conflicts of interest across four core domains:

Integrity Domain	What We Implement	Primary Rationale
1. Corporate & Financial Disclosures	Formal declarations of financial stakes or external employment.	To prevent commercial bias and ensure fair supplier/customer negotiations.
2. Gifts & Hospitality	Strict thresholds for corporate gifts and a nominal-value restriction on learner gifts.	To protect professional integrity and prevent undue influence.
3. Safeguarding & Recruitment	Separation of personal relationships from interview panels, line management, and LADO referrals.	To maintain strict compliance with KCSIE safer recruitment and low-level concerns frameworks.

4. Exams & Assessments	Mandatory declarations and recusal from exam activities when personal/financial links exist.	To protect the validity and fairness of educational qualifications.
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CRITICAL PRINCIPLE *"Complete transparency and integrity." CSPE expects all directors, tutors, and staff to freely, openly, and honestly declare all and any of their interests, in full and without reservation, whether financial or otherwise.*

4. CONFLICT OF INTEREST INTENT & STRUCTURE CSPE requires active management of relationships and interests to protect the centre's core functions:

- **Commercial Declarations:** Staff must declare any financial or non-financial stake, employment, or advisory role held with external organisations that interact with CSPE.
- **Recruitment and Panel Bias:** No staff member may sit on an interview panel, review application vetting, or verify background checks for a candidate with whom they have a close personal relationship.
- **Line Management:** Staff must never directly line-manage, conduct performance appraisals for, or sign off on financial expenses for a family member or close personal partner.
- **Gifts & Hospitality Restrictions:** Staff must not accept gifts or hospitality from learners or parents unless they are of strictly nominal value (e.g., small end-of-term tokens). Any corporate gifts over £20 must be declared in writing.

5. STEP-BY-STEP OPERATIONAL PROCESS (DECLARATIONS & RECUSAL) To ensure consistency and transparency, all staff must adhere strictly to the following workflow:

1. Formal Declaration: Staff must submit written declarations using the centre's formal *Conflict of Interest Declaration Form* at the earliest possible opportunity or immediately upon a shift in personal or commercial circumstances.

2. Recusal Protocols (Commercial): Where a potential conflict arises in relation to contracts or pricing, the involved individual must recuse themselves entirely from discussions and decision-making activities.

3. Recusal Protocols (Safeguarding): If a safeguarding concern involves someone with whom a manager has a personal connection, that manager must completely recuse themselves from the internal handling and LADO referral process, routing it immediately to an independent co-director or external safeguarding consultant.

4. Exam Adjustments: Where an exam-related conflict is declared (e.g., a personal relationship with a learner or providing private tuition), the staff member is strictly prohibited from participating in exam preparation, invigilation, internal marking, or moderation for that specific learner.

6. RECORDING, DATA MANAGEMENT & SECURITY

- **Management Review Meetings:** Where a complex conflict is identified, the Directors will convene a formal management meeting to determine and log the precise nature of the conflict, the risk mitigation controls implemented, and the alternative staffing arrangements deployed.

- **Secure Record Retention:** All written conflict declarations, meeting minutes, and exam mitigation plans are stored securely within Nextcloud under restricted Director-only access.
- **Audit Compliance:** These records are maintained for a minimum of **six years** following the termination of the associated contract or the conclusion of the relevant exam cycle to satisfy JCQ and Ofsted audit guidelines.

7. ROLES & RESPONSIBILITIES

Role	Specific Conflict of Interest Responsibilities
Director (Karen Greenwood)	• Retains absolute discretion over what qualifies as a significant conflict (all final decisions are binding and not subject to internal appeal). • Evaluates exam declarations and implements mandatory alternative arrangements (like independent invigilators) to ensure complete fairness.
Managers / Senior Leaders	• Must completely recuse themselves from managing safeguarding allegations or performance appraisals involving close personal connections.
All Staff & Tutors	• Legally obligated to formally declare any personal, financial, or exam-related conflicts at the earliest opportunity. • Must report all offers of gifts or hospitality from learners or families in writing to the Directors.

8. QUALITY ASSURANCE, MODERATION, & REVIEW To ensure the integrity of our operations, the school implements the following oversight protocol:

1. Annual Record Review: Secure conflict declarations and exam mitigation plans are subject to an annual internal review.

2. Policy Review: This Policy framework is reviewed regularly to incorporate updated statutory guidelines from KCSIE and the Joint Council for Qualifications (JCQ).

Policy for Curriculum, Assessment, and Wellbeing Mentoring

Document Title	Policy for Curriculum, Assessment & Wellbeing	Document Ref.	
School/Provision	Clear Steps Plus Education		
Version/Status	V1.0 Approved	Effective Date	July 14, 2026
Approved By	Executive Leadership Team	Review Cycle	Annual (July 2027)
Target Audience	All Academic Staff, Special Educational Needs Coordinators (SENCOs), Therapists, Mentors, and Education Assistants.		

1. PURPOSE & SCOPE

This Standard Operating Procedure (SOP) sets out how CSPE designs, delivers, and evaluates a high-quality, inclusive, and personalised curriculum that meets the needs of learners accessing alternative provision. This curriculum incorporates a clear, robust framework for identifying, monitoring, and communicating student progress through adapted assessment structures and specialised wellbeing mentoring approaches tailored for neurodiverse learners.

Underpinned by CSPE's core ethos of "**regulation before expectation**," this policy operates under the fundamental protective philosophy that learning can only occur when learners feel safe, regulated, and understood; that behaviour is a form of communication; and that personalised pathways are essential for meaningful progress. The objective of this procedure is to ensure that curriculum design and multi-dimensional assessment are used actively to adapt teaching, quantify holistic progress, and provide robust evidence for Education, Health, and Care Plan (EHCP) Annual Reviews and Ofsted inspections.

2. POLICY & LEGAL CONTEXT

This SOP operates in strict alignment with UK education regulations and statutory frameworks, including:

- **DfE Alternative Provision Statutory Guidance.**
- **Education Regulations:** Ensuring robust tracking of pupil progress, attainment, and leadership actively promoting learner wellbeing.
- **The Special Educational Needs and Disability (SEND) Code of Practice (0 to 25 years):** Specifically, the "**Assess, Plan, Do, Review**" cycle.
- **Keeping Children Safe in Education (KCSIE) 2026.**
- **The Data Protection Act 2018 and UK GDPR.**
- **Joint Council for Qualifications (JCQ) Access Arrangements.**

3. THE CLEAR STEPS PLUS HOLISTIC FRAMEWORK

Because our pupils present with non-linear learning pathways, CSPE rejects the principle of labelling learners by limits. Our framework is designed to discover what a child can do, highlighting their strengths and pinpointing the exact micro-steps required to overcome barriers to learning. Progress is measured dynamically across four core developmental domains:

Assessment Domain	What We Measure	Primary Tools & Systems Used
1. Academic & Cognitive	English, Mathematics, functional skills, vocational pathways, and cognitive processing.	Pre-Key Stage standards, standardized baseline tests (e.g., CEM testing), GCSE/Functional Skills metrics, and custom internal rubrics.
2. EHCP / Personal Outcomes	Progress against individual EHCP Section F provisions, communication, and independence targets.	Individual Support Plan trackers, individualised Goal Attainment Scaling (GAS), and progress matrices.
3. Social, Emotional & MH	Emotional regulation, anxiety levels, resilience, peer boundary navigation, and readiness to learn.	GAD7, PHQ9, Strengths and Difficulties Questionnaires (SDQs), and internal wellbeing mentoring logs.
4. Therapeutic & Physical	Speech, Language & Communication Needs (SLCN), executive functioning processing, and sensory processing profiles.	Therapy-led progress scales, Occupational Therapy (OT) tools, Speech & Language Therapy inputs, and executive functioning weekly tracking.

CRITICAL PRINCIPLE *"Regulation before expectation." Learning can only occur when learners feel safe, regulated, and understood; behaviour is a form of communication; and personalised pathways are essential for meaningful progress.*

4. CURRICULUM INTENT & STRUCTURE

The intent of the CSPE curriculum is to re-engage learners in education through positive, safe, and meaningful experiences, supporting academic, social, emotional, and critical life skills development. Each learner follows a personalised curriculum pathway, dynamically scheduled to balance academic attainment with emotional safety, which includes:

- **Core Academic Instruction:** Focused English and Mathematics instruction.
- **Vocational Pathways:** Functional, creative, and vocational learning opportunities.
- **Social & Emotional Development:** Social communication, emotional literacy, self-regulation techniques, and targeted therapeutic support.
- **Life & Career Skills:** Executive functioning development, independence building, and career guidance.
- **Preventative Safeguarding Education:** In accordance with KCSIE 2026, tutors utilize timetabled PSHE sessions to deliver age- and stage-appropriate education on healthy relationships, online safety (including AI and deepfakes), and recognizing and reporting concerns regarding abuse.

5. STEP-BY-STEP PROCESS

To ensure consistency and personalised support, all staff must adhere strictly to the following workflow:

1. Admissions & Induction: Relationship Building and Professional Curiosity Upon entry, staff prioritize building trusting relationships to ensure learners feel welcomed, safe, and valued. Staff apply professional

curiosity to ensure that observations directly inform curriculum access, pacing, and tailored support strategies.

2. Baseline Vetting Framework (Within 6 Weeks of Placement) Within the first six weeks, the SENCO and SEND Assistant conduct a comprehensive file review of the learner's EHCP and previous records. A benchmarking exercise identifies academic tracking metrics, holistic needs, and integrates the transferred Child Protection File into daily environmental planning.

3. Individual Learning Plans (ILPs) / Learner Passports Using baseline data, the SENCO and SEND Assistant draft an active Learner Passport or ILP. These documents outline strengths, learning barriers, attendance expectations, an end of KS4 target, and 3 to 4 SMART targets updated termly.

4. Ongoing Formative Assessment ("Do & Observe") Daily, teachers and LSAs collect formative evidence via objective observational notes logged directly into the secure pupil tracking database. Emphasis is placed on identifying immediate learning trends or emotional fluctuations to adapt classroom delivery in real time.

5. Wellbeing Mentoring Procedure Structured, neurodiversity-affirming mentoring is provided for learners aged 11–18 to support emotional regulation and identity development. Delivered weekly or fortnightly, mentoring respects differences as natural variations and supports self-acceptance rather than enforcing compliance. Confidentiality safeguards are maintained unless there is a risk of harm, which is referred to the DSL immediately.

6. Summative Tracking & Termly Progress Reviews from Key Stage 4 onwards, achievement is monitored using centralised tracking (GCSE 1–9 grading or Functional Skills metrics). Every 12 weeks, the Senior Team and curriculum leads hold formal progress reviews where testing or moderated work portfolios are cross-referenced with internal frameworks.

7. JCQ Examination Access Arrangements In accordance with JCQ Access Arrangements, adjustments like examination reading pens, assistive technology, and supervised rest breaks are integrated into daily classroom delivery to establish them as the child's "normal way of working".

6. RECORDING, DATA MANAGEMENT & SECURITY

All assessment data represents sensitive personal data under GDPR and the Data Protection Act 2018. The following protocols must be followed:

- **Secure Entry:** All academic progression, behavioural tracking, and therapy updates must be entered into the secure SIMS or Nextcloud infrastructure within 3 working days of the assessment window closing.
- **Access Controls:** Access is strictly limited on a role-specific basis. Only authorised educators, mentors, therapists, and members of the SLT may view full records.
- **External Sharing:** Assessment records requested by Local Authorities or Clinical Partners must be shared exclusively via secure, encrypted electronic channels.

7. REPORTING & DATA ANALYSIS

- **Parent and Caregiver Reporting:** Parents, caregivers, and commissioning authorities receive comprehensive, jargon-free progress reports translating academic, behavioural, and therapeutic milestones on a **weekly basis**.
- **Annual Reviews & Statutory Reporting:** Synthesized progress data and holistic matrices must be compiled into a formal, evidence-backed report to directly support each child's annual EHCP Review.
- **Data-Driven Intervention Planning:** The SLT and teaching staff must review aggregated, anonymized tracking data at the end of every term to evaluate curriculum impact, identify systemic trends, and strategically allocate resources.

8. ROLES & RESPONSIBILITIES

Role	Specific Assessment Responsibilities
Directors	• Oversees strategic direction and legal compliance of the curriculum and assessment framework. • Chairs termly moderation sessions to guarantee rigorous quality assurance. • Ensures data-driven insights are actively used to allocate school resources, plan staff CPD, and drive development plans.
SENCO & Therapists	• Manages therapeutic screenings and specialist diagnostic assessments. • Monitors compliance with EHCP statutory requirements and coordinates Annual Reviews.
Class Teachers / Tutors	• Conduct baseline assessments and termly evaluations. • Draft and review Individualised Learning Plans (ILPs) on a termly basis. • Direct Learning Support Assistants (LSAs) in daily evidence collection.
Learning Support Assistants (LSAs) / Mentors	• Collect real-time, objective observations and work samples during instruction and wellbeing mentoring sessions. • Input observation logs into the progress database as directed by the Teacher.

9. QUALITY ASSURANCE, MODERATION, & REVIEW

To ensure the integrity of assessment data, the school implements a three-tier quality assurance protocol:

1. Internal Moderation: Teachers engage in cross-classroom portfolio reviews twice per academic year to align interpretation of progress criteria, moderating student work using national grade descriptors.

2. External Moderation: Peer reviews are scheduled with partner special schools and established external subject networks to benchmark internal tracking metrics and ensure alignment with national standards.

3. Annual Policy Review: This policy framework is reviewed annually by the SLT to incorporate updated statutory guidelines, technological improvements, or changes in school context.

Policy for Data and ICT Security Management

Document Title	Policy for Data & ICT Security	Document Ref.	POL-DAT-001
School/Provision	Clear Steps Plus Education		
Version/Status	V1.0 Approved	Effective Date	July 19, 2026
Approved By	Executive Leadership Team	Review Cycle	Annual (July 2027)
Target Audience	All Academic Staff, Directors, Designated Safeguarding Leads (DSLs), and IT Partners.		

1. PURPOSE & SCOPE The purpose of this Policy is to govern the protection of the confidentiality, integrity, and availability of CSPE’s computer network, digital infrastructure, and data resources. It establishes clear IT security responsibilities, preserves network integrity, protects assets from unauthorised disclosure, and ensures our digital environment supports a robust safeguarding culture.

2. POLICY & LEGAL CONTEXT This Policy operates in strict alignment with UK regulations and statutory frameworks, including:

- **Keeping Children Safe in Education (KCSIE) 2026:** Specifically mandating robust web filtering, digital monitoring, and protections against online harms.
- **UK GDPR and the Data Protection Act 2018.**
- **The Computer Misuse Act 1990.**

3. THE CLEAR STEPS PLUS HOLISTIC SECURITY FRAMEWORK To proactively protect the integrity of our digital infrastructure and safeguard our learners, CSPE manages cyber security across four core domains:

Security Domain	What We Implement	Primary Rationale
1. Network & Device Defence	Whole-disk encryption, ESET anti-virus, and managed hardware deployment.	To prevent data loss and unauthorised access across all network endpoints.
2. Active Monitoring	Real-time web filtering and targeted alerts routed to the DSL.	To protect learners from exploitation, radicalisation, and self-harm under KCSIE guidelines.
3. Access & Authentication	Strict password complexity, auto-lock timeouts, and managed BYOD controls.	To guarantee secure identity verification and segment sensitive work data from household use.

4. Asset Lifecycle	Immediate de-provisioning upon exit and verified data destruction prior to disposal.	To maintain absolute compliance with UK WEEE regulations and GDPR data sanitisation laws.
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CRITICAL PRINCIPLE *"Security is a safeguarding priority." CSPE maintains the right to examine any system and inspect, review, or audit all corporate data at any time without prior notice, ensuring our digital environment proactively protects children from online harms.*

4. DATA SECURITY INTENT & STRUCTURE CSPE ensures network integrity and data protection through a highly managed IT infrastructure:

- **Authorised Access Only:** Only validated staff using laptops, tablets, or PCs fully provisioned, configured, and managed by our IT team (2PLUS1) are permitted to connect to the internal corporate network.
- **Encryption and Storage:** Storing data directly on local C: drives is strictly discouraged; all data must be synced to the secure CSPE Nextcloud platform. ESET Endpoint Encryption software is mandatory across all endpoints to render hard drives unreadable without authorised credentials if lost or stolen.
- **Email Communication Codes:** Hosted Microsoft Office 365 emails constitute official corporate records. Staff must not disrupt wider IT systems, exceed resource capacity limits (attachments are capped at 25MB), or transmit discriminatory, abusive, or defamatory content.

5. STEP-BY-STEP OPERATIONAL PROCESS To ensure strict security hygiene, all staff must adhere to the following workflow:

- 1. Password Configuration:** Credentials must be a minimum of **7 case-sensitive characters** (including uppercase, lowercase, numerical digits, and special symbols) and must be changed at a maximum interval of **every 90 days**. Passwords must never be written down or shared.
- 2. Bring Your Own Device (BYOD) Controls:** Staff using personal devices for Nextcloud access must maintain automated updates, hardware firewalls, active anti-malware, and full disk encryption. Staff must segment work data in separate, password-protected local user accounts and configure devices to auto-lock after a maximum of **15 minutes of inactivity**.
- 3. Reporting Safeguarding Breaches:** The use of AI to generate or view "deepfake" intimate images of children carries identical criminal thresholds as physical material and will trigger an immediate LADO referral. Staff receiving improper or abusive emails must preserve the evidence and report it immediately to the centre Directors.
- 4. Staff Offboarding:** Upon the resignation or termination of any individual, the Directors will notify IT support to **promptly revoke all access privileges** and deactivate corporate cloud, email, and network accounts.

6. RECORDING, ASSET RECOVERY & SECURE DISPOSAL

- **Data Sanitisation:** Devices destined for disposal must undergo a verified data overwrite procedure or physical destruction to render data entirely unrecoverable. If an overwrite fails, the equipment must be physically crushed or shredded.
- **Disposal Logs:** CSPE will maintain a permanent, centralised IT Disposal Register detailing the serial number of the disposed hardware alongside signed confirmation of the sanitisation process used.
- **Physical Protection:** Any physical or paper-based data must be held within a locked filing cabinet inside a locked cupboard. The premises are protected by an intruder alarm system configured to text message Directors instantly in the event of a physical security breach.

7. ROLES & RESPONSIBILITIES

Role	Specific Security Responsibilities
Directors	• Notifies IT support immediately to revoke access upon staff resignation. • Must formally contact 2PLUS1 IT support to obtain authorised managerial override access during staff absences, rather than requesting a personal password.
Designated Safeguarding Lead (DSL) Team	• Receives and responds to real-time targeted monitoring alerts linked to child exploitation, radicalisation, severe child-on-child abuse, or self-harm.
IT Partner (2PLUS1)	• Manages web filtering, active digital monitoring, hardware provisioning, and dynamic patch management.
All CSPE Staff	• Personally accountable for enforcing BYOD safety benchmarks and strict password hygiene. • Must complete mandatory IT security training during onboarding.

8. QUALITY ASSURANCE, MODERATION, & REVIEW To ensure the integrity of our IT networks, the school implements the following oversight protocol:

- 1. Automated Patching Oversight:** Operating system updates and ESET/Nextcloud software installations are monitored and patched dynamically by 2PLUS1 as updates are released.
- 2. Security Health Checks:** Tutors and staff may request a technical security health check on their devices, supported directly by 2PLUS1.
- 3. Annual Policy Review:** This Policy is reviewed annually by the SLT to align with updated cyber threat intelligence, KCSIE guidelines, and UK data protection legislation.

Policy for Data and ICT Security Management

Document Title	Policy for Data & ICT Security	Document Ref.	POL-DAT-001
School/Provision	Clear Steps Plus Education		
Version/Status	V1.0 Approved	Effective Date	July 19, 2026
Approved By	Executive Leadership Team	Review Cycle	Annual (July 2027)
Target Audience	All Academic Staff, Directors, Designated Safeguarding Leads (DSLs), and IT Partners.		

1. PURPOSE & SCOPE The purpose of this Policy is to govern the protection of the confidentiality, integrity, and availability of CSPE’s computer network, digital infrastructure, and data resources. It establishes clear IT security responsibilities, preserves network integrity, protects assets from unauthorised disclosure, and ensures our digital environment supports a robust safeguarding culture.

2. POLICY & LEGAL CONTEXT This Policy operates in strict alignment with UK regulations and statutory frameworks, including:

- **Keeping Children Safe in Education (KCSIE) 2026:** Specifically mandating robust web filtering, digital monitoring, and protections against online harms.
- **UK GDPR and the Data Protection Act 2018.**
- **The Computer Misuse Act 1990.**

3. THE CLEAR STEPS PLUS HOLISTIC SECURITY FRAMEWORK To proactively protect the integrity of our digital infrastructure and safeguard our learners, CSPE manages cyber security across four core domains:

Security Domain	What We Implement	Primary Rationale
1. Network & Device Défense	Whole-disk encryption, ESET anti-virus, and managed hardware deployment.	To prevent data loss and unauthorised access across all network endpoints.
2. Active Monitoring	Real-time web filtering and targeted alerts routed to the DSL.	To protect learners from exploitation, radicalisation, and self-harm under KCSIE guidelines.
3. Access & Authentication	Strict password complexity, auto-lock timeouts, and managed BYOD controls.	To guarantee secure identity verification and segment sensitive work data from household use.

4. Asset Lifecycle	Immediate de-provisioning upon exit and verified data destruction prior to disposal.	To maintain absolute compliance with UK WEEE regulations and GDPR data sanitisation laws.
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CRITICAL PRINCIPLE *"Security is a safeguarding priority." CSPE maintains the right to examine any system and inspect, review, or audit all corporate data at any time without prior notice, ensuring our digital environment proactively protects children from online harms.*

4. DATA SECURITY INTENT & STRUCTURE CSPE ensures network integrity and data protection through a highly managed IT infrastructure:

- **Authorised Access Only:** Only validated staff using laptops, tablets, or PCs fully provisioned, configured, and managed by our IT team (2PLUS1) are permitted to connect to the internal corporate network.
- **Encryption and Storage:** Storing data directly on local C: drives is strictly discouraged; all data must be synced to the secure CSPE Nextcloud platform. ESET Endpoint Encryption software is mandatory across all endpoints to render hard drives unreadable without authorised credentials if lost or stolen.
- **Email Communication Codes:** Hosted Microsoft Office 365 emails constitute official corporate records. Staff must not disrupt wider IT systems, exceed resource capacity limits (attachments are capped at 25MB), or transmit discriminatory, abusive, or defamatory content.

5. STEP-BY-STEP OPERATIONAL PROCESS To ensure strict security hygiene, all staff must adhere to the following workflow:

- 1. Password Configuration:** Credentials must be a minimum of **7 case-sensitive characters** (including uppercase, lowercase, numerical digits, and special symbols) and must be changed at a maximum interval of **every 90 days**. Passwords must never be written down or shared.
- 2. Bring Your Own Device (BYOD) Controls:** Staff using personal devices for Nextcloud access must maintain automated updates, hardware firewalls, active anti-malware, and full disk encryption. Staff must segment work data in separate, password-protected local user accounts and configure devices to auto-lock after a maximum of **15 minutes of inactivity**.
- 3. Reporting Safeguarding Breaches:** The use of AI to generate or view "deepfake" intimate images of children carries identical criminal thresholds as physical material and will trigger an immediate LADO referral. Staff receiving improper or abusive emails must preserve the evidence and report it immediately to the centre Directors.
- 4. Staff Offboarding:** Upon the resignation or termination of any individual, the Directors will notify IT support to **promptly revoke all access privileges** and deactivate corporate cloud, email, and network accounts.

6. RECORDING, ASSET RECOVERY & SECURE DISPOSAL

- **Data Sanitisation:** Devices destined for disposal must undergo a verified data overwrite procedure or physical destruction to render data entirely unrecoverable. If an overwrite fails, the equipment must be physically crushed or shredded.
- **Disposal Logs:** CSPE will maintain a permanent, centralised IT Disposal Register detailing the serial number of the disposed hardware alongside signed confirmation of the sanitisation process used.
- **Physical Protection:** Any physical or paper-based data must be held within a locked filing cabinet inside a locked cupboard. The premises are protected by an intruder alarm system configured to text message Directors instantly in the event of a physical security breach.

7. ROLES & RESPONSIBILITIES

Role	Specific Security Responsibilities
Directors	• Notifies IT support immediately to revoke access upon staff resignation. • Must formally contact 2PLUS1 IT support to obtain authorised managerial override access during staff absences, rather than requesting a personal password.
Designated Safeguarding Lead (DSL) Team	• Receives and responds to real-time targeted monitoring alerts linked to child exploitation, radicalisation, severe child-on-child abuse, or self-harm.
IT Partner (2PLUS1)	• Manages web filtering, active digital monitoring, hardware provisioning, and dynamic patch management.
All CSPE Staff	• Personally accountable for enforcing BYOD safety benchmarks and strict password hygiene. • Must complete mandatory IT security training during onboarding.

8. QUALITY ASSURANCE, MODERATION, & REVIEW To ensure the integrity of our IT networks, the school implements the following oversight protocol:

- 1. Automated Patching Oversight:** Operating system updates and ESET/Nextcloud software installations are monitored and patched dynamically by 2PLUS1 as updates are released.
- 2. Security Health Checks:** Tutors and staff may request a technical security health check on their devices, supported directly by 2PLUS1.
- 3. Annual Policy Review:** This Policy is reviewed annually by the SLT to align with updated cyber threat intelligence, KCSIE guidelines, and UK data protection legislation.

Policy for DBS Positive Disclosures

Document Title	Policy for DBS Positive Disclosures	Document Ref.	POL-DBS-001
School/Provision	Clear Steps Plus Education		
Version/Status	V1.0 Approved	Effective Date	July 19, 2026
Approved By	Executive Leadership Team	Review Cycle	Annual (July 2027)
Target Audience	All Directors, HR Leads, Designated Safeguarding Leads (DSLs), and Candidates.		

1. PURPOSE & SCOPE The purpose of this Policy is to outline how CSPE manages positive disclosures as a core component of our safer recruitment processes. CSPE is fiercely committed to safeguarding and promoting the welfare of children. This policy ensures that all staff, volunteers, contractors, and visitors transparently disclose any information that may affect their suitability to work with children and guarantees that CSPE will assess all positive disclosures fairly, proportionately, objectively, and securely.

2. POLICY & LEGAL CONTEXT This Policy operates in absolute compliance with UK statutory frameworks, including:

- Keeping Children Safe in Education (KCSIE) 2026.
- The DBS Code of Practice.
- The Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975.
- The Data Protection Act 2018 and UK GDPR.
- Safer Recruitment Consortium Guidance.

3. THE CLEAR STEPS PLUS HOLISTIC DISCLOSURE FRAMEWORK To ensure safe, objective, and legally defensible recruitment decisions, CSPE manages positive disclosures across four core assessment domains:

Assessment Domain	What We Implement	Primary Rationale
1. Information Gathering	Reviewing Enhanced DBS certificates, the Update Service, and self-disclosure forms.	To comprehensively identify historic, spent, or resolved matters requiring professional consideration.
2. Risk Evaluation	Analyzing the recency, frequency, and severity of the disclosed offense alongside role relevance.	To ensure fair and proportionate assessments of contextual exposure.

3. Professional Curiosity	Investigating inconsistencies between self-disclosures, verbal testimony, and official certificates.	To actively evaluate the depth of a candidate's insight, rehabilitation, and personal accountability.
4. Multi-Agency Oversight	Immediate escalation to external safeguarding partners when required.	To ensure statutory compliance if a disclosure meets LADO harm thresholds.

CRITICAL PRINCIPLE *"Prioritize Child Safety." The physical, psychological, and emotional protection of our highly vulnerable, neurodivergent, and SEND learners is our paramount consideration in every disclosure assessment.*

4. DISCLOSURE INTENT & STRUCTURE (DECISION OUTCOMES) A positive disclosure is defined as any information revealed through an Enhanced DBS certificate, the DBS Update Service, a candidate self-disclosure form, or a verbal disclosure offered during the recruitment/employment lifecycle. Following a rigorous risk analysis, the individual will be deemed to fall into one of three outcome columns:

- **Suitable:** The disclosure presents no ongoing risk to children or the setting's culture.
- **Suitable with Conditions:** The candidate may work under explicit restrictions, such as continuous supervision, an absolute ban on lone-working, or restricted data/physical access.
- **Not Suitable:** The risk profile violates safeguarding parameters, or the individual is subject to a statutory bar.

5. STEP-BY-STEP OPERATIONAL PROCESS (RISK ASSESSMENT FORM) To ensure consistency and safety, all leadership staff must adhere strictly to the following workflow when managing a positive disclosure:

- **1. Case & Contextual Overview:** The HR Lead must conduct an interview and document the exact legal nomenclature, category, and dates of the conviction/caution to determine if it is an isolated event or historical pattern.
- **2. Professional Analysis & Safeguarding Judgement:** Leadership will analyse how the behaviour impacts the candidate's capacity to hold secure boundaries. Clear evidence of rehabilitation, probation compliance, and sustained positive conduct must be evaluated.
- **3. Mandatory LADO Consultation:** An immediate consultation with the LADO must occur **within 24 hours** if the disclosure suggests the individual may have harmed a child, committed a criminal offense related to a child, or behaved in a way indicating unsuitability (including extra-familial contexts).
- **4. Formulating the Risk Management Plan:** If deemed "Suitable with Conditions", explicit limitations must be specified (e.g., prohibition from off-site transport duties) alongside mandatory, targeted safeguarding training modules to be completed immediately during induction.

6. RECORDING, DATA MANAGEMENT & SECURITY

- **Data Classification:** All positive disclosure data, risk assessment logs, and certificate notes are classified as highly sensitive data.

- **Secure Storage:** CSPE will ensure all information is stored within restricted Nextcloud files, accessed exclusively by authorised senior leadership.
- **Data Retention:** Records are retained strictly in line with statutory data preservation schedules and never shared without an explicit lawful basis.

7. ROLES & RESPONSIBILITIES

Role	Specific Disclosure Responsibilities
Executive DSL / Directors	• Evaluates the residual risk profile and realistic potential for behavioural recurrence within the alternative provision setting. • Contacts the LADO immediately wherever statutory risk thresholds are met.
HR Lead	• Completes the Case & Contextual Overview following the disclosure interview. • Co-signs the final determination form to verify compliance with KCSIE 2026 parameters.
Candidates & Staff	• Must transparently disclose any information that may affect their suitability to work with children during interview, induction, or ongoing employment.

8. QUALITY ASSURANCE, GOVERNANCE, & REVIEW To ensure the integrity of our safer recruitment decisions, the school implements the following oversight protocol:

- 1. Executive Sign-Off:** Every single positive disclosure decision must be reviewed, finalised, and physically signed off by the Executive DSL, the HR Lead.
- 2. Accountability & Defence:** Every decision and rationale is comprehensively documented to ensure all outcomes are fair, consistent, and legally defensible.
- 3. Annual Policy Review:** This Policy framework is reviewed annually by the SLT to incorporate updated statutory guidelines from KCSIE and the Safer Recruitment Consortium.

Policy for Enforcing Authorities Notification

Document Title	Policy for Enforcing Authorities	Document Ref.	POL-ENF-001
School/Provision	Clear Steps Plus Education		
Version/Status	V1.0 Approved	Effective Date	July 19, 2026
Approved By	Executive Leadership Team	Review Cycle	Annual (July 2027)
Target Audience	All Directors, Designated Safeguarding Leads (DSLs), and Senior Leaders.		

1. PURPOSE & SCOPE The purpose of this Policy is to define CSPE's statutory obligations and operational procedures for notifying Ofsted and relevant Local Authority safeguarding partners of any serious incidents, injuries, or critical operational modifications. This policy ensures complete transparency and regulatory alignment with our inspecting bodies.

2. POLICY & LEGAL CONTEXT This Policy operates in strict alignment with UK regulations and statutory frameworks, including:

- **Keeping Children Safe in Education (KCSIE) 2026.**
- **Ofsted’s Voluntary Childcare Register requirements.**
- **Local Authority Safeguarding Partner protocols.**

3. THE CLEAR STEPS PLUS HOLISTIC NOTIFICATION FRAMEWORK To ensure complete transparency and legal compliance with our inspecting bodies, CSPE manages statutory notifications across two core time-bound domains:

Notification Domain	What We Implement	Primary Rationale
1. Standard Modifications (14-Day Limit)	Formal reporting of premises, leadership, or health changes.	To maintain valid registration and compliance with the Ofsted Voluntary Childcare Register.
2. Emergency Escalation (Immediate)	Immediate phone notifications for severe accidents or abuse allegations.	To trigger rapid multi-agency support and ensure the immediate protection of learners and staff.

CRITICAL PRINCIPLE *"Transparent and Timely Escalation." Any allegation of serious harm, abuse, or inappropriate conduct committed by an adult looking after learners must completely bypass standard timelines and be routed directly to the LADO within 24 hours, prior to notifying Ofsted.*

4. NOTIFICATION INTENT & STRUCTURE CSPE ensures that any significant changes affecting the safety, suitability, or structural integrity of the alternative provision are communicated proactively to our enforcing authorities. The centre Directors hold ultimate responsibility for executing these formal notifications.

5. STEP-BY-STEP OPERATIONAL PROCESS (TIMELINES & THRESHOLDS) To achieve full alignment with statutory reporting changes, the Directors must adhere to the following strict timeline workflows:

1. Standard Mandatory Notifications (Strict 14-Day Limit): The Directors must formally notify Ofsted as soon as possible, and **no later than 14 days** after any of the following occur:

- A change to the address or structural layout of the centre premises.
- Any modification to the type or classification of provision provided.
- Any change of the centre Directors, Proprietor, or Nominated Person.
- Any change to the Manager's/Nominated Person's legal name, home address, or telephone number.
- Any significant personal, legal, or health event affecting the suitability of staff (including any new criminal offences that trigger a statutory disqualification).
- Any outbreak of food poisoning affecting two or more learners.

2. Immediate Escalation and Emergency Thresholds: The following critical events require an **immediate** phone notification to commissioning schools/local authorities, followed by formal Ofsted submission:

- Any serious accident, acute injury, or the death of a learner on-site or during off-site provision.
- Any serious accident, injury, or the death of any other person or contractor on the premises.

3. Allegations of Abuse (LADO First): Any allegation of serious harm, abuse, or inappropriate conduct committed by any tutor or adult looking after learners (whether on-premises or in an extra-familial context) must be routed to the Local Authority Designated Officer (LADO) **within 24 hours**, prior to notifying Ofsted.

6. RECORDING, DATA MANAGEMENT & SECURITY

- **Secure Archiving:** All formal notifications sent to Ofsted, the LADO, or local authorities must be securely logged and archived within the centre's Nextcloud system.
- **Confidentiality Safeguards:** Allegations of abuse are managed with the highest data protection standards to protect the vulnerable child and preserve the integrity of any subsequent police or LADO investigations.

7. ROLES & RESPONSIBILITIES

Role	Specific Notification Responsibilities
Directors / Nominated Person	• Holds ultimate statutory responsibility for notifying Ofsted within the 14-day limit for standard operational changes.

	• Immediately notifies commissioning schools and local authorities in the event of severe accidents or deaths.
Designated Safeguarding Lead (DSL)	• Ensures any allegation of abuse is routed directly to the LADO within 24 hours, prior to any Ofsted notification.
All CSPE Staff & Tutors	• Must immediately report any significant personal, legal, or health events (e.g., new criminal offenses) that may affect their suitability to work with children so the Directors can notify Ofsted appropriately.

8. QUALITY ASSURANCE, MODERATION, & REVIEW To ensure the integrity of our statutory compliance, the school implements the following oversight protocol:

1. Compliance Tracking: The Directors maintain an active log of all centre modifications to ensure the statutory 14-day reporting window is never breached.

2. Annual Policy Review: This Policy framework is reviewed annually by the SLT to incorporate updated statutory guidelines from KCSIE and Ofsted's Voluntary Childcare Register.

Policy for Enrolment and Learner Support for Formal Qualifications

Document Title	Policy for Enrolment & Support	Document Ref.	POL-ENR-001
School/Provision	Clear Steps Plus Education		
Version/Status	V1.0 Approved	Effective Date	July 19, 2026
Approved By	Executive Leadership Team	Review Cycle	Biennial (July 2028)
Target Audience	All Academic Staff, Trainers, Mentors, and Administrative Staff.		

1. PURPOSE & SCOPE, The purpose of this Policy is to define the structured systems, rigorous controls, and multi-agency safeguards utilized by CSPE to enrol learners into formal qualifications and to provide comprehensive academic, administrative, and wellbeing support. This framework is designed to maximize learner retention, protect educational progression, and ensure successful qualification completion across all delivery modes (face-to-face, online, blended, or workplace-based).

2. POLICY & LEGAL CONTEXT This Policy operates in strict compliance with the legal requirements and expectations set out in:

- **Keeping Children Safe in Education (KCSIE) 2026.**
- **The Equality Act 2010:** Incorporating the Public Sector Equality Duty and statutory duties for reasonable adjustments.
- **The SEND Code of Practice 0 to 25 years.**

3. THE CLEAR STEPS PLUS HOLISTIC LEARNER SUPPORT FRAMEWORK To maximize retention and ensure successful qualification completion, CSPE deploys a multi-layered support framework divided into core operational domains:

Support Domain	What We Implement	Primary Rationale
1. Academic Support	Tailored study skills, 1:1 mentoring, and Language, Literacy, Numeracy, and Digital (LLND) intervention.	To prepare learners for assessment and support independent progression.
2. Admin Support	Enrolment management, timetabling coordination, and platform access.	To provide clear, transparent processes for qualification progression or extensions.
3. Wellbeing & Pastoral	Referrals to internal mentors, clinical counselling, and statutory health services.	To implement neurodiversity-affirming adjustments and flexible study arrangements.

4. Pre-Enrolment Support	Options tracking, clear fee guidance, and suitability benchmarking.	To ensure all placements are appropriate, safe, and tailored to the learner's profile.
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CRITICAL PRINCIPLE *Safeguarding Integration: Any disclosure during the enrolment process that indicates severe mental health distress, past trauma, or extra-familial vulnerability will instantly trigger a priority briefing with the Executive DSL to ensure appropriate safeguarding controls are established before sessions commence.*

4. ENROLMENT INTENT & STRUCTURE (DEFAULT EXPECTATIONS) CSPE provides prospective learners, parents/carers, and commissioning schools with clear, current, and accessible information prior to enrolment.

- **Suitability Benchmarking:** Every applicant undergoes a formal review of prior qualifications, a screening of baseline capabilities (language, literacy, numeracy, and digital), and a structured pre-training interview.
- **Alternative Pathways:** Where an applicant is assessed as not yet suitable for a specific qualification, CSPE will explicitly collaborate with the commissioner to provide alternative guidance or defer enrolment until readiness parameters are met.
- **Reasonable Adjustments:** In accordance with the Equality Act 2010, adjustments to training and assessment methods are systematically implemented where required, provided they do not compromise the fundamental competency or academic standards of the awarding body.

5. STEP-BY-STEP OPERATIONAL PROCESS To ensure consistency and safety, all staff must adhere strictly to the following workflow:

- 1. Voluntary Needs Disclosure:** Learners and their families are provided a confidential mechanism during enrolment to disclose medical conditions, SEND, trauma, or technology access constraints.
- 2. Individual Support Plan Creation:** Where needs are identified, a personalised Individual Support Plan is developed collaboratively with the learner, parents/carers, and the commissioning authority.
- 3. Mandatory Orientation:** All newly enrolled learners must complete a structured induction program introducing qualification expectations, assessment rules, technology use, and formal complaints processes.
- 4. Progress Monitoring:** Staff utilize a centralised system to review daily attendance, engagement with digital platforms, formative marking data, and course milestone completion.
- 5. "At-Risk" Intervention:** If a learner exhibits declining engagement, repeated unauthorised absences, or severe sensory dysregulation, staff must implement a documented intervention strategy. These interventions include modified training plans, timeframe extensions, mock exam support, Easter School holiday sessions, or emergency multi-agency case reviews.

6. RECORDING, DATA MANAGEMENT & SECURITY

- **Centralised Enrolment Files:** CSPE maintains a secure file for every learner containing standardized enrolment forms, identity verification, pre-training review logs, and a signed Enrolment Agreement detailing fee obligations and withdrawal conditions.
- **Secure Tracking:** All communication, modifications, and intervention outcomes must be recorded inside the learner's secure profile, in strict compliance with current data protection and records management requirements.

7. ROLES & RESPONSIBILITIES

Role	Specific Enrolment & Support Responsibilities
Academic Leads & Trainers	• Conduct objective suitability screenings and provide ethical pre-enrolment advice. • Monitor data trends regularly to identify "at-risk" learners and implement recorded intervention strategies.
Executive DSL	• Leads priority briefings for any disclosures of severe distress or vulnerability during the enrolment process to establish immediate safeguarding controls.
Learners	• Expected to provide accurate enrolment information, participate actively in scheduled sessions, meet deadlines, and seek support proactively when experiencing barriers.

8. QUALITY ASSURANCE, MODERATION, & REVIEW To ensure the integrity of our support frameworks, the school implements the following oversight protocol:

1. Compliance & Auditing: The enrolment and learner support systems are evaluated through regular audits of completion and attrition data, support service usage logs, and formal feedback gathered from learners and commissioning schools.

2. Continuous Improvement: Identified gaps or operational risks will trigger immediate continuous improvement adaptations.

3. Biennial Policy Review: This Policy is subject to formal monitoring and will be reviewed at least every two years, or earlier in response to shifts in national regulatory, operational, or awarding body requirements.

Policy for Equality and Diversity

Document Title	Policy for Equality & Diversity	Document Ref.	POL-EQD-001
School/Provision	Clear Steps Plus Education		
Version/Status	V1.0 Approved	Effective Date	July 14, 2026
Approved By	Executive Leadership Team	Review Cycle	Annual (July 2027)
Target Audience	All Academic Staff, Directors, Designated Safeguarding Leads (DSLs), and Tutors.		

1. PURPOSE & SCOPE The purpose of this Policy is to ensure equality of opportunity for all staff, tutors, and learners at CSPE. We strictly prohibit unlawful discrimination, harassment, or victimisation against any individual based on the protected characteristics outlined in the Equality Act 2010 (including sex, race, age, disability, religion or belief, and sexual orientation). We actively fulfil our duties to eliminate unlawful discrimination, advance equality of opportunity, and foster positive, respectful relations across our entire community.

2. POLICY & LEGAL CONTEXT This Policy operates in strict alignment with UK regulations and statutory frameworks, including:

- **The Equality Act 2010** (incorporating the Public Sector Equality Duty).
- **The SEND Code of Practice 0 to 25 years.**
- **Keeping Children Safe in Education (KCSIE).**

3. THE CLEAR STEPS PLUS HOLISTIC EQUALITY FRAMEWORK To proactively protect our community and ensure an inclusive culture, CSPE manages equality and diversity across four core domains:

Equality Domain	What We Implement	Primary Rationale
1. Anti-Discrimination	Prohibiting unlawful discrimination across all protected characteristics.	To advance equality of opportunity and fulfill the Public Sector Equality Duty (PSED).
2. SEND Inclusion	Making reasonable adjustments for disabled children and young people.	To ensure learners with SEND or health conditions receive their full educational entitlement.
3. Safeguarding Integration	Zero tolerance for bullying, cyberbullying, and sexual harassment.	Recognizing that safeguarding and equality are inherently linked.

4. Gender-Questioning Support	Respectful handling of social transition requests with documented processes.	To provide a safe, respectful environment aligned with statutory single-sex regulations.
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CRITICAL PRINCIPLE *"Safeguarding and equality are inherently linked. Bias-related incidents, misogynistic or misandrist actions, and discriminatory bullying are never dismissed as 'banter' or 'part of growing up'. Any behaviours that compromise a learner's dignity, safety, or comfort will be handled promptly".*

4. EQUALITY INTENT & STRUCTURE (DEFAULT EXPECTATIONS) CSPE explicitly integrates the promotion of fundamental British values and respect into our curriculum and daily expectations:

- **British Values:** Staff actively promote democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.
- **Mutual Respect:** Staff and learners are expected to treat people of all faiths, races, cultures, and orientations with equal respect.
- **Personal Development:** The curriculum aims to develop learners' self-knowledge, self-esteem, confidence, and resilience, encouraging them to accept responsibility for their behaviour and contribute positively to wider society.

5. STEP-BY-STEP OPERATIONAL PROCESS To ensure a consistent and supportive environment, all staff must adhere to the following workflow when managing equality-related matters:

1. Managing Discriminatory Behaviour: Any bias-related incidents, prejudice-based bullying, or discriminatory language must be handled promptly and challenged directly under the CSPE Behaviour Policy.

2. Safeguarding Escalation: Where a discriminatory concern or instance of sexual violence/harassment meets a threshold for harm, it must be immediately referred to the DSL and handled in accordance with the Child Protection Policy.

3. Gender-Questioning Support: Staff must not initiate action regarding gender transition but must respond carefully and respectfully to requests for support with social transition made by a child or parent.

4. Transition Decision-Making: All processes regarding social transition must be fully documented, place the best interests of the child first, and actively involve parents/carers as a matter of priority (unless doing so poses a verified safeguarding risk to the child).

5. Facility Accommodations: Accommodations such as toilets and changing facilities will respect biological sex boundaries, while individual, safe, and dignified alternative spaces will be considered for gender-questioning learners upon request.

6. RECORDING, DATA MANAGEMENT & SECURITY

- **Safeguarding Logs:** Any discriminatory incidents, sexual harassment, or prejudice-based bullying meeting the harm threshold must be formally logged and securely managed under the Child Protection Policy.

- **Decision Documentation:** Social transition requests and subsequent facility adjustments must be securely recorded, ensuring parents/carers are involved appropriately while maintaining strict confidentiality and adherence to data protection standards.

7. ROLES & RESPONSIBILITIES

Role	Specific Equality Responsibilities
Directors / DSL	• Manages immediate safeguarding escalations for prejudice-based bullying, sexual harassment, or violence. • Oversees social transition documentation and ensures appropriate parent/carers involvement.
All CSPE Staff & Tutors	• Must actively promote fundamental British Values within the curriculum and community interactions. • Must recognise the additional safeguarding barriers faced by SEND learners (e.g., higher rates of peer isolation) and never dismiss discriminatory actions as "banter".

8. QUALITY ASSURANCE, MODERATION, & REVIEW To ensure the integrity of our inclusive environment, the school implements the following oversight protocol:

1. Strategic PSED Evaluation: Where CSPE operates as a state-funded provider, leadership consistently considers the equality implications of strategic decisions and centre-wide policies to eliminate discrimination and advance equality of opportunity.

2. Annual Policy Review: This Policy framework is reviewed annually by the SLT to incorporate updated statutory guidelines from KCSIE and the Equality Act 2010.

Policy for Fire Safety and Evacuation

Document Title	Policy for Fire Safety	Document Ref.	POL-FIR-001
School/Provision	Clear Steps Plus Education		
Version/Status	V1.0 Approved	Effective Date	July 19, 2026
Approved By	Executive Leadership Team	Review Cycle	Annual (July 2027)
Target Audience	All Academic Staff, Directors, Learners, Volunteers, and Visitors.		

1. PURPOSE & SCOPE The purpose of this Policy is to establish a secure, compliant, and efficient framework for fire safety and emergency evacuations across all CSPE centres. It defines management responsibilities, maintenance of life-saving equipment, and the exact step-by-step procedures to ensure the rapid and safe evacuation of all vulnerable learners, staff, and visitors during a fire emergency.

2. POLICY & LEGAL CONTEXT This Policy operates in strict alignment with UK regulations and statutory frameworks, including:

- The Regulatory Reform (Fire Safety) Order 2005.
- The Health and Safety at Work etc. Act 1974.
- Keeping Children Safe in Education (KCSIE) 2026.

3. THE CLEAR STEPS PLUS HOLISTIC FIRE SAFETY FRAMEWORK To proactively protect our learners and ensure absolute readiness, CSPE manages fire safety across four core domains:

Fire Safety Domain	What We Implement	Primary Rationale
1. Operational Readiness	Routine checks of CO2/Hydro spray extinguishers, exit signs, and emergency lighting.	To guarantee all life-saving equipment is functional and compliant with local fire inspector requirements.
2. Preventative Training	Mandatory induction fire training and regular, timed evacuation drills.	To ensure high staff-to-learner ratios can safely and efficiently coordinate a rapid evacuation.
3. Immediate Evacuation	Maintaining unobstructed, well-lit escape routes leading directly to an assembly point.	To ensure clear, panic-free egress for neurodivergent learners without any physical barriers.

4. Assembly & Clearance	Calling the attendance register and enforcing strict parent/carer sign-out rules.	To strictly account for every individual and prevent any child from being released unsafely.
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CRITICAL PRINCIPLE *"Prioritize Life and Supervision." Staff must never take unnecessary personal risks or attempt to extinguish a fire unless specifically trained. Staff must ensure learners do not leave the group unaccompanied under any circumstances, prioritizing their emotional and physical safety throughout the evacuation.*

4. FIRE SAFETY INTENT & STRUCTURE (DEFAULT EXPECTATIONS) CSPE maintains a state of continuous readiness to protect the school community:

- **Equipment Provision:** The centre is equipped with a live sign-in/out attendance register, CO2 and Hydro spray extinguishers, illuminated emergency exit signs, a designated Fire Log, and a first aid box.
- **Clear Communication:** Posters detailing Emergency Fire Evacuation Procedures are displayed prominently throughout the centre, reminding learners to stay calm, listen to staff, and follow instructions.
- **Satellite Settings:** When CSPE staff and learners operate within host schools or external community settings, they will strictly adhere to the specific fire policies and evacuation protocols pertaining to that host setting.

5. STEP-BY-STEP OPERATIONAL PROCESS (EVACUATION PROTOCOL) To ensure immediate response and legal compliance during a fire emergency, staff and learners must adhere strictly to the following workflow:

1. Discovering a Fire: Learners must alert a member of staff immediately. Staff must sound the fire alarm, instruct others to evacuate, and call the Fire Brigade (999) without taking personal risks.

2. On Hearing the Alarm: Learners must stop working, remain calm, and listen to staff. Staff prepare for immediate evacuation and ensure no learner leaves the centre unaccompanied (e.g., to find a parent or friend).

3. The Evacuation & Sweep: Staff assume responsibility for the learners in their area and guide them through the nearest fire exit in an orderly fashion. Simultaneously, the Director in charge conducts a full and final check of centre auxiliary zones (toilets, storage rooms) and proceeds to the assembly point with the pen-and-paper attendance register.

4. Assembly Point & Roll Call: Upon arrival at the Fire Assembly Point, the Director will immediately call the attendance register. If anyone is unaccounted for, the Fire Brigade must be notified instantly.

5. Safe Dismissal: No one may return to the building unless explicitly instructed by the Fire Brigade. If the centre cannot be re-entered, parents must physically sign next to the learner's name on the Fire Register before the learner can be released into their care.

6. RECORDING, DATA MANAGEMENT & SECURITY

- **The Fire Log:** Details of all emergency lighting tests, evacuation drills, and live evacuations must be recorded securely in the centre Fire Log upon return to the building.
- **Incident Reports in Pen:** All fire-related incidents must be written up in an Incident Report in permanent ink and reported centrally to the Head of Ofsted, Safeguarding & Compliance. This strict protocol ensures that records cannot be edited, erased, or tampered with.

7. ROLES & RESPONSIBILITIES

Role	Specific Fire Safety Responsibilities
Director in Charge	• Holds day-to-day and overall responsibility for fire safety, maintaining equipment, and conducting drills. • Conducts the final physical sweep of the building and leads the roll call at the assembly point.
All CSPE Staff	• Must assume immediate responsibility for their learner groups during an alarm and ensure no child is left unaccompanied.
Learners	• Expected to stay calm, alert staff if they discover a fire, and strictly follow staff instructions without wandering.

8. QUALITY ASSURANCE, MODERATION, & REVIEW To ensure the integrity of our emergency preparedness, the school implements the following oversight protocol:

1. Formal Fire Risk Assessments: The centre undergoes a comprehensive Fire Risk Assessment at launch, which is reviewed on a regular basis. Action points are set out clearly with a strict timeframe for completion.

2. Routine Testing: The Director conducts emergency lighting tests, evacuation drills, and training on a regular basis to ensure staff reflexes and building compliance remain sharp.

3. Annual Policy Review: This Policy framework is reviewed annually by the SLT to incorporate updated statutory guidelines from local fire authorities and the DfE.

Policy for Gender-Questioning Children Support Framework

Document Title	Policy for Gender-Questioning Children Support	Document Ref.	POL-GEN-031
School/Provision	Clear Steps Plus Education		
Version/Status	V1.0 Approved	Effective Date	July 14, 2026
Approved By	Directors	Review Cycle	Termly
Target Audience	All Staff, Designated Safeguarding Lead (DSL), Senior Leadership, and Parents.		

1. PURPOSE & SCOPE

This Policy establishes a rigorous, transparent, and legally sound procedure for responding to requests from alternative provision learners or their families regarding gender questioning and social transition. This framework operates under the guiding baseline that the centre will prioritize the **"best interests of the child and other children,"** recognizing that a child's expressed wishes may not always align with their overarching safeguarding needs.

2. POLICY & LEGAL CONTEXT

This Policy is written in strict compliance with the following statutory frameworks and clinical guidance:

- **Keeping Children Safe in Education (KCSIE) 2026:** Embeds gender-questioning guidance directly into statutory safeguarding mandates, framing social transition as an "active intervention".
- **The Equality Act 2010:** Incorporates duties surrounding the protected characteristics of sex and gender reassignment.
- **The Human Rights Act 1998 and the Data Protection Act 2018.**
- **The Cass Review:** Adopts clinical findings endorsing a cautious, individualised, and evidence-informed approach.

3. CORE OPERATIONAL PRINCIPLES

The Non-Initiation Mandate: Staff, tutors, and managers are strictly prohibited from initiating, suggesting, or driving any action regarding social transition. The centre acts exclusively as a responding body to formal requests. If a learner confides gender-questioning feelings without requesting operational adjustments, staff will maintain appropriate confidentiality unless a safeguarding risk is identified.

Cautious "Watchful Waiting" and Age Differentiation:

- **Watchful Waiting:** CSPE rejects rushed decision-making and applies a period of "watchful waiting" to ascertain whether a learner's stated feelings are stable and sustained over time.

- **Primary Age Caution:** For Key Stage 2 or primary-aged learners, staff exercise extreme caution. Structural agreement to full social transition for primary-aged children will be incredibly rare and subject to extensive multi-agency scrutiny.

Prohibition of Informal Accommodations: Staff are strictly prohibited from making ad hoc or informal accommodations (e.g., verbally agreeing to use alternative pronouns or modified names on a whim). Any adjustment to a learner's routine, name, or uniform must stem explicitly from the formal management process detailed below.

4. PARENTAL ENGAGEMENT & SAFEGUARDING THRESHOLDS

Parental Involvement as the Default: Engaging parents or carers is the absolute default position of CSPE, recognised legally as a core mechanism to promote a child's long-term wellbeing.

The Safeguarding Exception: The *only* circumstance under which parental involvement may be temporarily delayed is if the Designated Safeguarding Lead (DSL) explicitly determines that notifying the parents would expose the child to a direct, credible risk of significant physical or emotional harm.

- If a learner claims parental notification will cause severe domestic harm, the tutor must immediately refer this to the DSL.
- The DSL will coordinate a formal multi-agency risk assessment.
- If contact is withheld, evidence must be exhaustively documented, and a direct line with local authority children's services established immediately.

5. FORMAL DECISION-MAKING AND VETTING PROCESS

When a formal request for social transition (name changes, pronouns, uniform adjustments) is submitted, CSPE executes a structured, multi-step review:

Process Flow: [Formal Request Submitted] —> [DSL Informed & Logged] —> [Parental Consultation] —> [Individual Impact Assessment] —> [Alternative Plans/Agreement]

The Directors and DSL will convene an assessment panel to review:

- The age, cognitive capacity, and developmental maturity of the child.
- The child's overarching emotional wellbeing, neurodivergent profile, and mental health status.
- The explicit views, consent, or parameters provided by the parents/carers.
- The direct impact on the wider centre community, balancing the privacy, safety, and comfort of all other learners.

(Note: Where parents disagree or the clinical path is unclear, CSPE will request external clinical advice or local authority mediation before finalizing adjustments.)

6. ESTATE REGULATIONS, FACILITIES, AND SINGLE-SEX SPACES

To fulfil statutory safeguarding duties and preserve dignity, CSPE maintains absolute parameters regarding physical facilities:

- **Toilets and Latrines:** Learners are strictly prohibited from entering communal toilets designated for the opposite biological sex. A suitable alternative arrangement (e.g., a self-contained, lockable individual toilet) will be offered if a learner does not wish to use their assigned biological facility.
- **Changing Areas and Showers:** No learner aged 11 or older is permitted to undress or change in front of a peer of the opposite biological sex. Fully enclosed, single-occupancy lockable rooms will be provided as an alternative.
- **Educational Visits and Trips:** Learners are strictly prohibited from sharing bedrooms, cubicles, or collective overnight accommodation with peers of the opposite biological sex. Single-occupancy private rooms may be brokered following a dedicated trip risk assessment.
- **Physical Education:** Separate groups will be structured strictly on biological sex where safety or physical fairness is a concern; no exceptions will be made in response to a social transition request.

7. INFORMATION SYSTEMS AND RECORD-KEEPING

- **Accurate Biological Sex Tracking:** CSPE is legally required to accurately record biological sex and legal names across core management systems. Staff must be explicitly aware of each child's biological sex for physical safeguarding (e.g., trip assignments, first-aid).
- **Children Living in Stealth:** Cases where a learner has historically transitioned prior to arrival and is "living in stealth" must be securely managed by the DSL using restricted Nextcloud files.

8. PROFESSIONAL COMMUNITY BOUNDARIES AND BELIEFS

- **Impartiality & Respect:** CSPE enforces a culture free from bullying. Derogatory targeting of a gender-questioning child is managed immediately under the Anti-Bullying Strategy and Policy.
- **Protected Beliefs:** Leadership remains conscious of the statutory rights of staff and pupils regarding personal religion or philosophical beliefs. No member of staff can be legally compelled to use alternative pronouns that violate their conscience.
- **Practical Resolution:** To navigate competing rights smoothly, the centre prioritizes using the child's preferred first name instead of pronouns during daily instruction.

9. RETENTION AND REVIEW CONTROLS

All formal requests, consultation minutes, risk assessments, and facility plans will be recorded in writing and stored securely on Nextcloud under restricted DSL-only access. These cases are subject to a **mandatory termly review** by the DSL and Directors to evaluate shifts in the child's wellbeing, behavioural data, and clinical status. Historical arrangements implemented prior to KCSIE 2026 will be systematically audited for compliance.

Policy for Health, Safety, and Vulnerable Learners

Document Title	Policy for Health & Safety	Document Ref.	POL-HSA-001
School/Provision	Clear Steps Plus Education		
Version/Status	V1.0 Approved	Effective Date	July 19, 2026
Approved By	Executive Leadership Team	Review Cycle	Annual (July 2027)
Target Audience	All Academic Staff, Directors, Contractors, Volunteers, and Administrative Staff.		

1. PURPOSE & SCOPE The purpose of this Policy is to establish a secure, compliant, and supportive learning environment for all workers, learners, and visitors across CSPE centres. Compliance with the health, safety, and fire protocols detailed within this policy is mandatory for all personnel. This document functions alongside our Safeguarding & Child Protection Policy, Behaviour Policy, and SEND Policy.

2. POLICY & LEGAL CONTEXT This Policy operates in strict alignment with UK regulations and statutory frameworks, including:

- **The Health and Safety at Work etc. Act 1974.**
- **The Management of Health and Safety at Work Regulations 1999.**
- **Keeping Children Safe in Education (KCSIE) 2026.**
- **The Children Act 1989 and Children Act 2004.**
- **The Education Act 2002.**

3. THE CLEAR STEPS PLUS HOLISTIC SAFETY FRAMEWORK To protect our learners and staff, CSPE manages health and safety across four core operational domains:

Safety Domain	What We Implement	Primary Rationale
1. Operational Risk Management	Premises risk assessments, PAT/EICR testing, and COSHH audits.	To proactively identify defects, control hazards, and ensure safe equipment use.
2. Medical & Incident Logging	First aid infrastructure, RIDDOR reporting, and logging accidents in BrightSafe.	To track physical injuries, establish preventative controls, and fulfil HSE reporting duties.
3. Infection Control	Strict sanitisation schedules, hand-washing habits, and blended learning continuity.	To minimize the risk of infection and protect medically vulnerable learners.

4. Fire Safety & Evacuation	Monthly equipment checks, timed drills, and physical sweeps during evacuations.	To ensure safe, orderly, and fully accounted emergency evacuations.
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CRITICAL PRINCIPLE *"Every staff member, contractor, and volunteer is personally responsible for health and safety within the centre and must take reasonable care of their own health and safety, as well as the safety of the vulnerable learners in their direct charge".*

4. HEALTH & SAFETY INTENT & STRUCTURE (DEFAULT EXPECTATIONS) CSPE is committed to maintaining a safe, healthy, and trauma-informed working and learning environment.

- **Targeted LAC/PLAC Protections:** In accordance with statutory DfE guidance, CSPE implements targeted academic and pastoral protections for Looked-After and Previously Looked-After Children, ensuring they have personalised Learner Passports aligned with their statutory Personal Education Plan (PEP).
- **Training and Maintenance:** CSPE provides comprehensive health and safety training for all staff at induction and ensures that hazardous substances are handled, stored, and utilized safely out of the reach of learners.
- **Infection Control Exclusions:** Staff members must not come into the centre if they are unwell. If a learner is excluded from the site due to infectious illness but is well enough to study, secure online provision will be deployed to protect educational continuity.

5. STEP-BY-STEP OPERATIONAL PROCESS (EMERGENCY FIRE EVACUATION) To ensure immediate response and legal compliance during a fire alarm, staff and learners must adhere strictly to the following workflow:

1. Immediate Evacuation: Upon hearing the alarm, learners must stop working, remain calm, and follow staff directions. Staff assume immediate responsibility for their group, guiding them through the nearest designated fire exit in an orderly fashion without letting anyone wander.

2. Final Centre Sweep: The Directors in Charge conduct a rapid, full, and final check of all centre auxiliary zones (including toilets, sensory spaces, and storage rooms) and exits the building with the physical attendance register and a pen.

3. Assembly and Roll Call: Upon arrival at the Fire Assembly Point, the Directors will immediately call the attendance register. Any unaccounted individual is reported to the Fire Brigade incident commander immediately.

4. Clearance and Release: Staff and learners are strictly prohibited from re-entering the building until official clearance is granted by the senior fire officer. If the building cannot be re-entered, learners will only be released to verified parents/carers who must sign next to the learner's name directly on the Fire Register.

6. RECORDING, DATA MANAGEMENT & SECURITY

- **Digital Accident Logging:** All physical injuries, accidents, and medical incidents must be recorded immediately in the digital *BrightSafe* Accident Book.

- **Permanent Ink Records:** Serious health and safety incidents, injuries, or near-misses must be written up immediately in a formal Incident or Accident Report in ink and reported centrally to the Head of Ofsted, Safeguarding & Compliance. This prevents unauthorised editing or erasure.
- **Fire Logs:** All fire extinguisher checks, emergency lighting tests, and evacuation drill outcomes must be recorded inside the centre Fire Log.

7. ROLES & RESPONSIBILITIES

Role	Specific Health & Safety Responsibilities
Director (Karen Greenwood)	• Holds ultimate legal responsibility for health and safety, localized risk assessments, and serving as the designated point of contact for advice. • Responsible for reporting qualifying accidents to the HSE under RIDDOR.
Designated LAC/PLAC Leads (Dawn Schofield / Amy Hames)	• Act as Designated Director and Designated LSA responsible for constructing and updating personalised Learner Passports for highly vulnerable Looked-After Children.
All CSPE Staff, Volunteers & Contractors	• Personally responsible for reporting emerging defects, environmental hazards, or health concerns to the centre Directors immediately. • Must guide learners safely during evacuations, ensuring no learner leaves the group unaccompanied.

8. QUALITY ASSURANCE, MODERATION, & REVIEW To ensure the integrity of our safety systems, the school implements the following oversight protocol:

1. Formal Premises Risk Assessments: Directors conduct regular risk assessments in conjunction with *BrightSafe* to remove or control identified risks.

2. Statutory Testing Schedules: The centre mandates and logs regular PAT (Portable Appliance Testing), statutory EICR (Electrical Installation Condition Report) testing, and annual professional fire safety system inspections.

3. Annual Policy Review: This Policy framework is reviewed, tested, and revised at least annually by the SLT, or immediately following an incident.

Policy for Healthy Relationships and Sex Education (HRSE)

Document Title	Policy for HRSE	Document Ref.	POL-HRS-001
School/Provision	Clear Steps Plus Education		
Version/Status	V1.0 Approved	Effective Date	July 19, 2026
Approved By	Executive Leadership Team	Review Cycle	Annual (July 2027)
Target Audience	All Academic Staff, Directors, Learners, and Parents/Carers.		

1. PURPOSE & SCOPE, The purpose of this Policy is to outline CSPE's commitment to providing high-quality, inclusive, and developmentally appropriate Healthy Relationships and Sex Education (HRSE). Our aim is to equip learners with the knowledge, skills, and values they need to build healthy relationships, understand their bodies, stay safe, and make informed choices as they grow. We recognize that HRSE is an essential component for safeguarding, promoting wellbeing, and preparing learners for life in modern Britain.

2. POLICY & LEGAL CONTEXT This Policy operates in strict alignment with UK regulations and statutory frameworks, including:

- **DfE Relationships Education, Relationships and Sex Education (RSE) and Health Education statutory guidance (2019).**
- **Keeping Children Safe in Education (KCSIE).**
- **The Equality Act 2010.**
- **CSPE's Safeguarding and Child Protection Policy.** (*Note: As an independent school, CSPE will meet all statutory expectations for Relationships and Health Education and will provide Sex Education in line with our ethos and learners' needs*).

3. THE CLEAR STEPS PLUS HOLISTIC HRSE FRAMEWORK To ensure our HRSE curriculum is supportive, effective, and protective, CSPE manages its delivery across four core domains:

HRSE Domain	What We Implement	Primary Rationale
1. Relationships Education	Teaching all learners about friendships, online behaviour, consent, boundaries, and stereotypes.	To promote respect, empathy, positive relationship skills, and equality.
2. Health Education	Teaching physical health, hygiene, mental wellbeing, puberty, and basic first aid.	To reduce stigma around discussing emotions and to promote healthy lifestyles.

3. Sex Education	Factual, age-appropriate instruction on reproduction, contraception, sexual health, and the law.	To help secondary-aged learners recognize coercion, grooming, and exploitation while building healthy intimate relationships.
4. Inclusive Delivery	Trauma-informed delivery adapted for SEND learners with accessible language and visual supports.	To ensure content is sensitive to learners' abilities, backgrounds, and specific needs.

CRITICAL PRINCIPLE *"Safeguarding Priority."* HRSE is fundamentally a safeguarding priority. Staff must create a safe, respectful learning environment, use agreed ground rules, respond appropriately to disclosures, and empower learners to seek help from trusted adults if they feel unsafe or worried.

4. HRSE INTENT & STRUCTURE (DEFAULT EXPECTATIONS) CSPE expects the HRSE curriculum to be delivered in a factual, non-judgemental, and age-appropriate way.

- **Curriculum Delivery:** Content will be delivered through PSHCE lessons, mentoring sessions, one-to-one or small-group interventions, and cross-curricular links (e.g., science, ICT, PE).
- **Staff Neutrality:** Staff must use clear, factual language and will not promote personal opinions during instruction.
- **Right of Withdrawal:** Parents and carers may request withdrawal from Sex Education, but not from Relationships or Health Education. The senior team will discuss requests individually to review the educational benefits before a final decision is made.

5. STEP-BY-STEP OPERATIONAL PROCESS To ensure consistent delivery and safety, all staff must adhere to the following workflow when teaching HRSE:

1. Establishing the Environment: Staff must create a safe, respectful learning environment by utilizing agreed ground rules so learners can ask questions safely and engage respectfully.

2. Adaptive Teaching: Staff must adapt all instruction for SEND learners using accessible language and visual supports, remaining trauma-informed and supportive.

3. Safeguarding Vigilance: Staff must actively listen and respond appropriately to any disclosures made during discussions.

4. Formal Escalation: Any safeguarding concerns arising from HRSE lessons must be reported immediately in line with the Safeguarding and Child Protection Policy.

5. Parental Partnership: The school will share curriculum information annually, provide opportunities for parents to ask questions, and offer support for discussing HRSE topics at home.

6. RECORDING, DATA MANAGEMENT & SECURITY

- **Safeguarding Disclosures:** Any safeguarding disclosures made by learners during HRSE instruction must be securely recorded and managed by the DSL under strict child protection protocols.
- **Parental Withdrawals:** Parental requests for withdrawal from Sex Education, and the subsequent discussions with the senior team, are managed by the Directors and documented formally.

7. ROLES & RESPONSIBILITIES

Role	Specific HRSE Responsibilities
The Directors	• Ensures the alternative provision meets all statutory requirements and that HRSE is effectively planned and delivered. • Manages parental requests for withdrawal from Sex Education.
All CSPE Staff	• Deliver HRSE confidently, sensitively, and without promoting personal opinions. • Model respectful behaviour and strictly follow safeguarding procedures regarding disclosures.
Learners	• Expected to engage respectfully, treat others with kindness, and ask questions safely.

8. QUALITY ASSURANCE, MODERATION, & REVIEW To ensure the integrity and effectiveness of our HRSE provision, the school implements the following oversight protocol:

1. Strategic Evaluation: The HRSE curriculum is actively reviewed through learner voice, staff feedback, lesson observations, safeguarding data, and curriculum mapping.

2. Annual Policy Review: The Directors reviews and approves this Policy annually to ensure updates reflect statutory changes, best practice, and the specific, evolving needs of our learners.

Policy for Induction

Document Title	Policy for Induction	Document Ref.	POL-IND-001
School/Provision	Clear Steps Plus Education		
Version/Status	V1.0 Approved	Effective Date	July 19, 2026
Approved By	Executive Leadership Team	Review Cycle	Annual (July 2027)
Target Audience	All Academic Staff, Designated Safeguarding Leads (DSLs), Tutors, Parents/Carers, and Commissioning Partners.		

1. PURPOSE & SCOPE, The purpose of this Policy is to ensure that all learners joining CSPE experience an inclusive, welcoming, safe, and supportive induction. Our induction process is strategically designed to introduce learners to their setting, communicate safeguarding and health policies, build positive trusting relationships to identify safeguarding risks early, and provide personalised support to meet individual educational, mental health, and welfare needs. This policy applies to all learners starting placements, all CSPE staff members, parents/carers, and placement commissioners.

2. POLICY & LEGAL CONTEXT This Policy operates in strict alignment with UK regulations and statutory frameworks, including:

- **Keeping Children Safe in Education (KCSIE) 2026:** Specifically mandating the secure transfer of child protection files from previous settings.

3. THE CLEAR STEPS PLUS HOLISTIC INDUCTION FRAMEWORK To proactively protect our community and ensure a smooth transition, CSPE manages induction across four core domains:

Induction Domain	What We Implement	Primary Rationale
1. Relationship Building	Creating a welcoming space and applying professional curiosity.	To ensure learners feel secure and to understand their underlying experiences and wellbeing indicators.
2. Vulnerability Screening	Baseline assessments evaluating mental health, SEND, and external risks.	To act as a critical point of early intervention before learning commences.
3. Safety & CP Transfer	Securing child protection files and developing personalised safety plans.	To address specific risks such as exploitation, violence, or online harms immediately.

4. Preventative Guidance	Orienting learners to online safety, reporting channels, and trusted adults.	To systematically empower learners to voice concerns and participate actively in their safety planning.
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CRITICAL PRINCIPLE *"Every learner will be treated with dignity, respect, and care, with their best interests at the heart of the induction. Induction acts as a critical point of early intervention, providing a positive foundation for safety, re-engagement in education, personal development, and life skills."*

4. INDUCTION INTENT & STRUCTURE (WELCOME PACK) CSPE maintains and shares a written induction welcome pack with learners, parents/carers, and commissioners. Presented in an accessible language and format to ensure learners are fully informed without feeling overwhelmed, the pack includes:

- The purpose of the alternative placement and intended academic/pastoral outcomes.
- The comprehensive therapeutic, academic, and mentoring support available to the learner.
- Photographs of the centre layout and key staff members, including the identity of the Designated Safeguarding Lead (DSL) and deputies.
- Transparent, child-friendly safeguarding and child protection procedures, alongside health, safety, and acceptable technology use protocols.

5. STEP-BY-STEP OPERATIONAL PROCESS To ensure a consistent and supportive environment, all staff must adhere to the following workflow:

1. Professional Curiosity: Upon entry, staff focus on creating a welcoming and physically safe environment, applying professional curiosity to understand the learner's communication preferences and immediate well-being indicators.

2. Baseline Assessments: Once the learner has settled, comprehensive baseline assessments are conducted to evaluate educational skills, executive function, social/emotional development (noting any signs of trauma), and mental health or external safeguarding vulnerabilities.

3. Individual Learning Plans (ILPs): Each learner receives a Learner Passport or ILP detailing their timetable, designated trusted adults, short- and long-term targets aligned with EHC plans, and personalised emotional regulation strategies.

4. Safeguarding and CP File Transfer: In accordance with KCSIE 2026, the DSL ensures the learner's child protection files are securely transferred from their previous setting to inform risk assessments and personalised safety plans.

5. Clear Reporting Channels: Learners are given clear, accessible guidance on how and to whom they can confidently report any form of abuse, neglect, cyberbullying, or harassment. Learners are explicitly reassured that staff will support them safely, though absolute confidentiality cannot be promised if it compromises their protection.

6. RECORDING, DATA MANAGEMENT & SECURITY

- **Dynamic Review:** Passports and ILPs are reviewed regularly with the learner, parents/carers, and commissioners to remain highly responsive to the child's progress and evolving care needs.

- **Communication Loops:** A robust communication loop is established with parents/carers and commissioners to track attendance patterns, evaluate mentoring support mechanisms, and ensure seamless setting integration.

7. ROLES & RESPONSIBILITIES

Role	Specific Induction Responsibilities
Designated Safeguarding Lead (DSL)	• Ensures the learner's child protection files are securely transferred from their previous setting to inform risk assessments. • Oversees the development of specific safety plans addressing exploitation, violence, or online harms.
All CSPE Staff & Tutors	• Actively build trusted relationships to ensure learners know they are being taken seriously and will be supported safely without shame. • Apply professional curiosity to understand underlying experiences and identify early vulnerability indicators.
Parents/Carers & Commissioners	• Actively engage with the learner's safeguarding and learning journey, participating in robust communication loops to ensure setting integration.

8. QUALITY ASSURANCE, MODERATION, & REVIEW To ensure the integrity of our support frameworks, the school implements the following oversight protocol:

1. Stakeholder Feedback: Leadership will consistently monitor the effectiveness of the induction process through direct feedback from learners, parents/carers, and commissioners.

2. Annual Policy Review: This Policy framework will be reviewed annually or sooner if statutory DfE guidance, local safeguarding partner arrangements, or operational requirements change.

Policy for Learner Assessment, Baseline, and Progress Tracking

Document Title	Policy for Learner Assessment	Document Ref.	POL-EDU-004
School/Provision	Clear Steps Plus Education		
Version/Status	V1.0 Approved	Effective Date	July 14, 2026
Approved By	Executive Leadership Team	Review Cycle	Annual (July 2027)
Target Audience	All Academic Staff, Special Educational Needs Coordinators (SENCOs), Therapists, and Education Assistants.		

1. PURPOSE & SCOPE

This Policy defines the systematic approach to baseline assessment, ongoing formative monitoring, summative evaluation, and therapeutic integration for learners at Clear Steps Plus Education. As an independent special school catering to pupils with diverse Special Educational Needs and Disabilities (SEND)—including Social, Emotional, and Mental Health (SEMH) needs, Autism Spectrum Conditions (ASC), and associated learning difficulties—accurate, sensitive, and multi-dimensional assessment is vital.

The objective of this policy is to ensure that assessment is used actively to adapt teaching, quantify holistic progress (academic, social, behavioural, and therapeutic), and provide robust evidence for Education, Health, and Care Plan (EHCP) Annual Reviews and Ofsted inspections.

2. POLICY & LEGAL CONTEXT

This Policy operates in strict alignment with UK education regulations and statutory frameworks, including:

- **The Special Educational Needs and Disability (SEND) Code of Practice (2015):** Specifically, the "Assess, Plan, Do, Review" cycle.
- **Education Regulations:** Ensuring robust tracking of pupil progress and attainment.
- **The National Curriculum:** Supporting adapted frameworks (such as pre-key stage standards and engagement models) for learners with severe or complex cognitive barriers.

3. THE CLEAR STEPS PLUS HOLISTIC FRAMEWORK

Because our pupils present with non-linear learning pathways, our assessment framework measures four key domains of development. We call this the Holistic Progress Matrix:

Assessment Domain	What We Measure	Primary Tools & Systems Used
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1. Academic & Cognitive	English, Maths, Science, Foundation subjects, functional skills, and cognitive processing speed.	P-scales/Pre-Key Stage standards, standardized baseline tests (e.g., GL Assessments), customized internal rubrics.
2. EHCP/Personal Outcomes / PLP	Progress against individual EHCP Section F provisions, communication, and independence targets.	Tracker, individualised Goal Attainment Scaling (GAS), progress matrices.
3. Social, Emotional & MH	Emotional regulation, social interactions, anxiety levels, resilience, and readiness to learn.	GAD7 and PHQ9 Involvement, SDQs (Strengths and Difficulties Questionnaires).
4. Therapeutic & Physical	Speech, Language & Communication (SLCN), motor skills, sensory processing profiles.	Therapy-led progress scales (OT, Speech & Language Therapy, Clinical Psychology reports).

CRITICAL PRINCIPLE *"No Learner Labelled by Limits."* All assessments must be designed to discover what a child can do, highlighting their strengths and pinpointing the exact micro-steps required to overcome barriers to learning.

4. STEP-BY-STEP ASSESSMENT PROCESS

To ensure consistency, accuracy, and fairness, all teaching and clinical staff must adhere strictly to the following workflow:

1. Admissions & Initial Baseline (Within 6 Weeks of Placement) Upon entry, the SENCO and SEND Assistant conduct a comprehensive file review (EHCP, previous school records including prior attainment). Within the first 6 weeks, teachers complete baseline assessments across core subjects, Executive Functioning, reading and spelling age and initial therapeutic screeners to establish a robust academic and holistic starting point.

2. Formulating Individualised Learning Plans (ILPs) Using baseline data and EHCP objectives, the SENDCO and SEND Assistant drafts ILPs. These include formulating end of KS4 target, 3 to 4 SMART (Specific, Measurable, Achievable, Relevant, Time-bound) targets updated termly, addressing both academic goals and personal development pathways.

3. Ongoing Formative Assessment ("Do & Observe") Daily, teachers and Learning Support Assistants (LSAs) collect formative evidence. This involves observational notes logged directly into our pupil tracking database, with an emphasis placed on identifying immediate learning trends or emotional fluctuations.

4. Termly summative Progress reviews Every 12 weeks, Senior team and curriculum lead hold formal progress reviews. Standardised testing or moderated work portfolios are cross-referenced with internal frameworks to calculate progress increments.

5. Multidisciplinary Moderation and Quality Assurance Before final reports are published, the Senior Team and SENCO host a Moderation Meeting. Tracking database records are audited to ensure consistency and prevent over- or under-estimation of pupil ability.

6. Reporting & Annual EHCP Review Integration Assessment outcomes directly populate progress reports provided to parents, local authorities, and therapeutic partners. Crucially, this robust multi-source data is synthesized to form the school's statutory evidence contribution to the annual EHCP Review process.

5. RECORDING, DATA MANAGEMENT & SECURITY

All assessment data represents sensitive personal data under GDPR and the Data Protection Act 2018. The following protocols must be followed:

- **Secure Entry:** All academic progression and therapy updates must be entered into the secure School Information Management System (SIMS) within 3 working days of the assessment window closing.
- **Access Controls:** Access to assessment data is strictly limited on a role-specific basis. Only authorised educators, therapists, and members of the Senior Leadership Team (SLT) may view full developmental records.
- **External Sharing:** Assessment records requested by Local Authorities or Clinical Partners must be shared exclusively via secure, encrypted electronic channels.

6. REPORTING & DATA ANALYSIS

To ensure that student data actively drives improvement and is clearly communicated to all stakeholders, the following protocols must be implemented:

- **Parent and Caregiver Reporting:** Comprehensive progress reports—translating academic, behavioural, and therapeutic milestones into accessible, jargon-free summaries—to be shared with parents and caregivers on a Week basis.
- **Annual Reviews & Statutory Reporting:** Synthesized progress data must be compiled into a formal, evidence-backed report to directly support each child's annual Education, Health, and Care Plan (EHCP) Review.
- **Data-Driven Intervention Planning:** The Senior Leadership Team (SLT) and teaching staff must review aggregated, anonymized school-wide tracking data at the end of every term. This analysis is used to evaluate the impact of the curriculum, identify systemic learning or behavioural trends, and strategically allocate classroom and therapeutic resources.

7. ROLES & RESPONSIBILITIES

Role	Specific Assessment Responsibilities
Directors	• Oversees the strategic direction and legal compliance of the assessment framework. • Chairs termly moderation sessions to guarantee rigorous quality assurance. • Ensures that data-driven insights are actively used to allocate school resources, plan staff CPD, and drive whole-school development plans.
SENCO & Therapists	• Manages therapeutic screenings and specialist diagnostic assessments (e.g., speech & language, occupational therapy).

	• Monitors compliance with EHCP statutory requirements and coordinates Annual Reviews.
Class Teachers	• Conducts baseline assessments and termly evaluations for all pupils in their class. • Drafts and reviews Individualised Learning Plans (ILPs) on a termly basis. • Directs Learning Support Assistants (LSAs) in daily evidence collection.
Learning Support Assistants	• Collects real-time, objective observations and work samples. • Inputs observation logs into the progress database as directed by the Teacher.

8. QUALITY ASSURANCE, MODERATION, & REVIEW

To ensure the integrity of assessment data, the school implements a three-tier quality assurance protocol:

1. Internal Moderation: Teachers engage in cross-classroom portfolio reviews twice per academic year to align interpretation of progress criteria.

2. External Moderation: Peer reviews are scheduled with partner special schools to benchmark internal tracking metrics and ensure alignment with national standards.

3. Annual Policy Review: This Policy is reviewed annually by the SLT to incorporate updated statutory guidelines and technological improvements in assessment methodologies.

Policy for LAC and PLAC

Document Title	Policy for LAC & PLAC	Document Ref.	POL-LAC-001
School/Provision	Clear Steps Plus Education		
Version/Status	V1.0 Approved	Effective Date	July 19, 2026
Approved By	Executive Leadership Team	Review Cycle	Annual (July 2027)
Target Audience	All Academic Staff, Directors, Designated Safeguarding Leads (DSLs), and Administrative Staff.		

1. PURPOSE & SCOPE, The purpose of this Policy is to define the targeted academic and pastoral protections CSPE implements for Looked-After Children (LAC) and Previously Looked-After Children (PLAC). Because this cohort is highly vulnerable, this policy ensures they receive tailored support to overcome barriers linked to past trauma, attachment difficulties, and loss.

2. POLICY & LEGAL CONTEXT This Policy operates in strict alignment with UK regulations and statutory frameworks, including:

- **Keeping Children Safe in Education (KCSIE) 2026.**
- **DfE Statutory Guidance:** *The designated teacher for looked-after and previously looked-after learners.*

3. THE CLEAR STEPS PLUS HOLISTIC LAC/PLAC FRAMEWORK To protect our highly vulnerable learners and ensure their educational success, CSPE manages LAC and PLAC support across four core domains:

Support Domain	What We Implement	Primary Rationale
1. Statutory Alignment	Integrating Learner Passports with statutory Personal Education Plans (PEPs).	To ensure consistent, multi-agency educational targets and support structures.
2. Trauma-Informed Staff	Mandatory training on the impacts of trauma, loss, and attachment.	To ensure staff deeply understand the root causes impacting the child's learning and emotional development.
3. Wellbeing Mentoring	1:1 sessions for goal setting and personal reflection.	To allow learners to safely voice concerns regarding SEND or bullying with a trusted adult.

4. Multi-Agency Linking	Working directly with foster carers, Social Workers, and Virtual School Heads (VSH).	To build strong home-school links, explain core skill delivery, and support learning within the home.
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CRITICAL PRINCIPLE *"Sensitivity and Discretion."* Staff must set high learning goals to accelerate progress, treat these learners with extreme sensitivity, maintain strict confidentiality regarding their care status, and ensure they are never singled out or labelled.

4. LAC & PLAC INTENT & STRUCTURE (DEFAULT EXPECTATIONS) CSPE is committed to ensuring Looked-After and Previously Looked-After Children are fully supported. To achieve this, the centre relies on dedicated leadership and personalised learning tools:

- **Designated Leadership:** CSPE maintains a Designated Director for LAC/PLAC, alongside a Designated LSA responsible for the operational maintenance of individualised support tools.
- **Learner Passports:** Every Looked-After and Previously Looked-After child will have a personalised Learner Passport constructed, continually updated, and distributed to relevant staff.

5. STEP-BY-STEP OPERATIONAL PROCESS To ensure consistent support and multi-agency alignment, staff must adhere to the following workflow:

1. Competency & Training: All staff members must complete specialised training to ensure they understand the profound impact of past trauma, attachment difficulties, and loss on a child's learning and emotional development before working closely with LAC/PLAC.

2. PEP Alignment: CSPE works closely with the child's partner school, their designated statutory Social Worker, and the relevant Local Authority Virtual School Head (VSH) to ensure that the internal Learner Passport aligns perfectly with the child's statutory Personal Learning Plan (PLP).

3. Home-School Connection: The Designated Teacher works directly with foster carers, residential providers, and adoptive parents to build strong home-school links and explain core skill delivery, so learning is supported outside the centre.

4. Mentoring Interventions: The Designated Teacher actively utilizes 1:1 wellbeing mentoring sessions to allow the child to review their own progress, set personalised goals, and safely communicate concerns.

6. RECORDING, DATA MANAGEMENT & SECURITY

- **Strict Confidentiality:** All staff must maintain strict, absolute confidentiality regarding a child's care status.
- **Secure Tracking:** Personal Education Plans (PEPs) and internal Learner Passports must be held securely, with access restricted strictly on a "need to share" basis to facilitate safe care and instruction.

7. ROLES & RESPONSIBILITIES

Role	Specific LAC/PLAC Responsibilities
DSL (Dawn Schofield)	• Serves as the Designated Director for LAC and PLAC.

	• Liaises directly with statutory Social Workers and Virtual School Heads (VSH).
Designated LSA (Amy Hames)	• Responsible for constructing, updating, and distributing personalised Learner Passports for all LAC and PLAC.
All CSPE Staff & Tutors	• Must maintain strict confidentiality regarding a child's care status. • Expected to set high learning goals to accelerate progress while ensuring the learner is never singled out or labelled.

8. QUALITY ASSURANCE, MODERATION, & REVIEW To ensure the integrity of our support systems, the school implements the following oversight protocol:

1. Multi-Agency PEP Reviews: The educational progress and wellbeing of LAC/PLAC learners are continuously monitored in direct collaboration with partner schools and local authorities.

2. Annual Policy Review: This Policy framework is reviewed at least annually by the SLT to incorporate updated statutory guidelines and ensure protective measures remain highly effective.

Policy for Mobile Phone Use

Document Title	SOP for Mobile Phone Use	Document Ref.	SOP-MOB-001
School/Provision	Clear Steps Plus Education		
Version/Status	V1.0 Approved	Effective Date	July 19, 2026
Approved By	Executive Leadership Team	Review Cycle	Annual (July 2027)
Target Audience	All Academic Staff, Special Educational Needs Coordinators (SENCOs), Designated Safeguarding Leads (DSLs), and Mentors.		

1. PURPOSE & SCOPE, The purpose of this Standard Operating Procedure (SOP) is to define the boundaries, safety parameters, and permitted exceptions for mobile phone usage at CSPE. While CSPE establishes a controlled, mobile-free learning environment by default to protect children from online harms, we take a safeguarding-led, trauma-informed approach that recognizes mobile devices can serve as critical assistive tools for neurodivergent learners.

2. POLICY & LEGAL CONTEXT This SOP operates in strict alignment with UK education and safeguarding regulations, including:

- **Keeping Children Safe in Education (KCSIE) 2026.**
- **DfE Statutory Guidance:** *Mobile phones in schools.*
- **The Equality Act 2010.**
- **The Children Act 1989 and Children Act 2004.**
- **The Education Act 2002.** *(This document must be implemented in parallel with the CSPE Safeguarding & Child Protection Policy, Behaviour Policy, Online Safety Policy, and Staff Code of Conduct.)*

3. THE CLEAR STEPS PLUS HOLISTIC DEVICE EXEMPTION FRAMEWORK In strict accordance with the Equality Act 2010, CSPE recognizes that absolute blanket bans on communication devices can place certain neurodivergent or vulnerable learners at a substantial disadvantage. Approved exemptions are measured and supported dynamically:

Exemption Domain	What We Support	Permitted Tools & Systems
1. Emotional & Sensory Regulation	Supporting emotional regulation, reducing sensory anxiety, and mitigating autistic burnout.	Listening to calming music via headphones during designated regulation breaks; accessing approved mindfulness or self-regulation apps.

2. Assistive Technology	Providing vital assistive speech, language, or learning technology.	Utilizing assistive communication software.
3. Executive Functioning	Supporting executive functioning and independent pacing.	Visual pacing timers, digital schedules, or reminders.
4. Safeguarding & Safe Communication	Enabling controlled communication for vulnerable learners.	Contacting a pre-agreed, named safe adult under direct staff supervision.

CRITICAL PRINCIPLE *A safeguarding-led, trauma-informed approach: Mobile devices can serve as critical assistive tools for neurodivergent learners. We establish a mobile-free environment by default to protect children but prioritize reasonable adjustments to prevent placing vulnerable learners at a substantial disadvantage.*

4. MOBILE USE INTENT & STRUCTURE (DEFAULT EXPECTATIONS) To limit learners' exposure to online risks, maximize academic engagement, and prevent distraction, CSPE is a mobile phone-free environment by default.

- **Standard Storage:** Unless an explicit, documented exemption has been authorised as a reasonable adjustment, all learners must place their mobile phones in the secure, designated containers provided in each learning area upon arrival.
- **Device Status:** Standard devices must remain switched off or on silent and securely stored during all structured instructional periods.
- **Break Periods:** Permitted use of personal devices during designated break intervals remains at the discretion of centre leadership and must never disrupt the environment or compromise centre safeguarding.

5. STEP-BY-STEP OPERATIONAL PROCESS To ensure consistency, safety, and inclusion, all staff must adhere strictly to the following workflow:

- **1. Approved Regulation Exemptions:** Where device access is formally recognised and integrated into a learner's statutory **Education, Health and Care (EHC) plan**, *Individual Support Plan*, *Regulation Plan*, or *Centre Risk Assessment*, it will be treated as an approved reasonable adjustment.
- **2. Screening and Confiscation Protocol:** Where a member of staff has reasonable grounds to suspect that a learner's device contains prohibited, harmful, or illegal material, or has been used to perpetrate child-on-child abuse, the device may be formally confiscated. The reason will be explained in a calm, clear, and non-punitive manner to minimize distress.
- **3. Exemption Protections:** Where a confiscated device belongs to a learner using it as an approved regulation tool, its temporary removal must be strictly risk-assessed, time-limited, and carefully balanced against the immediate risk of severe emotional dysregulation.
- **4. Handling Indecent Material & Digital Evidence:** If a device is suspected to contain illegal content, staff must isolate the phone, refrain from navigating the menus, and hand the device

directly to the Designated Safeguarding Lead (DSL). Staff members are prohibited from viewing or forwarding suspected indecent images.

6. RECORDING, DATA MANAGEMENT & SECURITY

- **Secure Logging:** Any confiscation must include a formal entry detailing the rationale, timing, and staff involved, logged instantly in the centre records.
- **Parental Communication:** Parents/carers will be informed of any confiscation.
- **Preservation of Evidence:** The DSL will immediately manage any parallel referrals to local authority children's social care and the police, who will assume responsibility for device inspection of illegal content.

7. RESPONDING TO MISUSE & PROHIBITED CONDUCT In line with KCSIE 2026, mobile devices must **never** be used to access illegal/extremist content, facilitate child-on-child abuse/cyberbullying, create or share nudes/deepfakes, enable grooming, or record staff/learners without explicit consent. When a learner misuses a device, CSPE enforces a **regulation-first** framework rather than an automatically punitive response. Tutors will follow this sequence:

- **Regulate:** Address the learner's immediate emotional or sensory state.
- **Assess:** Evaluate the safeguarding context of the device misuse.
- **Restore:** Conduct a restorative conversation to repair boundaries and reinforce behavioural targets.
- **Review & Engage:** Review the Individual Support Plan and actively engage parents, carers, and commissioning authorities to adjust reasonable accommodations.

8. ROLES & RESPONSIBILITIES

Role	Specific Mobile Policy Responsibilities
Designated Safeguarding Lead (DSL) Team	• Continuously monitors centre trends relating to phone misuse and provides digital safety updates to staff. • Liaises directly with external multi-agency safeguarding partners and police regarding digital evidence or illegal content.
Class Teachers / Tutors	• Enforce the regulation-first sequence (Regulate, Assess, Restore, Review & Engage) following device misuse. • Ensure standard devices remain securely stored during structured instructional periods.
All CSPE Staff	• Maintain sharp operational awareness of the 4Cs of online risk (Content, Contact, Conduct, Commerce). • Ensure all digital communication with learners occurs via official CSPE channels; using personal mobile phones or social media to contact learners is prohibited.

9. QUALITY ASSURANCE, MODERATION, & REVIEW To ensure the integrity of safeguarding parameters, this policy is subject to formal monitoring.

1. Annual SOP Review: This policy framework is reviewed and updated annually by the SLT.

2. Incident-Responsive Review: The policy will be updated immediately following any significant device-related safeguarding incident, or in response to changes in statutory DfE guidance.

Policy for Online Safety and AI

Document Title	Policy for Online Safety & AI	Document Ref.	POL-OSA-001
School/Provision	Clear Steps Plus Education		
Version/Status	V1.0 Approved	Effective Date	July 19, 2026
Approved By	Executive Leadership Team	Review Cycle	Annual (July 2027)
Target Audience	All Academic Staff, Special Educational Needs Coordinators (SENCOs), Designated Safeguarding Leads (DSLs), and IT Partners.		

1. PURPOSE & SCOPE This Policy sets out how CSPE manages online safety as a core safeguarding responsibility, protecting learners from risks across four distinct areas: Content, Contact, Conduct, and Commerce. It also establishes the framework for the safe, ethical, and legal use of Artificial Intelligence (AI) tools within the provision.

2. POLICY & LEGAL CONTEXT This Policy is informed by and operates in strict alignment with UK education and safeguarding regulations, including:

- **Keeping Children Safe in Education (KCSIE) 2027.**
- **UK GDPR and the Data Protection Act 2018.**
- **The Prevent Duty 2023.**
- **The SEND Code of Practice.**
- **Local Safeguarding Partnership (Trafford) guidance.**

3. THE CLEAR STEPS PLUS HOLISTIC ONLINE SAFETY FRAMEWORK Our framework supports KCSIE’s requirement that educational settings take a proportionate, risk-based approach to emerging technologies. We measure and mitigate digital risks dynamically across four core domains:

Safety Domain	What We Implement	Primary Rationale
1. Content & Safe AI	Vetting all AI outputs and utilizing robust filtering systems.	To prevent exposure to illegal, inappropriate, or harmful material, including misinformation.
2. Contact & Conduct	Safeguards against grooming, cyberbullying, and peer pressure.	To manage digital footprint safety and protect from child-on-child abuse and exploitation.
3. Commerce & Security	GDPR compliance and protection against financial exploitation.	To protect vulnerable learners from scams, phishing, and gambling.

4. Human-Led Oversight	Prohibiting automated profiling without explicit consent.	Ensuring algorithmic models never override human clinical and educational judgment.
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CRITICAL PRINCIPLE *Online safety is handled strictly as a **whole-setting safeguarding issue**, rather than being delegated as a standalone IT infrastructure matter. AI tools must always meet four strict baseline pillars: Safe, Appropriate, Secure, and Human-Led.*

4. ONLINE SAFETY INTENT & STRUCTURE To ensure the digital environment remains safe and supportive for neurodivergent learners, CSPE enforces the following baseline expectations:

- **Technical Safeguards:** Robust filtering and monitoring systems are actively running across all networks and devices, with regular technical reviews performed by our IT partner, 2PLUS1.
- **Specialised Curriculum:** Learners are taught how to stay safe online through a specialised curriculum that features targeted adaptations to meet neurodiverse communication, sensory, and processing needs.

5. STEP-BY-STEP OPERATIONAL PROCESS (AI INTEGRATION) To mitigate algorithmic risks and protect children from inappropriate digital interactions, staff must adhere strictly to the following workflow when utilizing AI:

- **1. Mandatory Verification:** Staff must verify all AI-generated content before it is used in lesson plans or student-facing materials.
- **2. Continuous Supervision:** Staff must maintain continuous supervisor oversight of all learner interactions with AI tools during centre hours.
- **3. Prohibited Automated Profiling:** There is a strict prohibition against using any automated AI tools that could profile, label, or monitor behaviour without explicit, audited parental consent and senior leadership approval.
- **4. Immediate Reporting:** Any concerning, radicalizing, or sexually explicit AI outputs must be reported directly to the DSL team immediately.

6. RESPONDING TO ADVANCED DIGITAL HARMS (2027) To satisfy the compliance requirements of KCSIE 2027, this policy establishes explicit safeguards against advanced technology-assisted harms:

- **AI-Generated Intimate Material (Deepfakes):** The creation, modification, downloading, distribution, or viewing of AI-generated sexually explicit imagery of children is treated with the identical gravity as physical Child Sexual Abuse Material (CSAM). Any discovery or suspicion will immediately trigger a formal referral to the Trafford LADO and law enforcement within 24 hours.
- **Misinformation & Radicalisation:** To counter the risks of AI hallucination and bias, tutors must explicitly teach learners how to critically evaluate digital content and verify sources, mitigating the risk of vulnerable SEND learners being influenced by automated extremist content.

7. RECORDING, DATA MANAGEMENT & SECURITY

- **Data Security:** AI platforms used must be fully GDPR-compliant, with absolute prohibitions against entering any learner's personal data, names, or sensitive profiles into public or unvetted generative AI engines.
- **Safeguarding Logging:** Digital concerns and online vulnerabilities must be formally reported and recorded following the standard safeguarding procedures outlined in KCSIE.

8. ROLES & RESPONSIBILITIES

Role	Specific Online Safety Responsibilities
Designated Safeguarding Lead (DSL) Team	• Takes absolute lead operational responsibility for online safety, including incidents involving AI misuse, algorithmic harm, or toxic content. • Ensures KCSIE updates are reflected promptly in active staff training modules.
All Academic & Support Staff	• Retain ultimate responsibility and professional oversight for decisions affecting learners, ensuring human-led judgment. • Must complete comprehensive online safety training annually, covering the safe and ethical use of AI.
IT Partner (2PLUS1)	• Performs regular technical reviews of filtering and monitoring systems across all CSPE networks and devices.

9. QUALITY ASSURANCE, MODERATION, & REVIEW To ensure the integrity of our digital safeguards, this Policy will be formally reviewed annually. It will be reviewed and iterated sooner if:

1. Updates or amendments are made to national statutory KCSIE guidance.
2. New online risks, cyber threats, or generative AI tools emerge within the alternative provision sector or the CSPE network.
3. Internal safeguarding trends or localized incidents indicate a clear need for tactical policy revision.

Policy for Restrictive Interventions

Document Title	Policy for Restrictive Interventions	Document Ref.	POL-RST-001
School/Provision	Clear Steps Plus Education		
Version/Status	V1.0 Approved	Effective Date	July 14, 2026
Approved By	Executive Leadership Team	Review Cycle	Annual (July 2027)
Target Audience	All Academic Staff, Special Educational Needs Coordinators (SENCOs), Designated Safeguarding Leads (DSLs) and Learning Support Assistants.		

1. PURPOSE & SCOPE This Policy sets out how CSPE manages challenging behaviour and dysregulation. CSPE is committed to safeguarding and promoting the welfare of all learners. Restrictive interventions, including reasonable force and seclusion, are used only as a last resort and when lawful and necessary to keep individuals and the school community safe. The school prioritises proactive, trauma-informed, and neurodiversity-affirming approaches to minimize the need for these practices, operating under our baseline principle of "**regulation before expectation**".

2. POLICY & LEGAL CONTEXT This Policy operates in strict alignment with UK regulations and statutory frameworks, including:

- **Keeping Children Safe in Education (KCSIE) 2026:** Specifically mandating that restraint and seclusion are safeguarding matters, requiring rigorous monitoring for disproportionate impact on SEND learners.
- **Section 93 and 93A of the Education and Inspections Act 2006.**
- **The School’s (Recording and Reporting of Seclusion and Restraint) Regulations.**
- **The Equality Act 2010.**

3. THE CLEAR STEPS PLUS HOLISTIC RESTRICTIVE INTERVENTION FRAMEWORK Because our pupils present with non-linear learning pathways, trauma histories, or communication difficulties, all behaviour is understood as communication. Our intervention framework is driven by four core domains:

Intervention Domain	What We Implement	Primary Rationale & Systems Used
1. De-escalation & Prevention	Proactive strategies, co-regulation, and environmental adjustments.	Behaviour is communication; physical intervention is strictly a last resort.

2. Safe Practice & Restrictions	Active consideration of age, SEND, and medical conditions prior to intervention.	To ensure interventions are necessary, proportionate, and represent the least restrictive option.
3. Lawful Interventions	Reasonable force or seclusion used exclusively as exceptional safety measures.	To prevent a learner from causing injury to themselves/others, committing an offence, or causing severe property damage.
4. Post-Incident Support	Immediate medical assessments, emotional check-ins, and restorative debriefs.	To repair the adult-learner relationship and identify future prevention and regulation strategies.

CRITICAL PRINCIPLE *"Regulation before expectation." Restraint and seclusion are **never** used as punishment, for compliance, or for convenience. They are safety interventions, not disciplinary measures.*

4. INTERVENTION INTENT & STRUCTURE (DEFAULT EXPECTATIONS)

- **Terminology:** Restrictive Intervention is an umbrella term for actions aimed to prevent, restrict, or subdue movement. Reasonable Force uses no more force than necessary for the least amount of time.
- **Physical Contact Boundaries:** In alignment with our *Staff Code of Conduct*, CSPE does not operate a 'no contact' policy. Appropriate physical contact for comfort, emotional regulation, first aid, or educational guidance is supported when delivered in open, observable spaces.
- **Prohibited Techniques:** Prone (face-down), supine (face-up), mechanical, or pain-inducing techniques are **prohibited**. Holds must never restrict breathing, airways, speech, or the use of sensory or communication aids.

5. STEP-BY-STEP OPERATIONAL PROCESS To ensure consistency and safety, all staff must adhere strictly to the following workflow:

- 1. Proactive Strategies:** Staff must prioritize de-escalation, co-regulation, and environmental adjustments before any physical intervention is considered.
- 2. Risk Consideration:** Before administering an intervention, staff must actively consider the learner's age, specific SEND, communication vulnerabilities, and underlying medical conditions.
- 3. Administering Reasonable Force:** Reasonable force may be deployed only when all de-escalation attempts have failed, and it is immediately necessary to prevent injury, severe property damage, or a criminal offence.
- 4. Managing Seclusion:** Seclusion is used exclusively as an exceptional safety measure to protect others from immediate harm. The learner must be always supervised by a staff member who maintains visual contact in a safe, non-threatening space. The intervention must end the exact moment the immediate risk of harm reduces.

5. Search Powers: Authorised staff may use reasonable force to search for legally prohibited items only (e.g., weapons, alcohol, illegal drugs). **Any suspicion of weapons must immediately be escalated to the DSL.**

6. RECORDING, DATA MANAGEMENT & SECURITY

- **The Internal Incident Log:** All significant incidents involving the use of force, seclusion, or non-physical restraint must be recorded in writing by the staff involved on the **same day** as the incident occurs.
- **Secure Entry:** The record must be logged on our secure Nextcloud system. It must detail names, SEN status, precise timing/duration, triggers, de-escalation strategies attempted, degree of force applied, injuries, justification, and post-incident support.
- **Reporting to Parents/Carers:** CSPE must inform parents and carers of any significant incident in writing (via secure email) as soon as practicable, and **ideally on the same day**.
- **Reporting Exceptions:** Reporting is not required if the learner is aged 20 or older, or if the centre has reasonable safeguarding grounds to believe that reporting the incident to the family would result in serious harm or abuse. If an exception is made, the DSL must be notified immediately and a LADO referral evaluated.

7. POST-INCIDENT CARE & DEBRIEFING

- **Immediate Support:** Immediate medical assessments and emotional check-ins are provided to both the learner and the staff involved.
- **The Restorative Debrief:** A formal debrief conversation must be held within 48 hours to facilitate reflection, repair the adult-learner relationship, and identify future prevention strategies.
- **Partnership Review:** Parents and commissioning schools will be invited to a follow-up discussion to review environmental triggers, update risk assessments, and adjust the learner's *Behaviour Support Plan*.

8. ROLES & RESPONSIBILITIES

Role	Specific Restrictive Intervention Responsibilities
Governing Body & Directors	• Regularly interrogates anonymized centre data on restrictive interventions. • Evaluates direct indicators for staff training needs, adjustments to centre layout, and continuous policy improvements.
Designated Safeguarding Lead (DSL) / Safeguarding Leaders	• Evaluates LADO referrals if an exception to parent-reporting is made due to harm/abuse risks. • Manages immediate escalations regarding suspected weapons.
All Authorised Staff	• Prioritize de-escalation and ensure holds never restrict breathing or utilize pain-inducing techniques.

	• Must be adequately trained in safe, approved physical techniques and proactive, trauma-informed prevention strategies.
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9. QUALITY ASSURANCE, MODERATION, & REVIEW To ensure the integrity and safety of our restrictive intervention practices, the school implements the following oversight protocol:

- 1. Trend Analysis & Oversight:** Directors, and Safeguarding Leaders regularly interrogate anonymized centre data to evaluate repeat patterns, common environmental triggers, and individual student cycles.
- 2. Institutional Bias Monitoring:** Data analysis explicitly evaluates any indicators of institutional bias or **disproportionate use of restraint/seclusion related to protected characteristics, race, gender, or SEND status.**
- 3. Annual Policy Review:** This Policy framework is reviewed to incorporate updated statutory guidelines, address staff training needs, and ensure continuous policy improvements based on data insights.

Policy for Safe Storage, Disposal, and Breach Management

Document Title	Policy for Storage & Disposal	Document Ref.	POL-STO-001
School/Provision	Clear Steps Plus Education		
Version/Status	V1.0 Approved	Effective Date	July 19, 2026
Approved By	Executive Leadership Team	Review Cycle	Annual (July 2027)
Target Audience	All Academic Staff, Directors, Designated Safeguarding Leads (DSLs), and Administrative Staff.		

1. PURPOSE & SCOPE, The purpose of this Policy is to establish a secure framework for managing, storing, transferring, and disposing of confidential data at CSPE. Effective security is a collective responsibility requiring the active participation of every staff member and associate. Staff are personally responsible for the secure handling of confidential information entrusted to them and may access or share data only when authorised and strictly necessary for the performance of their duties.

2. POLICY & LEGAL CONTEXT This Policy operates in strict alignment with UK regulations and statutory frameworks, including:

The UK General Data Protection Regulation (UK GDPR).

The Data Protection Act 2018.

The Children Act 1989.

Keeping Children Safe in Education (KCSIE) 2026: Specifically, regarding child protection record retention and visibility.

3. THE CLEAR STEPS PLUS HOLISTIC DATA MANAGEMENT FRAMEWORK To protect the integrity of our records and ensure complete legal compliance, CSPE manages data security across four core domains:

Data Domain	What We Implement	Primary Rationale
1. Secure Retention	Distinct retention boundaries for standard vs. child protection records.	To legally dispose of standard data while permanently securing safeguarding chronologies.
2. Internal Sharing	Operating on a "need to share" rather than a "need to know" basis internally.	To optimize learner safety and ensure staff can fulfil their statutory duty of care under KCSIE 2026.
3. Subject Access (SAR)	A formal, four-step protocol to process requests within one calendar month.	To uphold fundamental data subject rights defined under the UK GDPR.

4. Breach Response	A structured four-step containment, assessment, and 72-hour reporting protocol.	To immediately isolate compromised data, mitigate risk, and comply with ICO notification laws.
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CRITICAL PRINCIPLE *"Safeguarding Exemption."* In strict compliance with KCSIE 2026 child protection standards, any record concerning a child protection disclosure, a safeguarding concern, or a multi-agency referral must **never** be prematurely destroyed. These records must be retained securely until the individual reaches the age of 25 to assist historical abuse investigations.

4. RECORD INTENT & STRUCTURE (ACCESS CONTROLS) CSPE maintains physical records inside secure, lockable filing cabinets at the centre, alongside encrypted digital backups hosted on a secure Cloud platform (Nextcloud). To maintain absolute data integrity, access permissions are segregated into three distinct columns:

Company Confidential: Financial Data, Business Plans.

Client Confidential: Service Level Agreements, Tutee Records.

Staff Confidential: DBS & Vetting Certificates, Personnel Logs. Access to all three categories is restricted exclusively to the Directors (Trusted Admin User), with access systematically denied to unauthorised personnel to mitigate the risk of harmful accidental disclosure.

5. STEP-BY-STEP OPERATIONAL PROCESS (BREACH RESPONSE) A security breach refers to any incident where protected, sensitive, or confidential data is copied, transmitted, viewed, stolen, or altered by an unauthorised individual. When an incident is identified, staff must immediately report it to the Director, who will execute the following workflow:

1. Containment & Recovery: Take immediate steps to secure systems, block further unauthorised access, isolate affected networks, and retrieve any compromised physical files.

2. Risk Assessment: The Director conducts an impact analysis to calculate the total number of affected data subjects, evaluate what specific information was compromised, and determine the legal and reputational risk.

3. Statutory Notification: If the breach risks the rights of individuals, notify the affected data subjects. The Director must formally report the breach to the ICO within **72 hours**. Severe cyber-attacks must also be reported to the NCSC and Action Fraud.

4. Evaluation & Response: Conduct a thorough root-cause analysis to establish why the incident occurred and implement updated physical or digital security controls.

6. RECORDING, DATA SUBJECT RIGHTS & SUBJECT ACCESS (SAR)

Statutory Records Preserved: CSPE systematically records learner and parent details, daily attendance registers, incident/accident logs, medication administration records, staff vetting statuses, and a central database of formal complaints or safeguarding concerns.

SAR Process: Parents, carers, and learners can make a SAR verbally or in writing. The Director logs the request, verifies identity, collates the data (deleting any intermediate digital copies), and delivers it

securely. This must be completed within **one calendar month** (with a possible two-month extension for complex requests).

Corporate Dissolution Safeguard: If CSPE ceases to operate, standard records will be destroyed, but child protection and safeguarding chronologies will be securely transferred directly to the respective commissioning Local Authorities.

7. ROLES & RESPONSIBILITIES

Role	Specific Data & Disposal Responsibilities
Director / Trusted Admin	• Manages strict access controls for Nextcloud and physical registries. • Executes the 72-hour ICO reporting protocol and data subject notifications during a breach. • Logs, verifies, and collates all Subject Access Requests (SARs).
Data Protection Officer (DPO)	• Ensures expert knowledge of data protection law is applied to centre operations. • Reports directly to the highest tier of centre management, remaining free from conflicts of interest.
All CSPE Staff	• Must operate on a "need to share" basis internally for safeguarding, while keeping data strictly private from external entities. • Must report any suspected security breach (or near miss) immediately to the centre Directors.

8. QUALITY ASSURANCE, MODERATION, & REVIEW To ensure the integrity of our data security systems, the school implements the following oversight protocol:

1. Post-Breach Evaluation: Following any data breach or near-miss, leadership executes a complete root-cause analysis and actively updates encryption systems and access controls.

2. SAR Compliance Auditing: Subject Access Requests are actively tracked to ensure the statutory one-month timeframe is never breached.

3. Annual Policy Review: This Policy framework is reviewed annually by the SLT to incorporate updated statutory guidelines from the Information Commissioner's Office (ICO) and KCSIE 2026.

Policy for Safeguarding and Child Protection

Document Title	Policy for Safeguarding	Document Ref.	POL-SGP-001
School/Provision	Clear Steps Plus Education		
Version/Status	V1.0 Approved	Effective Date	July 19, 2026
Approved By	Executive Leadership Team	Review Cycle	Annual (July 2027)
Target Audience	All Academic Staff, Directors, Designated Safeguarding Leads (DSLs), and Volunteers.		

1. PURPOSE & SCOPE, The purpose of this Policy is to define CSPE's overarching framework for child protection and welfare, ensuring we fulfil our statutory responsibilities under Section 175 of the Education Act 2002. This policy establishes the procedures for reporting abuse, managing mental health and self-harm disclosures, responding to child-on-child abuse, handling lost/uncollected learners, conducting secure online tuition, and managing allegations against staff. These protections apply to all children and young people under the age of 18 at CSPE.

2. POLICY & LEGAL CONTEXT This Policy operates in strict alignment with UK regulations and statutory frameworks, including:

- **Keeping Children Safe in Education (KCSIE) 2026.**
- **Working Together to Safeguard Children.**
- **The Equality Act 2010.**
- **Section 175 of the Education Act 2002.**

3. THE CLEAR STEPS PLUS HOLISTIC SAFEGUARDING FRAMEWORK To ensure complete protection for our neurodivergent and vulnerable cohort, CSPE manages safeguarding across four core domains:

Safeguarding Domain	What We Implement	Primary Rationale
1. Protection & Disclosure	Immediate reporting of unexplained marks, neglect, or mental health distress to the DSL.	To intervene early, coordinate external clinical teams, and build personalised safety plans.
2. Child-on-Child Abuse	A zero-tolerance approach to upskirting, sexual harassment, and discriminatory bullying.	To preserve physical and emotional safety and coordinate police/social care referrals for criminal behaviour.

3. Operational Safety	Strict missing learner sweeps, non-collection limits, and secure online tuition privacy controls.	To prevent unauthorised access, ensure adult supervision at home, and prevent loss of sight of a child.
4. Managing Allegations	Immediate LADO referrals within 24 hours prior to internal investigation.	To ensure unbiased, independent oversight of any adult whose behaviour suggests a risk of harm to children.

CRITICAL PRINCIPLE *"It could happen here." Staff must maintain an attitude of "it could happen here" and exercise professional curiosity at all times. Mental health concerns, suicidal ideation, and peer-on-peer abuse must always be treated as serious safeguarding issues, never minimized as mere behavioural infractions or "banter".*

4. SAFEGUARDING INTENT & STRUCTURE (BEHAVIOUR & DIGITAL EXPECTATIONS) CSPE enforces strict expectations regarding how behaviour and digital interactions are managed safely:

- **Regulation Before Expectation:** We view behaviour as a form of communication. Learners will not be sanctioned for behaviour driven by unmet SEND needs or sensory dysregulation.
- **Zero-Tolerance for Harassment:** Child-on-child abuse, sexual harassment, and upskirting are treated as high-level child protection and criminal matters, not "boys being boys".
- **Secure Online Tuition Rules:** Online sessions require explicit parental consent, default disabled video capabilities, and the physical presence of a responsible adult in the home. Tutors are prohibited from recording video or audio of online sessions.

5. STEP-BY-STEP OPERATIONAL PROCESS To ensure immediate response and legal compliance, staff must adhere strictly to the following workflows:

1. Reporting Disclosures & Harm: Staff must log concerns (e.g., unexplained marks, grooming, radicalisation) via the secure Staff Incident Form without delay. If a child is in immediate danger, staff must call **999** immediately and notify the DSL straight after.

2. Responding to Self-Harm: Staff must provide non-judgmental reassurance and listen patiently. Staff must **never** ask to inspect self-harm injuries or advise on cleaning methods. Emergency services (999) must be called if immediate medical assistance is required.

3. Missing & Non-Collection Procedure: If a learner is missing, staff must instantly alert the Directors, conduct a systematic sweep of the premises, and call **999** if the learner is not located. If a learner is uncollected for more than **120 minutes** past their session end, staff must contact parents, then emergency contacts, and finally Trafford First Response.

4. Managing Allegations Against Staff (Harm Threshold): Allegations suggesting a staff member poses a risk of harm must be reported directly to the Directors without delay (or to the Executive DSL if the allegation concerns a director). The case manager must contact the Trafford LADO within **24 hours** and prior to initiating any internal investigation or interviewing witnesses.

6. RECORDING, DATA MANAGEMENT & SECURITY

- **Incident Logging:** All safeguarding chronologies, interventions, and case decisions are recorded securely and made transparently available to the Trafford Council safeguarding team upon request.
- **Online Session Auditing:** To track progress and log content safely during online tuition, tutors capture static screenshots of annotated digital whiteboards rather than recording video to protect learner privacy.
- **Confidential Case Files:** Case summaries, resolutions, and outcomes for allegations against staff are retained securely on confidential personnel files in line with data protection laws.

7. ROLES & RESPONSIBILITIES

Role	Specific Safeguarding Responsibilities
Executive DSL (Dawn Schofield) & Deputy DSLs	• Leads parallel referrals to police and social care and liaises directly with the LADO. • Engages external clinical or mental health teams (such as CAMHS) to build personalised safety plans for self-harm risks.
Headteacher / Centre Directors	• Oversees immediate premises sweeps during lost/missing learner procedures. • Confidentially logs and addresses "low-level concerns" to maintain strict professional boundaries.
All CSPE Staff & Tutors	• Maintain an attitude of "it could happen here" and log concerns via the secure Staff Incident Form without delay. • Strictly adhere to "regulation before expectation" when managing behavioural crises.

8. QUALITY ASSURANCE, MODERATION, & REVIEW To ensure the integrity of our safeguarding systems, the school implements the following oversight protocol:

- 1. Continuous Training:** All staff members undergo robust safeguarding and child protection training at induction, which is updated at least annually via staff INSET and regular briefings.
- 2. Low-Level Concern Monitoring:** Staff behaviour that does not meet the harm threshold is logged confidentially as a low-level concern and reviewed for behavioural patterns to allow for early support or internal disciplinary action.
- 3. Annual Policy Review:** This Policy framework is reviewed regularly to incorporate updated statutory guidelines from KCSIE and Working Together to Safeguard Children.

Policy for Safer Recruitment

Document Title	Policy for Safer Recruitment	Document Ref.	POL-SAF-001
School/Provision	Clear Steps Plus Education		
Version/Status	V1.0 Approved	Effective Date	July 19, 2026
Approved By	Executive Leadership Team	Review Cycle	Annual (July 2027)
Target Audience	All Academic Staff, Directors, Senior Leaders, and Administrative Staff.		

1. PURPOSE & SCOPE, The purpose of this Policy is to define CSPE's exhaustive safer recruitment process to prevent unsuitable individuals from gaining access to vulnerable learners. It ensures that all employees, volunteers, and contractors undergo robust vetting, identity checks, and safeguarding screenings before they are permitted to operate within the centre.

2. POLICY & LEGAL CONTEXT This Policy operates in strict alignment with UK regulations and statutory frameworks, including:

- **Keeping Children Safe in Education (KCSIE) 2026 (Part Three)**: Which outlines the mandatory pre-employment vetting and clearance controls required for educational settings.

3. THE CLEAR STEPS PLUS HOLISTIC SAFER RECRUITMENT FRAMEWORK To proactively protect our learners and ensure staff alignment with our neurodiversity-affirming ethos, CSPE manages recruitment across four core domains:

Recruitment Domain	What We Implement	Primary Rationale
1. Pre-Employment Vetting	CV audits, reference triangulation, and Enhanced DBS with Barred List checks.	To legally prevent unsuitable individuals from gaining access to vulnerable learners.
2. Interview & Evaluation	Face-to-face interviews and practical teaching evaluations.	To explore a candidate's values, professional ethics, safety boundaries, and behaviour regulation methods.
3. Digital & Online Checks	Comprehensive statutory online and social media checks during shortlisting.	To identify behavioural indicators or expressed views that could compromise our safeguarding culture.
4. Live Centralised Tracking	Continuous maintenance of the Single Central Record (SCR).	To provide a live, audited tracking system of all identity, vetting, and Right to Work checks.

CRITICAL PRINCIPLE *"No employee, volunteer, or contractor will be permitted to engage in regulated activity before all statutory checks are finalised, verified, and recorded."*

4. RECRUITMENT INTENT & STRUCTURE (DEFAULT EXPECTATIONS) Job descriptions and person specifications are updated dynamically to meet the specialised needs of our neurodivergent cohort. When recruiting, CSPE sets the following structural expectations for all incoming staff:

- **Academic Delivery & Ratios:** Staff are expected to effectively instruct a maximum of 6 learners at a time, ensuring equitable attention. This ratio is significantly reduced (frequently 1:1 or 1:2) for high-need EOTAS cohorts.
- **Behavioural Philosophy:** Staff must support behaviour in a calm, non-punitive manner, strictly implementing our baseline framework of **"regulation before expectation"** and viewing behaviour as communication.
- **Exclusivity:** Tutors must not work for other tuition agencies while contracted by CSPE to ensure dedicated commitment to our learners.

5. STEP-BY-STEP OPERATIONAL PROCESS (THE VETTING PIPELINE) To ensure compliance with KCSIE 2026, the hiring team must adhere strictly to the following vetting workflow:

- **1. Application & CV Audit:** A complete employment history and CV review is conducted to identify, document, and investigate any chronological gaps or frequent short-term career changes.
- **2. Reference Triangulation:** A minimum of two written and verified verbal references are obtained directly from relevant educational settings/employers and scrutinised for safeguarding disclosures prior to the interview.
- **3. Interview & Practical Evaluation:** Candidates undergo a structured face-to-face interview to explore safeguarding values, followed by a practical teaching observation to evaluate active delivery methods.
- **4. Statutory Identification & Clearances:** CSPE conducts rigorous verification of identity, Right to Work in the UK, Enhanced DBS certification (with a Children's Barred List check), and physical evidence of qualifications.
- **5. Specialised Checks:** Where applicable, CSPE verifies that leadership candidates are not subject to a Section 128 direction and obtains additional criminal record checks or good conduct certificates from relevant embassies for candidates who have lived/worked overseas.

6. RECORDING, DATA MANAGEMENT & SECURITY

- **The Single Central Record (SCR):** CSPE maintains a live, centralised SCR containing proof of all vetting dates. This tracks Identity, Enhanced DBS and Barred List checks, Right to Work, Qualifications, Online checks, and Overseas history checks for every staff member, tutor, volunteer, and contractor operating on the premises.
- **Confidentiality Safeguards:** All applicant data, references, and background checks are treated with absolute confidentiality in accordance with GDPR.

7. ROLES & RESPONSIBILITIES

Role	Specific Safer Recruitment Responsibilities
Directors / Senior Leaders	• Oversee the statutory vetting pipeline and actively maintain the live Single Central Record (SCR). • Execute face-to-face interviews and formal teaching observations.
All CSPE Tutors & Staff	• Operate as a cohesive team to foster a positive, motivating, and safe environment. • Maintain acute operational vigilance regarding the physical and emotional welfare of all children, applying professional curiosity and reporting signs of harm directly to the DSL.

8. QUALITY ASSURANCE, MODERATION, & REVIEW To ensure the integrity of our staff and safeguarding environment, the school implements the following oversight protocol:

1. Open-Plan Safeguarding Supervision: The physical design of the CSPE learning environment is entirely open-plan, facilitating passive quality assurance, peer visibility, and constant line-of-sight oversight by the Directors and Senior Tutors during operational hours.

2. Formal Observations: Scheduled, formal session observations are executed by leadership post-recruitment to continually evaluate teaching quality, regulatory adjustments, and adherence to safety policies.

3. Annual Policy Review: This Policy framework is reviewed annually by the SLT to incorporate updated statutory guidelines from Part Three of KCSIE.

Policy for Safeguarding Supervision

Document Title	Policy for Safeguarding Supervision	Document Ref.	POL-SUP-001
School/Provision	Clear Steps Plus Education		
Version/Status	V1.0 Approved	Effective Date	July 19, 2026
Approved By	Directors (DS)	Review Cycle	Annual (July 2027)
Target Audience	All Staff, Volunteers, Governors, DSLs, SENCos, and Pastoral Leads.		

1. PURPOSE & SCOPE, The purpose of this Policy is to provide high-quality, structured safeguarding supervision for all staff working with children. Effective supervision strengthens professional judgment, promotes early identification of concerns, and ensures that safeguarding practice remains child-centred and reflective. Crucially, supervision helps acknowledge and manage the emotional load, stress, and decision-making fatigue associated with safeguarding duties. This policy applies to all staff, volunteers, and governors.

2. POLICY & LEGAL CONTEXT This Policy operates in strict alignment with UK regulations and statutory frameworks, including:

- **Keeping Children Safe in Education (KCSIE).**
- **Working Together to Safeguard Children.**
- Local safeguarding partnership procedures.
- CSPE’s *Safeguarding & Child Protection Policy*.

3. THE CLEAR STEPS PLUS HOLISTIC SUPERVISION FRAMEWORK To ensure operational agility alongside deep reflective space, CSPE utilizes a tiered, multi-format supervision framework:

Supervision Domain	What We Implement	Primary Rationale
1. Child-Centred Review	Exploring the child's daily lived experience and capturing their direct voice.	To prioritize the safety and voice of the child, with specialised consideration for neurodivergent (ND) needs.
2. Reflective Practice	Structured exploration of professional bias, assumptions, and blind spots.	To avoid "start-again" syndrome and confidently tackle "disguised compliance".
3. Scheduled Pathways	Tiered informal weekly, half-termly group, and 1:1 formal sessions.	To ensure ongoing cases do not drift while providing a clinical space for peer reflection.

4. Crisis Response	Mandatory 1:1 rapid response debriefs within 48 hours of a disclosure.	To provide immediate psychological containment and confirm immediate safety steps.
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CRITICAL PRINCIPLE *"Safeguarding supervision is supportive, reflective, and accountable. It is operationally separate from line management, performance appraisal, or HR monitoring."*

4. SUPERVISION INTENT & STRUCTURE (DEFAULT EXPECTATIONS) Access to supervision is structured based on the risk profile of the staff member's role:

- **Mandatory Access:** Required for the DSL, Deputy DSLs, Pastoral Lead, SENCo, Attendance/EWO Lead, and any staff member holding an active caseload. Formal 1:1 sessions occur half-termly for caseload holders.
- **Recommended/Targeted Access:** Termly 1:1 sessions are highly recommended for teachers working with high-need/high-risk pupils, 1:1 Learning Support Assistants, newly appointed staff, and staff supporting sensory-sensitive learners.
- **Group Peer-Supervision:** Mandatory for the core Safeguarding/DSL team, led half-termly by the Directors (DS).

5. STEP-BY-STEP OPERATIONAL PROCESS All formal individual and group supervision sessions must follow the CSPE structured agenda:

1. Child-Centred Review: Assess how the learner's neurodivergent (ND) or sensory needs are accommodated.

2. Review & Thresholds: Analyse new disclosures, attendance trends, or behaviour shifts, checking alignment with local Early Help/Family Help or statutory social care thresholds to prevent case drift.

3. Staff Wellbeing: Explicitly check-in on the emotional toll of cases, professional boundaries, support systems, and immediate training needs.

4. Agree Actions: Agree on clear, smart, time-bound objectives and document them on the CSPE Supervision Record.

5. Resolving Disagreements: If a disagreement arises regarding risk thresholds, the immediate safety of the child remains the absolute priority. The issue must be escalated directly to the Lead DSL, or to the Directors/Local Safeguarding Partnership if the Lead DSL is involved.

6. RECORDING, DATA MANAGEMENT & SECURITY

- **Secure, Separate Storage:** Formal supervision records are stored on CSPE's secure, restricted safeguarding system—completely isolated from standard HR personnel files.
- **Child Chronology:** Any child-specific decisions or direct actions must be copied directly into the student's active CPOMS chronology to maintain an accurate casework history.
- **Confidentiality Limits:** Supervision is a supportive space but is never completely confidential. If child protection concerns arise or thresholds are crossed, information must be escalated immediately.

7. ROLES & RESPONSIBILITIES

Role	Specific Supervision Responsibilities
Designated Safeguarding Lead (DSL)	• Oversees operational delivery and quality assurance of the supervision model. • Ensures rapid response debriefs are held within 48 hours of disclosures.
Senior Leadership & Governance (Directors)	• Protect timetabled time and allocate adequate resources for supervision. • Directly lead and facilitate half-termly group peer-supervision sessions. • Ensure external supervision is sourced for the Lead DSL to provide objective challenge.
Supervisees	• Prioritize and attend scheduled supervision, reflecting honestly on practice and emotional responses to casework.

8. QUALITY ASSURANCE, MODERATION, & REVIEW To ensure the integrity of our supervision framework, the school implements the following oversight protocol:

- 1. Frequency & Quality Audits:** The DSL conducts an annual quality and frequency audit of supervision sessions.
- 2. Strategic Evaluation:** Anonymized findings from the annual audit are presented directly to the Directors to evaluate organisation-wide impact.
- 3. Annual Policy Review:** This Policy framework is reviewed annually (next review July 2027) by the Directors to incorporate updated statutory guidelines.

Policy for Safer Recruitment

Document Title	Policy for Safer Recruitment	Document Ref.	POL-SAF-001
School/Provision	Clear Steps Plus Education		
Version/Status	V1.0 Approved	Effective Date	July 19, 2026
Approved By	Executive Leadership Team	Review Cycle	Annual (July 2027)
Target Audience	All Academic Staff, Directors, Senior Leaders, and Administrative Staff.		

1. PURPOSE & SCOPE, The purpose of this Policy is to define CSPE's exhaustive safer recruitment process to prevent unsuitable individuals from gaining access to vulnerable learners. It ensures that all employees, volunteers, and contractors undergo robust vetting, identity checks, and safeguarding screenings before they are permitted to operate within the centre.

2. POLICY & LEGAL CONTEXT This Policy operates in strict alignment with UK regulations and statutory frameworks, including:

- **Keeping Children Safe in Education (KCSIE) 2026 (Part Three)**: Which outlines the mandatory pre-employment vetting and clearance controls required for educational settings.

3. THE CLEAR STEPS PLUS HOLISTIC SAFER RECRUITMENT FRAMEWORK To proactively protect our learners and ensure staff alignment with our neurodiversity-affirming ethos, CSPE manages recruitment across four core domains:

Recruitment Domain	What We Implement	Primary Rationale
1. Pre-Employment Vetting	CV audits, reference triangulation, and Enhanced DBS with Barred List checks.	To legally prevent unsuitable individuals from gaining access to vulnerable learners.
2. Interview & Evaluation	Face-to-face interviews and practical teaching evaluations.	To explore a candidate's values, professional ethics, safety boundaries, and behaviour regulation methods.
3. Digital & Online Checks	Comprehensive statutory online and social media checks during shortlisting.	To identify behavioural indicators or expressed views that could compromise our safeguarding culture.
4. Live Centralised Tracking	Continuous maintenance of the Single Central Record (SCR).	To provide a live, audited tracking system of all identity, vetting, and Right to Work checks.

CRITICAL PRINCIPLE *"No employee, volunteer, or contractor will be permitted to engage in regulated activity before all statutory checks are finalised, verified, and recorded."*

4. RECRUITMENT INTENT & STRUCTURE (DEFAULT EXPECTATIONS) Job descriptions and person specifications are updated dynamically to meet the specialised needs of our neurodivergent cohort. When recruiting, CSPE sets the following structural expectations for all incoming staff:

- **Academic Delivery & Ratios:** Staff are expected to effectively instruct a maximum of 6 learners at a time, ensuring equitable attention. This ratio is significantly reduced (frequently 1:1 or 1:2) for high-need EOTAS cohorts.
- **Behavioural Philosophy:** Staff must support behaviour in a calm, non-punitive manner, strictly implementing our baseline framework of **"regulation before expectation"** and viewing behaviour as communication.
- **Exclusivity:** Tutors must not work for other tuition agencies while contracted by CSPE to ensure dedicated commitment to our learners.

5. STEP-BY-STEP OPERATIONAL PROCESS (THE VETTING PIPELINE) To ensure compliance with KCSIE 2026, the hiring team must adhere strictly to the following vetting workflow:

- **1. Application & CV Audit:** A complete employment history and CV review is conducted to identify, document, and investigate any chronological gaps or frequent short-term career changes.
- **2. Reference Triangulation:** A minimum of two written and verified verbal references are obtained directly from relevant educational settings/employers and scrutinised for safeguarding disclosures prior to the interview.
- **3. Interview & Practical Evaluation:** Candidates undergo a structured face-to-face interview to explore safeguarding values, followed by a practical teaching observation to evaluate active delivery methods.
- **4. Statutory Identification & Clearances:** CSPE conducts rigorous verification of identity, Right to Work in the UK, Enhanced DBS certification (with a Children's Barred List check), and physical evidence of qualifications.
- **5. Specialised Checks:** Where applicable, CSPE verifies that leadership candidates are not subject to a Section 128 direction and obtains additional criminal record checks or good conduct certificates from relevant embassies for candidates who have lived/worked overseas.

6. RECORDING, DATA MANAGEMENT & SECURITY

- **The Single Central Record (SCR):** CSPE maintains a live, centralised SCR containing proof of all vetting dates. This tracks Identity, Enhanced DBS and Barred List checks, Right to Work, Qualifications, Online checks, and Overseas history checks for every staff member, tutor, volunteer, and contractor operating on the premises.
- **Confidentiality Safeguards:** All applicant data, references, and background checks are treated with absolute confidentiality in accordance with GDPR.

7. ROLES & RESPONSIBILITIES

Role	Specific Safer Recruitment Responsibilities
Directors / Senior Leaders	• Oversee the statutory vetting pipeline and actively maintain the live Single Central Record (SCR). • Execute face-to-face interviews and formal teaching observations.
All CSPE Tutors & Staff	• Operate as a cohesive team to foster a positive, motivating, and safe environment. • Maintain acute operational vigilance regarding the physical and emotional welfare of all children, applying professional curiosity and reporting signs of harm directly to the DSL.

8. QUALITY ASSURANCE, MODERATION, & REVIEW To ensure the integrity of our staff and safeguarding environment, the school implements the following oversight protocol:

1. Open-Plan Safeguarding Supervision: The physical design of the CSPE learning environment is entirely open-plan, facilitating passive quality assurance, peer visibility, and constant line-of-sight oversight by the Directors and Senior Tutors during operational hours.

2. Formal Observations: Scheduled, formal session observations are executed by leadership post-recruitment to continually evaluate teaching quality, regulatory adjustments, and adherence to safety policies.

3. Annual Policy Review: This Policy framework is reviewed annually by the SLT to incorporate updated statutory guidelines from Part Three of KCSIE.

Policy for Special Educational Needs and Disabilities (SEND)

Document Title	Policy for SEND & Inclusion	Document Ref.	SOP-SND-001
School/Provision	Clear Steps Plus Education		
Version/Status	V1.0 Approved	Effective Date	July 14, 2026
Approved By	Executive Leadership Team	Review Cycle	Annual (July 2027)
Target Audience	All Academic Staff, Special Educational Needs Coordinators (SENCOs), Designated Safeguarding Leads (DSLs), and Tutors.		

1. PURPOSE & SCOPE This Standard Operating Procedure (SOP) sets out how CSPE aims to bring high-quality educational opportunities and benefits to as many learners as possible, explicitly including disabled learners, learners with additional needs, and those with Special Educational Needs and Disabilities (SEND). We treat all learners with equal concern as individuals with distinct profiles, strengths, and diverse needs.

2. POLICY & LEGAL CONTEXT This SOP operates in strict alignment with UK education regulations and statutory frameworks, including:

- **The Equality Act 2010.**
- **The Special Educational Needs and Disability (SEND) Code of Practice 0 to 25 years.**
- **Keeping Children Safe in Education (KCSIE) 2026.**
- **UK GDPR, the Data Protection Act 2018, and the Data (Use and Access) Act 2025.** *(Note: This policy completely supersedes past compliance under the Disability Discrimination Act 1995 and the 1995 Education Act.)*

3. THE CLEAR STEPS PLUS HOLISTIC FRAMEWORK To facilitate a truly child-centred and adaptive approach, CSPE measures and supports SEND requirements across distinct operational domains to ensure full inclusion and safety:

SEND Domain	What We Implement	Primary Rationale & Systems Used
1. Adjustments & EHCP	Reasonable adjustments and statutory EHCP provisions.	To proactively eliminate barriers to learning and ensure equal access.
2. Safeguarding	Vigilance against assumption barriers, peer isolation, and bullying.	To protect learners with SEND who face disproportionate vulnerabilities and extra-familial harms.

3. Collaborative Working	Initial consultations, continuous assessments, and professional dialogue.	To ensure early identification and targeted support for academic or emotional barriers.
4. Physical & Data Security	Wheelchair accessibility and strict data vetting protocols.	Ensuring safe physical access and confidential, lawful information sharing.

CRITICAL PRINCIPLE *"Child-Centred and Adaptive."* To facilitate a truly child-centred and adaptive approach, we maintain a high staff-to-learner ratio with a maximum of 1:5 at our centre and up to 1:6 within school settings.

4. SEND INTENT & STRUCTURE The intent of the CSPE SEND provision is to proactively identify and consistently implement reasonable adjustments to eliminate barriers to learning and ensure equal access for every individual disabled learner. Each learner is supported dynamically through:

- **Reasonable Adjustments:** Implementing adaptations without delay to ensure disabled learners can fully participate.
- **EHCP Alignment:** Reviewing statutory EHC plans to ensure all specified adjustments and targeted supports relevant to our educational setting are fully implemented.
- **Physical Access:** Ensuring accessible entry, including full wheelchair accessibility in the reception area.
- **Safeguarding Integration:** Maintaining an attitude of "it could happen here," specifically addressing communication obstacles and safeguarding vulnerabilities unique to SEND learners.

5. STEP-BY-STEP PROCESS To ensure consistency and personalised support, all staff must adhere strictly to the following workflow: **1. Initial Consultation:** We comprehensively discuss a learner's academic, emotional, and social needs with their parent/carer, class teacher, and the learner themselves at the time of registration. **2. Continuous Assessment:** Learners' progress is constantly reviewed and formally assessed with a view to adapting their individualised programs to overcome any emerging academic or emotional barriers. **3. Professional Dialogue:** We maintain ongoing opportunities for dialogue and feedback with parents, carers, and school professionals, remaining open to specialist guidance regarding specific training. **4. Safeguarding & Vulnerability Checks:** Staff must actively address communication obstacles and provide extra pastoral attention to mitigate risks of peer isolation and bullying (including prejudice-based bullying). Staff must never assume indicators of abuse are a manifestation of the learner's SEND without complete exploration. **5. DSL and SENCO Liaison:** Any report or suspicion of abuse, neglect, or exploitation involving a learner with SEND will trigger immediate, close liaison between the Designated Safeguarding Lead (DSL) and the Special Educational Needs Coordinator (SENCO) or named SEND lead.

6. RECORDING, DATA MANAGEMENT & SECURITY All SEND, and medical data represents sensitive personal data. The following protocols must be followed:

- **Confidentiality & Access:** Personal or medical data provided by a parent, carer, or teacher will be held in the strictest confidence.

- **Data Vetting:** In compliance with UK GDPR, the Data Protection Act 2018, and the Data (Use and Access) Act 2025, information is shared only with the minimum necessary members of staff to facilitate safe care and instruction.
- **Secure Storage:** All SEND records and child protection files are stored securely and transferred or disposed of via secure, lawful methods when no longer required.

7. REPORTING & COLLABORATION

- **Professional Development:** Staff regularly attend professional development training focused on evolving inclusive practices, understanding digital safety risks for SEND learners, and identifying extra-familial harms.
- **Parent and Stakeholder Dialogue:** Ongoing opportunities for dialogue and feedback are maintained with parents, carers, and school professionals to constantly adapt individualised programs.

8. ROLES & RESPONSIBILITIES

Role	Specific SEND Responsibilities
Designated Safeguarding Lead (DSL)	• Liaises immediately with the SENCO regarding any report or suspicion of abuse, neglect, or exploitation involving a learner with SEND.
SENCO / Named SEND Lead	• Reviews EHCP provisions and ensures that all specified adjustments and targeted supports are fully implemented. • Collaborates closely with the DSL on all SEND safeguarding matters.
Class Teachers / Tutors	• Conduct initial consultations and continuous assessments of learner progress to adapt programs. • Avoid "assumption barriers" by fully exploring all potential indicators of abuse or neglect, rather than attributing them solely to a learner's SEND.
All Staff	• Maintain a high staff-to-learner ratio (max 1:5 at centre, 1:6 in school settings). • Provide extra pastoral attention to mitigate peer isolation and prejudice-based bullying.

9. QUALITY ASSURANCE, MODERATION, & REVIEW To ensure the integrity of our SEND provision and safeguarding frameworks, the school implements the following protocol:

- 1. Continuous Assessment & Professional Dialogue:** Progress is constantly reviewed and formally assessed to adapt individualised programs, utilizing specialist guidance as needed.
- 2. Professional Development:** Staff engage in regular training on evolving inclusive practices and digital safety risks.

3. Annual Policy Review: This policy framework is reviewed to incorporate updated statutory guidelines, including the Equality Act 2010 and KCSIE 2026.

Policy for Staff Code of Conduct

Document Title	Policy for Staff Code of Conduct	Document Ref.	POL-SCC-001
School/Provision	Clear Steps Plus Education		
Version/Status	V1.0 Approved	Effective Date	July 19, 2026
Approved By	Executive Leadership Team	Review Cycle	Annual (July 2027)
Target Audience	All Tutors, Managers, Employees, Volunteers, Supply Staff, and Independent Contractors.		

1. PURPOSE & SCOPE, The purpose of this Policy is to establish an explicit framework of professional boundaries, ethical behaviours, and regulatory expectations for all individuals working within or on behalf of CSPE. Adherence to this code is a condition of employment, contract fulfilment, or voluntary engagement. This policy ensures that all adults create a safe, consistent, and predictable learning environment—prioritizing our cohort's psychological safety and emotional regulation.

2. POLICY & LEGAL CONTEXT This Policy operates in strict alignment with UK regulations and statutory frameworks, including:

- **Keeping Children Safe in Education (KCSIE) 2026:** Specifically mandating that all staff read Part 1 in full and that codes of conduct feature a dedicated low-level concerns framework.
- **The Equality Act 2010** and the **SEND Code of Practice**.
- **The Teachers’ Standards 2012:** Specifically, the duty to safeguard children's wellbeing and maintain public trust.

3. THE CLEAR STEPS PLUS HOLISTIC CONDUCT FRAMEWORK To proactively protect the integrity of our operations and safeguard our learners, CSPE manages professional conduct across four core domains:

Conduct Domain	What We Implement	Primary Rationale
1. Professional Boundaries	Strict guidelines on physical contact, seclusion, and equity.	To maintain professional integrity and avoid any conduct that could be interpreted as compromising or boundary-blurring.
2. Digital Integrity	Prohibition of personal device use for photos and strict rules on digital contact.	To protect learners from online harms, grooming, and inappropriate digital communication.
3. Safeguarding Vigilance	Active challenges to misogyny and professional curiosity regarding serious violence/weapons.	To intercept early indicators of harmful sexual behaviour, criminal coercion, or severe safeguarding risks.

4. Low-Level Concerns	An open, non-punitive culture of self-reporting and peer-reporting.	To detect systemic vulnerabilities, identify grooming behaviours early, and guide training adjustments.
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CRITICAL PRINCIPLE *"Regulation before expectation." All adults must create a safe, consistent, and predictable learning environment—prioritizing our cohort's psychological safety and emotional regulation above all else.*

4. CONDUCT INTENT & STRUCTURE (DEFAULT EXPECTATIONS) CSPE expects all staff to maintain an impeccable level of professional integrity:

- **Interacting with Minors:** Staff must continuously remember that all pupils under 18 are children by law and must never assume maturity on behalf of a pupil or treat them as peers.
- **Physical Contact Boundaries:** Physical contact must be professional, non-gratuitous, adjusted for SEND needs, and must always take place within open-plan or fully observable settings.
- **One-to-One Seclusion Prohibitions:** Staff are prohibited from engaging with a child one-to-one in a secluded area or behind a closed door unless a specific medical/regulatory session has been pre-approved by the Directors.
- **Favouritism and Humiliation:** Staff must maintain strict equity. Having "favourites" or providing unapproved gifts is forbidden. Behaviour management must remain calm and objective; sarcastic or humiliating language is never permitted.
- **Digital Communication Boundaries:** Staff must never communicate with a learner or their family via personal social media or texts. All digital contact must route through official CSPE enterprise accounts.

5. STEP-BY-STEP OPERATIONAL PROCESS (LOW-LEVEL CONCERNS) A low-level concern is any doubt or worry—even a passing sense of unease or "nagging doubt"—that an adult has acted inconsistently with this Code of Conduct but does not meet the legal threshold for a formal LADO referral.

1. Reporting Peers: Staff must report any low-level concern regarding a colleague's behaviour to the centre Directors as soon as possible, and strictly **within 24 hours** of becoming aware of the behaviour.

2. The Self-Reporting Mechanism: Staff are actively empowered to self-report situations where they feel their actions may have been misinterpreted, where they accidentally overstepped a boundary, or where a learner has become fixated on them. **3. Escalation Thresholds:** If a low-level concern is reported about the centre Directors, the staff member must route the report directly to the Deputy DSL or another senior manager, or bypass internal channels using the Whistleblowing Policy.

4. Managing Severe Breaches: Any suspicion that a pupil is carrying a weapon must be reported immediately to the DSL. The creation or viewing of any AI-generated "deepfake" intimate images of children will result in an immediate LADO referral and summary dismissal.

6. RECORDING, DATA MANAGEMENT & SECURITY

- **Written Records:** Every low-level concern will be securely recorded in writing on the centre's *Low-Level Concern Form*, capturing the context, concern, reporter's name, and subsequent actions.
- **Secure Storage:** Records are classified as highly confidential and stored in restricted Nextcloud directories under the direct administration of the Directors, fully detached from the standard personnel file unless disciplinary action is triggered.
- **Retention Limit:** Records are maintained at least until the individual leaves employment or contract with CSPE. For supply staff, CSPE will formally share the log entries with their home agency employer.

7. ROLES & RESPONSIBILITIES

Role	Specific Conduct Responsibilities
Directors / DSL	• Periodically reviews all compiled low-level concerns to perform a root-cause pattern analysis to detect grooming behaviours or training needs. • Immediately escalates patterns that meet the harm threshold to the Trafford LADO.
Deputy DSL / Senior Managers	• Receives and manages low-level concern reports if the concern involves the centre, Directors.
All CSPE Staff & Contractors	• Must actively challenge and report early indicators of harmful sexual behaviour, misogyny, or discriminatory "banter". • Legally obligated to sign an annual vetting declaration confirming they have read KCSIE 2026 (Part 1) and agree to adhere to this Code.

8. QUALITY ASSURANCE, MODERATION, & REVIEW To ensure the integrity of our professional environments, the school implements the following oversight protocol:

1. Annual Vetting Declaration: Every staff member must sign and date a formal declaration upon completion of induction and annually thereafter to confirm adherence to this Code.

2. Pattern Review Analysis: The Directors periodically review all low-level concern records to detect systemic vulnerabilities and adjust future centre training.

3. Annual Policy Review: This Policy framework is reviewed annually to incorporate updated statutory guidelines from KCSIE and the Teachers' Standards.

Policy for Suspension and Exclusion

Document Title	Policy for Suspension & Exclusion	Document Ref.	POL-EXC-001
School/Provision	Clear Steps Plus Education		
Version/Status	V1.0 Approved	Effective Date	July 19, 2026
Approved By	Executive Leadership Team	Review Cycle	Annual (July 2027)
Target Audience	All Academic Staff, Directors, Designated Safeguarding Leads (DSLs), and Commissioning Partners.		

1. PURPOSE & SCOPE, The purpose of this Policy is to define the strict legal and procedural boundaries for suspensions (fixed-period exclusions) and permanent exclusions within CSPE. Decision-making processes at CSPE ensure that any choice to exclude or suspend is lawful, reasonable, procedurally fair, and implemented only as an absolute last resort. This policy establishes mandatory multi-agency safeguards to ensure that vulnerable, neurodivergent, or excluded learners do not become hidden from statutory systems or exposed to criminal and sexual exploitation.

2. POLICY & LEGAL CONTEXT This Policy is built upon and operates in direct compliance with UK regulations and statutory frameworks, including:

- **Keeping Children Safe in Education (KCSIE) 2026.**
- **DfE Statutory Guidance:** *Suspension and Permanent Exclusion from maintained schools, academies and pupil referral units in England.*
- **The Equality Act 2010** (incorporating the Public Sector Equality Duty).
- **The SEND Code of Practice 0 to 25 years.**

3. THE CLEAR STEPS PLUS HOLISTIC EXCLUSION FRAMEWORK To ensure lawful application and prioritize safety, CSPE manages behavioural crises and exclusions across four core domains:

Exclusion Domain	What We Implement	Primary Rationale
1. Absolute Last Resort	Exhaustion of alternative regulatory and therapeutic avenues.	To ensure suspension or exclusion is never an automated disciplinary response.
2. Disability Protections	Urgent multidisciplinary reviews rather than standard exclusion for SEND-related behaviour.	To comply with the Equality Act 2010 and recognize behaviour as a manifestation of SEND.

3. Preventative Safeguards	Risk assessments, wellbeing mentoring, and phased timetables.	To alleviate learning burnout or EBSNA triggers prior to a student reaching a crisis point.
4. Safeguarding Centrality	Explicit tracking of the child's vulnerability during their absence.	To prevent exposure to online harms or criminal and sexual exploitation while off-site.

CRITICAL PRINCIPLE *A suspension or permanent exclusion is never an automated response and is utilized only when all alternative regulatory and therapeutic avenues are completely exhausted. Decisions to suspend or exclude are treated as critical child safety inflection points, requiring explicit tracking of the child's vulnerability to external harms during their absence.*

4. EXCLUSION INTENT & STRUCTURE (LAWFUL GROUNDS) A learner may only be subject to a suspension or permanent exclusion by explicit authorisation of a centre Directors where:

- The learner has committed a severe, acute breach, or persistent, documented, and repeated breaches of the centre's behavioural expectations.
- Allowing the learner to remain on-site would seriously harm the education, safety, welfare, or physical protection of the learner themselves, other peers, or centre staff.
- A serious safety incident has occurred involving physical violence, weapons, targeted child-on-child abuse, or the introduction of prohibited hazardous items.

5. STEP-BY-STEP OPERATIONAL PROCESS To ensure fairness and compliance, staff and leadership must adhere strictly to the following workflow:

1. SEND Vetting Audit: Prior to authorizing any exclusionary action, the Directors must formally audit whether the behaviour is linked to the child's SEND, and whether all pre-agreed reasonable adjustments were being actively followed.

2. Immediate Notification: When an exclusion or suspension is confirmed, the Directors will notify the parents/carers and the commissioning school or Local Authority without delay.

3. Statutory Tracking Priority: If the learner has an active Social Worker (Child in Need or Child Protection Plan) or is a Looked After Child, the DSL will immediately contact the social worker and the Virtual School Head on the day of the exclusion.

4. Exploitation and Welfare Reviews: During the period of suspension, the DSL team will conduct a targeted risk review evaluating the child's heightened vulnerability to online harms, peer-group isolation, mental health decline, or community-based exploitation. **5. Reintegration Framework:** Following any suspension, a formal Reintegration Meeting must occur before the learner is permitted to return, prioritizing a calm, restorative conversation to repair relationships and evaluate systemic triggers.

6. RECORDING, DATA MANAGEMENT & SECURITY

- **Statutory Written Notice:** Formal written notification must be distributed on the day of the decision, detailing the precise reasons, the exact duration, a clear summary of evidence, and instructions for accessing alternative education.
- **Data Tracking:** CSPE systematically tracks, monitors, and audits all exclusion rates, SEND categories, patterns, and triggers to eliminate adverse equality impacts.

7. ROLES & RESPONSIBILITIES

Role	Specific Exclusion Responsibilities
Directors	• Formally audits SEND vetting criteria prior to any exclusionary action to ensure legal fairness. • Notifies parents and commissioning authorities without delay and distributes the statutory written notices.
Designated Safeguarding Lead (DSL)	• Conducts targeted risk reviews during suspensions to track exploitation vulnerabilities and mental health decline. • Contacts social workers immediately for Looked After Children or those subject to Child Protection Plans.
Governing Panel / Trust Board	• Hears formal representations and appeals against exclusion decisions from parents and carers.

8. QUALITY ASSURANCE, MODERATION, & REVIEW To ensure the integrity of our exclusion procedures, the school implements the following oversight protocol:

- 1. Evidence of Preventative Safeguards:** Before exclusion is considered, the centre must produce written documentation proving that multi-agency strategy reviews, wellbeing mentoring, and therapeutic avenues were deployed and exhausted.
- 2. Equality Monitoring:** Exclusion data is continuously audited across SEND categories to ensure there is no institutional bias.
- 3. Annual Policy Review:** This Policy framework is reviewed annually, or immediately in response to updated statutory DfE exclusion guidance.

Policy for Trips

Document Title	Policy for Trips	Document Ref.	POL-TRP-001
School/Provision	Clear Steps Plus Education		
Version/Status	V1.0 Approved	Effective Date	July 2026
Approved By	Directors (DS)	Review Cycle	Annual (July 2027)
Target Audience	All Staff, Volunteers, Governors, Parents, and Carers.		

1. PURPOSE & SCOPE CSPE provides flexible, compassionate, and neurodiversity-aware alternative provision for SEND children, including those who are Education Other Than at School (EOTAS) and Emotionally Based School Non-Attendance (EBSNA) learners. School trips at CSPE are designed to provide inclusive, real-life experiences that build self-esteem, independence, and life skills in a supportive environment. A core component of planning any CSPE trip is ensuring it is financially viable and accessible for our families.

2. POLICY & LEGAL CONTEXT This Policy operates in strict alignment with UK regulations and statutory frameworks, including:

- **The Equality Act 2010**, specifically regarding the 'anticipatory' duty to make reasonable adjustments so disabled learners can fully participate.
- Health and Safety legislation mandating that a formal risk assessment is a legal requirement to evaluate hazards and implement control measures.

3. THE CLEAR STEPS PLUS HOLISTIC TRIP FRAMEWORK To ensure safe, inclusive, and emotionally regulated off-site experiences, CSPE utilizes a structured framework for trips:

Trip Management Domain	What We Implement	Primary Rationale
1. Inclusion & Equality	Anticipatory reasonable adjustments for all disabled learners.	To ensure every learner is entitled to full inclusion on trips, without asking parents to fund these specific disability adjustments.
2. Behaviour & Regulation	The principle of "regulation before expectation".	Unfamiliar settings can cause heightened anxiety or dysregulation; staff must prioritize emotional and sensory needs before placing behavioural demands.
3. Health & Safety Ratios	Maintaining or increasing a high maximum staff-to-learner ratio of 1:5.	To ensure close monitoring and individualised support in off-site environments.

CRITICAL PRINCIPLE: *"Learners will not be sanctioned for behaviour on a trip that is a direct result of unmet SEND-related needs or emotional dysregulation. Physical intervention is strictly a last resort if there is an immediate risk to safety."*

4. TRIP PLANNING INTENT & EXPECTATIONS Access and participation requirements are structured to ensure safety and affordability:

- **Timeline Expectations:** Planning for significant trips should ideally begin 12 to 18 months before departure to secure preferred dates and give parents ample time to pay their contributions.
- **Mandatory Permissions:** Written permission must be gathered from parents/carers, alongside up-to-date medical information, dietary requirements, and emergency contact details.
- **Medical Authorisation:** If a learner requires life-saving medication or treatment during the trip, written permission from the parent/carer must be obtained via the CSPE 'Administration of Medication' form, detailing the dosage, storage, and administration times.

5. STEP-BY-STEP OPERATIONAL PROCESS All trips must follow the CSPE structured planning and management agenda:

- 1. General Risk Assessment:** A formal risk assessment must be completed to evaluate environmental hazards and implement control measures.
- 2. Personalised Risk Assessments:** Individualised safety plans and risk assessments must be developed for individual learners to maintain their specific safety and wellbeing during the trip.
- 3. Environmental Budgeting:** Budget planning for the trip must automatically include any costs for accessible transport or required adaptations.
- 4. Managing Dysregulation:** If challenging behaviour occurs on the trip, staff must respond calmly, using de-escalation strategies and offering time, space, or sensory breaks.

6. FINANCIAL MANAGEMENT & PARENT CONTRIBUTIONS

- **Voluntary Contributions:** When a specific trip is proposed, a letter must be sent detailing the rationale, main activities, and the specific level of voluntary monetary contribution expected for that individual trip.
- **Payment Schedules & Deposits:** For larger trips, provisional bookings may be made to hold spaces. Parents/carers must be provided with a clear payment schedule early on so they can appropriately budget.
- **Fundraising:** CSPE encourages fundraising activities such as bake sales, car washes, or crowdfunding to make trips more affordable and reduce the burden of parent contributions.

7. ROLES & RESPONSIBILITIES

Role	Specific Trip Responsibilities
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Directors & Leadership	• Ensure trips are financially viable and accessible for families. • Ensure budget planning automatically includes costs for required adjustments.
Trip Leaders & Staff	• Maintain a high staff-to-learner ratio (maximum 1:5) for close monitoring. • Prioritize learners' emotional/sensory needs ("regulation before expectation"). • Develop formal and personalised risk assessments prior to departure.
Parents & Carers	• Provide written permission, up-to-date medical/dietary info, and emergency contacts. • Complete the 'Administration of Medication' form if life-saving treatment is needed.

8. QUALITY ASSURANCE, MODERATION, & REVIEW To ensure the integrity of our trip framework, the school implements the following oversight protocol:

1. Safety & Financial Audits: Regular review of risk assessments and trip budgets to ensure compliance with inclusive anticipatory duties.

2. Annual Policy Review: This Policy framework is reviewed annually to incorporate updated statutory health, safety, and equality guidelines.

Policy for Whistleblowing

Document Title	Policy for Whistleblowing	Document Ref.	POL-WHI-001
School/Provision	Clear Steps Plus Education		
Version/Status	V1.0 Approved	Effective Date	July 19, 2026
Approved By	Executive Leadership Team	Review Cycle	Annual (July 2027)
Target Audience	All Academic Staff, Employees, Volunteers, Supply Staff, and Independent Contractors.		

1. PURPOSE & SCOPE, the purpose of this Policy is to establish a clear, secure, and legally protected pathway for staff to raise concerns about malpractice, wrongdoing, or safeguarding failures within CSPE. CSPE actively fosters an open, transparent, and collaborative workplace culture underpinned by professional curiosity and high communication standards. Whistleblowing is distinct from an individual grievance; it applies when a member of staff raises a concern regarding a systemic risk, illegal act, or danger that affects learners, staff, or the public.

2. POLICY & LEGAL CONTEXT This Policy operates in strict alignment with UK regulations and statutory frameworks, including:

- **Keeping Children Safe in Education (KCSIE) 2026.**
- **The Public Interest Disclosure Act 1998 (PIDA):** Providing statutory protection from detriment or victimization for whistleblowers.

3. THE CLEAR STEPS PLUS HOLISTIC WHISTLEBLOWING FRAMEWORK To proactively protect our community and ensure transparency, CSPE manages whistleblowing and escalation across four core domains:

Whistleblowing Domain	What We Implement	Primary Rationale
1. Peer Conduct Reporting	Immediate reporting of concerns regarding colleague working practices or boundaries.	To address potential breaches of the Staff Code of Conduct early.
2. Safeguarding Escalation	Escalating unresolved concerns directly to the Executive Safeguarding Team.	To ensure LADO referrals occur within 24 hours if the harm threshold is met.
3. External Pathways	Direct reporting channels to the Trafford LADO or NSPCC.	To provide a secure route if internal leadership is implicated or fails to act.

4. Victimisation Protection	Absolute guarantee of protection from detriment or harassment.	To encourage good-faith reporting without fear of career retaliation.
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CRITICAL PRINCIPLE *"Protection from Detriment."* CSPE guarantees that any staff member who raises a genuine, good-faith concern under this policy will be protected from any form of professional detriment, harassment, or career victimization, even if the subsequent investigation concludes that the employee was mistaken.

4. WHISTLEBLOWING INTENT & SCOPE (REPORTABLE CONCERNS) Staff are both obligated and encouraged to report concerns that compromise the centre. Reportable incidents include, but are not limited to:

- A failure to comply with a legal or statutory obligation (including child protection and data security rules).
- Working practices that compromise the safety, regulation, or emotional wellbeing of learners.
- Deliberate concealment of a safeguarding failure or an incident of child-on-child abuse.
- Conduct that breaches the CSPE *Staff Code of Conduct*.

5. STEP-BY-STEP OPERATIONAL PROCESS To ensure concerns are addressed securely and promptly, staff must adhere to the following escalation workflow:

- **1. Internal Step 1 (Reporting Peer Conduct):** If any member of staff is concerned with the working practices, boundaries, or conduct of another colleague, they must report this immediately to a centre Directors.
- **2. Internal Step 2 (Unresolved Safeguarding Concerns):** If a staff member feels their concerns regarding safeguarding or welfare have not been addressed appropriately or timely by immediate management, they must escalate the matter directly to the Executive Safeguarding Team (Karen Greenwood).
- **3. Review and LADO Referral:** The Executive DSL will review the escalation and immediately pass this information on to the Local Authority Designated Officer (LADO) within 24 hours if the harm threshold is met.
- **4. External Escalation Routes (KCSIE 2026 Mandates):** Where a staff member feels unable to raise a concern internally—or reasonably believes that senior leadership is entirely implicated in the failure or has failed to act—they must bypass the internal hierarchy and utilize external statutory channels directly. Staff may contact the **Trafford LADO (0161 912 5125)** or the **NSPCC National Whistleblowing Helpline (0800 028 0285)**.

6. RECORDING, DATA MANAGEMENT & SECURITY

- **Confidentiality:** All whistleblowing reports are handled with high confidentiality to protect the reporter.

- **Retaliation Safeguards:** Any retaliation against a whistleblower represents a severe breach of our *Staff Code of Conduct* and will result in immediate disciplinary action up to and including summary dismissal.

7. ROLES & RESPONSIBILITIES

Role	Specific Whistleblowing Responsibilities
Executive DSL (Karen Greenwood)	• Reviews internal Step 2 escalations and ensures appropriate information is passed to the LADO within 24 hours if the harm threshold is met.
Directors / Senior Managers	• Receive initial Step 1 reports regarding peer conduct and take appropriate remedial action.
All CSPE Staff & Contractors	• Explicitly protected and obligated to bypass internal hierarchies to utilize external statutory channels (NSPCC/LADO) if leadership is implicated in a failure or refuses to act.

8. QUALITY ASSURANCE, MODERATION, & REVIEW To ensure the integrity of our reporting systems, the school implements the following oversight protocol:

1. Protection Monitoring: CSPE actively monitors whistleblowing procedures to ensure complete compliance with the Public Interest Disclosure Act 1998 (PIDA).

2. Annual Policy Review: This Policy framework is reviewed annually by the SLT to incorporate updated statutory guidelines from KCSIE and relevant employment legislation.