



# **AP and Private Tuition**

## **COMPANY POLICIES AND PROCEDURES**

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## **1. OUR PHILOSOPHY**

CSPE are dedicated and passionate in providing an alternative provision and support for SEND children, particularly those who are neurodiverse. Both directors and several staff, have first-hand knowledge of being parents, as well as teachers of neurodiverse children, who have had significant struggles in main-stream school. We are therefore committed to providing suitable, flexible and compassionate education for children who are not accessing main-stream or special educational settings.

We strive to provide an environment that enables children with SEND to achieve their full potential, whilst being understood, listened to, and their strengths celebrated. We work with children, parents and schools/education authorities to create workable and realistic plans for each child. Reviews are periodic in order to ensure the provision is effective and appropriate and will be adapted to a child's changing needs. CSPE will make all reasonable adjustments to enable every child to access their education; with the most important adjustment focusing on the attitude, SEND knowledge and approach of CSPE staff towards relationship building and teaching and learning. We also focus on integrating strategies to develop executive function skills within teaching and learning. CSPE provide this service to meet the needs of the gap between main-stream and SEND schools, by providing alternative provision for EOTAS and EBSNA children.

Packages will be built based on a child's current needs, with a phased and tailored approach adopted in the creation of every package. Engagement will be at the child's pace and all approaches will take their additional needs into consideration. We will make and trial all reasonable adjustments that are appropriate for the individual child, listening to student /parent voice as to what works best for them, alongside the support of experienced CSPE staff.

We focus on children recovering from burnout, improving confidence and self-esteem and celebrating their differences, whilst supporting them in developing strategies to better cope with situations in which they find uncomfortable and challenging. We offer understanding and genuine inclusion, helping each individual child to look forward to their futures and develop a pathway for them to achieve their full potential.

## **2. EQUALITY & DIVERSITY POLICY**

CSPE is an equal opportunities provider which endeavours to provide equality of opportunity for all tutors/learners, regardless of sex, race, age, disability, marital status, creed, ethnic origin, cultural differences, religion, or sexual orientation.

CSPE aims to respect equality of opportunity and celebrate positively the variety in our multiethnic/cultural society.

CSPE demonstrates all the legal obligations as outlined under the Sex Discrimination Act of 1975 and 1986, The Race Relations Act of 1976 and the Disability and Discrimination Act of 1995 (in addition to the statements outlined above)

CSPE upholds the Code of Practice on the Identification and Assessment of Additional Needs (1st September 1995) as established in the 1995 Education Act. This entitles all learners with Special Needs to receive their full educational entitlement. All tutors and directors of CSPE should have an awareness of this.

CSPE is focused on bringing the educational opportunities and benefits to as many learners as possible. It is important to us that we serve a diverse mix of learners and in particular:

- from all sexes
- from a diversity of racial and cultural backgrounds
- of all abilities

- with special additional or special educational needs and disabilities

Our ways of working ensure that every learner is treated as an individual.

It is the responsibility of our staff to ensure that the centre is welcoming to all learners, and that they all benefit from what we have to offer. This includes a high level of individual attention, recognition, celebration of their successes and positive social interactions with staff and others.

CSPE staff promote the fundamental British values of:

- democracy,
- the rule of law,
- individual liberty, and
- mutual respect and tolerance of those with different faiths and beliefs.

Staff and learners are encouraged to regard people of all faiths, races and cultures with respect and tolerance. It is expected that they should understand that while different people may hold different views about what is 'right' and 'wrong,' all people living in England are subject to its law.

CSPE will endeavour to enable learners to:

- develop their self-knowledge, self-esteem, and self-confidence.
- distinguish right from wrong and to respect the civil and criminal law of England
- accept responsibility for their behaviour, show initiative, be resilient and to understand how they can contribute positively to the lives of those living and working in the locality of the centre and to society more widely

We will always encourage learners to:

- acquire a broad general knowledge of and respect for public institutions and services in England
- be tolerant of different cultural traditions by enabling learners to acquire an appreciation of and respect for their own and other cultures
- respect other people
- have respect for democracy and support for participation in the democratic processes, including respect for the basis on which the law is made and applied in England.

## **2.1 SEND POLICY**

CSPE aims to bring educational opportunities and benefits to as many learners as possible, including disabled learners and learners with special additional and special educational needs.

CSPE aims to treat all learners with equal concern, as individuals, with diverse needs, likes and dislikes. Our service has a lot to offer all learners, irrespective of ability. We tutor with a high staff to learner ratio of a maximum of 1:5 at our centre and up to 1:6 in schools, which helps us take a learner centred approach.

We will always ensure that:

- all reasonable adjustments are implemented consistently and effectively for each individual learner.
- If a learner has an EHCP, we will ensure that the reasonable adjustments are implemented where relevant to our setting.
- we discuss a learner's needs with the parent/carer/class teacher and learner at the time of registration.
- all learners are supported and encouraged irrespective of ability.
- learners' progress is constantly reviewed and assessed with a view to adapting their programmes if necessary.
- we provide opportunities for dialogue and feedback with parents/carers/class teachers.
- we are aware of disability issues and endeavour to attend development training on developing inclusive practice.
- we are mindful of barriers to learning and endeavour to use our experience, skills, and expertise to overcome those barriers, whether they be academic, emotional, or social.
- we are always open to guidance from parents and professionals on the type of training that may be beneficial or necessary for working with a specific learner.
- our centre is accessible to wheelchairs in the reception area
- information provided by a parent/carer/class teacher will remain confidential and only shared with the minimum necessary members of staff, adhering to safeguarding, data protection and GDPR practices.
- all information provided will be stored securely and disposed of securely when no longer required. We work within the guidelines of the Disability Discrimination Act 1995.

### 3. INDUCTION POLICY

The purpose of this policy is to ensure that all learners joining CSPE experience an **inclusive, welcoming, and supportive induction**. Our induction process is designed to:

- Introduce learners to their setting, learning expectations, and intended outcomes.
- Communicate CSPE's safeguarding, health, and safety policies.
- Build positive relationships between staff and learners.
- Provide personalised support to meet individual educational, social, and welfare needs.
- Enable learners, parents/carers, and commissioners to actively engage with the learner's learning journey.

**This policy applies to:**

- All learners starting placements at CSPE.
- CSPE staff responsible for induction, teaching, safeguarding, and pastoral support.
- Parents/carers and placement commissioners who support the learner's learning journey.

**Our aims at CSPE are that:**

- Every learner will be treated with dignity, respect, and care.
- Induction will be **flexible and tailored** to the learner's current state of well-being and individual needs.
- Learners will be encouraged to **voice concerns** and participate actively in their own induction and learning.
- Induction will provide a positive foundation for **re-engagement in education**, personal development, and life skills.

**Induction Process**

## **Building Relationships**

Upon entry, staff focus on creating a welcoming environment where learners feel safe, understood, and valued.

Staff observe and interact with learners to gain insight into their needs, preferences, and wellbeing.

## **Baseline Assessments**

Once the learner has settled, comprehensive baseline assessments are conducted (as appropriate) to evaluate:

- Educational skills and progress
- Executive function
- Social and emotional development
- Welfare and wellbeing needs

## **Individual Learning Plans / Learner Passports**

Each learner receives a **Learner Passport / Individual Learning Plan (ILP)** detailing:

- Timetable and daily structure
- Short- and long-term learning targets (aligned to EHCPs if applicable)
- Regulation strategies

Passports/ILPs are reviewed regularly with the learner, parents/carers, and commissioners to remain responsive to the learner's progress and evolving needs.

## **Risk Assessment and Safety Planning**

Where safeguarding concerns are identified by commissioners, staff complete a **personalised risk assessment**.

A **safety plan** is developed with the learner if necessary and shared with parents/carers and commissioners.

Appropriate strategies and support are implemented to maintain the learner's safety and wellbeing.

## **Communication with Parents/Carers and Commissioners**

Clear information about the induction process, educational offer, and support systems is provided to parents/carers and commissioners.

This can include mentoring and other support mechanisms to ensure smooth integration.

## **Support During Induction**

Staff actively build relationships throughout the induction period, offering reassurance, guidance, and emotional support.

Timetables and activities may be **flexibly adapted** to meet the learner's current needs.

Learners are encouraged to express concerns or dysregulation, with strategies provided to aid self-regulation.

Clear guidance is provided on how to report issues, ensuring the learner's voice remains central.

## **Induction Welcome Pack**

CSPE is developing a **written induction welcome pack**, which will be shared with learners, parents/carers, and commissioners. The pack will include:

- Purpose of the placement and intended outcomes
- Support available to the learner
- Photographs of centre and key staff
- Safeguarding procedures
- Health and safety protocols in accessible language and format

This ensures learners are informed without feeling overwhelmed.

### **Implementation and Review**

Staff are responsible for delivering induction in line with this policy.

Leadership will monitor the induction process through feedback from learners, parents/carers, and commissioners.

The policy will be reviewed annually or sooner if legislation, guidance, or operational requirements change.

### **Outcomes**

Through this structured induction, CSPE ensures that every learner:

- Understands the purpose of their placement
- Knows how to remain safe
- Is supported to achieve learning outcomes
- Builds self-esteem, self-advocacy, and life skills
- Feels welcomed, supported, and valued throughout their learning journey

## **4. ADMISSIONS POLICY**

### **4.1 ALTERNATIVE PROVISION**

CSPE Ltd (CSPE) provides specialist alternative provision for learners and young people who are not currently accessing mainstream or special school settings.

CSPE supports:

- **Education Other Than At School (EOTAS)** learners funded by Local Authorities.
- **Emotionally Based School Non-Attendance (EBSNA)** learners funded by schools or Local Authorities.
- Learners at risk of EBSNA who require SEND transition support while remaining on roll at a school.
- Learners awaiting SEND specialist school allocation.
- Learners with an **EHCP or awaiting assessment**.

Our mission is to deliver **flexible, compassionate, and neurodiversity-aware education** that supports reintegration into suitable education wherever possible.

### **Eligibility for Admission**

CSPE is open to learners who meet one or more of the following criteria:

1. Funded by a Local Authority under EOTAS.

2. Funded by a school or Local Authority due to EBSNA.
3. At risk of EBSNA and requiring SEND transition support as part of reasonable adjustments.
4. Awaiting a SEND specialist school placement.
5. Have an EHCP or are awaiting SEND assessment.
6. Funded by a school or Local Authority due to medical reasons.

CSPE makes **all reasonable adjustments** to ensure learners can access education in line with their individual SEND needs.

## Referral Process

Admissions are made via:

- Local Authority EOTAS teams
- Schools / SENDCO referrals
- Education Authorities commissioning provision
- Parent/carer consultation (in partnership with schools or LA)

A referral must include:

- Learner profile and current educational needs
- SEND status (EHCP or assessment in progress if applicable)
- Reason for alternative provision placement
- Proposed educational aims and transition plan
- Any safeguarding or risk information

CSPE works collaboratively with families, schools and Local Authorities to ensure a **workable and realistic plan** is in place before admission.

# The Learner Admissions Journey: A Comprehensive 8-Step Guide

A structured roadmap for administrative and safeguarding procedures, transitioning learners into CSPE with personalised settings with personal support.



## 1. Gather Information

Gather completed forms and essential documentation from previous schools, Local Authorities, and parents or carers.



## 2. Check Documents

Verify that all paperwork is received and proactively chase any missing information to ensure a complete file.



## 3. Contact Information

Identify potential risks and specific support needs by carefully reviewing documentation and existing EHCPs.



## 3. Safeguarding Review

Identify potential risks and specific support needs by carefully reviewing documentation and existing EHCPs.



## 4. Contact Stakeholders

Introduce the new setting to parents and hold discussions regarding the learner's specific requirements.



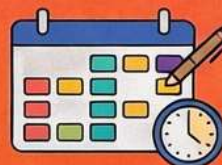
## 5. Manage Data

Upload all records to secure, GDPR-compliant systems to maintain accurate and protected data.



## 7. Create Learner Passport

Develop and share a support strategy 'passport' with all relevant members to ensure consistent care.



## 6. Create Timetable

Build a customised, bespoke schedule tailored to the specific needs and goals of the learner.

## 8. Start Placement



## Assessment Prior to Admission

Before a learner is admitted:

- A meeting is held with the learner, parents/carers and referring body.
- The learner's **academic, emotional and regulation needs** are reviewed.
- An **individualised timetable** is created in collaboration with all stakeholders.
- Provision may start at a reduced number of hours and increase gradually based on need and engagement.

Packages are tailored and reviewed regularly to ensure they remain effective and appropriate.

## Provision Offered

CSPE operates a flexible timetable from Monday–Friday, **8.30am–4:30pm**, offering up to five one-hour sessions daily with flexible engagement depending on the learner's needs.

We provide:

- Academic teaching across KS2–GCSE (including Maths, English, Science, Computer Science, ICT, Humanities and Languages)
- Creative and vocational subjects (Art, Music, Cooking, PE, Textiles, DIY, Film Studies)
- SEND and therapeutic support (Lego Therapy, mentoring, wellbeing, mindfulness)
- Access to **sensory and regulation rooms, fitness and acoustic classrooms**
- Career guidance and PSHCE / Citizenship
- Short online accredited courses where appropriate

All academic sessions are delivered by **fully qualified, enhanced DBS-checked teachers**, supported by a SEND LSA for mentoring and wellbeing sessions.

## Safeguarding and Suitability

CSPE is **OFSTED approved** and maintains:

- Full safeguarding checks and safer recruitment procedures
- Appropriate insurances and policies
- A strong focus on relationship-building and emotional safety

Admissions will only be offered where CSPE can meet the learner's needs safely and effectively.

## Review of Placement

All admissions are:

- **Regularly reviewed** in line with EHCP or EOTAS plans.
- Supported by **weekly progress feedback** to the referring school or Local Authority (and shared with parents where appropriate).
- Adjusted to reflect a learner's **changing needs and engagement levels**.

CSPE aims to support each learner's successful transition back into mainstream or specialist education when appropriate.

## Equal Opportunities


CSPE welcomes all learners regardless of background, disability, neurodiversity or diagnosis. We strive to create an environment where all learners are **understood, listened to, and supported to reach their full potential**. All admissions are in compliance with the Equality Act 2010.


## **Contact for Admissions – EOTAS/AP**

**Karen Greenwood – Director**

### **CSPE Ltd**

18 Station Road, Urmston, Manchester, M41 9JN

 enquiries@clearstepsplus.co.uk

 07788628681

## **4.2 Private Tuition**

At our centre the parent /carer should bring his/her learner(s) into the Centre's reception area. Here they will be met by a member of staff. The learner's name and date of arrival is written on a paper Attendance/Evacuation Register in pen, which is kept in the reception area. Where the learner is receiving private tuition funded by a school or education authority, a weekly register/tracker will be sent at the end of each week to confirm attendance and report on progress. If a learner does not arrive for tuition at the centre, the parents/carers will be contacted, and the and if appropriate the SENCO will be informed by email.

If the parent/carers is not present, the above procedure should be followed with regards to the learner and tutor.

### **Departure Procedure**

Upon registration of their learner, the parent/carers is required to indicate on the Registration document who is authorised to collect their learner at the end of their session. If the parent does not provide any other names, then only that parent will be allowed to collect the learner. They may only give permission for their learner to be allowed to leave independently if they KS5/5. This still applies to learners leaving the centre for a break between double sessions. Parents/carers should understand that CSPE can take no responsibility for learners leaving or arriving unaccompanied.

If a learner must be collected, CSPE will keep learners within the centre until the parent or nominated person arrives in the reception area, where they will be greeted and identified by a staff member, before collecting the learner. Anyone not known to the team must have been given permission.

If a person asks to collect a learner who is not known, we will call the parent and ask to confirm this new person was sent to collect the learner. If this cannot be done, the learner will not be permitted to leave until a nominated person can come to collect them.

If there is a police or court order in place to prevent visitation/contact of a learner by a parent, the family are required to inform the Director and provide evidence to prevent an incident occurring where a learner could be released into the care of a person who was previously allowed contact. If a couple divorce and a parent does not want their ex-partner to have access, they would need to notify the Director so they could change the pickup arrangement records.

On leaving the centre the tutor is required to sign out the learner; or the learner may sign themselves out by placing a signature on the paper. In the case of EOTAS/AP learners, they will be signed in and out by a member of staff.


On leaving the centre all staff take responsibility to conduct a thorough sweep of the entire centre and any additional rooms to make sure all learners have departed.


## Contact for Admissions – Private Tuition

Karen Greenwood – Director

### CSPE Ltd

18 Station Road, Urmston, Manchester, M41 9JN

 enquiries@clearstepsplus.co.uk

 07788628681

## 4.3 Transition Panel Admissions and Consultation Policy

### Quick Reference Flow Chart

<b>1. Consultation or referral received</b> AP transition request or new learner education authority placement consultation.
↓
<b>2. Initial information gathered</b> EHCP, professional reports, safeguarding information, AP records, parent/carer views and learner views requested where relevant.
↓
<b>3. Transition Panel review</b> multi-disciplinary panel considers needs, suitability, safety, resources, reasonable adjustments and impact on existing pupils.
↓
<b>4. Panel recommendation made</b> Offer, offer with phased transition, defer pending further evidence, continue AP pathway, decline, or other appropriate outcome.
↓
<b>5. Written decision issued</b> Academy confirms the recommendation, evidence considered, reasons, support requirements and any proposed transition arrangements.
↓
<b>6. If place is offered</b> Transition plan agreed, including timetable, key worker, safeguarding arrangements, baseline assessment, risk management and review date.
↓
<b>7. If decision is disputed</b> Parent/carer, education authority or relevant professional may request a review within ten working days. EHCP statutory rights remain separate.
↓
<b>8. Records and policy review</b> Consultation records are stored securely, and the policy is reviewed annually or sooner if required.

### Policy Statement

The Clear Steps Specialist Academy is committed to ensuring that all admissions and placement consultations are considered carefully, transparently and in the best interests of the child or young person. This includes children and young people moving from the Academy's Alternative Provision pathway into a substantive registered school place, as well as new learners who are not already accessing the AP pathway where an education authority has requested a consultation for a placement offer.

The Transition Panel will make evidence-based recommendations about whether the Academy can meet the child's identified needs safely, effectively and sustainably within its registered specialist provision. Where a child has an Education, Health and Care Plan, the local authority remains responsible for the statutory consultation process and for any decision to name the Academy in Section I of the plan.

### **Purpose of the Policy**

This policy sets out the arrangements for receiving, reviewing and responding to admissions consultations where a child or young person may transition from the Academy's Alternative Provision pathway into a substantive place at The Clear Steps Specialist Academy, or where a new learner who is not currently accessing the AP pathway is referred by an education authority for consultation about a possible placement offer.

The policy is intended to ensure that decisions are consistent, fair, child-centred, compliant with statutory duties, informed by professional evidence and aligned with the Academy's registration, resources, safeguarding arrangements and specialist curriculum offer.

### **Scope**

This policy applies to children and young people who are attending, or have recently attended, The Clear Steps Specialist Academy's Alternative Provision pathway and are being considered for admission to the Academy's registered specialist school provision. It also applies to new learners who are not currently accessing the AP pathway where an education authority has requested a consultation regarding a potential placement offer.

It applies to consultations received from local authorities, requests arising from annual reviews or emergency reviews, requests linked to an Education, Health and Care Plan process, and internal recommendations where the Academy considers that a child may require a different pathway.

### **Legal and Regulatory Context**

The Academy will have regard, where applicable, to the Children and Families Act 2014, the SEND Code of Practice: 0 to 25 years, the Equality Act 2010, the Education Act 2002, the Education and Skills Act 2008, the Education (Independent School Standards) Regulations 2014, safeguarding statutory guidance including Keeping Children Safe in Education, local authority consultation arrangements and any contractual or commissioning requirements agreed with placing authorities.

Where a child has an Education, Health and Care Plan, the Academy's panel decision will inform the Academy's consultation response. It does not replace the statutory decision-making responsibility of the local authority.

In responding to consultations, the Academy will consider whether the placement is suitable for the child's age, ability, aptitude and special educational needs; whether attendance would be compatible with the efficient education, safety and welfare of others; and whether the placement would represent an efficient use of resources. The Academy recognises that the education authority retains responsibility for statutory decision-making where it is consulting on, maintaining or amending an Education, Health and Care Plan.

### **The Transition Panel**

The Transition Panel is the Academy's multi-disciplinary decision-making forum for considering whether a child or young person should be offered a substantive registered school place. This may follow, or sit alongside, attendance on the Alternative Provision pathway, or may relate to a new learner consultation submitted by an education authority for a potential placement offer.

The panel will consider whether the Academy can meet the child's special educational needs, social, emotional and mental health needs, communication and interaction needs, sensory needs, medical or therapeutic needs, safeguarding needs and any other relevant provision requirements.

## **Panel Membership**

The Transition Panel will normally include the following core members:

- Headteacher or delegated senior leader with authority to make placement recommendations.
- SENCO, Head of SEND or senior leader responsible for special educational needs provision.
- Alternative Provision Director.
- Executive Designated Safeguarding Lead or delegated safeguarding representative.
- Admissions, placements or commissioning lead.
- Therapy or clinical professionals or mentor, where the child's needs require specialist input.
- Local authority SEND representative, where the request relates to an EHCP consultation or local authority-funded placement (if appropriate).

Additional professionals may be invited where relevant, including an educational psychologist, social worker, virtual school representative, youth offending team worker, health professional, previous school representative or other professional with direct knowledge of the child.

## **Quorum and Decision-Making Authority**

The panel will be quorate where at least the Headteacher or delegated senior leader, the SENCO or Head of SEND, the Alternative Provision Lead and the Designated Safeguarding Lead or delegated safeguarding representative are present. Where the consultation is made by a local authority, the Academy will seek relevant local authority input before finalising its response.

The panel will aim to reach a consensus. Where consensus cannot be reached, the Headteacher or delegated senior leader will make the final Academy recommendation, taking account of all professional advice and recorded evidence.

## **Referral and Consultation Process**

A request for transition or admission may be initiated by a local authority, parent/carer, professional network or the Academy. Requests should be submitted with sufficient evidence to allow the panel to make an informed decision.

The Academy may request the following information before the panel meeting:

- Current or draft Education, Health and Care Plan, where applicable.
- Recent annual review, emergency review or professional reports.
- Attendance, behaviour, engagement and progress information from the AP pathway.
- Risk assessments, behaviour support plans, positive handling plans or safety plans.
- Safeguarding information and relevant chronology, where appropriate.
- Health, therapy or clinical reports relevant to educational provision.
- Parent/carer and child or young person views.
- Information about previous placements, exclusions, managed moves or periods out of education.

## **Assessment Criteria**

The panel will consider each case individually. Decisions will be based on the child's needs, the Academy's ability to make appropriate provision and the likely impact of admission on the child, existing pupils and the safe operation of the school.

The panel will consider:

- Whether the Academy's registered specialist provision is suitable for the child's age, aptitude, ability and special educational needs.
- Whether the Academy can deliver the provision required by the child's EHCP or identified assessment profile.

- Whether reasonable adjustments can be made to support access, inclusion and participation.
- Whether the child's safeguarding, welfare, health and risk needs can be safely managed.
- Whether specialist staffing, therapeutic input, curriculum pathways and environmental adaptations are available.
- Whether admission would be compatible with the efficient education, safety and welfare of existing pupils.
- Whether any additional funding, support package or phased transition plan is required.
- Whether the proposed transition is likely to be sustainable and, in the child's, best interests.

### **Possible Panel Outcomes**

Following consideration of the evidence, the panel may recommend one of the following outcomes:

- Offer a substantive registered school place, subject to any required local authority agreement and funding arrangements.
- Offer a place with a phased transition plan and clearly identified support arrangements.
- Defer a decision pending further evidence, updated assessments or professional advice.
- Recommend continued attendance on the Alternative Provision pathway while further review takes place.
- Decline the placement, with clear written reasons linked to the child's needs, suitability, safety, resources or the Academy's ability to make appropriate provision.

### **Transition Planning**

Where a place is offered, the Academy will develop a transition plan proportionate to the child's needs. The plan may include a phased timetable, named key worker, baseline assessment, therapeutic input, safeguarding arrangements, risk management plan, parent/carer communication arrangements and review date.

The transition plan will identify the support required for the child to move successfully from AP into the registered school provision and will be reviewed regularly during the initial placement period.

### **Communication of Decisions**

The Academy will provide a written response following the panel decision. Where the consultation has been received from a local authority, the response will be sent to the relevant local authority officer within the agreed timescale wherever possible.

The written response will set out the panel's recommendation, the evidence considered, any conditions or support requirements, proposed transition arrangements where relevant and reasons for any decision to decline or defer.

### **Appeals and Review Process**

The Academy will ensure that any concern or request for review relating to a consultation or admissions decision is handled fairly, promptly and transparently. Where a parent/carer, education authority or other relevant professional disagrees with a panel recommendation, they may request that the decision is reviewed.

A request for review should be submitted in writing within ten working days of the written decision being issued, unless there are exceptional circumstances. The request should set out the reasons for the review and include any new or additional evidence that was not available to the Transition Panel at the time of the original decision.

The review will normally be considered by the Headteacher, proprietor, advisory board representative or another senior leader who was not directly involved in the original panel recommendation, where this is practicable. The reviewer will consider whether the original decision was reasonable, evidence-based, procedurally fair and consistent with this policy.

Following the review, the Academy may uphold the original decision, amend the recommendation, request further evidence, reconvene the Transition Panel or propose an alternative transition or support plan. The outcome of the review will be confirmed in writing, with reasons, normally within ten working days of the review being completed.

Where the consultation relates to a child with an Education, Health and Care Plan, the Academy's review process does not replace the statutory rights of parents/carers or young people to make representations to the education authority, request mediation, or appeal to the First-tier Tribunal where those statutory routes apply.

### **Records and Confidentiality**

The Academy will maintain a record of all consultations, evidence reviewed, panel attendance, decisions, reasons and actions arising. Records will be stored securely and processed in line with data protection requirements, confidentiality expectations and the Academy's information governance procedures.

### **Safeguarding and Welfare**

Safeguarding will be a central consideration in all transition and admission decisions. The panel will consider whether appropriate safeguarding arrangements, risk assessments, supervision plans, pastoral support and multi-agency communication are in place before a child transitions into a substantive registered school place.

### **Equality and Reasonable Adjustments**

The Academy will ensure that admissions and consultation decisions are made without discrimination. The panel will consider whether reasonable adjustments can be made to avoid disadvantage for disabled children and young people and to support access to the Academy's provision.

### **Conflicts of Interest**

Panel members must declare any conflict of interest, including personal, financial or professional interests that may affect impartial decision-making. Where a conflict is identified, the Headteacher or Chair of Panel will determine whether the member should withdraw from part or all of the discussion.

### **Review of Policy**

This policy will be reviewed annually, or sooner if there are changes to legislation, statutory guidance, local authority commissioning arrangements or the Academy's registration, provision model or admissions procedures.

## **Appendix 1: Admissions Consultation Request Form**

This form should be completed when an education authority, parent/carer, professional network or internal Academy representative requests that a child or young person is considered for admission or transition into the registered specialist school provision.

<b>Child / young person name</b>	
<b>Date of birth</b>	
<b>Year group / key stage</b>	
<b>Current setting or pathway</b>	
<b>Education authority / placing authority</b>	
<b>Named contact and role</b>	

<b>Reason for consultation</b>	
<b>EHCP status</b>	Draft / Final / Under assessment / No EHCP / Other
<b>Requested placement start date</b>	
<b>Documents provided</b>	EHCP, annual review, professional reports, risk assessments, attendance and behaviour information, safeguarding information, parent/carer views, child or young person views, previous placement information.

## Appendix 2: Transition Panel Decision Template

This template should be used to record the evidence considered, the panel's discussion, the recommendation reached and the reasons for the decision.

<b>Panel date</b>	
<b>Child / young person name</b>	
<b>Consultation route</b>	AP transition / New learner education authority consultation / Other
<b>Panel members present</b>	
<b>Evidence reviewed</b>	
<b>Summary of identified needs</b>	
<b>Safeguarding and risk considerations</b>	
<b>Provision, staffing or therapeutic requirements</b>	
<b>Reasonable adjustments considered</b>	
<b>Funding or commissioning requirements</b>	
<b>Panel recommendation</b>	Offer / Offer with phased transition / Defer / Continue AP pathway / Decline / Other
<b>Reasons for recommendation</b>	
<b>Actions agreed</b>	
<b>Named lead</b>	
<b>Review date</b>	

## 5. SAFEGUARDING POLICIES AND PROCEDURES

**Executive DSL: Dawn Schofield Deputy DSL: Amy Hames**

### 5.1 LEARNER PROTECTION AND DISCLOSURE

CSPE fully recognises its responsibilities, under Section 175 of the 2002 Education Act, to have arrangements in place to safeguard and promote the welfare of learners. We adhere to the most recent statutory guidance for schools and colleges 'Keeping Children Safe in Education, 'and adhere to the guidance in Working together to safeguard learners 2025 aiming to protect and promote the welfare of all learners and young people under the age of 18 in England.

All staff have appropriate annual safeguarding and learner protection training which is regularly updated throughout the academic year. This training is updated annually via official online modules and during staff INSET . In addition, we ensure all staff are updated regularly and consistently have an open channel of communication regarding safeguarding and learner protection. All staff, have a duty to recognise concerns and maintain an open mind. Accordingly, all concerns regarding the welfare of learners will be recorded and discussed with the DSL (Deputy DSLs), DSL and/or our other Deputy DSL prior to any discussion with parents/carers/commissioners and in accordance with the policies and procedures pertinent to each educational setting. All Safeguarding procedures are continually audited and any concerns are documented.

As per CSPE/ school policy and training, tutors must immediately report any suspicion that a learner is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play.

- Any explanation given which appears inconsistent or suspicious.
- Any allegations made against them or any other colleague and act appropriately as per 'Allegations Policy.'
- Any concerns that a learner may be suffering from inadequate care, ill treatment, or emotional maltreatment.
- Any concerns regarding person(s) who may pose a risk to learners (e.g., living in a household with learners present)
- Any concerns regarding the radicalisation of learners or young adults using PREVENT strategies
- Any concerns regarding the mental health and well-being of learners including self-harm
- Any concerns regarding sexual exploitation, trafficking, FGM, honour- based violence and forced marriage

Staff are also encouraged to actively consider learners who might present as vulnerable, particularly within our EOTAS/EBSNA provision.

All concerns about a learner or young person should be reported, without delay and recorded by the DSL (Dawn Schofield) or Deputy DSLs (Karen Greenwood and Amy Haymes).

All concerns must be reported immediately to the DSL (Dawn Schofield) or Deputy DSLs (Karen Greenwood and Amy Haymes).in person and/ or via the Staff Incident form and all referrals will be made in line with Local Learners' Services/educational setting procedures and the statutory guidance. If, at any point, there is a risk of immediate serious harm to a learner a referral should be made to Childrens' Services and/or the police immediately.

Referrals to **LADO** must be made via: <https://www.traffordsafeguardingpartnership.org.uk/safeguarding-learners-and-young-people/Allegations-Against-Adults-Who-Work-With-Learners/allegations-against-adults-who-work-with-learners.aspx>

<https://www.trafford.gov.uk/residents/learners-and-families/worried-about-a-learner/trafford-first-response.aspx#:~:text=If%20the%20learner%20is%20at,you%20provide%20will%20be%20used.>

Concerns can also be reported to the NSPCC on 0808 800 5000. If a learner is in immediate danger, call the police on 999

### **Self-harm**

Particularly within our EOTAS/EBSNA provision, where a learner is displaying evidence of self-harm, these being physical such as cuts, marks, bruises etc; behavioural such as covering up and being secretive, or emotional such as having low mood; these should be reported to the DSL or Deputy DSLs. The DSL or Deputy DSLs may make offers

of help and reassurance. Silence from the learner is acceptable, should they not wish to talk, staff and tutors should listen and be patient.

Staff and tutors may ask to see the cuts etc in case of infection and any medical assistance is needed. They may also advise on keeping tools clean and cuts clean to avoid infection and give other options to try before self-harming.

A personalised risk assessment and a safety plan will be devised with the learner documenting:

- What their triggers are
- What helps and what doesn't help
- A safe environment
- Their safe person
- Positives - something to look forward to.

If there are concerns about the Director, they should be referred to the Executive DSL , all referrals will be made in line with Local Children's Services/educational setting procedures and the statutory guidance and documented.

<https://www.trafford.gov.uk/residents/learners-and-families/worried-about-a-learner/trafford-first-response.aspx#:~:text=If%20the%20learner%20is%20at,you%20provide%20will%20be%20used.>

### **Director's child attending the setting (conflict of interest)**

**When a director's learner attends CSPE, safeguarding concerns should be handled in accordance with the CSPE's safeguarding procedures.** In the event that there are safeguarding concerns about any of the Director own children attending the setting, these concerns should be referred to the Executive DSL or Deputy DSL if appropriate) and in the case of EOTAS learners, the EHCP Co-ordinator would be contacted for their records if deemed above Level 1. All records of any concerns, however, will made available to Trafford Council, with actions and interventions documented if deemed necessary or upon request. All referrals will be made in line with Local Children's Services/educational setting procedures and the statutory guidance. <https://www.trafford.gov.uk/residents/learners-and-families/worried-about-a-learner/trafford-first-response.aspx#:~:text=If%20the%20learner%20is%20at,you%20provide%20will%20be%20used.>

### **WITHIN SCHOOL CENTRE and/or work with learners on role in mainstream/partner schools.**

We actively request policies and procedures for following safeguarding issues and ensure all staff know who to contact if a safeguarding concern arises.

Lostock High School: <https://www.lostock.trafford.sch.uk/policies>

St Anthony's Roman Catholic High School: <https://st-antony.com/wellbeing-support/safeguarding/>

Stretford Grammar School: <https://www.stretfordgrammar.com/attachments/download.asp?file=1558&type=pdf>

Loreto Grammar School: <https://www.loretogrammar.co.uk/5252/safety-and-wellbeing>

Urmston Grammar School:

<https://www.urmstongrammar.org.uk/page/?title=Safeguarding&pid=51#:~:text=Urmston%20Grammar%20aims%20to%20create,listened%20to%20and%20taken%20seriously.>

Barlow High School: <https://www.thebarlowrhigh.co.uk/Safeguarding/>

Wellacre High School: <https://www.wellacre.org/parents-carers-and-learners/keeping-learners-safe/>

## **5.2 GUIDELINES FOR MANAGING LEARNERS AND CHILD ON CHILD ABUSE AND BEHAVIOUR POLICY**

Our Behaviour Policy fully integrates our SEND Policy, as our focus is on 'regulation before expectation', which creates a fully inclusive environment and reduces behaviours becoming an issue. We have had zero physical intervention incidents.

### **Our Behaviour Policy**

At CSPE, we believe that positive behaviour is best supported through strong relationships, emotional regulation, and inclusive practice. Our Behaviour Policy is fully integrated with our SEND Policy and is underpinned by the principle of "regulation before expectation." This means that we prioritise a learner's emotional and sensory needs before placing behavioural or academic demands upon them.

We recognise that behaviour is a form of communication and that learners may display behaviours when they are dysregulated, anxious, overwhelmed, or experiencing unmet needs. Our approach aims to create a safe, supportive, and inclusive environment where all learners can engage in learning successfully.

### **Aims of the Behaviour Policy**

We aim to:

- Promote a calm, respectful, and inclusive learning environment.
- Support learners to develop emotional regulation, self-awareness, and positive coping strategies.
- Reduce the likelihood of behaviours escalating by addressing underlying needs.
- Ensure all learners, including those with SEND, are treated fairly, consistently, and with dignity.
- Work in partnership with parents/carers, schools, and external professionals.
- Regulation Before Expectation
- Before any behavioural expectations are applied, staff will:
- Assess whether a learner is emotionally and physically regulated.
- Provide appropriate support such as time, space, reassurance, sensory breaks, or emotional coaching.
- Adjust expectations, tasks, or the learning environment where necessary.
- Use de-escalation strategies to reduce anxiety or distress.
- Learners will not be sanctioned for behaviour that is a direct result of unmet SEND-related needs or emotional dysregulation.

### **Positive Behaviour Support**

We promote positive behaviour by:

- Building strong, trusting relationships with learners.
- Using clear, consistent routines and boundaries.
- Providing praise and recognition for effort, progress, and positive choices.
- Modelling respectful communication and behaviour.
- Setting realistic, individualised expectations appropriate to each learner's needs and abilities.
- Managing Challenging Behaviour
- When challenging behaviour occurs, staff will:
- Respond calmly and consistently.

- Use de-escalation strategies and supportive language.
- Seek to understand the cause of the behaviour rather than focusing solely on the behaviour itself.
- Allow time and space for regulation before discussing expectations or consequences.
- Record and review incidents to identify patterns and inform future support.
- Any consequences used will be proportionate, restorative where possible, and appropriate to the learner's developmental level and SEND profile.
- Individual Support and Reasonable Adjustments
- Where required, behaviour support will be tailored to the individual and may include:
  - Individual behaviour or support plans.
  - Adjusted timetables or learning activities.
  - Sensory supports or quiet spaces.
  - Increased adult support in line with our high staff-to-learner ratio.
  - Collaboration with parents/carers, schools, and external professionals.
  - All reasonable adjustments will be implemented consistently and reviewed regularly.

### **Physical Intervention**

Physical intervention will only be used as a last resort, where there is an immediate risk to the safety of the learner or others. Any intervention will be:

- Reasonable, proportionate, and necessary.
- In line with safeguarding guidance and staff training.
- Recorded and shared with parents/carers and relevant professionals.
- Partnership with Parents and Professionals
- We believe effective behaviour support relies on strong partnerships. We will:
  - Communicate openly with parents/carers and schools.
  - Share strategies that support consistency across settings.
  - Welcome guidance from external professionals.
  - Review behaviour approaches regularly to ensure they remain effective and appropriate.

### **Review and Monitoring**

This Behaviour Policy is reviewed regularly to ensure it:

- Reflects best practice in inclusive education.
- Meets the needs of our learners.
- Remains consistent with our SEND Policy and legal responsibilities, including the Disability Discrimination Act 1995.

### **CSPE Behaviour Support Approach Summary**

- Regulation Before Expectation
- Behaviour is Communication
- Before responding, ask:
  - "What is this learner trying to tell me?"

#### **STEP 1: Behaviour Observed**

Pause. Stay calm.

Ensure safety for everyone.

#### **STEP 2: Is the Learner Regulated?**

Look for signs of:

- Anxiety or distress
- Overwhelm or sensory overload
- Shutdown or withdrawal
- Escalation or frustration

## **IF THE LEARNER IS NOT REGULATED**

### **REGULATE FIRST**

- ✓ Reduce demands
- ✓ Offer time and space
- ✓ Use calm, supportive language
- ✓ Provide sensory or movement breaks
- ✓ Offer reassurance and predictability

No sanctions at this stage

→ Return to learning only once the learner is regulated

## **IF THE LEARNER IS REGULATED**

### **SET EXPECTATIONS**

- ✓ Clearly restate expectations
- ✓ Offer choices
- ✓ Support positive behaviour
- ✓ Praise effort and regulation

### **STEP 1: Does the Behaviour Continue?**

- ✓ Review triggers
- ✓ Consider SEND needs
- ✓ Adjust task or environment
- ✓ Increase support if needed

### **STEP 2: AFTER REGULATION**

RESTORE

- ✓ Calm, private conversation
- ✓ Help the learner reflect
- ✓ Reinforce expectations

- ✓ Repair relationships

### **STEP 3: ONGOING CONCERNS**

- ✓ Update individual support plan
- ✓ Review reasonable adjustments
- ✓ Liaise with parents/carers & professionals
- ✓ Monitor and adapt strategies

### **REMEMBER**

Regulation comes before expectation

Behaviour is not the problem – unmet needs may be

Consistency, calm, and connection matter

SEND needs must always be considered

Physical intervention is a last resort only

CSPE Commitment

A calm, inclusive, and supportive environment for every learner.

### **Child-on-child abuse**

When necessary, tutors, staff and learners are made aware of the CSPE's position on child-on-child abuse. Peer-on-peer abuse behaviour is unacceptable in any form. CSPE has high expectations of outstanding behaviour, and we consistently challenge any behaviour that falls below this. Anyone who knows that peer-on-peer abuse is happening is expected to tell a member of staff and/or report it via the Learner Incident report. Any learner who is a victim of child-on-child abuse will be dealt with in a sympathetic manner. If child-on-child abuse is suspected or reported, the incident will be dealt with immediately by the member of staff informed and then discussed with a director. All staff will be informed so that close monitoring of the victim and perpetrator can begin. Parents/carers of both parties will be informed. We aim to explain that an educational setting is a place where learners have the opportunity to come and have fun learning, make new friends, and work together, not a place to be unpleasant to others.

Where a learner is getting dysregulated or upset at under-achievement or is dissatisfied with their score, we will always praise them and make them see what they've achieved so far.

Where a learner is destructive towards the equipment or facilities at CSPE, or in the educational setting, we will make it clear that such behaviour is inappropriate and disrespectful.

Serious incidents that involve injuries to the learner, another person, including learners or staff must be written up in an Incident Report and reported to the Director .

### **WITHIN SCHOOL CENTRE**

We actively request behaviour and reward policies and procedures in order to effectively manage behaviour and rewards in accordance with specific school policy.

## **5.3 UPSKIRTING**

Upskirting is a form of sexual abuse and a violation of a person's privacy and dignity. It involves taking a photograph or video under a person's clothing without their knowledge or consent. Our organisation has a zero-tolerance approach to upskirting and any similar behaviour.

We are committed to providing a safe and respectful environment for everyone. Any act of upskirting, attempted upskirting, or sharing of such images will be treated as a serious safeguarding concern and may also constitute a criminal offence. Allegations or reports will be taken seriously, responded to promptly, and referred to appropriate authorities where required.

All staff, volunteers, and participants are expected to:

- Respect personal boundaries and privacy at all times
- Never take images or recordings without clear consent
- Report any concerns, incidents, or suspicions of upskirting immediately through safeguarding reporting procedures

We will support anyone affected, protect their confidentiality as far as possible, and follow our safeguarding and reporting processes to ensure appropriate action is taken.

#### **5.4 LEARNER NON-COLLECTION**

In the instance of a learner within our care, who is not permitted to leave CSPE independently not being collected within 120 minutes of being registered or by closing time, the following action would be taken:

- Telephone the parent/ carer, or a person on their nominated collection contact list.
- If the parent/carers cannot be contacted, contact the second emergency contact then if that fails call Social Services, who are trained to support the learner and help them cope with their vulnerable position.

#### **5.5 LOST LEARNER PROCEEDURE**

In the instance of a finding that a learner within our care is missing and unaccounted for, actions should be taken in following sequence, until the learner is located:

- Immediately inform the Director and other staff members.
- Conduct a thorough search of the Centre. Check they have not been signed out/collected by someone else.

#### **5.6. SICK LEARNER/FIRST AID PROCEDURE**

At CSPE we seek to ensure:

- Prompt and appropriate care for sick or injured learners
- Clear communication with parents/carers
- Safe management of medical emergencies
- Compliance with health and safety regulations
- Trained first aiders are appointed
- Adequate first aid supplies are available
- First aiders oversee the implementation of this procedure

All designated first aider(s) including member of staff in charge of First Aid (Paul Greenwood)

- Must hold a valid First Aid certification
- Provide first aid within scope of training
- Maintain first aid kits and incident records

All staff must:

- Always supervise learners
- Report illness/injury immediately
- Complete incident forms when required

All emergency contact information is maintained and updated. All parents/carers are called when necessary. All medical records are kept securely and confidentially on our secure cloud.

### **When a Learner Becomes Ill During the School Day**

#### **Step 1: Immediate Assessment**

- Staff assess the learner's condition.
- If minor (headache, mild stomach ache, nausea), send learner to designated medical area (outside staff toilet) with supervision. Depending on the nature of the illness, a notice is then placed on the staff toilet temporarily instructing staff to use the downstairs student toilet whilst a member of staff stands guard.

#### **Step 2: First Aid Evaluation**

- First aider assesses:
  - Temperature
  - Visible symptoms
  - Level of discomfort
  - Any pre-existing medical conditions

#### **Step 3: Decision Making**

##### **A. Learner returns to lesson if:**

- Symptoms are mild
- Learner feels well enough to participate

##### **B. Parent/Carer contacted for collection if:**

- Fever ( $\geq 38^{\circ}\text{C}$  /  $100.4^{\circ}\text{F}$ )
- Vomiting or diarrhoea
- Suspected contagious illness
- Persistent pain
- Injury requiring medical review

#### **Step 4: Supervision While Waiting**

- Learner remains in designated medical area under supervision.
- No learner is left unattended.

#### **Emergency Situations**

Call emergency services immediately if the learner has:

- Difficulty breathing
- Unconsciousness
- Seizure (lasting more than 5 minutes or repeated)

- Severe allergic reaction (anaphylaxis)
- Suspected head/neck/spinal injury
- Severe bleeding
- Chest pain
- Severe asthma attack

**Emergency Procedure:**

1. Call local emergency number (e.g., 911 / 999 ).
2. Administer first aid within training scope.
3. Contact parent/carer immediately.
4. Assign a staff member to meet emergency responders.
5. Complete incident report within 24 hours.

In the case of learners in our care in other educational settings i.e., schools, we follow all protocols and systems of that school.

**5.7 CENTRE CAPACITY POLICY**

CSPE maintains a capacity limit of 1:6 teacher to learner ratio with a limit of 20 learners at any one time in the evenings should the need arise (i.e., in the case of conducting mock exams/intervention sessions etc). For our AP, our capacity is 35 (if appropriate for the needs of our learners).

Should a situation arise whereby admitting further learners would exceed these limitations, we reserve the right to not admit these learners. In this situation we would reserve a place by putting their name on a waiting list.

**5.8 SECURE ONLINE TUITION**

As appropriate, we will take a blended approach to tutoring and uses a combination of face to face and on-line approaches.

Prior to tutoring on-line sessions, CSPE will seek emailed permission from parent/carer/school for their preference of video and audio usage before online tuition commences.

As a default, CSPE will ensure that the video settings are turned off and only audio will be allowed. The tutor will instruct parent/carer/school at the start of each session to ensure video is also off to comply with best safeguarding practice unless written permission has been received. Parents/carers/schools are required to give permission to enable video.

CSPE will screen share documents, files, computer whiteboards or computer windows solely for the purpose of tutoring online.

At each scheduled session time, parents/carers/schools must ensure a suitable device is logged on with directed video conferencing software started.

CSPE tutor will securely provide the Meeting ID and secure passcode to participants ready for commencing online tuition.

Parent/carer/responsible adult must be available at the start and end of session for telephone instructions and feedback.

It is a requirement that parents/carers/responsible adult are in the vicinity while the online sessions are ongoing with the door wedged/propped open.

CSPE tutors will not record the online session but will regularly 'screen shot' shared annotated screen for retrospective marking and as a log of the session content.

## **5.9 STAFF CODE OF CONDUCT**

At CSPE we recognise our responsibilities to our staff and clients. We also have responsibilities to the community which we serve and therefore expect our staff to work to the highest possible standards. In performing their duties, staff are required to act with integrity, honesty, impartiality, and objectivity. CSPE's standards of behaviour are set out in this 'Code of Conduct.'

This code should be seen as complimentary to any specific offsite procedures or standards. Similarly, professional staff such as tutors are also bound by standards of professional conduct.

When working with people, we expect our staff:

- To always be polite to colleagues and members of the public
- To be sure that the information you provide is accurate (if you are not sure about something it is better to say so)
- To respect confidential information in accordance with GDPR
- To avoid doing anything which would make the public doubt motives or your integrity as a school employee or would bring CSPE into disrepute.

In terms of personal standards, we expect our staff to:

- Have personal high standards of general behaviour when dealing with, colleagues, learners, parents, carers and with members of the public
- Not threaten, fight, or assault anyone, or persist in verbal or non-verbal behaviour which would intimidate or offend anyone
- Not steal, take without authority, or deliberately damage things that belong to someone else or to the centre/off-site educational setting
- Not use their position with any educational setting inappropriately to advance the interests of any other person or organisation with which they are associated, or show favour to any friends, family, or personal contacts.

Staff must not:

- Report for tuition less than fully competent due to drinking alcohol
- Report for tuition under the influence of illegal drugs

- Drink alcohol whilst in any educational setting
- Be in possession of, consume, or supply any controlled drug (other than appropriately prescribed medication) in any educational setting
- Present an unprofessional image of CSPE and/or perform duties to an unsatisfactory standard due to drinking alcohol

Failure to adhere to the above will result in disciplinary action and may result in dismissal.

All tutor/staffs are expected to work within the scope of their terms of employment, carrying out the reasonable instructions of their directors, head teachers from other educational settings, and to work to the requirements of the job. Their terms of employment are essentially based on trust. That trust would be damaged if tutors:

- Are not truthful and honest in dealings with the centre, its learners and parents or carers, colleagues and your directors and head teachers from other educational settings
- Seek to deceive CSPE by withholding information, giving false information, or destroying, damaging, or altering any records or documents without proper authorisation
- Misrepresent CSPE in dealings with others or make any statement on behalf of the centre which they are not authorised to do (e.g., giving a reference for a colleague on behalf of the CSPE, making statements to the press or other media) fail to respect and uphold the conditions of employment of your fellow tutors
- Work for any other tuition agency whilst employed by CSPE

## ALLEGATIONS

In the case where a customer/learner makes an allegation against a tutor/director or a tutor makes an allegation against a director, incidents must be written up in an Incident Report. The tutor will not continue with sessions whilst a full investigation has taken place. Where possible, incidents will be investigated internally by a director and in the case of serious incidents, they will be reported centrally to the Head of Ofsted, Safeguarding & Compliance. Records should always be made in pen so they cannot be edited or erased. (refer Incident Policy point 7). As per point 5.1 of our

**LEARNER PROTECTION AND DISCLOSURE.** We adhere to the statutory guidance for schools and colleges 'Keeping Children Safe in Education'

[https://assets.publishing.service.gov.uk/media/66d7501b9085b18b95709f75/Keeping\\_learners\\_safe\\_in\\_education\\_2025.pdf](https://assets.publishing.service.gov.uk/media/66d7501b9085b18b95709f75/Keeping_learners_safe_in_education_2025.pdf)

## 6. ATTENDANCE POLICY

The purpose of this policy is to ensure that all learners at CSPE attend regularly and on time, as consistent attendance is vital for learning, personal development, and wellbeing. We recognise that our learners may have unique needs, and we aim to provide support to overcome barriers to attendance.

This policy applies to all learners enrolled at CSPE their parents/carers/commissioners, and all staff involved in supporting attendance.

Attendance is a key part of ensuring learners achieve their potential. We take a **person-centered approach**, recognising that learners with SEND may have complex needs affecting attendance. Attendance concerns will be

addressed with **support, collaboration, and flexibility**. Clear communication with families and commissioners is essential.

### **Expectations**

Learners are expected to attend all scheduled sessions unless there is a valid reason for absence.

Parents/carer/commissioners must inform CSPE **as soon as possible** if their child cannot attend, explaining the reason.

Staff will monitor attendance daily and follow up on unexplained absences promptly.

### **Absence Reporting**

The following procedures are in place:

- **Planned absence:** e.g., medical appointments. Parents/carers should inform staff in advance where possible.
- **Unplanned absence:** e.g., illness. Parents/carers should call or message the CSPE on the first day of absence.
- Absences should be recorded clearly, distinguishing between authorised and unauthorised absences.
- All 'no-show' learners are followed up and a record kept on the 'First Response' book by the member of staff on duty for 'First Response' on that day and parent/carers/commissioners informed requiring a reason for absence.

### **Support Strategies**

We recognise that some learners may face barriers to attendance. Strategies to support learners include:

- Individual attendance plans tailored to learners' needs.
- Flexible timetables or phased reintegration for learners returning from illness or difficulty.
- Regular check-ins with key staff (e.g., Learning Mentor, SENCo).
- Collaboration with families and external agencies (e.g., health, social care) where needed.

### **Late Arrival**

- Learners are expected to arrive on time. Staff will challenge late arrivals if appropriate and discuss patterns with learners and parents/carers/commissioners to identify solutions. Persistent lateness may lead to a review of timetabling, transport support, or additional interventions.

### **Monitoring and Review**

Attendance data will be reviewed regularly by member of staff responsible for attendance tracking and patterns of absence or lateness will be addressed individually, with an emphasis on support and problem-solving. Home visits may be actioned when there are concerns around persistent attendance in order to have 'sight' of learners. Formal interventions (meetings, attendance contracts) will be considered if support strategies do not improve attendance.

### **Review**

This policy will be reviewed annually, or sooner if required due to changes in legislation, practice, or the needs of our learners.

## **7. CURRICULUM POLICY**

The purpose of this policy is to set out how CSPE designs, delivers, and evaluates a **high-quality, inclusive, and personalised curriculum** that meets the needs of learners and young people accessing alternative provision. This curriculum is underpinned by CSPE's ethos of **regulation before expectation** and is inseparable from our **Induction, Behaviour, and Safeguarding Policies**.

The curriculum supports learners to re-engage with education, make meaningful progress from their individual starting points, and prepare for positive next steps.

### **STATUTORY AND GUIDANCE FRAMEWORK**

This policy aligns with the expectations set out in:

- DfE Alternative Provision Statutory Guidance
- Ofsted Education Inspection Framework (EIF)
- SEND Code of Practice (2015)
- Keeping Children Safe in Education (KCSIE)

The curriculum reflects Ofsted's focus on **Intent, Implementation, and Impact**, ensuring that learners receive an ambitious and appropriate educational offer.

This policy applies to:

- All learners placed at CSPE
- All staff involved in induction, teaching, behaviour support, safeguarding, and pastoral care
- Parents/carers and commissioners involved in supporting the learner's placement

### **CURRICULUM ETHOS AND PRINCIPLES**

CSPE recognises that many learners accessing alternative provision have experienced disruption, trauma, or unmet needs. Our curriculum is therefore:

- Learner-centred, strengths-based, and trauma-informed
- Inclusive of neurodiversity and SEND
- Flexible and responsive to wellbeing and regulation
- Focused on re-engagement, self-esteem, and independence

We believe:

- Learning can only occur when learners feel safe, regulated, and understood
- Behaviour is a form of communication
- Personalised curriculum pathways are essential for meaningful progress

### **CURRICULUM INTENT**

The intent of the CSPE curriculum is to:

- Re-engage learners in education through positive, meaningful experiences
- Deliver a broad, balanced, and personalised curriculum
- Support academic, social, emotional, and life skills development

- Meet EHCP outcomes where applicable
- Prepare learners for reintegration, further education, training, or employment

## **INDUCTION AS THE FOUNDATION OF THE CURRICULUM**

Curriculum planning begins during the **induction process**, recognising that readiness to learn varies for each learner.

### **Relationship Building**

Upon entry, staff prioritise building trusting relationships to ensure learners feel welcomed, safe, and valued. Observations during this period inform curriculum access, pacing, and support strategies.

### **Baseline Assessment**

Once a learner has settled (and when appropriate), baseline assessments are undertaken to identify:

- Educational attainment and learning gaps
- Executive functioning skills
- Social and emotional development
- Welfare and wellbeing needs

Baseline information informs Individual Learning Plans and curriculum design.

## **CURRICULUM STRUCTURE AND CONTENT**

Each learner follows a personalised curriculum pathway which may include:

- English and Mathematics
- Functional and vocational learning
- PSHE, wellbeing, and life skills
- Social communication and emotional literacy
- Executive functioning and independence skills
- Mentoring or therapeutic support where appropriate

Timetables are flexible and adapted in response to regulation, engagement, and progress.

## **INDIVIDUAL LEARNING PLANS(IEPS) AND LEARNER PLANS**

All learners have a **Learner Passport / Individual Learning Plan (ILP)** which:

- Identifies strengths, needs, and barriers to learning
- Sets short- and long-term targets
- Aligns with EHCP outcomes where applicable
- Outlines attendance, engagement, and behaviour expectations

ILPs are reviewed regularly with the learner, parents/carers, and commissioners to ensure continued relevance and progress.

## **TEACHING LEARNING AND BEHAVIOUR ALIGNMENT**

Teaching approaches at CSPE:

- Are differentiated and personalised
- Are trauma-informed and neurodiversity-aware
- Prioritise emotional regulation and wellbeing
- Use de-escalation strategies and proactive support

Behaviour is addressed through curriculum design and relationships, in line with CSPE's Behaviour Policy. Dysregulation is understood as a barrier to learning rather than a disciplinary issue.

### **Assessment, Progress, and Impact**

Progress is measured from individual starting points rather than age-related expectations alone.

Assessment includes:

- Baseline assessments following induction
- Ongoing formative assessment
- Regular review of academic, behavioural, and personal development outcomes
- Weekly progress trackers to identify levels of engagement, attainment progress and informing assessment for learning opportunities whilst also monitoring attendance and reports to parents/carers and commissioners
- Progress in executive functioning skills is monitored weekly with opportunities to improve these skills enabling learners access and achieve their full academic potential

Impact is demonstrated through:

- Improved engagement and attendance
- Academic and functional progress
- Increased self-regulation and independence
- Successful transitions to next placements or pathways

### **Safeguarding, Risk Assessment, and Health & Safety (Curriculum)**

Safeguarding is embedded within the curriculum. Where safeguarding concerns are identified:

- Personalised risk assessments are completed
- Safety plans are developed with the learner where appropriate
- Plans are shared with parents/carers and commissioners

Learners are taught how to keep themselves safe and how to raise concerns.

### **INCLUSION AND EQUAL OPPORTUNITIES (Curriculum)**

CSPE is committed to ensuring equal access to the curriculum. Reasonable adjustments are made to support SEND, medical needs, and individual circumstances, removing barriers to learning.

### **PARTNERSHIP WORKING AND COMMUNICATION**

CSPE works collaboratively with:

- Parents and carers

- Commissioners
- External professionals and agencies

Regular communication ensures transparency, consistency, and shared responsibility for outcomes.

## **MONITORING, SELF-EVALUATION, AND QUALITY ASSURANCE**

Curriculum quality is monitored through:

- Learner progress, behaviour, and attendance data
- Feedback from learners, parents/carers, and commissioners
- Internal audits and development planning
- Actions taken following quality assurance visits

This demonstrates continuous self-evaluation in line with DfE expectations.

## **OVERALL IMPACT**

Through a personalised, induction-led, and behaviour-informed curriculum, CSPE ensures learners feel safe, valued, and supported to make meaningful progress, develop confidence, and prepare for successful future pathways.

### **7.1 WELLBEING MENTORING PROCEDURE**

This policy outlines how the setting provides structured wellbeing mentoring to neurodiverse learners (aged 11–18) to support emotional regulation, identity development, confidence, and setting engagement.

The programme aims to:

- Provide a safe, predictable adult relationship
- Reduce anxiety, overwhelm, and burnout
- Support social understanding and peer navigation
- Build self-advocacy and independence
- Promote a neurodiversity-affirming setting culture
- Support trauma informed understanding and recovery
- Promote positive mental health and emotional well-being
- Encourage healthy sleep routines
- Support personal health, hygiene and self-care

This policy applies to:

- Neurodiverse learners (diagnosed or self-identified)
- Designated Safeguarding Lead (DSL)
- Pastoral staff
- Mentoring staff
- Setting leadership
- Parents/carers (where appropriate)

## **Core Principles**

### **Neurodiversity-Affirming Practice**

- Differences are respected and valued.
- The goal is to support wellbeing and understanding.
- Masking, burnout, and sensory overload are recognised as wellbeing issues.

### **Student Voice**

- The young person's perspective guides mentoring goals and consent and choice are central.

### **Predictability & Safety**

Sessions occur at the same time each week where possible and structure is consistent. There are clear expectations communicated from the mentor at the beginning of the first session.

### **Strengths-Based Approach**

In sessions, interests are used as engagement tools and identity and self-acceptance are actively supported.

### **Identification & Referral Process**

Learners may be referred by:

- Director
- Parent/carer
- Self-referral
- Mentor lead

Referral Criteria may Include:

- Emotional dysregulation
- Social isolation
- Setting avoidance
- Executive functioning challenges
- Signs of masking or burnout
- Mental health difficulties
- Experiences of significant life challenges

### **Role of the Mentor**

Mentors may be:

- Lead mentor
- Deputy DSL
- Other staff mentors under the guidance of the Lead mentor

Mentors will:

- Provide weekly or fortnightly sessions (as required)

- Offer emotional regulation strategies
- Help problem-solve social or academic challenges
- Support self-advocacy skills
- Liaise with staff (with student consent)
- Liaise with parents /carers(with student consent)
- Support emotional well-being
- Build a positive rapport with the student
- Become a safe, trusted adult

Mentoring is not therapy unless delivered by a qualified clinician.

### **Session Structure**

Predictability is especially important in small settings where routines can vary.

Example Session Flow:

1. Check-in (feelings tracker, gratitude jar)
2. Review previous week
3. Focus topic (e.g., anxieties, friendship difficulty)
4. Strategy building
5. Summary and next steps (Verbally)
6. Clear ending ritual with topic for the following week

Visual schedules and written summaries may be used where helpful.

### **Safeguarding & Confidentiality**

- Safeguarding follows the setting's existing child protection policy.
- Learners are clearly informed of confidentiality limits.
- Concerns are reported to the DSL immediately.
- Notes are stored securely in line with data protection policies.

Because small settings can feel "close-knit," extra care is taken to:

- Maintain privacy
- Avoid informal sharing of sensitive information
- Clarify boundaries between mentoring and teaching roles

### **Parental/carer Involvement**

- Parents are informed of mentoring (unless safeguarding concerns dictate otherwise).
- General progress may be shared (with student consent).
- Specific disclosures remain confidential unless risk is present.
- Parent support meetings may be offered separately.

The student's autonomy increases with age and maturity.

### **Staff Training**

All mentors should receive:

- Neurodiversity-affirming training
- Safeguarding training (updated annually)
- Understanding of masking and burnout
- Training in emotional regulation strategies
- Understanding of mental health
- Staff to have awareness of how language may impact anxiety, shame and low-esteem
- Staff to know how to communicate with students to minimise distress

Wider staff should receive basic awareness training to ensure mentoring strategies are supported consistently in classrooms.

### **Accessibility & Adjustments**

The setting will:

- Provide a quiet, low-sensory mentoring space
- Allow alternative communication methods (written, drawing, typed)
- Avoid punitive responses to overload-related behaviours
- Provide reasonable classroom adjustments aligned with mentoring goals
- Provide sensory resources (fidgets, soft cushions, weighted blankets)

### **Monitoring & Review**

- Mentoring needs reviewed every 6–8 weeks.
- Feedback gathered from student (verbally)
- Impact measured via:
  - Attendance
  - Emotional regulation improvements
  - Student-reported confidence
  - Reduction in crisis incidents

### **Ending Mentoring**

Mentoring may end when:

- Goals are met
- Student feels confident to manage independently
- External support is engaged
- Transition period ends

Endings should be planned, predictable, and processed emotionally.

## 7.2 ASSESSMENT PROCEDURES

The primary purpose of this policy is to provide a framework for identifying, monitoring, and communicating student progress through an adapted curriculum that utilizes specialised approaches for neurodiverse learners.

While the school maintains high aspirations for all students to achieve GCSE examinations, we recognise that some individuals may require a tailored approach to their curriculum. Our assessment system is designed to be a meaningful and reflective tool that supports teachers in planning the best route for each individual, which may include Functional Skills or other nationally accredited qualifications.

### Baseline Assessment and Pathway Identification

Upon entry, all students undergo a comprehensive benchmarking exercise to determine their starting points.

- **Academic Benchmarking:** This includes standardised testing (e.g., CEM testing), reading and maths ages, and triangulation with prior attainment data.
- **Pathway Mapping:** Baseline data is used to identify the most appropriate Personalised Progression Pathway. For example, students entering with specific baseline levels may be directed toward an Entry Level/Functional Pathway (Entry Level 1–3) or a mixed academic pathway involving both GCSEs and Functional Skills.

### Formative Assessment and Individualized Targets

Formative assessment is the continuous process that informs daily planning and ensures students are "challenged appropriately".

- **Individual Learner Pathways (IPPs):** Every student has an IPP that reflects their specific Education, Health and Care Plan (EHCP) outcomes in areas such as Cognition and Learning and SEMH.
- **Aspirational Target Setting:** Targets are set using multiple sources, including teacher knowledge and external benchmarks, to ensure they remain "aspirational" and "challenging".

### Summative Assessment and Accredited Qualifications

From Key Stage 4 onwards, students begin nationally accredited qualifications.

- **GCSE Pathway:** Progress is tracked using the national 1–9 grading system.
- **Functional Skills Pathway:** For learners where GCSEs may not be the most suitable immediate goal, we offer Functional Skills qualifications in English and Maths. Attainment in these areas is tracked and reported using the specific grading systems of the awarding bodies.
- **Monitoring Framework:** We use a centralised system to track progress against national curriculum objectives and qualification criteria, allowing us to capture even "small step" progress for students working below national expectations.

### Inclusion, Accessibility, and Access Arrangements

We adhere to the JCQ Access Arrangements framework to ensure fair assessment for all neurodiverse learners.

- **Reasonable Adjustments:** Assessments are adapted to be accessible, utilizing tools like examination reading pens, assistive technology, and supervised rest breaks.
- **Evidence of Need:** These adjustments are integrated into classroom practice to establish them as a student's "normal way of working," providing the necessary evidence for formal exam arrangements.

### Recording, Reporting, and Quality Assurance

- **Annual Reporting:** Parents receive an annual written report detailing progress and attainment in all main subjects, including those on Functional Skills pathways.

- EHCP Reviews: Formal annual reviews ensure the student’s pathway remains aligned with their evolving needs and aspirations.
- Moderation: To ensure consistency, student work is moderated both internally and externally in partnership with other schools and subject networks. Subject leaders use published grade descriptors to validate teacher judgments.

## 8. MOBILE PHONE USE POLICY

At CSPE we recognise our approach is safeguarding-led, but we accept that mobile phones can:

- Support emotional regulation
- Reduce anxiety
- Enable communication with safe adults
- Provide assistive technology
- Support executive functioning

At the same time, mobile phones present safeguarding risks and we encourage learner’s to place phones in the containers provided in each area.

This policy ensures:

- Compliance with **Keeping Children Safe in Education**
- Clear safeguarding procedures
- Proportionate and trauma-informed responses
- Reasonable adjustments under the **Equality Act 2010**

### Legal and Statutory Framework

This policy operates in line with:

- **Keeping Children Safe in Education**
- **Children Act 1989**
- **Children Act 2004**
- **Education Act 2002**
- **Department for Education** behaviour and safeguarding guidance

This policy should be read alongside:

- Safeguarding & Child Protection Policy
- Behaviour Policy
- Online Safety Policy
- Staff Code of Conduct

We appreciate that mobile phones can be used to:

- Access harmful content
- Facilitate child-on-child abuse
- Share indecent images
- Enable online exploitation
- Record staff or learners without consent

All concerns will be managed in line with KCSiE and safeguarding procedures.

### **Neuro-affirming and Trauma-Informed**

We recognise:

- Removal of regulation tools may escalate distress.
- Some learners require phone access as a reasonable adjustment.
- Blanket bans may be discriminatory where regulation needs are evidenced.

### **Proportionate**

Responses will prioritise safety, regulation, and education over punishment.

### **Regulation and Reasonable Adjustments**

Where mobile phone use forms part of a learners':

- EHCP
- Individual Support Plan
- Regulation Plan
- Risk Assessment
- Phone agreement document

...it will be treated as a reasonable adjustment under the Equality Act 2010.

Examples of permitted regulation use:

- Listening to music via headphones
- Accessing calming apps
- Visual timers or reminders
- Contacting a named safe adult (where agreed)
- Using assistive communication tools

### **General Expectations**

Unless agreed as a regulation tool:

- Phones must be on silent.

- Phones should be stored securely during learning time.
- Phones may be used during agreed breaks.

Where phones are agreed regulation tools:

- Learners may keep phones on their person.
- Staff may check usage if concerns arise.
- Use must not disrupt learning or compromise safeguarding.

### **Safeguarding Risks and KCSiE Compliance**

In line with KCSiE, staff must be alert to:

- Online sexual abuse
- Sexual harassment and sexual violence
- Sharing of nude or semi-nude images
- Grooming or exploitation
- Radicalisation
- Bullying (including cyberbullying)
- Recording without consent

If a safeguarding concern arises:

1. Do not investigate alone.
2. Do not view indecent images unless directed by DSL.
3. Report immediately to the Designated Safeguarding Lead (DSL).
4. Follow safeguarding procedures in line with KCSiE.

Confiscation may occur where there is reasonable belief that a device contains harmful or illegal material. This will be proportionate and documented.

### **Prohibited Use**

Mobile phones must not be used to:

- Record staff or learners without consent
- Share images of peers
- Access pornographic or extremist material
- Engage in bullying or harassment
- Arrange off-site contact that poses safeguarding risk

Serious breaches may result in:

- Temporary confiscation
- Parent/carer involvement

- Safeguarding referral
- Police involvement (where required)

### **Confiscation Procedures**

Where confiscation is necessary:

- The reason will be explained calmly.
- The device will be stored securely.
- A record will be made.
- Parents/carers will be informed where appropriate.

Where the phone is a regulation tool, removal should be:

- Time-limited
- Risk-assessed
- Balanced against potential dysregulation

### **Staff Responsibilities (KCSiE Alignment)**

All staff must:

- Receive safeguarding training in line with KCSiE.
- Understand online safety risks.
- Recognise signs of child-on-child abuse.
- Report concerns immediately.
- Avoid using personal phones to contact learners.
- Follow staff code of conduct regarding digital communication.

The DSL will:

- Monitor trends in phone-related safeguarding incidents.
- Provide training updates.
- Liaise with external agencies where required.

### **Responding to Misuse**

Our approach is:

1. Regulation first
2. Safeguarding assessment
3. Restorative conversation
4. Review of support plan
5. Parental engagement

Sanctions will not override safeguarding or equality duties.

## **Monitoring and Review**

This policy will be reviewed:

- Annually
- Following safeguarding incidents
- Following updates to KCSiE
- If cohort needs change

## **9. EXCLUSION POLICY**

This policy sets out the principles and procedures for fixed-term and permanent exclusions within an Alternative SEND Provision setting. The aim is to ensure that any decision to exclude is lawful, reasonable, fair, and used only as a last resort. The policy recognises the additional vulnerabilities and needs of learners with Special Educational Needs and Disabilities (SEND) and prioritises inclusive, restorative, and supportive approaches wherever possible.

This policy applies to:

- All learners on roll at the Alternative SEND Provision
- All staff, including temporary and agency staff
- Senior leaders, governors/trustees, and external partners involved in behaviour and placement decisions

## **Legal and Statutory Framework**

This policy operates in line with:

- National exclusions guidance
- SEND Code of Practice
- Equality legislation
- Safeguarding and learner protection guidance
- Relevant local authority protocols

The provision recognises its duties regarding disability discrimination and reasonable adjustments.

## **Guiding Principles**

- Exclusion is a last resort.
- Decisions are made on a case-by-case basis.
- SEND needs and individual circumstances are always considered.
- Reasonable adjustments must be explored and documented.
- Early intervention and multi-agency support are prioritised.
- Restorative and therapeutic approaches are used wherever possible.

- Safeguarding risks are central to decision-making.

### **Preventative and Supportive Measures**

Before exclusion is considered, the provision will normally demonstrate that the following have been implemented where appropriate:

- Individual behaviour support plans
- Risk assessments and management plans
- SEND support strategies and reasonable adjustments
- Therapeutic or pastoral interventions
- Multi-agency involvement
- Family meetings and reviews
- Adjusted timetables or provision
- Staff training and environmental adaptations

All actions and interventions should be recorded.

### **Grounds for Exclusion**

A suspension or permanent exclusion may be considered where:

- There is serious or repeated breach of behaviour expectations
- There is risk of harm to the learner or others
- There is significant disruption to safe operation
- A serious incident has occurred (e.g., violence, serious threat, dangerous items)

Behaviour that is a direct manifestation of a learner's SEND should trigger an urgent review of provision and support rather than default exclusion wherever possible.

### **SEND and Disability Considerations**

Before making any exclusion decision, Director must consider:

- Whether the behaviour is linked to identified or suspected SEND
- Whether reasonable adjustments were in place
- Whether support plans were followed
- Whether further assessment is required
- Whether the placement remains suitable

An emergency review of the learner's support plan or placement should be considered.

### **Decision-Making Process**

Only a Director may authorise an exclusion.

The decision will be based on:

- Evidence and incident reports
- Staff statements
- Learner voice where possible
- SEND records and plans
- Risk assessments
- Safeguarding considerations

The decision must be proportionate and justified.

### **Notification Procedures**

Parents/carers and the placing authority must be informed without delay and provided with:

- Reason for exclusion
- Length and type of exclusion
- Evidence summary
- Next steps and review arrangements
- Right to make representations
- Education arrangements during exclusion

Communication should be accessible and supportive.

### **Education During Exclusion**

Suitable alternative education will be arranged from the required timeframe onward, tailored to the learner's SEND needs wherever possible.

Work provided will be appropriate, accessible, and reviewed.

### **Reintegration Following Suspension**

A reintegration meeting will normally take place before return and include:

- Parents/carers
- Key staff
- SEND lead
- External professionals where appropriate

A revised support and risk management plan will be agreed.

### **Permanent Exclusion Procedures**

Permanent exclusion will only occur when:

- All reasonable alternatives have been exhausted
- The placement can no longer safely meet need
- Risk cannot be mitigated

The placing authority and relevant partners will be involved in planning next steps.

### **Appeals and Representations**

Parents/carers have the right to make representations to the governing body/trust or designated panel in line with statutory guidance.

Clear timelines and procedures will be provided in writing.

### **Safeguarding**

All exclusions will be reviewed for safeguarding implications, including:

- Risk of exploitation
- Mental health concerns
- Vulnerability factors

Referrals will be made where necessary.

### **Monitoring and Review**

The provision will monitor:

- Exclusion rates
- SEND categories
- Equality impact
- Patterns and triggers

This policy will be reviewed annually or sooner if guidance changes.

### **Related Policies**

- Behaviour Policy
- SEND Policy
- Safeguarding Policy
- Equality Policy
- Positive Handling Policy

## **10. PROCEDURE FOR ENROLEMENT AND LEARNER SUPPORT FOR FORMAL QUALIFICATIONS**

This policy defines the system and controls used by the CSPE to enrol learners into formal qualifications and to provide structured academic, administrative, and wellbeing support that maximises learner retention, progression, and successful qualification completion.

The policy ensures enrolment and learner support processes are consistent, transparent, equitable, and compliant with applicable regulatory and accreditation requirements.

This policy applies to:

- All formal qualifications delivered by the CSPE

- All prospective and enrolled learners
- All staff and contractors involved in recruitment, enrolment, training, assessment, and learner support
- All delivery modes (face-to-face, online, blended, workplace-based)

### **Policy Statement**

The CSPE will implement and maintain a documented system that:

- Provides accurate pre-enrolment information
- Assesses learner eligibility and suitability
- Identifies individual support needs
- Establishes clear enrolment agreements
- Delivers structured orientation and induction
- Monitors learner progress
- Provides timely and appropriate interventions (mock exams, summative and formative assessment, Easter School)
- Supports learners through to qualification completion where reasonably practicable

### **Pre-Enrolment Information and Advice**

Prospective learners will be provided with clear, accurate, and current information about each formal qualification, including:

- Qualification outcomes and career pathways (Options programme at the end of KS3)
- Entry requirements and prerequisites
- Language, literacy, numeracy, and digital expectations
- Course structure and duration
- Delivery and assessment methods
- Work placement requirements (if applicable)
- Fees, funding, and payment terms
- Available learner support services
- Rights and responsibilities

Information will be provided in accessible formats upon request.

### **Eligibility and Suitability Assessment**

Prior to enrolment, each applicant will undergo a suitability assessment which may include:

- Review of prior qualifications and experience
- Verification of entry requirements
- Language, literacy, numeracy, and digital capability screening
- Pre-training review or interview

Where a learner is assessed as not yet suitable, the CSPE will:

- Provide guidance on alternative pathways, or
- Recommend preparatory or foundation programs, or
- Defer enrolment until requirements are met.

### **Enrolment System Requirements**

The CSPE will maintain a documented enrolment system that includes:

- Standardised enrolment forms and data collection
- Identity verification processes
- Eligibility checks for funded programs (if applicable)
- Pre-training review records
- Disclosure of support needs
- Signed training or enrolment agreements

Enrolment agreements will clearly state:

- Qualification details
- Delivery arrangements
- Assessment requirements
- Support arrangements
- Fee obligations
- Withdrawal and refund conditions.

All enrolment records will be securely stored in accordance with privacy and records management requirements.

### **Identification of Learner Support Needs**

At enrolment, learners will be given the opportunity to disclose support needs that may affect participation or completion, including:

- Disability or medical conditions
- Language or literacy needs
- Learning difficulties
- Cultural or community considerations
- Technology access limitations
- Work or personal constraints

Disclosure is voluntary and managed confidentially.

Where needs are identified, an Individual Support Plan will be developed with the learner.

### **Learner Support Framework**

The CSPE will implement a structured learner support framework covering the following areas.

#### **Academic Support**

- Study and research skills guidance
- Language, literacy, numeracy, and digital support
- Assessment preparation assistance
- Tutorial or mentoring support
- Access to learning resources

#### **Administrative Support**

- Enrolment and timetabling assistance
- Learning system access support
- Qualification and progression advice
- Extensions and special consideration processes

#### **Wellbeing and Pastoral Support**

- Referral to counselling or external services
- Flexible study arrangements where appropriate
- Inclusion and cultural support

#### **Reasonable Adjustments**

Reasonable adjustments to training and assessment will be implemented where required and feasible, without compromising the integrity of competency or academic standards.

#### **Orientation and Induction**

All enrolled learners must complete an orientation or induction program that includes:

- Qualification requirements and expectations
- Assessment processes and rules
- Academic integrity requirements
- Use of learning technologies
- Support services and access points
- Complaints and appeals processes
- Health and safety information

#### **Progress Monitoring System**

The CSPE will maintain a learner progress monitoring system that tracks:

- Attendance and participation
- Assessment submissions and outcomes
- Course milestone completion
- Engagement with learning platforms

Trainers and academic staff are responsible for regularly reviewing learner progress data.

## **At-Risk Learner Identification and Intervention**

Learners may be identified as at risk where there are indicators such as:

- Repeated non-attendance
- Missed assessments
- Poor assessment performance
- Low engagement

Documented intervention strategies will be implemented, which may include:

- Additional academic support
- Modified training plans
- Increased trainer contact
- Extended timeframes where permitted
- Referral to specialist support services

All interventions must be recorded.

## **Communication with Learners**

The CSPE will maintain regular and structured communication with learners through approved channels.

Learners will receive timely notification of:

- Course or schedule changes
- Assessment requirements and due dates
- Available support services
- Policy or regulatory changes affecting their qualification.

## **Learner Responsibilities**

Learners are required to:

- Provide accurate enrolment information
- Participate actively in learning and assessment
- Meet course requirements and deadlines
- Seek support when needed
- Comply with policies and codes of conduct

## **Staff Responsibilities**

Staff involved in enrolment and delivery must:

- Provide accurate and ethical enrolment advice
- Conduct suitability assessments
- Identify and respond to support needs
- Monitor learner progress

- Implement support and intervention strategies
- Maintain accurate and confidential records

### **Records and Privacy**

All learner enrolment and support records will be managed in accordance with applicable privacy legislation and CSPE privacy and records management policies.

### **Quality Assurance and Continuous Improvement**

The enrolment and learner support system will be reviewed regularly through:

- Learner feedback
- Completion and attrition data
- Support service usage data
- Internal audits and compliance reviews

Improvements will be implemented where gaps or risks are identified.

### **Policy Review**

This policy will be reviewed at least every two years or earlier where regulatory, operational, or qualification requirements change.

## **11. HEALTH AND SAFETY POLICY PROCEDURE**

Based upon Health and Safety at work Act 1975

This is the Health and Safety Policy Statement of CSPE.

We are committed to providing a safe environment for workers, learners, or any other visitors to CSPE centres and follow the Health and Safety protocols of all educational settings. The safety procedures in operation are for the protection of people who work at or visit the organisation's centre and compliance with these procedures is mandatory.

CSPE's Statement of General Policy is to:

- Always maintain a safe and healthy working environment
- Identify person/s responsible for monitoring and controlling risks arising from work activities
- Keep all parties informed on all matters of Health and Safety
- Provide and maintain safe equipment
- Ensure that substances are handled in a safe manner
- Provide Health and Safety training
- Prevent accidents and cases of work-related ill-health.
- Review and revise this policy as necessary at regular intervals.

## **11.1 HEALTH AND SAFETY PROCEDURES (In conjunction with BrightSafe)**

The following document details health and safety policies and procedures specific to the CSPE.

### **Responsibilities**

- Overall responsibility for Health and Safety is that of the Director.
- The day-to-day responsibility of ensuring this policy is put into practice is delegated to the Director in the centre.
- Any staff are personally responsible for health and safety within the centre and should:
  - a. Co-operate with the Director on health and safety matters.
  - b. Take reasonable care of their own health and safety and that of the learners in their care.
  - c. Not interfere with anything provided to safeguard their health and safety and that of the learners in their care.
  - d. Report any concerns over health and safety.

### **Health and Safety Risks Assessments (In conjunction with BrightSafe)**

- The directors will carry out regular risk assessments of the Centre and will approve any action required to remove or control a risk.
- Informing staff of Health and Safety

### **Safe Equipment**

- Director will be responsible for identifying all equipment needing maintenance and effective maintenance procedures will be drawn up.
  - Any problems found with equipment should be reported immediately.
  - The purchaser will check that any new equipment meets health and safety standards before it is purchased.
    - Regular PAT testing
    - EICR testing
    - Annual fire safety checks

### **Safe handling, storage, and use of substances**

- The directors will be responsible for identifying all substances used at the centre, which require a COSHH assessment (Chemicals or Substances Hazardous to Health).
- The directors will be responsible for undertaking COSHH assessments.
- The directors will be responsible for ensuring that all actions identified in the assessments are implemented.
- All purchasers will check that new substances can be used safely before they are purchased.
- Cleaning products will be stored in a cool environment in a locked cupboard and or shelf out of reach of learners.

### **Information, Instruction and Supervision**

- Health and Safety advice is available from the Director Karen Greenwood.

- Supervision of part-time staff and/or trainees will be arranged, undertaken, and monitored by the Director.
- The Director is responsible for ensuring that staff working at locations under the control of other employers are given relevant health and safety information.

### **Accidents & First Aid**

- The first aid box is kept in the centre in the on the shelf just inside the main building, and it includes an itinerary
- All accidents are recorded in the Accident Book (**BrightSafe**)
- The Director/staff are responsible for reporting accidents, diseases, and dangerous occurrences (RIDDOR) to HSE and to the enforcing authority (Ofsted/Care Inspectorate).
- All Director are responsible for investigating accidents of the learners in their care.

### **Emergency Procedures**

- The Director is responsible for ensuring the Annual Fire Risk Assessment is undertaken and implemented.
- The Director is responsible for checking escape routes.
- Fire extinguishers are checked monthly and maintained and serviced on an annual basis.
- Emergency Lighting is tested monthly and recorded in the Fire Log.
- CSPE operates a strictly No Smoking Policy
- Serious H&S incidents must be written up in an Incident or Accident Report in pen and reported centrally to the Head of Ofsted, Safeguarding & Compliance. Records should always be made in pen so they cannot be edited or erased.

### **INFECTION CONTROL POLICY**

CSPE aims to promote the general wellbeing and health of all learners and to ensure that the risk of infection is minimised amongst all learners and staff.

We ensure that:

- Staff do not come into work if they are unwell and will inform the Director if they are feeling unwell during work
- Where appropriate, on-line provision can be made available
- All learners are encouraged to regularly wash their hands to maintain good hygiene practice
- Soap and paper towels/hand dryer are provided in the toilet facilities
- The centre is cleaned regularly; and equipment which is used by learners on a regular basis is cleaned after each use.
- During periods when learners are present on site, any food brought in by staff, learners or visitors is monitored. Animals are not allowed into the centre by staff, learners or visitors without a risk assessment or unless they require a guide dog (Exceptions may be applied for our EOTAS learners)
- Director will notify parents if there is spread of infection in the centre amongst learners or staff
- In the event of having to dispose of clinical waste, we would consult the Environment Agency to comply with correct guidelines

- Serious incidents must be written up in an Incident Report and reported centrally to the Head of Ofsted, Safeguarding & Compliance. Records should always be made in pen so they cannot be edited or erased.

## 12. LAC AND PLAC POLICY AND PROCEDURES

The policy is informed by the following Department for Education (DfE) document:

The Designated Director for Looked-After and Previously Looked-After Learners (Dawn Schofield). Statutory guidance on their roles and responsibilities

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/685561/The\\_designated\\_teacher\\_for\\_looked-after\\_and\\_previously\\_looked-after\\_learners.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/685561/The_designated_teacher_for_looked-after_and_previously_looked-after_learners.pdf)

(DfE February 2018)

CSPE is committed to providing high quality education for all its learners, based on equality of opportunity, access and outcomes. We recognise the need to champion performance, for looked after learners (LAC) and previously looked after learners (PLAC) and is committed to improving outcomes for them.

CSPE committed to ensuring that LAC and PLAC are supported as fully as possible and will ensure that the following are in place, and are working effectively:

A Designated Director for LAC and PLAC (Dawn Schofield)

A Designated LSA with responsibility for Learner Passports for all LAC and PLAC (Amy Haymes)

1. All staff in the setting will have a clear understanding of the issues that affect LAC and PLAC; their learning needs; how to support them in school and issues relating to confidentiality.
2. Policies, procedures and strategies are in place to promote the achievement and well-being of this vulnerable group.

### **Role of the Designated Teacher for Looked After and Previously Looked After Learners (LAC/PLAC)**

1. The designated member of staff is the main contact at CSPE for anything related to LAC and PLAC. They ensure learning is not disrupted and everything is well-coordinated.
  2. They lead efforts to help every LAC and PLAC succeed at CSPE by working with partner school (if appropriate) and promoting a culture that supports these learners' academic, emotional, and personal development.
5. They help all staff understand what may affect LAC/PLAC's learning and how to support their achievement.
5. They promote a positive culture during mentoring sessions where LAC/PLAC:
  - Can discuss their progress and help set their own goals on a 121 basis
  - Feel confident about their future and talk openly about issues like SEN or bullying with trusted adults.
6. They advise staff on how to tailor lessons for LAC/PLAC
7. They work directly with LAC/PLAC and their carers to:

- Build strong school-home links.
  - Support learning at home.
  - Explain how the school teaches core skills.
  - Help plan for the learner’s future success.
8. They lead the creation and updating of Passports for LAC.
  9. They ensure Passports are completed on time and sent to staff.
  10. They work closely with the school’s Safeguarding Lead to address any concerns quickly.
  11. They involve parents/guardians of PLAC and work with the CSPE to meet individual needs.

#### All Staff Responsibilities

All staff at CSPE will:

1. Set high learning goals and support faster progress for LAC/PLAC.
2. Understand how past trauma or loss affects these learners emotionally and socially.
5. Treat LAC/PLAC as individuals and with sensitivity—never label or single them out.
5. Recognise the importance of the Passport in guiding support for each learner.
5. Understand how social workers, carers, and partner schools (if appropriate) and how Passports fit into this.
6. For PLAC, involve parents/guardians in curriculum decisions and offer support when needed.

### **13. FIRE POLICIES & PROCEDURES**

In the case of other educational settings all CSPE staff will adhere to systems, policies, and protocols.

#### **Management Responsibilities**

It is the Director’s overall responsibility to:

- Ensure all staff are familiar with CSPE’s Fire Safety Policies and Procedures
- Ensure all firefighting equipment on the centre is correct, sufficient and in good working order
- Conduct emergency lighting tests, evacuation drills and training on a regular basis, and record in the Fire Log

In our Centre, the Director maintains a day-to-day responsibility for fire safety. In the event of a fire, procedures should be followed as outlined.

#### **Staff Training**

- CSPE ensures all staff receive induction fire training.

- Our high staff to learner ratios allows us to safely and efficiently evacuate the centre as our staff can manage small groups of learners, with the Director coordinating an evacuation.
- Evacuation Exits and Routes are always clear from obstruction, well-lit and lead directly to a point of safety with a clear path to the Evacuation Meeting Point.
- The centre has a Fire Risk Assessment conducted at its launch and is reviewed on a regular basis. Action points are set out clearly with a time frame to be completed.

## Equipment

In accordance with the local authority Fire Inspector the centre is equipped with:

- Sign in/out sheet to record member attendance
- CO2 Extinguisher, 1 Hydro spray Extinguisher
- Emergency Exit signs
- Fire Log
- First aid box

## Notification of Procedures to Parents/Carers and Learners

Posters are displayed throughout the centre detailing the Emergency Fire Evacuation Procedures and reminding them to:

- Stay calm,
- Listen to the staff
- Stay with the staff and follow their instructions.

All fire related incidents must be written up in an Incident Report and reported centrally to the Head of Ofsted, Safeguarding & Compliance. Records should always be made in pen so they cannot be edited or erased. Emergency Fire Evacuation Actions

## IF YOU DISCOVER A FIRE

- **Learners:** Alert a member of staff
- **Staff:** Sound the fire alarm and instruct other staff to start evacuating themselves and their learners not taking any unnecessary personal risks. Close any doors/ windows if it is safe for you to do so. Evacuate the building. Unless trained to do so, do not attempt to extinguish the fire CALL THE FIRE BRIGADE

## ON HEARING THE ALERT OF FIRE i.e fire alarm will sound

- **Learners:** Listen to staff
- **Staff:** Prepare to begin evacuation. Ensure learners DO NOT leave the centre unaccompanied i.e., to find parent/friend. Evacuate the centre as per evacuation procedure demonstrated on walls

## EVACUATION PROCEDURE

- **Learners:** Stay calm and listen to your member of staff. Stay with your staff member & follow their instructions. Evacuate via your nearest fire exit to the fire assembly point

- **Staff:** Evacuate learners through the nearest fire exit in an orderly fashion. Take responsibility for the learners in your area and take learners to the fire assembly point. Do not let learners leave unaccompanied
- **Director in charge:** Conduct full & final check of centre to ensure empty i.e., toilet, storage room, and proceed to fire assembly point with attendance register in pen

#### **AT FIRE ASSEMBLY POINT**

- Call attendance register on arrival and notify the Fire Brigade if anyone is not accounted for.
- Await further instruction from Fire Brigade.
- Do not return to the building unless instructed to do so by the Fire Brigade.
- If you are not permitted to return to the centre, parents must sign next to the learner's name on the Fire Register before you can release them into their care.
- Details of the evacuation must be recorded in the Fire Log on your return to the centre.

#### **WITHIN SCHOOL CENTRE**

We adhere to the Fire policy and procedures pertaining to each school/setting.

### **14. INTRUDER EVACUATION POLICY (Lockdown)**

Lockdown happens when something threatening happens outside (for example an armed intruder in or around the centre, and the only consideration is keeping learners and adults safe).

A lockdown is signalled using the 'lockdown alarm' system.

Staff with remote controls operate the closing of the external shutter. Staff to move learners into beyond the door into the hallway(by the stairs) or safe areas. Learners to hide or disperse if this will improve their safety. During lockdown, staff must supervise learners, closing/locking doors windows, window blinds(where appropriate) and moving learners away from sight.

If necessary, staff to:

- block access points (e.g. move furniture to obstruct doorways)
- Instruct learners to sit on the floor, under tables or against a wall.
- Instruct learners to keep out of sight.
- Draw curtains / blinds, turn off lights, stay away from windows and doors.
- Keep learners calm and assure them.

During and after lockdown staff to:

- Liaise with the police.
- Check for any missing or injured learners, staff or visitors if possible.
- Direct learners back to lessons.

Once the lockdown ends the Director/staff will sound all clear. Classrooms can be put back to normal, any missing learners or injuries are to be reported as soon as possible.

### **15. ACCIDENT POLICY**

CSPE has a commitment to the safety and well-being of the learners, staff, parents/carers, and visitors who come to our centre. Our Accident Policy is designed to ensure that any accident that takes place within our centre is dealt with appropriately. This policy works in conjunction with our Behaviour Management and Incident policies.

- CSPE will notify Ofsted/ Care Inspectorate of a serious injury or death to any learner in our care or an adult on our centre.
- The centre have a First Aid Box and Accident Report and Accident Procedure
- Where an accident takes place, it will be reported in an Accident Report
- The following will be recorded:
  - a) Date, time and location of accident
  - b) Name of the person(s) injured.
  - c) Name(s) of the staff reporting the accident.
  - d) Circumstances of the accident, what the accident was, when it happened and whether any furniture or equipment was involved.
  - e) A description of any injury sustained (type and location). A note should also be made if no visible injury or wound is visible.
  - f) What actions were taken and by whom e.g. First Aid administered.
  - g) The signature of 1 member of staff as witnesses to the event.
  - h) The signature of the parent / guardian collecting the learner or the signature of the adult to whom the accident happened.

**N.B.** If a learner has been injured and has permission to leave the centre by themselves and is not being collected by a parent/ carer, a director will telephone the parent/ carer and notify them of the accident, explaining that it has been recorded in the Accident Book. The staff member should make sure the parent/carer informed confirming they have been notified the next time they come to the setting.

If the learner has been involved in an accident, and the staff do not feel it is appropriate for the learner to leave on their own, they will call the parent/carer and ask them to collect the learner.

An accident report should also be made if a learner comes to a centre with an existing injury.

**Serious Accidents** or those who need **hospitalisation** must be written up and reported centrally to the Head of Ofsted, Safeguarding & Compliance. Records should always be made in pen so they cannot be edited or erased. The Director is responsible for reporting accidents, diseases, and dangerous occurrences (RIDDOR) to HSE and to the enforcing authority, and Ofsted/Care Inspectorate.

## **WITHIN SCHOOL CENTRE**

We adhere to the Accident policy and procedures pertinent to each school.

## **16. INCIDENT POLICY**

An 'incident' as any incident causing concern for the welfare of staff, a learner, parent/carer, or visitor that is not accidental. This may or may not have resulted in an injury.<sup>3</sup>

This would include any situation where:

- it is necessary to restrain a learner physically due to severe or dangerous behaviour
- an individual attempted to or caused deliberate harm to another person

- an individual verbally abuses another person
- a learner attempts to escape from the setting
- a learner escapes from the setting
- a learner is removed without authorisation from the centre
- a safeguarding incident
- theft, burglary, or vandalism.

CSPE has a commitment to the safety and wellbeing of learners under the care of CSPE staff. Our Incident Policy is designed to protect the learners, staff, parents/carers, and visitors to CSPE and ensure that any incident is dealt with appropriately.

Where an incident takes place at CSPE centre the situation will be recorded in our Incident Report.

**The following details will be recorded:**

1. Date and time the incident happened
2. Learner's full name and age
5. Full name of the member(s) of staff or others involved
5. An account of the incident from a member of staff and any witnessed
5. An account of the incident from the learners involved
6. How the incident was handled
7. The outcome of the investigation
8. The signature of the parent/carer on collecting the learner
9. Whether the incident requires reporting to Social Services or enforcing authorities such as Ofsted/Care Inspectorate

CSPE staff will notify the parent/carers of the learners involved in the incident when they come to collect them, or telephone them immediately, depending on the severity of the incident. CSPE staff will review the learner's behaviour with the parent and the learner and agree the best course of action.

**N.B.** If the learner is leaving our CSPE centre on their own and not being collected by a parent/ carer, the Director will telephone them and notify them of the incident explaining that it has been recorded on the Incident form.

Serious incidents must be written up in an Incident Report and reported centrally to the Head of Ofsted, Safeguarding & Compliance. Records should always be made in pen so they cannot be edited or erased.

**WITHIN SCHOOL CENTRE**

We adhere to the Incident policy and procedures pertinent to each school.

**17. ADMINISTRATION OF MEDICINE/TREATMENT**

This is only applicable to learners based at our centre. CSPE is committed to bringing educational opportunities and benefits to as many learners as possible including those with disabilities, special additional needs, special educational needs, and medical needs.

Whilst CSPE has a **general policy of not administering** any medication to learners whilst they are on CSPE centre, we recognise that certain learners, in certain circumstances, might require the administration of a specific medication or treatment in a life-threatening situation. This includes learners with life threatening allergies. In such situations, a First Aid trained person will administer the necessary medication or treatment. Written permission from the learner's parent(s) or carer(s) must be obtained via the '**Administration of Medication**' form.

To administer the necessary medication or treatment to a learner in an emergency or life-threatening situation the parent/guardian must provide:

- A full written description of the medication/treatment needed on the 'Emergency Medication/Treatment Permission Form': type, name, and strength of medication, how the medication should be stored, what dose is required, the time that medication should be administered and any other relevant information. Written, signed permission should be given by parents/carers.
- Any medication required as per the learner's medical needs, the parent is responsible for providing in-date medication and the disposal of out-of-date medication.

**In addition, should the administration of the named medication/treatment require specific training:**

- The parent(s) or carer(s) should either give CSPE Director/relevant staff member the necessary training or arrange for the necessary training to be given.
- A record of all training events will be kept. It is the parent/ carer's responsibility to ensure that the Director/relevant staff member are kept up to date with the relevant training for administering their learner's medication or treatment in a life-threatening situation.
- When any new full-time staff joins CSPE the Director will notify the relevant parent(s) and carer(s) and arrange for the new member(s) of staff to be appropriately trained.

**CSPE will:**

- Keep an up-to-date list of learners with severe allergies or life-threatening medical conditions (noted on a learner's data sheet).
- Ensure the safe storage of such medicines or life-saving equipment in a clean hygienic storage box in the stock room out of reach of learners. A small fridge can be supplied if medicine requires refrigeration.
- Each medicine is clearly labelled with the learner's name and dosage requirements and noted on th learner's data sheet
- Details describing the administration of medication will be kept in the learner's file and will be referred to before any medication is given.
- Contact the parent or carer of the learner in the event that any life-threatening situation arises.

Staff ensure that any medication administered is recorded with the following information:

1. The full name of the learner being given the medication.
2. The full name of the staff member administering the medication.
5. A description of what happened.
5. The medication administered: name, strength, dose, and time.
5. In addition, a second member of staff should sign the Medication Record as a named witness.
6. The parent(s) or carer(s) should also sign the record on collecting the learner.

CSPE will inform parents/carers of any medication administered to reduce the risk of overdose.

Serious incidents must be written up in an Incident Report and reported centrally to the Head of Ofsted, Safeguarding & Compliance. Records should always be made in pen so they cannot be edited or erased.

## **18. POLICY FOR THE SAFE STORAGE, DISPOSAL AND MANAGEMENT OF CONFIDENTIAL DOCUMENTS AND RECORDS AND BREACH MANAGEMENT**

CSPE is committed to the safe storage of records, policies, and procedures. This information will be kept at the CSPE centre within the secure cabinet and digital copies are kept securely on the Cloud.

**CSPE will keep records of the following and retain them for the period of tuition after which they will be securely destroyed in accordance with GDPR:**

- The name, home address and date of birth of each learner who attends the centre.
- The name, home address and telephone number of a parent/carer of each learner who attends the centre.
- A daily record of the names of the learners who attend the centre and their hours of attendance.
- Accidents which involve the learners who attend and which occurs on the centre
- Any medicine administered to any learner who attends the centre, including the date and circumstances and who administered it, including medicine which the learner is permitted to self-administer, together with a record of a parent/carer's consent.
- The name, home address and telephone number of every person working at the centre
- Incident and Accident Records
- Administration of Medicine Records
- Staff and Visitor Log
- Complaint/concerns Records

### **Learners' Records:**

- All learners' records comply with the Children's Act 1989 Regulations.
- A secure electronic database record will be kept
- Are openly shared with the learner's parent/carer/tutor and their contribution is valued.

In the event of CSPE as a company ceasing to operate, all records and documentation will become shredded. We will maintain the secure storage of the above records and documentation for the appropriate length of time. All electronic data will be stored in accordance with the GDPR.

While CSPE staff share records and information concerning a learner and their family, this information is private and therefore treated with strict confidentiality. On joining CSPE all staff sign terms and conditions and agree to keep all information about a learner and their family, other staff, and the company strictly confidential.

Effective security is a team effort requiring the participation and support of every staff member and associate. It is the responsibility of every staff member to know and follow these guidelines.

**You are personally responsible for the secure handling of confidential information that is entrusted to you. You may access, use, or share confidential information only to the extent it is authorised and necessary for the proper performance of your duties. Promptly report any theft, loss or unauthorised disclosure of protected information or any breach of this policy to the CSPE Director.**

Parents/carers are informed of our Confidentiality Policy and Ofsted's/Care Inspectorate's right to inspect our records at any point in the Parents Information Form. They give agreement to this when they sign the GDPR Form.

### **Access controls**

Internally, as far as possible, we operate on a 'need to share' rather than a 'need to know' basis with respect to company confidential information. This means that our bias and intention is to share information to help people do their jobs rather than raise barriers to access needlessly.

GDPR regulation protects the fundamental rights and freedom of natural persons and their rights to personal data security.

- ✓ The right of access – providing copies of the information held about an individual
- ✓ The right to rectification – correcting incorrect information
- ✓ The right to erasure – deleting all or partial information about an individual; where consent has been withdrawn and there is no other legal grounds for the processing
- ✓ The right to restrict processing – stopping further processing of an individual data; where consent has been withdrawn, no legal ground for further processing
- ✓ The right to data portability – proving information in a machine-readable format and able to transmit such data to third party upon an individual request
- ✓ The right to object – stopping the processing of an individual data for direct marketing, profiling and where there are no compelling legitimate grounds
- ✓  Rights in relation to automated decision making and profiling - not to be subjected to a decision based solely on automated processing, including profiling of an individual.

As for client information, we operate in compliance with the GDPR 'Right to Access.' This is the right of data subjects to obtain confirmation as to whether we are processing their data, where we are processing it and for what purpose. Further, we shall provide, upon request, a copy of their personal data, free of charge in an electronic or hardcopy format.

A step-by-step approach will always be followed in relation to specific subject requests.

- Request is made verbally or in writing to staff
- Request is forwarded to the CSPE Director
- CSPE Director logs the request in the Subject Access Request document stored securely on CSPE secure cloud system (Nextcloud)
- CSPE Director contacts and informs the subject to acknowledge receipt of the request and to confirm validity of the request and either accept or refuse to process
- CSPE Director seeks and photocopies paper information

- CSPE Director Print Screen's specific electronic information into a new MS Word document and prints the document. The MS Word document is deleted
- CSPE Director arranges with subject their chosen method of receiving the paper information

This process must be completed **a calendar month** of receiving the request. For any delay, the CSPE Director to communicate with the data subject in writing. If more time is needed to respond to complex requests, an extension of another two months is permissible, provided this is communicated to the data subject in a timely manner within the first month. Where it has been agreed not to action the request, data subject must be informed of this decision and advice on the right to complain to the supervisory authority, ICO.

We also allow data subjects to transmit their own personal data to another controller.

However, in general, to protect confidential information we implement the following access controls:

### **Company confidential**

CONTROL MEASURES – Confidential Company information is stored on the Nextcloud system and lockable filing systems. This is only accessible to the Director with denied access to other staff.

SENSITIVE SYSTEMS – Financial Information

TRUSTED ADMIN USERS – CSPE Director

### **Client confidential**

CONTROL MEASURES - Confidential Client information is stored on the Nextcloud system and lockable filing systems. This is only accessible to the Director with denied access to other staff.

SENSITIVE SYSTEMS - Service Level Agreements (SLAs); Tutee data/information

TRUSTED ADMIN USERS – CSPE Director

### **Staff confidential**

CONTROL MEASURES - Confidential Staff information is stored on the Nextcloud system and lockable filing systems. This is only accessible to the Director with denied access to other staff.

SENSITIVE SYSTEMS - DBS and confidential staff information;

TRUSTED ADMIN USERS – CSPE Director

The deliberate or accidental disclosure of any confidential information has the potential to harm the business. This policy is designed to minimise that risk.

### **Breach Management**

A security breach is where a security incident in which sensitive, protected or confidential data is copied, transmitted, viewed, stolen, or used/amended by an individual unauthorised to do so.

Details of all incidents resulting in breaches of security (or near misses), whether by staff or others and whether deliberate or accidental, must be reported without due delay.

The reporting of incidents is for the common good and the major concern is not to apportion blame, but to contain, then resolve the situation and prevent a breach or future breaches. Failure to report incidents is a serious matter as it could leave the business exposed to repeated and more serious incidents and/or breaches. In the

event where an incident is known and has not been communicated by an individual, disciplinary action may be sought in line with the appropriate misconduct guidelines.

These are the required steps and action that CSPE must take if they suspect a security incident has taken place, which may or may not have caused a breach and where CSPE acts as the Data controller.

- **Containment and Recovery** Once a security incident has been identified, we contain the incident so that no further breaches can be realised and recover from the situation.
- **Assessment of ongoing risk** We assess the initial risk impact of the breach included the volume of areas affected. E.g., calculate how many data subjects were affected by the breach and what data has been lost, or could still be lost. We assess the potential financial, legal and reputation impact of the breach on CSPE.
- **Notification of Breach** From the understanding of who has been affected by the breach, we have a legal and regulatory responsibility to notify affected data subjects of the incident and the impact it had on their data and them as individuals. For those breaches assessed as being a high risk, we need to notify the Information Commissioners Office (ICO). Certain cyber or IT incidents may need to be reported to other authorities such as the National Cyber Security Centre (NCSC) or Action Fraud.
- **Evaluation and Response**  
We must fully investigate why the incident occurred and what the overall effect was of the breach.

### **Appointment of a Data Protection Officer**

If necessary, a Data Protection Officer will be appointed on their professional qualities and expert knowledge on data protection law and practices. This can be a staff member or an external service provider. Either way, we will provide contact details to the relevant data protection authorities.

CSPE will ensure a data protection officer is given all appropriate resources to carry out their tasks and maintain their expert knowledge.

A Data Protection Officer reports directly to the highest level of management and must not carry out any other tasks that could result in a conflict of interest.

## **19. POLICY FOR THE NOTIFICATION OF INFORMATION TO ENFORCING AUTHORITIES**

CSPE understands its requirements to comply with Ofsted's Voluntary Childcare Requirements Care Inspectorates Standards. Staff understand they must provide the following information and any changes of circumstance as soon as possible and no later than 15 days after the change occurs:

- A change to the address of the centre where Childcare is provided.
- A change in the type of Childcare we provide.
- Any change of the Director or Nominated Person.
- Any change of the Managers or Nominated Person's name, address, or telephone number.
- Any significant event which is likely to affect the Managers or Nominated Person's suitability or any person caring for learners on the centre, such as any offences or orders that may disqualify them.
- Any incident of food poisoning affecting two or more learners in the provider's care.

- Any serious accident or injury to, or the death of any learner while receiving learnercare.
- Any serious accident or injury to, or the death of, any other person on the centre on which learnercare is provided.
- Any allegation of serious harm to, or abuse of, a learner committed by any person looking after learners at the centre (whether that allegation relates to harm or abuse committed on the centre or elsewhere), or by any person, where the allegation relates to harm or abuse occurring on those centre.

Ofsted and the Care Inspectorate notification forms can be used along with guidance to inform them of such events as detailed above.

## **20. SAFER RECRUITMENT PROCESS AND QUALITY ASSURANCE**

### **Safer Recruitment**

CPSE adopt a rigorous recruitment process which may include:

CV (if appropriate)

Written/verbal references (from relevant educational settings)

- ✓ Interview
- ✓ Teaching observation
- ✓ Trial period
- ✓ Enhanced DBS checks
- ✓ Evidence of qualifications
- ✓ Transparent and comprehensive social media checks

The purposes of this process being to ensure only the best staff are recruited and they hold the same professional ethics as our company.

### **Candidate requirements**

The job description and person specification may alter, depending on the company's needs.

### **Job Description: CSPE Tutors/staff**

At CSPE, we work as part of a team, and we encourage everyone to help in generating a positive, fun, and exciting atmosphere where learners will love to learn.

### **Specific duties include:**

- Tutors of all subjects using engaging teaching methods.
- Effectively tutor up to 6 learners at a time, ensuring every learner gets equal time, attention, and quality of teaching (although this number may be significantly less for EOTAS)
- Inspire and motivate our members and pass on a genuine enthusiasm for learning, so that they become excited by learning, and adopt a have-a-go attitude to trickier tasks.
- Provide useful feedback about notable successes or problems during a learner's session; enabling us to give good quality feedback to their parents.

- Develop a thorough knowledge of the curriculum at CSPE.
- Act as a positive role model to all our learners.
- Support the management of learners' behaviour in a calm and fair manner, emplying the ethos of regulation before expectation.
- Be vigilant regarding the welfare and safety of all learners and adults at CSPE centre.
- Assist with administrative and maintenance duties as requested by the Centre's Managerial team.
- Maintain high Health and Safety standards within the centre.
- Contribute to CSPE's aims to meet Ofsted/ Care Inspectorate requirements and standards.
- Treat any knowledge of customers' personal details and the internal affairs of CSPE with total confidentiality.
- Publicly represent CSPE in the best possible manner through their personal conduct.
- Adhere to the CSPE Code of Conduct.
- Must not work for other tuition agencies whilst also working for CSPE.

## **Quality Assurance**

In its design, the CSPE learning environment is entirely open plan to ensure passive quality assurance and supervision by the Director and/or Senior Tutors during CSPE's hours of business, although we may on occasions observe sessions to formally quality assure sessions. We systematically review and evaluate the efficacy of CSPE policies and procedures on provision to maintain and improve its quality, equity, and efficiency. Schemes of Learning are reviewed and evaluated at all key stages in accordance with the subject requirements for each school and learner where appropriate (on an individual or school basis). In addition, for evening sessions, schemes of Learning for the 11+ Entrance Exams are in place and are reviewed and adapted on a regular basis in accordance with the requirements of the ever-changing Entrance Exams. External QA is determined by Ofsted.

### **20.1 DBS Positive Disclosure Policy**

#### **Policy Statement**

Clear Steps Plus Education is committed to safeguarding and promoting the welfare of children. As part of our safer recruitment processes, all staff, volunteers, contractors, and visitors must disclose any information that may affect their suitability to work with children.

A **positive disclosure** is any information revealed through:

- A DBS certificate
- The DBS Update Service
- A self-disclosure form
- A verbal disclosure during interview, induction, or employment

This includes historic, spent, or resolved matters that still require professional consideration.

Clear Steps Plus Education will assess all positive disclosures fairly, proportionately, and in line with statutory guidance.

## **Legal and Statutory Framework**

This policy is underpinned by:

- Keeping Children Safe in Education (KCSIE) 2025
- DBS Code of Practice
- Rehabilitation of Offenders Act 1974 (Exceptions Order)
- Data Protection Act 2018 & UK GDPR
- Safer Recruitment Consortium Guidance

## **Principles**

Clear Steps Plus Education will:

- Prioritise child safety
- Treat all disclosures confidentially and respectfully
- Assess relevance, seriousness, and recency
- Consider the role and level of access to children
- Seek clarification and evidence where needed
- Consult the DSL, HR, and Senior Leadership
- Contact the LADO where thresholds are met
- Record all decisions and rationales
- Ensure decisions are fair, consistent, and defensible

## **When the LADO Must Be Consulted**

A LADO consultation is required if the disclosure suggests the individual:

- May have harmed a child
- May have committed a criminal offence against a child
- Behaved in a way that indicates unsuitability to work with children
- Has been the subject of previous safeguarding allegations

## **Decision Outcomes**

Following assessment, the individual may be deemed:

- **Suitable**
- **Suitable with conditions** (e.g., supervision, restricted duties)
- **Not suitable**

All decisions must be signed off by:

- **DSL**
- **Headteacher / Principal**

- **HR Lead**

### **Data Protection**

All information will be:

- Stored securely
- Accessed only by authorised staff
- Retained in line with statutory retention schedules
- Not shared without lawful basis
- risky individuals
- Inconsistencies

### **Professional Analysis**

This section provides the professional judgement underpinning the decision. It should synthesise factual information, context, and safeguarding principles to determine whether the disclosure affects suitability to work with children.

Guidance for Completion

When completing this section, consider:

- Nature and relevance of the disclosure to the role
- Recency and frequency of the incident(s)
- Evidence of rehabilitation or change
- Insight and accountability demonstrated by the individual
- Impact on trust, boundaries, and safeguarding culture
- Potential for recurrence or residual risk
- Any inconsistencies between the disclosure, DBS certificate, and references

### **Multi-Agency Considerations**

- LADO consulted: Yes / No
- Police / Probation consulted: Yes / No
- Additional evidence requested: Yes / No

### **Risk Management Plan (if applicable)**

- Supervision arrangements:
- Restrictions on duties:
- Training required:
- Review schedule:
- Named manager:

### **Final Decision**

- Suitable
- Suitable with conditions
- Not suitable

## **21. WHISTLE BLOWING POLICY**

CSPE actively encourages a very open culture within its workplace, which includes a high level of communication between all staff.

If any member of staff is concerned with the working practices of another member of staff, they must report this to a director as set out in the terms and conditions of their contract of employment.

If you have concerns in connection to safeguarding or regulation, and feel they are not being addressed appropriately you can contact the Director/Executive DSL/DSL/ Deputy DSLs:

CSPE Director Karen Greenwood on: 07788628681 and k.greenwood@clearstepsplus.co.uk

with a view to passing this information on to The LADO

## **22. COMPLAINTS POLICY**

### **Complaints**

Parents/carer/schools are informed that should they feel at any time that they have reason for complaint or concern regarding the quality-of-service provision, in the first instance they should speak to the Director.

Any complaint made in writing or made by e-mail that relates to the Requirements of the Voluntary childcare Register (in England and Wales) or the National Care Standards (in Scotland) will be fully investigated.

Any complaint will be dealt with in full within 28 days working days of receipt of the written complaint, including a written response which will include an account of the findings of the investigation and any action taken as a result.

CSPE keeps a written record of complaints which includes:

- i. the nature of the complaint,
- ii. how the complaint was dealt with,
- iii. the outcome of the investigation,
- iv. any action taken, and
- v. whether the parent/carer was given an account of the findings within 28 days of the date on which the complaint was received.

Complaint report summaries (data protected) are available to parents and Ofsted/Care Inspectorate on request.

Complaints records are kept for ten years. If the complainant is not happy with the final decision made, they can take their complaint directly to Ofsted or Care Inspectorate(CI).

Complaints made to Ofsted/Care Inspectorate about a provider may be referred to the provider for investigation.

Ofsted Complaints Line: 03001234666 Care Inspectorate Complaints Line: 03456009527

## 23. DATA AND ICT SECURITY MANAGEMENT POLICY

This document sets out CSPE Security Policies governing protection of the confidentiality, integrity and availability of the computer network and its resources.

It establishes the responsibilities for IT security, preserve integrity of the computer network, protect the computer network and its resources, preserve confidentiality, and protect assets against unauthorised disclosure.

All staff must consider the sensitivity of the information they handle.

All staff must protect information in proportion to its sensitivity by ensuring that information, whatever its format, is secured by physical means or by using approved electronic means (laptop/tablet-pc)

### Network Security

Only CSPE staff, using company laptops/tablets and PCs can connect to the CPSE network. These laptops/tablets and pcs are firstly set-up and managed by the I.T team employed by CSPE (2PLUS1) prior to deployment and use.

### Computer Security & Monitoring

- All staff must abide by the rules of **GDPR 2025** and the Data Protection Act and the Computer Misuse Act 1990
- All resources of the company, including computers, email, and voicemail are provided for legitimate use. If there are occasions where it is deemed necessary to examine data beyond that of the normal business activity of the company then, at any time and without prior notice, the company maintains the right to examine any systems and inspect and review all data recorded in those systems. This will be undertaken by authorised staff only. Any information stored on a computer, whether the information is contained on a hard drive, USB pen or in any other manner may be subject to scrutiny by the company. This examination helps ensure compliance with internal policies and the law. It supports the performance of internal investigations and assists in the management of information systems.
- Storage of data on PC or Laptops C: drive is discouraged and all users are requested not to store files on PC or Laptops C:\drives because in the event of failure, all data stored on the C: drive would be lost as it not backed up. PLEASE ensure that data is saved on the Nextcloud provided by 2Plus1. Nextcloud data is backed up regularly in multiple secure places.
- All information related to company business is to be stored on CSPE Nextcloud and encryption / data protection is outlined in the section below outlining the contractual agreement between CSPE and 2Plus1. This is a secure storage area which is regularly backed up and is therefore resilient to failure.
- Storage of any paper-based data will be held in a locked filing cabinet in a locked cupboard within the centre. The centre will be armed with an intruder alarm that will text message directors if there is a breach of security.

### Wireless Security

All staff who log into the CSPE network via access points or more commonly known as WIFI, will be presented with a password prompt which is governed by the 802.11 authentication protocol. The network is secure and uses industry standard encryption to manage the passwords.

Limited access is available to guests, who are also presented with a SSID (network name – Service Set Identifier). MAC addresses (media access control) are unique to each machine or mobile device that connects to the network, are also retained for security and monitoring movements around the network.

## **Email use and Security**

Emails sent or received on the hosted email system, Office 365 (Microsoft), form part of the official records of the company. CSPE does not recognise any right of staff to impose restrictions on disclosure of emails within the system.

When using emails, staff must: ensure they do not disrupt the wider IT systems or cause an increase for significant resource demand in storage, capacity, speed, or system performance e.g., by sending large attachment to many internal recipients (currently set to 25MB), and bring it into disrepute, incur liability on the part company or adversely impact on its image.

Staff must not seek to gain access to restricted areas of the network or other “hacking activities” is strictly forbidden must not use email for the creation, retention, or distribution of disruptive or offensive messages, images, materials, or software that include offensive or abusive comments about ethnicity or nationality, gender, disabilities, age, sexual orientation, appearance, religious beliefs and practices, political beliefs, or social background. Staff who receive emails with this content from other staff, should report the matter to the CSPE Director and not send email messages that might reasonably be considered by recipients to be child on child abuse, harassing, abusive, malicious, discriminatory, defamatory, and libellous or contain illegal or offensive material, or foul language, not upload, download, use, retain, distribute, or disseminate any images, text, materials, or software which might reasonably be considered indecent, obscene, pornographic, or illegal.

Staff must not engage in activities that serve to deny service to other users be outside of the scope of normal work-related duties – for example, unauthorised selling/advertising of goods and services affect or have the potential to affect the performance of damage or overload the company system, network, and/or external communications in any way be a breach of software licence.

Staff who receive improper emails from individuals inside or outside the Company, should discuss the matter in the first instance with the Director.

## **Passwords**

Passwords should not be written down or given to others to use under any circumstances, and for individual use only.

Passwords must be a minimum of 7 case sensitive characters and should be a combination of upper/lower/numeric/special characters. Ideally Passwords should also contain random characters such as #@?!\$& etc.

Passwords must be changed every 90 days as a minimum. If a director needs access to your computer, for example if you are off sick, they must contact the I.T support to request managerial access to your computer.

## **Viruses**

ESET NOD52 anti-virus protection is installed on all laptop/pc/servers throughout the entire CSPE networked environment. This is provided by 2Plus1. All laptops have at least Windows 10 operating system which includes Windows Firewall in order to block malware and viruses.

## **Telephone & Mobile**

All CSPE smartphones setup with work email accounts and/or internet-based access to company data must be protected with four-digit security passcode and have built in encryption. Mobile phones may not be used to store and/or transmit personal data for which are company sensitive, with the exception of email.

Telephones are provided primarily for business use in order to assist staff in carrying out official company business. Company landlines and mobile phones must not be used for any secondary business purpose.

### **Updating and Installation of Patches**

Windows 10 updates are automatically installed when required. Nextcloud software and ESET software is updated and patches installed by 2PLUS1 as and when necessary.

### **Use of Nextcloud and ESET Endlock Encryption**

#### **CSPE's requirements:**

- Central location for shared data with regular back up
- Secure storage of personal data
- Offline access to data

### **Implementation of Nextcloud and ESET Endlock Encryption**

With regard to the above requirements 2Plus1 have provided the product Nextcloud (cloud storage) which satisfies shared access that is secure and backed up regularly.

The devices that data could potentially be held on need to be addressed as cloud storage doesn't mean data is only held in the cloud as this would prohibit offline access to the data, instead data is kept in sync with a central server where all clients and server all have a copy of the data.

This means that the PCs that have the data synced to them have the potential to leak data if they were stolen or lost. This risk is easily mitigated through the use of encryption software which makes the devices storage (hard drive) unreadable to anyone without the correct credentials (user name and password). A windows password is unsecure as a drive can just be read by another computer system but if the data is encrypted it cannot be read. ESET Endlock Encryption software has therefore been installed on all CSPE PCs and Laptops as it provides maximum protection with minimal disruption for ease of use of a computer system.

CSPE's email system and Nextcloud Storage uses end to end SSL encryption to ensure all data passing between organisations and third parties is secure.

### **Data Processing agreement with 2plus1.com PC Services Ltd agreed originally 29/11/18 (Revised annually)**

### **Staff joining and leaving**

We will provide training to new staff and support for existing staff to implement this policy. This includes:

- An initial introduction to IT security, covering the risks, basic security measures, company policies and where to get help
- Training on how to use company systems and security software properly
- On request, a security health check on their computer, tablet or phone supported by 2plus1

When people leave CSPE, we will promptly revoke their access privileges to company systems.

### **Protecting your own device(s)**

It is also your responsibility to use your devices (computer, phone, tablet etc.) in a secure way. However, we will provide training and support to enable you to do so (see below). At a minimum:

- Update your operating system and applications regularly
- Keep your computer firewall switched on
- For Windows users, make sure you install anti-malware software (or use the built-in Windows Defender) and keep it up to date. For Mac users, consider getting anti-malware software.
- Store files in official company storage locations (Nextcloud) so that it is backed up properly and available in an emergency.
- Switch on whole disk encryption (ESET Endlock Encryption or Windows Bitlocker (with Windows 10 Pro))
- Understand the privacy and security settings on your phone and social media accounts
- Have separate user accounts for other people, including other family members, if they use your computer. Ideally, keep your work computer separate from any family or shared computers.
- Don't use an administrator account on your computer for everyday use
- Make sure your computer and phone logs out automatically after 15 minutes and requires a password to log back in.

### **Secure Disposal of IT Equipment**

IT equipment means all equipment purchased by or provided by CSPE to store or process information including but not necessarily limited to desktop computers, servers, printers, copiers, laptops, tablet computers, electronic notebooks, mobile telephones, digital recorders, cameras, USB sticks, DVDs, CDs and other portable devices and removable media.

Information means all information and data held or recorded electronically on IT equipment or manually held or recorded on paper.

CSPE supports policies which promote sustainability and take account of environmental impact. CSPE will therefore support recycling or sustainable redeployment in the disposal of IT equipment as long as information held on the equipment is irretrievably and securely destroyed prior to the disposal of the equipment.

WEEE: IT equipment must also be disposed of in line with the EU Waste Electrical and Electronic Equipment (WEEE) Directive and the UK Waste Electrical and Electronic Equipment Regulations 2006.

Copyright: software must be disposed of in line with copyright legislation and software licensing provisions.

All CSPE IT equipment which stores or processes data will be deemed to hold sensitive data, therefore all such IT equipment will undergo appropriate physical destruction or an appropriate data overwrite procedure which irretrievably destroys any data or information held on that equipment.

Where an overwrite procedure fails to destroy the information irretrievably, the equipment shall be physically destroyed to the extent that the information contained in it is also irretrievably destroyed.

For the avoidance of doubt, removable digital media including but not limited to CDs, DVDs, USB drives, where the default is that they contain sensitive data, shall, if not successfully overwritten, be physically destroyed to the extent that all data contained in the media are irretrievable.

All IT equipment awaiting disposal must be stored and handled securely.

Where the overwriting procedure and/or physical destruction of IT equipment are carried out on behalf of CSPE by a third party, there shall be a contract with that third party which appropriately evidences: that party's obligations to keep that data confidential and; that party's responsibility under the Data Protection Act 1998 for the secure disposal of the data.

In any case where IT equipment is to be passed on by CSPE for reuse, those staff involved in the sale or transfer of the equipment shall ensure that any information on the equipment has been irretrievably destroyed and that any other appropriate issues, including, but not limited to, the safety of the equipment are satisfactorily addressed.

With the disposal of IT equipment, CSPE shall keep a record of the details of the equipment which has been disposed of along with a record of the process by which the information stored on the equipment has been irretrievably destroyed.

## **24. CONFLICT OF INTEREST**

### **Conflict of Interest Policy (Including Exams)**

We expect CSPE directors, tutors and other staff to freely, openly and honestly declare all and any of their interests, in full and without reservation, in suppliers, customers and/or competitors, whether financial or other. We expect CSPE directors, tutors and other staff to freely, openly and honestly declare all and any gifts or hospitality (over a value of £20) received in connection with their role in the organisation, whether from suppliers, customers and/or competitors, whether financial or other.

Further, we do not expect CSPE directors and staff to accept any gifts or hospitality from learners and/or their parents/carers, unless of only nominal value. All offers of gifts or hospitality from learners and/or their parents/carers must be reported in writing to Director Karen Greenwood via email.

Declarations of interest should be detailed in writing. CSPE tutors and other staff are expected to declare all and any potential conflicts of interest at the earliest opportunity.

### **Conflicts of Interest Relating to Exams**

To protect the integrity, fairness and credibility of all assessments, CSPE directors, tutors and other staff must declare any potential conflict of interest that could influence, or be perceived to influence, exam preparation, invigilation, marking, or assessment decisions. This includes, but is not limited to:

- Personal relationships with learners, including family members, close friends, partners, or individuals with whom there is a significant personal connection.
- Financial or business relationships with learners or their parents/carers.
- Private tutoring or paid support provided to any learner who is enrolled in a CSPE course or sitting a CSPE-related exam.
- Any situation where impartiality could reasonably be questioned, even if no actual bias exists.

Where such a conflict exists, the staff member must not participate in exam-related activities for that learner, including exam preparation, invigilation, marking, moderation, or any decision-making related to assessment outcomes. The Director will determine appropriate alternative arrangements to ensure fairness and transparency.

### **Managing Conflicts of Interest**

Where any potential conflict of interest may arise in relation to contracts, pricing or other factors, where the person is directly related or has interest in the other party, CSPE directors, tutors and other staff are expected to recuse themselves from discussions, negotiations and related activities. This does not include situations where the benefits are universal or insignificant. Nevertheless, all interests are expected to be declared formally and in advance.

All decisions regarding what qualifies as a significant interest are at the discretion of the Director. These decisions are final and not subject to appeal.

Where necessary, The Director will convene a formal meeting. This meeting will decide:

- The nature and extent of the conflict.
- The actions taken to manage the conflict.

## 25. CAREERS EDUCATION, INFORMATION, ADVICE, AND GUIDANCE (CEIAG) POLICY

### Vision and Values

**Our Vision:** Fostering an inclusive community that provides opportunities for all young people to excel, while celebrating the unique strengths that neurodivergent individuals bring to the workforce, such as profound attention to detail, diverse perspectives, and dedicated special interests.

### Our Values:

- Treating all students as individuals, engaging positively, and understanding the whole child and their specific sensory, communication, and educational needs.
- Ensuring the safety and wellbeing of all learners, providing consistent procedures, and creating an inclusive environment where students are inspired throughout their school journey.
- Nurturing a 'can do' attitude, supporting students to overcome societal barriers, and preparing them to successfully transition into adulthood and meaningful employment.

### Equal Opportunities Statement

In implementing this policy, all staff must ensure that no student is disadvantaged on the grounds of disability, neurodivergence, gender, race, sexual orientation, religion, or belief. We actively challenge the systemic barriers that currently result in only one in four autistic young people accessing education or training beyond school.

### Purpose of CEIAG

CSPE is committed to providing high-quality Careers Education, Information, Advice, and Guidance (CEIAG) tailored for neurodivergent young people. This provision ensures our students are not excluded from advancing to further education or meaningful employment due to a lack of understanding and support.

Effective CEIAG is essential because it:

- Empowers neurodivergent young people to gain and sustain enriching employment by ensuring they gain necessary employability and self-advocacy skills.
- Addresses the specific needs of our students, combating the national statistic where only 57% of autistic young people feel careers advisors understand their needs.
- Supports young people to confidently plan their futures, manage their expectations, and understand their workplace rights.

### Aims and Strategic Themes

Our CEIAG provision is guided by the Gatsby Benchmarks, with a targeted focus on young people with special educational needs and differences (SEND). We base our approach on four core themes:

1. **Engaging Stakeholders:** Collaborative efforts involving multiple stakeholders starting as soon as a young person enters our setting.
2. **Curriculum Planning:** Embedding an understanding of the working world and necessary life skills within timetabled lessons.
3. **Experiences in and of the Workplace:** Providing tailored insights to help neurodivergent students think about career choices, develop self-advocacy skills, and understand reasonable adjustments and workplace rights.

4. **Transition Planning:** Preparing early for the daunting reduction of support in the workplace compared to education, providing exposure to the working world throughout their education years.

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.

### **Provision and Student Entitlement**

All students at CSPE will have access to a range of opportunities to support their development. This entitlement includes:

- Access to an independent careers advisor who is specifically trained in understanding autism and neurodivergent needs.
- Differentiated resources, including specialized guidance for students accessing a personalized or non-GCSE curriculum, as well as those accessing mainstream subjects.
- Opportunities to explore occupations linked to curriculum areas and discover local, national, and international Labour Market Information (LMI).

### **Key Stage 3 Provision**

During KS3, students will follow a program of careers education designed to build foundational understanding:

- **Year 7:** Identifying personal strengths, understanding personal brand, and setting lifelong learning goals.
- **Year 8:** Exploring the difference between a job and a career, exploring different career pathways, and developing core skills and values.
- **Year 9:** Managing expectations, exploring different progression routes, understanding rights and responsibilities in employment, and making informed option choices for KS4.

These sessions will be delivered during the students individual mentoring sessions and tailored very specifically to their needs and interests.

### **Key Stage 4 Provision**

During KS4, focus shifts to practical exposure and transition planning:

- **Year 10:** Engaging in visits to aspirational Further and Higher Education providers to explore accessible opportunities. Students will attend careers fairs with inclusive local employers and begin making decisions about post-16 progression.
- **Year 11:** Focused support for the post-16 application process. Students will receive independent careers guidance interviews to secure their next steps, with detailed teaching on workplace rights, self-advocacy, online presence, and accessing support.

These sessions will be delivered during the students individual mentoring sessions and tailored very specifically to their needs and interests.

### **Partnerships**

**Parents and Carers:** We seek to actively partner with parents and carers to support transition planning. We encourage parents to support via work shadowing placements or career insight talks, and signpost them to specialized transition toolkits and online communities. **Alumni:** Past students are encouraged to share their progress. A network of neurodivergent alumni can serve as vital role models to inspire current students.

**Provider Access:** We actively recruit local education and training providers, businesses, and employers to offer assembly presentations, mentoring, and insight talks.

## **Tracking and Evaluation**

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

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 Further Education providers and local skills teams. The CEIAG provision is evaluated annually, taking into consideration feedback from students, parents, and local authority destination data.

## **Staff Development**

We recognize that effective careers guidance requires specialized understanding. The CPD (Continuing Professional Development) needs of the Careers Leader, SENCO, and other staff are identified annually. Staff are encouraged to access specific training, such as the Careers Education Framework training course for supporting autistic young people, to ensure they remain current with best practices for neurodivergent youth.

### **25.1 Provider Access Policy and Procedure**

**Rationale** High-quality careers education and guidance in school or college is critical to young people's futures. It helps to prepare them for the workplace by providing a clear understanding of the world of work, including routes to engaging and rewarding jobs and careers. Historically, owing to a lack of understanding and support, many neurodivergent and autistic young people face exclusion, miss opportunities to advance to further education, and struggle to find meaningful employment. In fact, research shows that only one in four autistic young people access education or training beyond school.

However, neurodivergent individuals possess many unique strengths, such as exceptional attention to detail, deep focus on special interests, and the ability to offer different perspectives. Therefore, as the number of apprenticeships, T-Levels, and Higher Technical Qualifications rises, it is increasingly important that all young people have a full understanding of the options available to them post-16 and post-18.

**Commitment** CSPE is committed to ensuring there is an opportunity for a range of education and training providers to access students to inform them about approved technical education qualifications and apprenticeships. We are fully aware of our responsibility to set students on a path that secures the best outcomes and enables them to progress into education and work. We act impartially, in line with statutory duties, showing no bias towards any route. We recognize that an effective, tailored careers education approach is essential to ensure neurodivergent young people gain necessary employability skills and prepare for adulthood.

**Aims** The CSPE policy for access to other education and training providers aims to:

- Develop the knowledge and awareness of our students regarding all available career pathways, including technical qualifications and apprenticeships.
- Support young people in learning about education and training opportunities outside of school before making crucial future choices.
- Reduce dropout rates from courses and avoid the risk of students becoming NEET (Not in Education, Employment, or Training).
- Provide robust transition planning, recognizing that the reduction of support in the workplace compared to education can be daunting for neurodivergent young people.

**Student Entitlement** CSPE fully supports the statutory requirement for students to have direct access to providers of further education, technical training, and apprenticeships. The school will comply with the legal requirement to put on at least six encounters with providers of approved technical education qualifications or apprenticeships. This will be facilitated through visits, curriculum careers weeks, and tailored workplace experiences that help neurodivergent young people develop self-advocacy skills and an understanding of workplace rights.

**Equality, Diversity, and Inclusion** Access to other providers is available and promoted to allow all students to access information about further education and apprenticeships. CSPE is committed to encouraging all students to make decisions based on impartial information.

**Requests for Access** Requests for access should be directed to the designated Careers Lead at CSPE.

**Grounds for Granting Requests for Access** Access will be given for providers to attend during school assemblies, timetabled Careers or Life lessons, and specific Careers or Raising Aspirations events arranged by CSPE. To best support our neurodivergent learners, curriculum planning will also embed an understanding of the working world directly within timetabled lessons.

**Details of Centre or Facilities Provided** CSPE will provide an appropriate room - to be agreed upon with the provider. The Careers Leader will work closely with the provider to ensure the facilities and delivery style are appropriate to the audience, taking into account any potential sensory overload or specific needs of our neurodivergent cohort. Appropriate safeguarding checks will be carried out, and providers will be met and supervised by a member of the Careers Team.

**Live/Virtual Encounters** To increase accessibility, CSPE will consider live online encounters with providers where requested. These may be broadcast into classrooms, providing a comfortable environment for students who may find in-person encounters overwhelming. Technology checks in advance will be required to ensure system compatibility.

**Parents and Carers** Ensuring neurodivergent young people reach their potential requires a collaborative effort involving multiple stakeholders from the moment they enter the educational setting. Parental involvement is highly encouraged, and parents/carers may be invited to attend events to meet the providers and support their child's transition to employment.

**Management and Complaints** The Careers Leader coordinates all provider requests and is responsible to their senior management line manager. Any complaints regarding this policy should be raised to the Careers Lead, who will escalate them to the appropriate Deputy Headteacher or Senior Leader at CSPE.

**Monitoring, Review, and Evaluation** This policy is monitored and evaluated annually via the personal development and wellbeing department to ensure it continues to meet the statutory guidelines set by the Department for Education and best serves our neurodivergent students. It is underpinned by key school policies, including Careers, Child Protection, Equality and Diversity, and SEND.

## 26. ONLINE SAFETY AND AI POLICY

### Statutory and Regulatory Framework

This Online Safety Policy, including the AI Use Policy, is informed by and aligned with the statutory guidance in **Keeping Children Safe in Education (KCSIE)**, which sets out schools' and colleges' legal duties to safeguard and promote the welfare of children. In line with KCSIE, the provision recognises that online safety is a core safeguarding responsibility and that risks can arise from:

- content (what learners see)
- contact (who learners communicate with)
- conduct (how learners behave online)
- commerce (risks such as scams, phishing, and financial exploitation)

KCSIE emphasises the need for **appropriate filtering and monitoring, staff training, clear reporting routes, and proactive safeguarding practice**, all of which are reflected in this policy.

The policy also aligns with:

- UK GDPR and Data Protection Act 2025
- The Prevent Duty
- The SEND Code of Practice
- Local Safeguarding Partnership guidance

### **Safeguarding Responsibilities**

In accordance with KCSIE, the provision ensures that:

- **All staff receive online safety training**, including the safe and ethical use of AI tools.
- **Online safety is treated as a whole-setting safeguarding issue**, not an IT issue.
- **Filtering and monitoring systems** are in place and reviewed regularly.
- **Learners are taught how to stay safe online**, with adaptations for neurodiverse communication and processing needs.
- **The DSL takes lead responsibility** for online safety, including incidents involving AI misuse or harmful digital content.
- **Concerns are reported and recorded** following the safeguarding procedures outlined in KCSIE.

### **Integration of AI Use Policy Within KCSIE Safeguarding Expectations**

The AI Use Policy supports KCSIE's requirement that schools take a **proportionate, risk-based approach** to emerging technologies. AI tools are treated as part of the online environment that must be:

- **safe** (content reviewed, supervised use)
- **appropriate** (age-appropriate, accessible, non-harmful)
- **secure** (GDPR-compliant, no personal data entered)
- **human-led** (staff retain responsibility for decisions affecting learners)

KCSIE highlights the importance of protecting children from **misinformation, harmful content, and inappropriate digital interactions**. The AI Use Policy directly addresses these risks by requiring:

- staff verification of AI-generated content
- supervision of all learner interactions with AI
- prohibition of AI tools that could profile, label, or monitor behaviour
- reporting of concerning outputs to the DSL

This ensures AI is used in a way that strengthens safeguarding rather than introducing new vulnerabilities.

### **AI Use Policy**

Your AI policy text remains unchanged, but the following sentence can be added at the start to explicitly link it to statutory safeguarding duties:

*This AI Use Policy forms part of the provision's safeguarding approach and is aligned with the expectations set out in Keeping Children Safe in Education (KCSIE), particularly regarding online safety, data protection, and the requirement for staff to exercise professional judgment when using digital tools.*

The rest of your AI policy can then follow exactly as written.

### **Policy Review**

This policy will be reviewed annually or sooner if:

- updates are made to **KCSIE**
- new online risks emerge
- new AI tools are introduced
- safeguarding concerns indicate a need for revision

The DSL will ensure that updates to KCSIE are reflected promptly in staff training and policy amendments.

## **27. CSPE HEALTY RELATIONSHIPS AND SEX EDUCATION(HRSE) POLICY**

CSPE is committed 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 recognise that HRSE is essential for safeguarding, promoting wellbeing, and preparing learners for life in modern Britain.

### **Aims of HRSE**

Our HRSE curriculum aims to:

- Promote respect, empathy, and positive relationship skills
- Teach learners how to recognise healthy and unhealthy relationships
- Support learners to understand consent, boundaries, and personal safety
- Provide accurate, age-appropriate information about the human body, puberty, and reproduction
- Reduce stigma around discussing emotions, relationships, and health
- Promote equality, inclusion, and respect for diversity
- Help learners understand online safety, digital behaviour, and risks
- Strengthen safeguarding by empowering learners to seek help when needed

### **Legal and Statutory Framework**

This policy is informed by:

- DfE *Relationships Education, Relationships and Sex Education (RSE) and Health Education* statutory guidance (2019)
- Keeping Children Safe in Education (KCSIE)
- Equality Act 2010
- Independent School Standards (ISS)
- School's Safeguarding and Child Protection Policy

As an independent school, CSPE will meet all statutory expectations for Relationships Education and Health Education and will provide Sex Education in line with our ethos and learners' needs.

## **CURRICULUM CONTENT**

### **Relationships Education (all learners)**

- Families and different family structures
- Friendships and respectful relationships
- Bullying, conflict resolution, and help-seeking
- Consent and personal boundaries
- Stereotypes, equality, and respect
- Online behaviour, digital footprints, and staying safe online

### **Health Education (all learners)**

- Physical health, hygiene, and self-care
- Mental wellbeing and emotional literacy
- Puberty and body changes
- Healthy lifestyles, sleep, and nutrition
- Drugs, alcohol, and tobacco awareness (age-appropriate)
- Basic first aid

### **Sex Education (secondary-aged learners)**

Sex Education will be taught in a factual, non-judgemental, and age-appropriate way. Content includes:

- Human reproduction
- Fertility, pregnancy, and birth
- Contraception and safer sex (age-appropriate)
- Sex, the law, and consent
- Sexual health and accessing support services
- Healthy intimate relationships
- Recognising coercion, exploitation, and grooming

Parents/carers may request withdrawal from Sex Education (but not from Relationships or Health Education). Senior team will discuss requests individually.

### **Teaching and Learning Approach**

HRSE will be delivered through:

- PSHCE lessons
- Mentoring sessions
- One-to-one or small-group interventions where appropriate
- Cross-curricular links (e.g., science, ICT, PE)

Teaching will be:

- Inclusive and sensitive to learners' backgrounds, needs, and abilities
- Trauma-informed and supportive
- Grounded in safeguarding principles
- Adapted for SEND learners using accessible language and visual supports

Staff will use clear, factual language and will not promote personal opinions.

### **Safeguarding and Confidentiality**

HRSE is a safeguarding priority. Staff will:

- Create a safe, respectful learning environment
- Use agreed ground rules
- Respond appropriately to disclosures
- Report concerns in line with the Safeguarding and Child Protection Policy

Learners will be encouraged to speak to trusted adults if they feel unsafe or worried.

## **ROLES AND RESPONSIBILITIES**

### **The Director**

- Ensures the AP meets statutory requirements
- Reviews and approves the HRSE policy annually
- Ensures HRSE is effectively planned and delivered
- Supports staff training
- Manages parental requests for withdrawal

### **Staff**

- Deliver HRSE confidently and sensitively

- Follow safeguarding procedures
- Model respectful behaviour

### **Learners**

- Engage respectfully
- Ask questions safely
- Treat others with kindness

### **WORKING WITH PARENTS AND CARERS**

We value partnership with families. The school will:

- Share curriculum information annually
- Provide opportunities for parents to ask questions
- Offer support for discussing HRSE topics at home

Parents may request withdrawal from Sex Education; the school will discuss the educational benefits before making a final decision.

### **MONITORING AND EVALUATION**

The HRSE curriculum will be reviewed annually through:

- Learner voice
- Staff feedback
- Lesson observations
- Safeguarding data
- Curriculum mapping

Updates will reflect statutory changes, best practice, and the needs of our learners.

### **28. CSPE RESTRICTIVE INTERVENTIONS POLICY (including updates for April 2026)**

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.

#### **Legal and Regulatory Framework**

This policy is informed by:

- Section 93 and 93A of the Education and Inspections Act 2006 (Statutory guidance on recording and reporting).
- The Schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025.
- Keeping Children Safe in Education (KCSIE).

- Equality Act 2010.

### **Terminology**

- Restrictive Intervention: An umbrella term for physical and non-physical actions aimed to prevent, restrict, or subdue movement.
- Reasonable Force: Physical restrictive intervention using no more force than necessary for the least amount of time.
- Seclusion: A non-disciplinary safety measure where a learner is confined alone and prevented from leaving to protect others from harm during high dysregulation.
- Restraint: An intervention that limits movement, which may or may not involve direct physical contact (e.g., removing a learner's walking aid).

### **Principles and Prevention**

- Behaviour is understood as communication, particularly for learners with SEND or communication difficulties.
- Staff prioritise de-escalation, co-regulation, and environmental adjustments.
- CSPE does not have a 'no contact' policy; appropriate physical contact for comfort, first aid, or guidance is supported.
- Restraint and seclusion are never used as punishment, for compliance, or for convenience.

### **When Restrictive Interventions May Be Used**

Reasonable force may be used to prevent a learner from:

1. Causing injury to themselves or others.
2. Committing a criminal offence.
3. Damaging property.
4. Causing disorder.

Seclusion is used only as a safety measure to protect others from harm. The learner must be supervised at all times in a non-threatening space, and the intervention must end as soon as the risk reduces.

Search Powers: Authorized staff may use reasonable force to search for legally prohibited items only, not items banned solely by school rules.

### **Safe Practice Requirements**

- Staff likely to need these interventions must be adequately trained in safe use and preventative strategies.
- Interventions must be necessary, proportionate, and use the least restrictive option.
- Holds must never restrict breathing, communication, or sensory aids. Prone or pain-inducing techniques are prohibited.
- Staff must consider the learner's age, SEND, and medical conditions.

### **Statutory Recording and Reporting**

Recording: All significant incidents of force, seclusion, or non-physical restraint must be recorded in writing by the staff involved, endeavouring to do so on the same day. Records must include:

- Names of involved learners and staff.
- The learner's SEN status code and any relevant needs.
- Time, date, location, and approximate duration.
- Triggers, de-escalation strategies used, type/degree of force, and any injuries.
- Why the intervention was assessed as necessary and details of post-incident support.

Reporting to Parents: Schools must inform parents of any significant incident in writing (e.g., email) as soon as practicable, ideally the same day.

- Exceptions: Reporting is not required if the learner is 20+ or if reporting would likely result in serious harm to the learner.

### **Post-Incident Procedures**

- Learner and Staff Support: Medical assessments are provided if needed.
- Debrief: A follow-up conversation is held to facilitate reflection, repair relationships, and identify future prevention strategies.
- Partnership: Parents are invited to a follow-up discussion to review triggers and adjust Behaviour Support Plans.

### **Governance and Monitoring**

The Governing Body and school leaders will regularly interrogate data on restrictive interventions to:

- Identify repeat patterns and triggers.
- Identify any disproportionate use related to protected characteristics or SEND.
- Identify areas for staff training and policy improvement.

## **29. TRIP POLICY**

### **Purpose and Philosophy**

CSPE is dedicated to providing 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.

**Financial Policy and Parent/Carer Contributions** A core component of planning any CSPE trip is ensuring it is financially viable and accessible for our families.

- **Voluntary Contributions for Specific Trips:** When a specific trip is proposed, a letter must be sent to parents/carers detailing the rationale of the trip, the main activities, and the **specific level of voluntary monetary contribution expected for that individual trip.**
- **Payment Schedules and Deposits:** For larger trips, CSPE may make a provisional booking to hold spaces, allowing time to promote the trip and collect initial deposits. Parents/carers must be provided with a clear payment schedule early on so they can appropriately budget for the trip.

- **Fundraising:** To make trips more affordable and reduce the burden of parent contributions, CSPE encourages fundraising activities such as bake sales, car washes, or crowdfunding.

**Inclusion and Equality** CSPE treats all learners as individuals with diverse needs and ensures every learner is entitled to full inclusion on trips.

- **Reasonable Adjustments:** Under the Equality Act 2010, CSPE has an 'anticipatory' duty to make reasonable adjustments so disabled learners can fully participate. **CSPE will make all reasonable adjustments for learners without asking parents to fund these specific disability adjustments.**
- Budget planning for the trip must automatically include any costs for accessible transport or required adaptations.

### Trip Planning and Risk Assessments

- **Timeline:** 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.
- **Risk Assessments:** A formal risk assessment is a legal requirement to evaluate hazards and implement control measures. In addition to general trip risk assessments, **personalised risk assessments and safety plans must be developed for individual learners** to maintain their safety and wellbeing during the trip.
- **Permissions and Information:** Written permission must be gathered from parents/carers, alongside up-to-date medical information, dietary requirements, and emergency contact details.

### Health, Safety, and Medication

- **High Staff-to-Learner Ratios:** CSPE operates with a high staff-to-learner ratio of a maximum of 1:5 at our centre. This high level of adult support must be maintained or increased on trips to ensure close monitoring and individualized support.
- **Medication:** 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.

### Managing Learner Behaviour on Trips

- **Regulation Before Expectation:** CSPE's approach to behaviour on trips is underpinned by the principle of "**regulation before expectation**". Unfamiliar settings can cause heightened anxiety or dysregulation; therefore, staff must prioritize a learner's emotional and sensory needs before placing behavioural demands on them.
- **De-escalation and Support:** If challenging behaviour occurs, staff must respond calmly, using de-escalation strategies and offering time, space, or sensory breaks.
- **No Unfair Sanctions:** Behaviour is viewed as a form of communication. **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.

## 30. Anti-Bullying Strategy and Policy

### Statement of Intent and Statutory Compliance

At CSPE, we are dedicated to providing compassionate, flexible, and neurodiversity-aware education for all learners, whilst maintaining high expectations of outstanding behaviour. Child-on-child abuse or bullying is unacceptable in any form.

This policy is designed to ensure strict compliance with:

- **DfE Independent School Standards (ISSR):** Specifically Part 3, Paragraph 10, which requires the implementation of an effective anti-bullying strategy, and Part 8 regarding leadership actively promoting learner wellbeing.

- **Ofsted Education Inspection Framework (EIF):** Ensuring a safe, inclusive environment where all learners can thrive socially and academically.
- **The Equality Act 2010:** Ensuring principles are actively promoted that encourage respect for other people, paying particular regard to protected characteristics.
- **Statutory Safeguarding Guidance:** Including *Keeping Children Safe in Education* (KCSIE).

**Understanding Behaviour, Bullying, and "Double Empathy"** At CSPE, we recognise that behaviour is a form of communication. Learners may display challenging behaviours when dysregulated, anxious, or experiencing unmet SEND-related needs. However, deliberately hostile behaviour, bullying, or discrimination against any protected characteristics will be consistently challenged.

### Teaching Double Empathy

A cornerstone of our neurodiversity-affirming culture is the teaching of the Double Empathy problem. We recognise that misunderstandings and peer-on-peer conflicts often arise not from malice, but because neurodivergent individuals experience, process, and communicate about the world differently.

- Through our PSHCE and Social Communication and Emotional Literacy focus within our mentoring sessions, we actively teach learners about Double Empathy.
- We help learners understand that communication is a two-way street and that differing social cues or processing styles are valid. By teaching learners to recognise and bridge these communication gaps, we foster profound mutual respect, reduce social isolation, and proactively prevent misunderstandings from escalating into bullying.

### Preventative Strategy: Regulation Before Expectation

Our strategy for preventing bullying is rooted in our core principle of "**regulation before expectation**". We reduce the likelihood of bullying and child-on-child abuse by:

- **High Adult-to-Learner Ratios:** We tutor with a maximum ratio of 1:5, allowing staff to provide individual attention, closely monitor social interactions, and intervene early.
- **Curriculum Integration:** We embed relationship building, mutual respect, and tolerance into our core curriculum, specifically through wellbeing, mentoring, and healthy relationship education.
- **Neurodiversity-Affirming Mentoring:** We support learners to develop self-advocacy, positive coping strategies, and identity development, helping them navigate social situations safely.
- **Online Safety:** Learners are taught how to stay safe online and understand digital behaviour and risks, reducing the likelihood of cyberbullying.
- **Information & Awareness Posters:** Posters are also displayed throughout the building highlighting what is acceptable and what is unacceptable behaviour towards one another and how to get help/support. Information explaining how to contact approved organisations are also displayed.

**Procedures for Reporting and Responding to Bullying** If bullying or child-on-child abuse is suspected or reported, CSPE takes the following immediate actions:

1. **Reporting:** Anyone who witnesses or suspects child-on-child abuse must report it to a member of staff immediately and/or report it via the Learner Incident report.

2. **Immediate Response:** The incident will be dealt with immediately by the informed staff member and discussed with the Director.
3. **Recording:** The incident will be formally documented in an Incident Report. In accordance with CSPE policy, records must always be written in pen so they cannot be edited or erased. A record of any sanctions imposed will be kept, as required by ISSR Part 3, Paragraph 9.
4. **Monitoring and Communication:** Close monitoring of both the victim and the perpetrator will begin immediately. The parents/carers of both parties will be promptly informed.

## 5. Support, Safeguarding, and Interventions

- **Victim Support:** Any learner who is a victim of child-on-child abuse will be supported in a highly sympathetic manner. Staff will provide a safe environment and ongoing wellbeing mentoring to restore confidence.
- **Perpetrator Intervention:** In responding to the perpetrator, staff will apply de-escalation strategies and seek to understand the root cause of the behaviour, particularly looking at unmet SEND needs. Interventions are restorative and tailored to the learner's SEND profile. CSPE strictly rejects the use of corporal punishment. Exclusion is an absolute last resort.
- **Safeguarding Escalation:** Where bullying constitutes a safeguarding concern or risk of serious harm, the matter will be immediately referred to our Designated Safeguarding Lead (DSL), Dawn Schofield, or Deputy DSLs, Karen Greenwood and Amy Haymes.

### 5. Leadership Monitoring and Quality Assurance

The Director and leaders will regularly interrogate incident logs, behaviour data, and bullying records. This continuous self-evaluation allows leaders to identify repeat patterns, evaluate the impact of interventions, and adapt safeguarding strategies to ensure a consistently safe, inclusive, and hostile-free culture for all learners. Incidents and trends are also highlighted and discussed in weekly Safeguarding Meetings where interventions are planned. This is attended by the Head teachers, DSL and Deputy DSL.

## Policy Review

This policy will be reviewed annually or sooner if required by changes in legislation or school context.