Alternative Provision (AP) Policy

Policy Number:	EDE/POL/013	Policy Owner Job Role	Quality Director
Issue Number:	002	Ratified By	Quality Manager
Issue Date:	1/9/26	Service Type:	Education
		Applicable Services:	Schools
Contributors			
Mandatory Policy	☒Yes ☐No		
Relevant Regulations	• Keeping Children Safe in Education (2026) • Working Together to Safeguard Children (2026) • Suspension and Permanent Exclusion Guidance (2023) • Alternative Provision Statutory Guidance (2025) • SEND Code of Practice (0-25) • Data Protection Act 2018 / UK GDPR • Health and Safety at Work etc. Act • Education (Independent School Standards) Regulations 2014 (ISSR)		
Note	This policy must not be amended without prior approval of the Education Director		

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1. Supporting Documents

This policy should be read alongside:

- Safeguarding and Child Protection Policy
- SEND Policy
- Behaviour Policy
- Attendance Policy
- Positive Handling Policy

2. Introduction

At Keys Group, we recognise that some pupils require flexible, individualised curricula and occasionally alternative provision to meet their unique needs. Our commitment is to provide high-quality, personalised education that supports each pupil's academic, social, and emotional development, ensuring they achieve their potential in a safe and supportive environment. Our alternative provision is designed to meet the diverse and complex needs of pupils, including those with the most complex SEND and SEMH needs, through tailored, developmentally appropriate curricula and personalised learning approaches.

To comply with statutory guidance, alternative provision is only provided where it is in the best interests of the child or young person. However, the overall statutory responsibility of safeguarding, the quality of education and pupil outcomes remains with the commissioning authority. The school maintains safeguarding responsibility for pupils on roll and ensures oversight for any alternative placements.

3. Aim/Scope

Our schools aim to create extraordinary learning experiences every day by believing in every pupil's potential. We provide innovative education and care services to children and young people with complex needs, emotional and behavioural difficulties, or challenging behaviour. Alternative provision is a vital part of this commitment, offering specialist support and opportunities beyond the school environment.

4. Purpose and Intent

This policy outlines how Keys Group commissions, monitors, and manages alternative provision to:

- Personalise learning pathways aligned with each pupil's EHCP and needs.
- Ensure access to high-quality, accredited education and vocational opportunities.
- Promote independence, wellbeing, and successful transitions to further education, training, or employment.
- Comply with statutory guidance, including Keeping Children Safe in Education (2026) and the Alternative Provision statutory guidance.
- We ensure that curriculum adaptations and teaching strategies within AP settings provide the best opportunities for pupils with complex needs to develop independence, communication, and emotional regulation skills.
- A graduated approach of assess, plan, do and review will be applied when considering or reviewing alternative provision placements.

5. Roles and Responsibilities

5.1 Governors and Regional Director/Executive Headteacher

- Monitor and review the implementation of this policy.
- Receive termly reports on alternative provision placements, quality assurance, attendance, safeguarding, and outcomes.
- Ensure statutory duties are met, in line with the Independent School Standards for safeguarding and the quality of the education required.

5.2 Headteacher

- Overall responsibility for the use and effectiveness of alternative provision.
- The school retains overall responsibility for the education, safeguarding, welfare and outcomes of pupils on roll, regardless of where education is delivered.
- Ensure budgets are allocated and managed effectively.
- Engage with parents/carers and pupils to identify appropriate alternative provision.
- Report on AP effectiveness to the governing body.

5.3 Alternative Provision Lead (Senior Leadership Team Member)

- Conduct initial and ongoing quality assurance of alternative providers.

- Ensure written confirmation is obtained from providers regarding safeguarding checks, including staff vetting, and maintain records of provider address, provision details and any subcontracted provision.
- Maintain regular communication with providers, pupils, and families.
- Undertake termly visits to alternative provision settings, including observations and progress reviews.
- Manage incidents and behavioural concerns in conjunction with the headteacher.
- Ensure all providers receive and adhere to the school's safeguarding and child protection policies.
- Share relevant pupil SEND and risk information with providers.
- Collect pupil and parent voice feedback each half-term.
- Collect and analyse pupil voice regularly, ensuring pupils' views inform the evaluation and development of AP provision.

5.4 School Administrator / Senior Attendance Champion

- Monitor and record daily attendance of pupils in alternative provision.
- Liaise with providers to confirm attendance or absence promptly.

6. Commissioning Alternative Provision

6.1 Pre-Placement Checks

- Complete a comprehensive audit of the provider using the AP Audit Form (Appendix 1).
- Obtain a safeguarding assurance letter confirming all staff checks and training (Appendix 2).
- Record the full address of the provision, the timetable from the location of the provision and any subcontract details.
- Share relevant pupil information (EHCP, risk assessments, profiles) with the provider.
- Establish a Service Level Agreement (SLA) covering safeguarding, data sharing, attendance reporting, complaints, and escalation procedures.
- Confirm insurance and health and safety compliance.

- The school will never commission alternative provision which it knows, or reasonably believes, should be registered as an independent school but is operating unlawfully without registration.

6.2 Ongoing Monitoring

- Conduct termly QA visits including learning observations, progress data scrutiny, and welfare checks.
- Review attendance and behaviour logs regularly.
- Monitor achievement of personalised learning objectives and qualifications.
- Collect and review pupil and parent/carer feedback.
- Ensure timely communication of safeguarding or health and safety incidents.
- Evaluate how well the curriculum and teaching in AP settings are adapted to meet the needs of pupils with complex SEND and SEMH, ensuring progress towards personalised outcomes.
- Pupil feedback is gathered at least half-termly and used to shape teaching approaches, pastoral support, and curriculum content within AP settings.

7 . Referral Process

- Discuss alternative provision options with pupils and parents/carers, securing agreement.
- Clearly record the decisions and include the rationale, expected outcomes, review dates and any safeguarding considerations.
- Develop a personalised learning plan with clear objectives, timelines, and success criteria.
- Arrange induction and transition activities with the provider.
- Maintain pupil registration at the home school with dual registration at the AP provider.
- Alternative provision will be linked to EHCP outcomes, Individual Education Plans and individual risk assessments.
- Review placement and progress at least half-termly, adjusting plans as necessary.

8 . Safeguarding and Health & Safety

- Providers must have a designated DSL and deputy during operational hours. The overseeing of any safeguarding incident or concern will be completed by the DSL.
- Providers must follow safeguarding policies aligned with Working Together to Safeguard Children (2026) and KCSIE (2026).
- The school retains ultimate responsibility for the safeguarding of pupils in alternative provision.
- Immediate notification of any safeguarding concerns, staff changes, or incidents is mandatory.
- Risk assessments must be in place for all activities.
- Providers must maintain appropriate insurance levels (public liability, employer's liability, professional indemnity).

9. Attendance Monitoring

- Providers report daily attendance to the school by agreed times.
- The school conducts first-day calling for unexplained absences.
- In line with Working Together to Improve School Attendance (2026), we recognise attendance as a safeguarding priority. Persistent absence is investigated with consideration of underlying barriers and vulnerabilities.
- Attendance will be monitored in line with statutory requirements, including maintaining accurate attendance records and ensuring pupils remain on roll at the school.

10. Staff Training and Development

Staff working in or supporting alternative provision receive regular, targeted training to develop expertise in meeting the needs of pupils with complex SEND and SEMH. Training includes curriculum adaptations, communication strategies, behaviour management, and safeguarding in AP contexts. Training needs are reviewed annually as part of professional development.

11. Behaviour Support and Preventative Use of AP

- AP, including off-site direction and managed moves, is used as a preventative measure to exclusion, based on pupil needs and after other interventions have been exhausted.
- Off-site direction complies with statutory guidance, it is time-limited and aimed at improving future behaviour, not as a punishment for past misconduct.

- Managed moves are voluntary, planned transfers to support pupil reintegration or progression.
- All AP placements have clear objectives, timelines, and frequent reviews to support reintegration or transition.

12. Reintegration and Transition

- A Reintegration Plan with measurable targets and a clear timeline is agreed at placement start.
- Plans support return to school or transition to post-16 education, training, or employment.
- EHCP reviews are triggered if provision changes materially.
- Reintegration plans include measurable targets linked to post-16 progression, and outcomes, including safeguarding, attendance, academic progress and personal development, are monitored to ensure pupils are supported towards fulfilling adult lives.

13. Quality Assurance and Review

- Records of audits, visits, communications, and progress are maintained by the AP Lead.
- The headteacher reports termly to governors on AP usage, quality, and outcomes.
- This policy is reviewed annually and updated as necessary.
- Termly reports to governors include analysis of post-16 destinations and long-term outcomes for pupils attending AP.
- The school systematically evaluates the impact of alternative provision on pupils' long-term outcomes, including academic progress, social and emotional development, and successful transitions to post-16 education, training, or employment. Data from progress reviews, reintegration plans, and destination tracking inform ongoing improvements to AP provision.
- The effectiveness of staff training in AP settings is monitored through performance reviews and linked to improvements in pupil outcomes.

Equality Impact Statement

All relevant persons are required to comply with this policy and must demonstrate sensitivity and competence in relation to diversity in race, faith, age, gender, disability and sexual orientation. If you, or any other groups, believe you are disadvantaged by this policy please contact your line manager. Keys Group will then actively respond to the enquiry.

- **Version Control**

This document can be found in Radar. This policy is reviewed annually, or sooner if legislation or statutory guidance changes. The next review date and version history are recorded in the control table above. The named owner for review at Embleton View School is the headteacher.

Appendix 1: Off-site & Alternative Provision Audit Form

Checklist of factors to consider when deciding that an alternative provision or out-of-school placement is of suitable quality and that appropriate and robust monitoring arrangements are in place. All sections/questions must be completed.

Name of Provider:	
Date & time of visit:	
Visit / Audit completed by:	
Address:	
Telephone number:	
E-mail address:	
Key Contact:	

Registration Status

A provider must register as an Independent school if they meet the following conditions:

- Providing 18 hours or more 'full time' education to 5 or more pupils of compulsory school age, or
- 1 pupil of compulsory school age who is looked after, or has an EHCP.

Question	**Yes**	**No**	**Comment**
Does the provider meet the condition for registration above?			
Are they registered with the DfE?			**DfE number:**
Are they an Outdoor Adventurous Activity provider?			**AALA Licence number:**

Safeguarding

Question	Yes	No	Comment
Is the provision on the Local Authorities AP Framework?			
Is a recent 'Good' or 'Outstanding' Ofsted Report available where applicable?			
Does the provider have a robust attendance procedure and report daily on attendance?			
Will the provider notify the school if the pupil is absent? If so, how?			
Have staff had recent safeguarding training?			Training provider, course name/level, date:
Topics covered in safeguarding training			
Who are the provider's DSL and DDSL?			Training details:
Does the provider record concerns about pupils? If so, how?			
Are there clear arrangements for information sharing between the provider and the school?			
Has the school received written confirmation from the provider that safeguarding checks in line with KCSIE have been carried out on all individuals?			(See Appendix 2 letter template)
Are the following policies and procedures in place?			Attendance, Admissions, Health & Safety, Code of Conduct, Behaviour, Data Protection, Equality, Child Protection, Prevent Risk

Question	Yes	No	Comment
			Assessment, Online Safety, Missing Child Procedure, Allegations Management, Low-level Concerns, Lone Working, RSHE Policy, Complaints Procedure

Health & Safety

Question	Yes	No	Comment
First aid provision			
Medication management			
Fire safety arrangements			
Transport arrangements			

Insurance

Insurance Type	Yes	No	Comment
Public Liability Insurance (£5,000,000 minimum)			Insurer, Expiry Date, Level of liability
Employer's Liability Insurance (£10,000,000 minimum)			Insurer, Expiry Date, Level of liability
Professional Negligence Insurance (£2,000,000 minimum)			Insurer, Expiry Date, Level of liability
Motor Vehicle Insurance (if applicable)			Insurer, Expiry Date, Special Conditions
Subcontractor Liability Insurance			Insurer, Expiry Date, Special Conditions

Quality of Provision

Question	Yes	No	Comment
Does the commissioned course meet the educational and SEMH needs of each pupil?			
Are the premises fit for purpose?			
Are health and safety arrangements appropriate?			
Is teaching and learning of a high standard?			
What quality assurance processes are undertaken at the provider?			
What is the regularity of progress reporting and meetings?			

Question	Yes	No	Comment
Observations during learning walk/tour: engagement, behaviour, pastoral support, quality of teaching, adult-pupil interaction			
How is learning organised? (Long/medium/short term planning, differentiation, personalisation)			
Observations on learners' work, displays, challenge level			
Are suitable resources and teaching materials available?			
Is behaviour management strong?			
Is tracking and reporting on progress robust?			
Are suitable accreditation and outcomes on offer?			
Is due attention paid to reintegration or progression to post-16 pathways?			
Is there a pupil voice process?			

Transition and Admission Processes

Question	Yes	No	Comment
Does the provider have an admissions and induction process?			
Can pupils visit prior to attendance?			
Does the provider offer taster sessions?			
Is the transition timetable bespoke to each pupil?			
What does a typical transition look like?			
Does the provider have links with careers advisers or mainstream providers/employers for transitions?			
Does the provider have a specific process for ending a placement?			Outline for both parties

Additional Support

Question	Yes	No	Comment
Does the provider set targets for attendance, progress, personal/social/behaviour/attitude?			
Can the provider evidence overall progress of the pupil?			
Will the provider produce reports for parents/carers or EHCP reviews?			
Which external agencies does the provider work with? (Social Care, Educational Psychology, CAMHS, YOT/YOS, Substance Abuse Services, Other)			

Supporting Documentation

Document	Yes	No	Comment
Service Level Agreement or Provider Contract			
Education plan for each pupil or group			
Protocol for monitoring pupil progress, outcomes, and quality			
Review calendar for monitoring progress and quality			
Effective communication protocol			
Details of any subcontracted provision and due diligence evidence			

Suitability of Provision

Question	Yes	No	Comment
Is the provision suitable for the pupil(s)? If yes, why?			

Appendix 2: Safeguarding Assurance Letter
(To be completed by the Alternative Provision Provider)

To: [Commissioning School Name]
From: [Alternative Provision Provider Name]
Date: [Insert date]
Dear [Headteacher],
This letter confirms that all staff, volunteers, and contractors working with pupils from [Commissioning School Name] have undergone the required safeguarding and pre-employment checks in line with Keeping Children Safe in Education (2026) and all relevant statutory guidance.
For each member of staff, we confirm the completion and verification of:

1. Enhanced DBS check with children's barred list information.
2. Identity verification using three separate documents per DBS guidelines.
3. Children's barred list check (where regulated activity applies).
4. Teacher status/prohibition checks where applicable.
5. Section 128 direction checks for management positions.
6. Overseas checks including certificates of good conduct, where relevant.
7. Verification of professional qualifications, where required.
8. Right to work in the UK.
9. Two professional references verified for authenticity.

We also confirm:

- Operation of age-appropriate internet filtering and monitoring systems, with termly written assurance to the commissioning school and immediate notification of material changes or incidents.
- Same-day notification of any safeguarding allegation, concern, or incident involving your pupils, as well as any changes to our DSL/deputy DSL or senior leadership.
- Immediate notification if any new staff, volunteer, or contractor is appointed to work with your pupils, with deployment only after written assurance of completed checks.
- Notification within one working day of any safeguarding policy change, filtering/monitoring system change, or material incident affecting our statutory duties.

Yours sincerely,
[Name]
[Role/Position]
[Organisation Name]
[Signature]

Appendix 3: Off-site Alternative Provision Checks Flowchart

1. Identify a Lead for off-site & AP providers in school.
2. AP Lead visits provider and completes the Audit Document (Appendix 1).
3. AP Lead ensures receipt of completed Safeguarding Assurance Letter (Appendix 2).
4. Audit, Safeguarding letter, and additional evidence (e.g., insurance documents) are kept on file for scrutiny.
5. Plan transition for the pupil.
6. School administrator and provider maintain daily contact regarding pupil attendance.
7. Ongoing QA checks are scheduled and completed by AP Lead/SLT using QA form (Appendix 5).

Appendix 4: Alternative Provision Process Guidance

Key areas and documents to verify for compliance and quality assurance:

- Registration Status: Confirm if the provider needs to be registered as an independent school (18+ hours, 5+ pupils or 1 EHCP/looked-after child). Check DfE registration and Ofsted/ISI reports. Outdoor and adventurous providers require AALA licence.
- Safeguarding: Confirm provider has robust safeguarding training, policies, and procedures. Check attendance reporting and first-day contact procedures. Obtain written confirmation of safer recruitment checks (Appendix 2).
- Health & Safety: Ensure risk assessments are in place for all activities including off-site and adventurous activities. Check first aid, medication, fire safety, and transport arrangements.
- Insurance: Confirm public liability, employer's liability, professional indemnity, motor vehicle, and subcontractor insurance are adequate and current.
- Quality of Provision: Assess provider's experience with SEMH/ASD pupils, premises suitability, engagement levels, teaching quality, curriculum planning, differentiation, assessment, behaviour management, and progress tracking.
- Transitions and Admissions: Confirm robust admissions, induction, and transition processes, including taster sessions and clear procedures for ending placements.
- Additional Support: Clarify roles for attendance, progress monitoring, and external agency involvement.
- Documentation: Ensure contracts, education plans, monitoring protocols, communication protocols, and due diligence evidence for subcontractors are in place.

Appendix 5: Ongoing Quality Assurance Monitoring of Teaching & Learning

Areas to monitor during onsite visits:

Description	Comments & Notes
Curriculum	
Delivery of a broad and balanced curriculum / range of accredited courses	
Quality of teaching and learning: planning, delivery, relevance	
Accurate identification of pupils' needs to address barriers to learning	
Scrutiny of pupils' work	
Quality of assessment and feedback	
Progress and attainment tracking	
Transition support	
Attendance	
Daily recording of attendance	
First day response procedures for non-attendance	
Tracking of attendance data	
Behaviour	
Identification and meeting of personal, social, academic needs	
Improved motivation and engagement	
Behaviour policy adherence, staff training, incident recording	
Restraint/physical intervention incidents and post-incident support	
Personal Development	
Planning incorporates pupil's SEN as per EHCP	
Identification and meeting of personal, social, academic needs	
Improved pupil motivation and self-confidence over time	

Description	Comments & Notes
Well-planned transition with clear objectives and next steps	
Destination	
Destination planning and CEIAG links	
Parent/carer liaison	
Successful transition to appropriate destination	
Infection Control Measures (when applicable)	
Infection control arrangements and risk assessments	
Safe and well checks	
Effectiveness of curriculum adaptations for pupils with complex SEND and SEMH needs.	
Use of specialised resources and communication methods.	
Evidence of pupil engagement and feedback influencing provision.	