



**THE COMPLETE
EDUCATION SOLUTION**

CREATING UNIQUE JOURNEYS FOR LIFE AND LEARNING

Safeguarding for Off-Site Provision Policy

Approved by the TCES Operational Board
on behalf of Thomas Keaney, CEO and Schools' Proprietor

Date of next formal review, September 2024

This policy applies to all The Complete Education Solution
(TCES) schools and services

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Introduction

TCES is committed to safeguarding and promoting the welfare of all of its pupils as outlined within our *Safeguarding Children and Vulnerable Adults policy* which provides procedural guidance on how to respond to safeguarding concerns. In order to support the unique abilities of pupils attending TCES, there are occasions when off-site opportunities are identified for pupils to cater to diverse learning styles and support specific needs that cannot be fully addressed within the school setting, fostering a more inclusive and tailored educational experience. Examples may include work experience, educational visits, coached activities, or any other activity which will result in a pupil being in receipt of services provided by other agencies and organisations. When pupils are attending these other agencies and organisations, the safeguarding responsibility for a pupil is retained by the TCES. All TCES schools and services have a responsibility pursuant to the [Education, England \(Independent School Standards\) Regulations 2014](#) to ensure that they 'promote the welfare of pupils at the school'.

[Keeping Children Safe in Education \(KCSIE\) 2023](#) statutory guidance outlines the retention of safeguarding responsibility for schools where placing with an alternative provider:

"Where a school places a pupil with an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil and should be satisfied that the provider meets the needs of the pupil. Schools should obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of its own staff. Schools and colleges organising work experience placements should ensure that the placement provider has policies and procedures in place to protect children from harm".

It is important to note that not all organisations/agencies that are identified as suitable for off-site provision will be governed by the KCSIE 2023 statutory guidance and, as such, the standards of safeguarding that schools are operating to may not be embedded within these organisations. In addition, not all organisations/agencies that are identified as suitable for off-site provision will have their safeguarding practice overseen by regulatory bodies (such as Ofsted) in the same way that schools are overseen.

Procedurally, it is therefore proportionate to consider two different approaches to auditing the safeguarding practice and standards expected from off-site providers who may be considered suitable to deliver services to TCES pupils:

- 1) For those providers to whom Keeping Children Safe in Education applies, namely maintained schools and colleges, independent schools (including academies, free schools and alternative provision academies), non-maintained special schools and pupil referral units (PRUs) and where there is regulatory oversight whose reports are publicly available.
- 2) For those providers who do not have regulatory oversight and to whom Keeping Children Safe in Education 2023 does not apply; but whose practice is guided by Working Together to Safeguarding Children 2023 and (in many instances) the non-statutory guidance contained within [Keeping Children Safe in Out of School Settings](#). Please note that this process was previously referred to as the "Section 11 process".

Procedure

In order for TCES schools to ensure that pupils are effectively safeguarded whilst attending an off-site provision, the following process must precede any agreement for pupils to attend that provision.

- 1) The safeguarding arrangements in place within the provision need to satisfy the school that they are suitable and in line with the safeguarding expectations for pupil. This should be established with the use of the relevant safeguarding confirmation in Appendix A (for provision whose organisation/agency is subject to KCSIE 2023 guidance – see above) or Appendix B (for provision whose organisation/agency is not subject to KCSIE 2023 guidance – see above).
- 2) Any proposed off-site provision must have a joint risk assessment completed and signed off by both the off-site provision and TCES staff member who will have met relevant staff and visited the provision to ensure its suitability – Appendix C.
- 3) Any Activity being undertaken off-site must be approved by the SLT – Appendix D
- 4) Any agreed college provision must be approved by the Headteacher/Head of Service – Appendix E
- 5) Consent must be sought and obtained by the relevant individual/s who hold parental responsibility for the child. If the provision is proposed to be for a 'Care Experienced' child (commonly referred to as 'Looked After Child'), clarity should be sought from the Designated Safeguarding Lead (DSL) as to who holds parental responsibility for the child prior to consent being sought.
- 6) All paperwork must be signed off and stored in a separate off-site provision folder with relevant contact details disseminated to those who have a need to know in order to management both practical and potential safeguarding arrangements. A front sheet for this folder is included in Appendix F.
- 7) Off-site provision that continues to be in use should be subject to routine monitoring of their safeguarding practice on an annual basis with any updated information recorded within the folder. Appendix G should be used to support reviews for these providers.
- 8) Any provider operating as a 'sole trader' or individual, should be included on the commissioning schools' Single Central Record (SCR) alongside the required checks for this register alongside an appropriate risk assessment.

For staff involved in the scrutiny of the prospective provider's Safeguarding Policy, there are a number of basics that should be in place to make it compliant with both TCES expectations but also the provider's statutory duty. Appendix H is a tool devised to support this process. Should any queries arise, these should be raised with the DSL for the school.

In the event that the requirements of the provision are not deemed to be met, any TCES school will not be authorised to use the provision and the DSL notified for consideration of escalation to the relevant LADO (should the provision be providing services to other children and not have the required statutory safeguarding arrangements in place). If the organisation is able to demonstrate at a later time that the standards are fully met, then the school may review their decision and undertake the above process from the beginning. Caution needs to be applied to those providers that have failed in their evidencing of suitable safeguarding arrangements previously and a consultation with the DSL should take place to consider how embedded organisational safeguarding practice may be at the proposed provision.

Appendix A: Safeguarding Confirmation for schools/colleges subject to KCSIE 2023

Organisation:		
Address:		
Contact Name:	Email Address	
Position:	Telephone number	
Name of DSL:	Email Address	
Position:	Telephone number	
Name of deputy DSL:	Email Address	
Position:	Telephone number	

In line with the responsibilities outlined within to the Keeping Children Safe in Education 2023 statutory guidance, TCES is required to ensure that the safeguarding arrangements that are in place within any organisation providing off-site provision for its pupils are sufficient:

“Where a school places a pupil with an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil and should be satisfied that the provider meets the needs of the pupil. Schools should obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of its own staff”.

As a registered education provider, please could you confirm the following:

- 1) I confirm that our school/college is regulated by either Ofsted or the Independent Schools Inspectorate.
- 2) I confirm that our school/college is fully compliant with its safeguarding requirements as outlined within Keeping Children Safe in Education 2023 and Working Together to Safeguard Children 2023 statutory guidance.
- 3) I confirm that appropriate safeguarding checks have been carried out on individuals who will come in to contact with pupils in line with expected safer recruitment practice. This includes, but is not limited to, undertaking enhanced DBS checks and criminal record checks for overseas applicants.
- 4) I confirm that any concerns/incidents/notable event that relates to a TCES pupil will be shared with the Designated Safeguarding Lead (DSL) and Headteacher/Head of Service for the pupil’s school as soon as is practicable. This includes, but is not limited to:
 - a) concerns for a pupil’s welfare including any safeguarding concerns.
 - b) pupil non-attendance (notification to be provided on the same day regardless of the reason provided).

Name of TCES School/service DSL:
 Contact email:
 Contact telephone:

Name of TCES Headteacher/Head of Service:
 Contact email:
 Contact telephone:

School / College signature:
 Position (must be DSL/Headteacher):
 Contact email:
 Contact telephone:
 Date:

Appendix B – Safeguarding Confirmation for providers not subject to KCSIE 2023

Organisation:		
Address:		
Contact Name:	Email Address	
Position:	Telephone number	
Name of DSL:	Email Address	
Position:	Telephone number	
Name of deputy DSL:	Email Address	
Position:	Telephone number	

In line with the responsibilities outlined within to the Keeping Children Safe in Education 2023 statutory guidance, TCES is required to ensure that the safeguarding arrangements that are in place within any organisation providing off-site provision for its pupils are sufficient:

“Where a school places a pupil with an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil and should be satisfied that the provider meets the needs of the pupil. Schools should obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of its own staff.”

“Schools and colleges organising work experience placements should ensure that the placement provider has policies and procedures in place to protect children from harm”

As a setting offering off-site provision for a TCES pupil/pupils, please could you confirm the following:

- 1) I confirm that our provision is fully complaint with its safeguarding requirements as outlined within Working Together to Safeguard Children 2023 statutory guidance [and Keeping Children Safe in Out of Schools settings non-statutory guidance] – delete where not applicable.
- 2) I confirm that appropriate safeguarding checks have been carried out on individuals who will come in to contact with pupils in line with expected safer recruitment practice. This includes, but is not limited to, undertaking enhanced DBS checks and criminal record checks for overseas applicants.
- 3) I confirm that I have provided the following policy documentation for review:

Documentation	Date of Receipt
1. Safeguarding / Child Protection Policy	
2. Whistleblowing Policy (where not included in 1)	
3. Managing Allegations Against Staff Policy (where not included in 1)	
4. Safer Recruitment Policy (where not included in 1)	
5. Staff / Volunteer Code of Conduct	
6. Health and Safety Policy	
7. Complaints Procedure	
8. Information Sharing / Data Protection Policy	
9. Equality and Diversity Policy	
10. Risk Assessment in relation to provision / activity (to be completed jointly)	
11. Employer Liability Insurance	
12. Public Liability Insurance	
13. Service Level Agreement	

- 4) I confirm that any concerns/incidents/notable event that relates to a TCES pupil will be shared with the Designated Safeguarding Lead (DSL) and Headteacher/Head of Service for the pupil's school as soon as is practicable. This includes, but is not limited to:
- a) concerns for a pupil's welfare including any safeguarding concerns.
 - b) pupil non-attendance (notification to be provided on the same day regardless of the reason provided).

Name of TCES School/service DSL:
Contact email:
Contact telephone:

Name of TCES Headteacher/Head of Service:
Contact email:
Contact telephone:

Off-site Provision signature:
Position (must be a Senior Leader/Manager):
Contact email:
Contact telephone:
Date:

Appendix C – Joint Risk Assessment – To be completed by providers and TCES School

Risk Assessment in relation to Offsite Provision at:

Date:

Completed by (TCES Staff):

Completed by (Off-Site Provision Staff):

SLT Approval provided by:

Severity	Multiplier					
Extreme / Catastrophic	5	5	10	15	20	25
Major	4	4	8	12	16	20
Moderate	3	3	6	9	12	15
Minor	2	2	4	6	8	10
Insignificant	1	1	2	3	4	5
	Multiplier	1	2	3	4	5
Likelihood		Remote	Unlikely	Possible	Probable	Certain

	Key	
Severe	20 - 25	Unacceptable level of risk exposure which requires immediate corrective action to be taken
Major	12 - 16	Unacceptable level of risk exposure which requires constant active monitoring, and measures to be put in place to reduce exposure
Moderate	5 - 10	Acceptable level of risk exposure subject to regular active monitoring measures
Minor	3 - 4	Acceptable level of risk exposure subject to regular passive monitoring measures
Insignificant	1 - 2	Acceptable level of risk subject to periodic passive monitoring measures

Details of Risk	To whom	Severity	Likelihood	SxL = Risk rate	Control measures	Further actions	Controlled Severity	Controlled Likelihood	SxL = Risk rate

Appendix D – Activity Authorisation

Type of Activity _____

Location / venue address _____

Reason for Activity _____

Activity Team Leader _____

Mode of transport _____

Date of proposed Trip / first session _____ No of sessions _____

Pupils Attending	
Staff Attending	

Cost of Activity & transport per pupil per session _____

Total cost including staff attendance _____

Prior to approval Checklist: The following items must be attached to this sign-off sheet:

Risk Assessment for Activity (Appendix C)	
Completed Appendix A / B [where required]	
Risk Assessment for transportation method	
Signed Individual Risk Assessment for each pupil	
Signed Parent/Carer consent for each pupil	

I confirm as Team Leader that the information above is correct.

Signed by _____ Name _____ Date _____

I approve the planned Activity for the pupils named above to take place on the date above (SLT only)

Signed by _____ Name _____ Date _____

Appendix E – College Placement Authorisation

This form must be completed and signed off by the Headteacher/Head of Service in advance of any pupil attending the named college.

Name of College _____

Academic Year _____

Please confirm by ticking the box that the following documents / Information have been obtained / completed and are they attached to this form:

Signed letter head of confirmation from the college

College's Safeguarding Policy (should be available on their website)

College's Safer recruitment policy (may be part of the safeguarding policy)

Completed Appendix A form.

Completed Risk Assessment

Most Recent Ofsted Inspection Report

Name of person completing the form: _____ Role _____

Signature _____ Date _____

Comments:

I confirm that pupils can be placed in the above-named college:

Name _____ Role _____

Signature _____ Date _____

Appendix F – Off-Site Provision Cover Sheet

Pupil Name	Timetable	Enrichment	Provision	Provision Address	Provision Contact details	Provision Contact Name	Safeguarding Lead
<i>James Smith (e.g)</i>	<i>Tues/Thurs</i>	<i>Online Tuition</i>	<i>Home Learning Service</i>	<i>1 HLS Street, London SW1 1AB</i>	Steve.james@homelearning.co.uk 01234 567 8910	<i>Steve James</i>	<i>Nancy Smith</i>

Appendix G – Provision Monitoring Form

RED	Indicates that processes are lacking and need to be developed as a matter of urgency to meet minimum requirements for a specific standard. However, we will not be able to use this provider again. In all cases check with Headteacher/Head of Service and Head of Safeguarding							
AMBER	Indicates that processes are in place, but they need to be reviewed or further improved for a specific standard. This must be a time limit for improvement							
GREEN	Indicates that the provider meets the standard fully with all processes in place and up to date, at least to the required minimum							
Provision	Date Off-Site Provision Commissioned	Updated Policies received (annually)	Employers and Public Liability Insurance expiry date	Dates Venue RA Checked	Activity Authorised Date	SLA Expiry Date	Most Recent Lesson Observation	Signed

Appendix H – Safeguarding Policy Audit Tool

The below checklist is a tool to support the reviewing of prospective off-site provider's Safeguarding Policies. This covers the basic requirements pursuant to Working Together to Safeguard Children 2023. If these areas are not present procedurally at the prospective provision, the relevant school seeking to use the provider of off-site provision will need to raise this with the provider for remedy and, if concerns around understanding or application remain, advise that their safeguarding arrangements are not suitable for the relevant pupil / pupils. If the latter is decided and staff are aware of other children using the setting, a discussion with the DSL is required to consider escalation to the local LADO / Safeguarding Children Partnership.

Area for consideration	Yes / No	RAG Rating
Is the organisation's name and address clear?		
Are the Designated Safeguarding Lead's (DSL) contact details clear?		
Are there contact details for a Deputy DSL (where Appropriate)?		
Are there contact details for a Senior Lead for Safeguarding?		
Is there reference to the relevant statutory guidance? (WTTSC, KCSIE)		
Is there reference to the organisation's local partnership and procedures? (e.g. London Child Protection Procedures)		
Does the Safeguarding Policy consider pathways to support for children (referrals for staff to DSL / referral from DSL to CSC for statutory support)?		
Does the Safeguarding Policy consider escalation policies for staff to follow when their child safeguarding concerns are not being addressed within their organisation or by other agencies?		
Does the Safeguarding Policy (or separate policy) include arrangements which set out clearly the processes for sharing information, with other practitioners and with safeguarding partners?		
Does the Safeguarding Policy (or separate policy) include whistleblowing processes?		
Does the Safeguarding Policy (or separate policy) include safe recruitment practices and ongoing safe working practices for individuals whom the organisation or agency permit to work regularly with children, including policies on when to obtain a criminal record check?		
Does the Safeguarding Policy (or separate policy) include appropriate supervision and support for staff, including undertaking safeguarding training?		
Does the Safeguarding Policy (or separate policy) include comment regarding a culture of listening to children and taking account of their wishes and feelings, both in individual decisions and the development of services?		
Does the Safeguarding Policy (or separate policy) include comment regarding staff being given a mandatory induction, which includes familiarisation with child protection responsibilities and the procedures to be followed if anyone has any concerns about a child's safety or welfare?		
Does the Safeguarding Policy (or separate policy) include procedures for dealing with allegations against people who work with children?		
Does the above include the details of the LADO to whom these allegations need to be reported to?		

Appendix I – Safeguarding for Off-site Provisions Flowchart



Is the pupil(s) visiting or engaging in activity outside of the school/service?

Safeguarding off-site provision policy not applicable

Is the pupil(s) accessing a college placement?

Will the pupil(s) be taught and/or supervised by a non-TCES staff member at any point during the activity/visit?

The following documents must be completed/obtained:

- **Appendix D:** Activity authorisation
- **Risk assessment for transportation method(s)***
- **Parent/carer consent***
- **Pupil risk assessment for activity***

**for each pupil*

Is the pupil(s) visiting or engaging in activity at a school or college (including a different TCES school/service)?

The following documents must be completed/obtained:

- **Appendix A:** Safeguarding confirmation for schools/colleges subject to KCSIE 2023
- **Appendix C:** Joint risk assessment (this is separate from the pupil's general risk assessment)
- **Appendix D:** Activity authorisation
- **Appendix E:** College placement authorisation
- **Risk assessment for transportation method(s)***
- **Parent/carer consent***
- **Pupil risk assessment for activity***

**for each pupil*

The following documents must be completed/obtained:

- **Appendix A:** Safeguarding confirmation for schools/colleges subject to KCSIE 2023
- **Appendix C:** Joint risk assessment (this is separate from the pupil's general risk assessment)
- **Appendix D:** Activity authorisation
- **Risk assessment for transportation method(s)***
- **Parent/carer consent***
- **Pupil risk assessment for activity***

**for each pupil*

Is the off-site provision setting subject to Keeping Children Safe in Education 2023?

The following documents must be completed/obtained:

- **Appendix B:** Safeguarding confirmation for providers not subject to KCSIE 2023
- **Appendix C:** Joint risk assessment (this is separate from the pupil's general risk assessment)
- **Appendix D:** Activity authorisation
- **Risk assessment for transportation method(s)***
- **Parent/carer consent***
- **Pupil risk assessment for activity***

**for each pupil*

Once all paperwork is obtained, School Business Manager to update/complete:

- **Appendix F:** Off-site provision cover sheet
- **Appendix G:** Provision monitoring form (if applicable)
- **Appendix H:** Safeguarding policy audit tool
- **Safeguarding off-site provisions folder** (all appendix documents to be added)