CREA PAX LTD

Core policies and statements

Alternative provision 2026 to 2027

Approved edition - effective 17 October 2026

This collection brings together the 18 core policies and statements for Crea Pax. It is intended for families, learners, referring schools, local authorities and others who need to understand our provision, safeguarding and operating commitments.

Approved by Martha Bache, Director and Proprietor, on 17 October 2026, effective the same date. This edition replaces the earlier public core-policy collection. Review dates are stated in each policy; earlier review will take place where required.

Staff must also follow the current authorised operational procedures and individual support plans. Restricted learner, safeguarding, personnel and recruitment records are not included. Detailed security, animal emergency instructions and qualification governance records remain controlled documents.

Contact and safeguarding

General enquiries and DSL: Martha Bache
07730 476738 | martha@creapax.com
Deputy DSL: Stephanie Selby | steph@creapax.com
Concerns involving the Proprietor: Stephanie Selby | steph@creapax.com

In immediate danger, call 999. Do not use the website enquiry form for urgent safeguarding concerns.

Crea Pax Ltd | Badgers Mount, Kingston House, Kingston Deverill, Warminster, Wiltshire, BA12 7HE
Company number 13826441 | Registered in England and Wales

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POLICY 01 | 2026-27

Safeguarding adults and child protection

Owner: Martha Bache, Director and Proprietor. Operational safeguarding: Martha Bache, DSL; Stephanie Selby, DDSL. Health and safety: Edwin Ralph.

Version: 2026-27.1 | Approved and effective: 17 October 2026

Approved by: Martha Bache, Director and Proprietor | Next review: By 1 September 2027, or earlier if required.

1 Policy statement and status

Crea Pax is an alternative education provision supporting children, young people and adult learners with social, emotional, mental health and special educational needs. Crea Pax provides therapeutic interventions and a therapeutically informed approach; it does not provide formal therapy as part of its commissioned alternative provision.

For children under 18, Crea Pax adopts Keeping Children Safe in Education 2026 (KCSIE) as its operating safeguarding baseline, together with Working Together to Safeguard Children 2026, current information-sharing guidance, local safeguarding partnership procedures, contractual requirements and relevant law. For learners aged 18 and over, Crea Pax also applies the Care Act 2014 adult safeguarding framework and the Mental Capacity Act 2005 where relevant.

Safeguarding is everyone’s responsibility. Crea Pax works in a child- and learner-centred, trauma-informed, relational, inclusive and professionally curious way. Wishes, feelings and communication needs are taken seriously without allowing delay where protection is required.

Commissioning responsibility Placement at Crea Pax does not remove the commissioning school’s, college’s or local authority’s safeguarding duties. Crea Pax and the commissioner agree information-sharing, attendance, emergency, family-contact and review arrangements before or at placement start.

2 Scope and key definitions

This policy applies to the proprietor, employees, agency and contracted workers, apprentices, trainees, students on placement, volunteers, visitors and any adult working for or representing Crea Pax, on site, online, during transport or during off-site activity.

- A child is anyone under 18.
- An adult learner is a learner aged 18 or over. Adult safeguarding duties are considered where the adult has care and support needs, is experiencing or at risk of abuse or neglect, and because of those needs is unable to protect themselves from the abuse, neglect or risk.
- Safeguarding concerns are acted upon regardless of where or when the alleged harm occurred. Concerns may also relate to an unborn baby.
- All adults working with children must read KCSIE 2026 Part One in full. Any quick-reference overview supports recall but does not replace Part One.

This policy should be read alongside Crea Pax arrangements for staff behaviour/code of conduct, allegations and low-level concerns, whistleblowing, online safety and devices, attendance, behaviour and positive handling, SEND, health and safety, first aid and medication,

personal care where applicable, complaints, data protection/information sharing, safer recruitment, risk assessment and off-site activities.

3 Key safeguarding contacts

Role	Contact
Proprietor and DSL	Martha Bache • 07730 476738 • martha@creapax.com
Deputy DSL	Stephanie Selby • steph@creapax.com
Alternative senior contact if concern is about proprietor	Stephanie Selby (DDSL) - steph@creapax.com
Wiltshire Integrated Front Door (children)	0300 456 0108 • out of hours 0300 456 0100
Wiltshire Adult Social Care / safeguarding	0300 456 0111 • out of hours 0300 456 0100
Wiltshire LADO	LADO@wiltshire.gov.uk
Dorset Family Support & Advice Line (children)	01305 228558 • out of hours 01305 221000
Dorset Adult Safeguarding	01305 221016 • out of hours 01305 221000
Dorset LADO	01305 221122 • lado@dorsetcouncil.gov.uk
Immediate danger or crime in progress	999 • otherwise police 101 as appropriate
NSPCC Whistleblowing Advice Line	0800 028 0285 • help@nspcc.org.uk

Local contact details, thresholds and referral routes are checked at least annually and before reliance. The learner’s home authority, commissioning authority and school/setting may have different notification routes; the DSL records which route applies. Adult safeguarding routes are similarly checked for the relevant local authority.

4 Immediate safeguarding route

Child concern Report immediately to Martha Bache (DSL) or Stephanie Selby (DDSL). Use the relevant children’s safeguarding route without delay where required. Notify the commissioner as appropriate.

Adult-at-risk concern Report to the DSL/DDSL. Consider the relevant Adult Social Care safeguarding route, the adult’s wishes and capacity, and commissioner involvement as appropriate.

Concern about a member of staff Report to the proprietor/DSL. Where the harm threshold may be met, seek LADO advice without conducting an internal investigation first.

Concern about Martha Bache Report to Stephanie Selby (DDSL) and the relevant LADO directly. Martha must not manage the response.

Immediate danger or urgent medical need Call 999 first. Do not wait for the DSL, parent/carer or commissioner before obtaining emergency assistance.

If the DSL is unavailable, staff contact the DDSL. If neither is immediately available, staff must not delay protective action or referral simply because they are waiting for them.

5 Roles and accountability

5 1 Proprietor

- Ensures effective safeguarding governance, resources, challenge, annual review and implementation.
- Oversees safer recruitment, checks, the Single Central Record (SCR), training and required referrals.
- Ensures online safety, filtering, device, mobile phone, image and generative-AI arrangements are proportionate to Crea Pax systems.
- Ensures allegations concerning the proprietor are managed without the proprietor controlling the response.
- Ensures learning from incidents, audits and complaints is translated into actions.

5 2 DSL and DDSL

- Are available during operating hours with clear cover arrangements.
- Manage or support referrals to children’s social care, adult safeguarding, LADO, police, Channel and other agencies as appropriate.
- Maintain accurate safeguarding records, decisions, rationale, follow-up and outcomes.
- Work with commissioners, parents/carers and professionals unless doing so could increase risk or prejudice an investigation.
- Contribute appropriately to existing statutory or multi-agency safeguarding/support plans.
- Challenge and escalate where another agency’s response may leave a learner at risk.
- Receive role training at least every two years and refresh knowledge and skills at least annually.

5 3 All staff and volunteers

All adults must know the safeguarding systems, act immediately on concerns, share information appropriately, maintain professional boundaries and never assume somebody else will act. Where unsure, they speak to the DSL/DDSL; uncertainty must not cause delay where there is immediate risk.

6 Recognising abuse, neglect, exploitation and vulnerability

Staff remain alert to abuse, neglect and exploitation inside or outside the home, within families, peer relationships or institutions, in the community and online. Concerns may overlap and may not present through a direct disclosure. A learner may experience multiple, simultaneous forms of harm.

Area	Examples / indicators
Physical abuse	Injury, poisoning, burning, suffocation, fabricated or induced illness, concerning explanations or repeated patterns.

Area	Examples / indicators
Emotional/psychological abuse	Persistent criticism, belittling, intimidation, silencing, coercive control, exposure to ill-treatment or developmentally inappropriate expectations.
Sexual abuse	Contact or non-contact abuse, hidden/intrafamilial or institutional abuse, grooming, sexual images, online facilitation, exploitation and harmful sexual behaviour.
Neglect	Persistent failure to meet physical, emotional, medical, supervision, safety or educational needs.
Exploitation and modern slavery	Criminal or sexual exploitation, county lines, trafficking, financial exploitation, organised networks, coercion and criminalisation of victims.
Domestic abuse and relationship abuse	Seeing, hearing or experiencing domestic abuse; coercive control, stalking, monitoring, isolation, threats, sexual pressure, economic control and technology-facilitated abuse, including in teenage relationships.
Prejudice-based/discriminatory harm	Racism, faith-based prejudice, sexism, misogyny, misandry, homophobia, disability-related or other discriminatory harm.
Other specific risks	FGM, forced marriage, so-called honour/faith-based abuse, radicalisation, serious violence, child-to-parent/caregiver abuse, substance misuse, young caring, homelessness/temporary accommodation and extra-familial harm.

Grooming may occur online or offline and may involve adults or peers. It can involve gifts, money, affection, attention, threats, blackmail, sexual imagery or the creation of dependency. Apparent cooperation by a child does not mean exploitation is absent.

Staff remain professionally curious where behaviour, distress, sexualised behaviour, unexplained gifts/contact, avoidance of people/places or changes in presentation raise concerns. Staff notice, record and report; they do not investigate suspected abuse themselves.

Discriminatory behaviour can itself cause harm and may also create an environment in which other abuse becomes easier to perpetrate or harder to disclose.

7 Additional barriers, SEND and care experience

Crea Pax works with learners whose SEND, communication needs, trauma, health conditions, disrupted education, previous exclusion, care experience or other circumstances may increase vulnerability or make concerns harder to recognise. Staff must not attribute injuries, distress, sexualised behaviour, absence or changes solely to disability, diagnosis or SEMH presentation.

- Use preferred and accessible communication methods and allow additional processing time.
- Recognise behaviour as a possible form of communication and consider reasonable adjustments.
- Recognise that learners may fear not being believed or may not identify their experience as harmful.
- Be alert to online grooming, bullying, exploitation and radicalisation risks.

- For looked-after children, children in kinship/special guardianship/foster arrangements and care-experienced learners, understand who holds relevant responsibilities and who should receive information.

Where Crea Pax becomes aware of a private fostering arrangement involving a child, the DSL ensures the relevant local authority is notified in accordance with current requirements.

8 Responding to a concern or disclosure

- Listen calmly and take the learner seriously.
- Do not interrogate, ask leading questions or investigate.
- Do not promise secrecy. Explain that information may need to be shared to keep people safe.
- Check immediate safety and obtain urgent medical help where needed.
- Report to the DSL/DDSL immediately, or use a direct external route if delay would create risk.
- Record factually and promptly, including the learner's own words where relevant.
- Where an injury needs recording, a body map may be used to record the observed location/presentation; staff must not conduct unnecessary examinations or ask a learner to remove clothing merely to complete a body map.

9 Decision making, referrals and early and family help

The DSL/DDSL considers the concern against current local thresholds and decides whether the response requires family/early help, statutory children's social care, adult safeguarding, police, Channel, LADO or another service. Any staff member may make a direct referral where necessary. A decision not to refer is recorded with rationale and any monitoring or review arrangements.

Crea Pax contributes appropriately to Child in Need, child protection, adult safeguarding and other multi-agency plans. Where a response from another agency appears insufficient to protect a learner, Crea Pax challenges and escalates through the relevant local procedure.

10 Child on child harm and harmful behaviour

Child-on-child abuse is never dismissed as banter, part of growing up or an inevitable feature of SEND or alternative provision. It can include bullying/cyberbullying, physical abuse, sexual violence or harassment, harmful sexual behaviour, non-consensual imagery, upskirting, hazing/initiation, coercion, threats and weapon-related harm.

The absence of reports does not mean abuse is not occurring. Where behaviour may constitute child-on-child abuse or another safeguarding concern, safeguarding procedures take precedence over ordinary behaviour-management processes.

Crea Pax considers the safety, welfare and wishes of the learner harmed and separately considers whether the learner displaying harmful behaviour may themselves have unmet safeguarding needs. Dysregulation, SEND or trauma may help explain behaviour but must not be used to minimise harm caused to another person.

Sexualised behaviour is considered in context, including age/development, SEND, frequency, coercion, power imbalance, consent, impact and possible exposure to abuse or sexual content. Staff do not investigate suspected sexual abuse themselves.

For adult learners, harmful, abusive, threatening, discriminatory or sexual behaviour is considered under adult safeguarding, criminal law and capacity/consent principles as appropriate, with particular attention to the safety of any children present.

11 Nudes, sexual imagery, sextortion, AI and deepfakes

Concerns may involve photographs, video, livestreams, digitally altered material, AI-generated content, deepfakes or “deep nudes”. Sexual extortion (“sextortion”) includes threats, blackmail, coercion or exploitation using real or fabricated sexual imagery.

Staff must not ask a learner to forward material, unnecessarily show it, search through a device/account or copy it. Staff secure the immediate situation, report to the DSL/DDSL and follow current safeguarding guidance.

12 Online safety, Wi Fi, devices and images

Crea Pax provides filtered Wi-Fi access for authorised learner use. Mobile network coverage at the premises is currently very limited; Wi-Fi enables appropriate communication and online access without unnecessary isolation. Learners aged 13+ may be permitted to connect personal devices during designated periods, subject to safe-use expectations. Technical controls do not replace supervision, professional curiosity or safeguarding action.

- Crea Pax internet access is protected by content filtering. Filtering arrangements are checked at least annually and after significant network changes.
- Crea Pax devices are securely stored and protected by access controls, including two-stage/PIN verification.
- When learners use Crea Pax devices, authorised apps are used and the device is locked into the relevant app; a staff PIN is required to exit.
- Staff use Crea Pax-controlled devices, not personal devices, to photograph or record learners.
- Personal devices brought by under-13 learners are securely stored and used only under staff supervision where necessary, including contact with parents/carers/guardians.
- Learners aged 13+ may use personal devices during designated break periods. Photographing, filming, audio-recording or livestreaming another learner is not permitted.
- Individual safeguarding/risk assessments or placement arrangements may require tighter device restrictions regardless of age.

Consent regarding photography is established at placement commencement. Where Crea Pax proposes to publish or publicly share a photograph containing an identifiable learner, specific consent is sought for that photograph before publication. General placement consent is not treated as blanket publication permission. Crea Pax does not publish learner images without prior consent.

If misuse is suspected, staff do not routinely search a learner’s personal device themselves. They secure the situation, report to the DSL/DDSL and follow the appropriate safeguarding process.

13 Attendance, missing learners, transport and handover

Crea Pax records attendance for every commissioned session, including relevant arrival/departure information and partial attendance. Reasons for absence or reduced attendance are recorded where known.

30-minute attendance procedure Where a learner does not arrive for an expected session and no explanation has been received, staff follow the communication arrangements agreed for that individual placement. The appropriate commissioning contact is notified of unexplained non-attendance within 30 minutes of the expected arrival time. Where circumstances indicate immediate safeguarding risk, staff act without delay and do not wait for the 30-minute point.

Placement arrangements may require contact with a parent/carer, commissioner, transport provider or other professional. Crea Pax does not impose one communication chain on every placement.

Repeated absence, refusal, deterioration in attendance or unexplained lateness is considered through a safeguarding and unmet-needs lens, not simply as poor attendance. Crea Pax's reporting does not replace the commissioner's statutory attendance or safeguarding responsibilities.

If a learner leaves unexpectedly or cannot be located during a Crea Pax session, staff immediately assess risk, inform the DSL/DDSL, check the immediate area without compromising others' safety, and contact parent/carer, commissioner and police as appropriate. There is no fixed waiting period where risk warrants immediate action.

Learners do not leave independently during a commissioned session unless this is an agreed part of their plan/risk assessment. For adult learners, staff respect autonomy and capacity while responding proportionately to known vulnerability and immediate risk.

Transport and collection arrangements are verified where necessary. Unfamiliar drivers/escorts or unexpected changes are checked rather than accepted solely on a learner's account. Independent travel must form part of agreed placement arrangements.

14 Behaviour, dysregulation and positive handling

Crea Pax does not use punishment as a response to dysregulation or behaviour communicating distress. Staff work with the learner to understand contributing factors, reduce risk, support regulation, repair relationships where necessary and adjust support, environment or risk management.

Staff recognise fight, flight, freeze and other dysregulated responses. Responses may include reducing demands or triggers, allowing processing time and space, offering choices, changing the activity/environment and using trusted-adult or individual regulation strategies.

Where a learner is significantly dysregulated, safety and wellbeing are the priority. Crea Pax does not routinely end a session because a learner is dysregulated; where risk can be managed safely, staff continue to support regulation and participation. Where significant risk cannot be safely managed, parent/carer and commissioner are involved as appropriate and an early end to the session may be considered as a risk-management measure, never as punishment.

Positive handling and physical intervention

Staff whose duties could involve physical intervention must have appropriate current training and work within their competence. Physical intervention is a last resort when necessary to prevent significant harm and when other strategies have been attempted or are not practicable in the immediate circumstances. It must be lawful, reasonable, proportionate and used for the minimum time. It must not be used as punishment, to enforce compliance or simply because a learner refuses an activity. Publication of this policy does not certify individual training status.

A learner walking away does not automatically justify physical intervention. Staff assess the risk, use de-escalation and follow/seek assistance as appropriate. For adult learners, staff do not use positive handling merely to prevent a capacitous adult choosing to leave; emergency intervention to prevent immediate significant harm must be lawful, necessary and proportionate.

Significant incidents and any physical intervention are recorded and reviewed. Parents/carers, commissioners and other professionals are informed as appropriate. Any injury or safeguarding concern arising from an intervention is addressed separately through the relevant procedure.

15 Off site activities, animals, environment and one to one work

Crea Pax activities may include animal-assisted interventions, outdoor learning, gardening, food growing, sports, community activities and other practical/life-skills work. Risk assessment is proportionate to the activity, learner and environment and includes dynamic assessment when circumstances change.

- Staff consider known individual risks such as absconding, impulsivity, aggression, self-harm, exploitation vulnerability, sensory/communication needs, medical needs, allergies, animal-related fears and previous incidents. SEND itself is not treated as a risk.
- Animal interaction is planned and supervised according to the learner, animal, activity and environment. Learners receive appropriate instruction and are never pressured into physical contact with an animal.
- Animal welfare is considered alongside learner safety. If an animal is stressed, unwell, fearful or unsuitable for interaction, the activity is changed or stopped. Deliberate cruelty or a concerning change in behaviour towards animals is recorded and considered in context.
- Only authorised Crea Pax animal activities form part of provision. Restricted and private areas are outside learner access; staff follow current risk controls and animal-welfare procedures.
- Learners access only areas designated or authorised for Crea Pax activities unless there is a legitimate and supervised reason otherwise.
- Supervision is sufficient to safeguard while allowing appropriate independence, privacy, therapeutic space and skill development. Staffing is determined by learner need, activity, environment, risk assessment and commissioning arrangements.
- Staff know which learners are in their care and where they are during off-site activity, using appropriate checks/headcounts when moving locations.

One-to-one working is an established and legitimate part of Crea Pax provision and is not inherently a safeguarding concern. It must have a legitimate educational/therapeutic purpose, relevant staff should generally know where the learner and staff member are, and professional boundaries apply. Unnecessarily isolated situations without legitimate purpose are avoided.

Safeguarding does not prevent appropriate private or confidential conversations. Staff use professional judgement about location and privacy while maintaining professional accountability. Absolute confidentiality cannot be promised where safeguarding information needs to be shared.

Where authorised 1:1 work takes place away from the main site, the activity/location, communication arrangements and expected return/contact arrangements are agreed. Staff may change, postpone or stop an activity if circumstances make continuation unsafe or inappropriate.

Appropriate physical contact may occur for first aid, necessary safety intervention, practical assistance or appropriate reassurance. Contact must be necessary, proportionate, respectful of dignity and consent where possible, and responsive to the individual learner’s needs. Personal/intimate care, where required, is agreed in advance wherever possible and follows an individual plan.

16 Medical needs, first aid, medication and emergencies

Relevant medical information is obtained as part of placement arrangements, including known conditions, allergies, prescribed/emergency medication, healthcare plans, emergency contacts and information staff need to support the learner safely. Changes should be communicated during the placement.

Learners normally self-administer their own medication in accordance with individual arrangements. Medication requiring secure storage is kept in designated secure medication storage while remaining appropriately accessible when required. Emergency medication arrangements prioritise timely access.

Where a learner has a medical need requiring specific staff knowledge, support or intervention, such as diabetes management or insulin, Crea Pax obtains appropriate information, training and agreed procedures before the learner begins or resumes attendance. Staff do not undertake medical procedures for which they have not received appropriate information, instruction or training.

Crea Pax maintains appropriate first-aid provision for on-site and off-site activities. Where staff believe emergency medical attention is required, they call 999 without waiting for permission. Parent/carer and commissioner are informed as soon as practicable.

Significant injuries are treated and recorded. Unexplained, inconsistent or concerning injuries are also considered as safeguarding matters. Significant medical/allergy incidents and near misses are reviewed for learning and any required changes to risk assessment, emergency information, medication access or staff awareness.

17 Mental health, self harm, suicide risk and eating concerns

Mental-health difficulties may coexist with or indicate abuse, neglect, exploitation, bullying, domestic abuse, online harm or trauma, but they do not automatically prove a safeguarding concern. Staff notice, listen, safeguard, record and escalate; they do not diagnose.

Self-harm is responded to calmly and without judgement. Staff attend to immediate physical safety/first aid, inform the DSL/DDSL and consider what further safeguarding, medical or professional action is required. Self-harm is not treated as misconduct or attention-seeking.

Suicidal thoughts are taken seriously. Where there is immediate risk to life or serious harm, staff contact emergency services. Staff are not expected to conduct clinical suicide-risk assessments; they gather enough information to understand immediate safety, involve the DSL/DDSL and escalate to appropriate professionals.

Significant changes in eating/drinking or concerns about an eating disorder receive appropriate welfare/medical response and safeguarding consideration where relevant. Equivalent emergency-safety standards apply to adult learners, while respecting adult autonomy and capacity.

18 Prevent and serious violence

Concerns about radicalisation or extremism are reported to the DSL/DDSL, who considers current local authority, police and Channel routes. Prevent concerns are handled proportionately and without stereotyping. Relevant safeguarding information follows the learner through transition where lawful and necessary.

Staff remain alert to indicators of serious violence, criminal exploitation and weapon-related risk, including changes in peer groups, unexplained injuries, gifts/money, fear, absence and coercion. Immediate danger is reported to police.

19 Adult safeguarding, consent and capacity

Safeguarding support does not stop at 18. When a learner approaches or reaches adulthood, Crea Pax considers whether existing risks and support arrangements require lawful transition into adult safeguarding, care, health or other services. The different adult statutory threshold is applied without assuming that previously identified risks have disappeared.

Adult safeguarding recognises physical, sexual, psychological/emotional, financial/material, discriminatory and organisational abuse; domestic abuse; modern slavery; neglect/acts of omission; and self-neglect. Crea Pax applies the principles of empowerment, prevention, proportionality, protection, partnership and accountability, and seeks to make safeguarding personal to the adult wherever possible.

An adult learner is presumed to have capacity unless established otherwise. Capacity is decision-specific and time-specific. SEND, SEMH needs, learning disability, mental-health difficulty, different communication or an unwise decision do not by themselves establish lack of capacity. Reasonable support is provided to help the adult understand, retain, weigh and communicate relevant information; specialist advice is sought where significant capacity issues arise.

For a capacitous adult, wishes and informed consent carry substantial weight. However, refusal of consent does not automatically prevent proportionate information sharing where another person or child may be at risk, serious crime/public-interest issues arise, coercion or intimidation is present, or capacity is in question. Decisions and rationale are recorded.

A person can have capacity and still meet adult safeguarding criteria; equally, having SEND does not automatically make someone an adult at risk.

20 Learner voice, consent, parents and carers and commissioners

Crea Pax seeks, listens to and takes seriously the learner’s wishes and feelings using methods appropriate to age, understanding, SEND and communication needs. Communication may include additional processing time, visual methods, writing/text, communication aids, familiar staff, quieter environments or discussion alongside an activity.

For children, developing autonomy is respected, but consent is not required before necessary action is taken to protect a child from safeguarding risk. Parents/carers are ordinarily involved openly and collaboratively, but are not informed before action where doing so may increase risk, prejudice an investigation or conflict with safeguarding advice. Parental disagreement does not prevent necessary safeguarding action.

Crea Pax follows recorded parental responsibility/contact arrangements and seeks clarification from the commissioner/appropriate authority where these are uncertain or disputed. Court orders or safeguarding restrictions communicated to Crea Pax are followed.

For learners aged 18 and over, the commissioner will normally remain Crea Pax’s principal professional contact in accordance with placement arrangements. Crea Pax may also work with parents, carers or supporters where this forms part of agreed arrangements and is consistent with the adult learner’s wishes, consent and capacity. Crea Pax does not assume that parental involvement gives a parent authority to make decisions for an adult learner.

For significant safeguarding decisions, records include the learner’s wishes where possible, how these were obtained and how they influenced the decision. Where action is taken contrary to those wishes, the reason is recorded.

21 Information sharing and safeguarding records

Safeguarding information is recorded promptly, factually and proportionately. Records distinguish fact, the learner’s own words, information provided by others and professional judgement. They include action taken, information shared, decisions, rationale and follow-up, forming a clear chronology.

Crea Pax provides therapeutic interventions rather than formal therapy/counselling within its commissioned provision. Information arising through therapeutic interventions forms part of the learner's Crea Pax record. Safeguarding information arising through those interventions is acted upon through this policy. Records include information relevant to provision, progress, welfare and safeguarding and avoid unnecessary personal detail.

Information is shared on a lawful, necessary and proportionate basis with people who need it for safeguarding or support. Staff do not promise absolute confidentiality. Where safe and appropriate, learners and families are told what information will be shared and why; advance notification is withheld where it could increase risk or prejudice an investigation.

Crea Pax shares relevant safeguarding information with commissioners where necessary for safeguarding, risk management or support, while recognising that not every detail held about a learner needs to be shared. Significant safeguarding information received by email, message or telephone is incorporated into the safeguarding record rather than left solely in an inbox or message thread.

Safeguarding records are securely stored with access limited according to role. When a placement ends, relevant safeguarding information is transferred securely and promptly where necessary, with a record of what was transferred, to whom, when and how. Retention/disposal follows Crea Pax data-retention arrangements and applicable requirements.

Requests from police, social care, LADO or other safeguarding authorities are handled promptly through the DSL/proprietor as appropriate. Data protection law is not used as a reason to withhold necessary safeguarding information.

Ordinary provision records and detailed safeguarding records are kept separately with access appropriate to role. Approved AI-assisted drafting may support routine records only within the assessed purpose and authorised workflow. It does not replace safeguarding reporting, professional decisions, verification or management authorisation to file. Staff do not delay protective action to draft a record.

22 Allegations, low level concerns, complaints and whistleblowing

A complaint about service quality, communication or provision follows the complaints procedure. Where a complaint contains information suggesting abuse, neglect, exploitation, unsafe staff practice or another safeguarding concern, safeguarding procedures take priority.

Concerns about adults working with learners are considered against the KCSIE harm threshold and low-level-concern framework. Where the harm threshold may be met, the DSL/proprietor seeks LADO advice and does not conduct an internal investigation before external advice where this could prejudice the process.

Low-level concerns are encouraged and recorded where behaviour is inconsistent with the staff code of conduct, including over-familiarity, favouritism, humiliating language, inappropriate social-media contact, inappropriate image use or unnecessarily secluded 1:1 working without legitimate purpose. Patterns and cumulative concerns are considered.

Where a concern is about Martha Bache, report to Stephanie Selby (DDSL) and the relevant LADO without Martha managing the response. If the designated recipient is implicated or unavailable, use the relevant external safeguarding route without delay.

Learners do not need to use formal complaint language. Statements or behaviour indicating discomfort, fear or concern about an adult are considered for safeguarding significance. Anonymous information is also considered on its specificity, reliability, context and corroboration.

Staff may raise concerns through whistleblowing arrangements and the NSPCC Whistleblowing Advice Line where internal reporting is unsafe, ineffective or implicated. No learner, family member, volunteer or staff member should be disadvantaged for raising a genuine safeguarding concern in good faith.

Where allegations are later found to be unsubstantiated, unfounded, false or malicious, Crea Pax follows appropriate guidance and considers any further safeguarding or support response required. The person raising a concern may be told that it has been received and acted upon but may not be entitled to confidential outcome details.

23 Safer recruitment, SCR, visitors, volunteers and apprentices

Safeguarding suitability is considered throughout recruitment and after appointment. Crea Pax scrutinises applications, gaps/discrepancies and suitability; verifies identity, right to work, references and relevant qualifications; obtains enhanced DBS/barred-list information where legally applicable; undertakes overseas/prohibition/restriction or other role-specific checks where required; and resolves discrepancies before appointment.

The SCR records relevant checks and is periodically audited for completeness. The removal of the supervision exemption from 1 September 2026 is considered when deciding regulated activity and barred-list eligibility; supervision is not used as a substitute for a legally required check.

Crea Pax may occasionally use volunteers. Volunteers with learner access are appropriately DBS checked and trained, with barred-list checks where applicable. They receive induction appropriate to their role and know the DSL/DDSL, reporting, boundaries, confidentiality and whistleblowing arrangements.

Apprentices, trainees and students on placement are subject to checks appropriate to their role and complete safeguarding induction before undertaking unsupervised responsibilities. Supervision reflects competence, experience, training and role.

Visitors sign in/out and are appropriately identified. Professional identity is verified where appropriate; unfamiliar unscheduled visitors may be verified with their organisation. Visitors and contractors are supervised according to purpose, duration and level of learner access, and work is organised to minimise unnecessary contact with learners.

Being personally known to Crea Pax, being a family member or “only helping” does not replace safeguarding checks. Adult learners are not used as substitutes for staff or routinely given responsibility for supervising children unless the role has been formally assessed and necessary safeguards/checks are in place.

Crea Pax makes a DBS referral where the legal duty is met and considers other professional/regulatory referrals where appropriate.

24 Training and induction

All staff receive safeguarding and child-protection training, including online safety and filtering responsibilities, at induction and receive updates as required and at least annually. Significant changes are communicated when they arise rather than waiting for the next annual session.

Induction covers, as relevant: DSL/DDSL arrangements; reporting; disclosures; allegations/low-level concerns; whistleblowing; confidentiality/information sharing; professional boundaries; online/device expectations; attendance/missing procedures; positive handling; SEND/communication; exploitation; child-on-child harm; mental health; nudes/AI; Prevent; local routes; and off-site/animal-assisted practice.

Staff whose role may require positive handling receive appropriate training. Relevant staff receive first-aid/medical training according to learner need. Volunteers and apprentices receive role-appropriate training. Training and KCSIE-reading confirmations are recorded. Understanding is checked and absent/new staff receive catch-up/induction before unsupervised work.

25 Governance, audit and review

Safeguarding is a standing management/staff consideration. The proprietor and DSL review referrals, response times, attendance patterns, allegations and low-level concerns, online-safety incidents, significant behaviour/positive-handling incidents, training, SCR evidence, risk assessments, learner/family feedback and commissioner feedback. Patterns across incidents are considered, not only individual events.

- A formal safeguarding policy review is completed at least annually and earlier following significant statutory/local change, serious incident, significant operational change or learning from practice.
- A proportionate annual safeguarding audit checks the SCR, recruitment evidence, training, KCSIE confirmations, DSL/DDSL training, Prevent, safeguarding records/chronologies, attendance reporting, referral contacts, online filtering, first aid/medical arrangements, risk assessments and linked policies.
- The DSL and DDSL review patterns, outstanding actions, training due, learner-risk changes, online concerns and significant incidents at a frequency proportionate to risk and commissioner requirements. Significant concerns are acted upon when they arise; this policy does not certify that a fixed meeting cycle is already operating.
- Actions arising from audit/review are recorded with owner, target date and completion status.
- Learner and family experience of safety is considered through reviews, observations and feedback in ways appropriate to the learner.
- Crea Pax cooperates with legitimate commissioner/LA quality-assurance activity while recognising that commissioner oversight does not transfer Crea Pax’s own safeguarding responsibility.
- The current policy is available to staff, commissioners and parents/carers on request. Superseded versions are clearly archived.
- Local safeguarding contacts carry a verification date and are checked at least annually.

26 Professional challenge and escalation

Professional disagreement and challenge are legitimate safeguarding activities. If Crea Pax believes a school, local authority, social care team, commissioner or other professional response leaves a learner at risk, the DSL challenges the decision, seeks reconsideration or senior review where required, follows the relevant local escalation/case-resolution process and records the challenge and outcome.

Safeguarding decisions are not overridden solely because a commissioner, parent/carer or other professional disagrees. Equally, Crea Pax treats professional challenge to its own decisions as an opportunity to reflect and improve.

Appendix 1 Staff immediate action card

Situation	Immediate action
Concern/disclosure	Listen • reassure • do not promise secrecy • report immediately • record factually.
Immediate danger/urgent medical need	Call 999 and notify DSL/DDSL as soon as practicable.
DSL unavailable	Contact DDSL; use direct LA/police/adult safeguarding route if delay creates risk.
Concern about staff/volunteer	Report to proprietor/DSL; consider LADO where harm threshold may be met.
Concern about proprietor/DSL	Report to Stephanie Selby (DDSL) and relevant LADO directly.
Sexual/AI imagery	Do not search, copy, forward or unnecessarily view. Secure situation and contact DSL.
Learner missing/leaves unexpectedly	Assess risk immediately; inform DSL; act without a fixed waiting period where risk is significant.
Unexplained non-attendance	Follow placement communication route; notify appropriate commissioner within 30 minutes, sooner if risk.
Response feels inadequate	Challenge/escalate through local safeguarding procedure or whistleblowing route.

Appendix 2 Minimum safeguarding record

- Learner’s name, date of birth/age and commissioner
- Date, time, location and person recording
- Concern/disclosure in the learner’s own words; observations and context
- Clear distinction between fact, information from others and professional judgement
- Immediate safety/medical action
- Who was informed and when
- Advice/referral details and reference number where applicable
- Parent/carer or adult learner involvement, or reason not involved
- Decision, rationale, responsible person and review date
- Learner’s wishes and feelings and how these influenced the decision
- Follow-up, outcome and closure/review decision
- For transfers: what was shared, with whom, when and how

Appendix 3 Sources and linked guidance

Keeping Children Safe in Education 2026 (Department for Education); Working Together to Safeguard Children 2026; Information sharing to safeguard children and young people (2026 statutory guidance, including the information-sharing duty effective 30 September 2026); Care Act 2014 and current Care and Support Statutory Guidance; Mental Capacity Act 2005 and Code of Practice; Prevent duty guidance and current Channel arrangements; UKCIS guidance on sharing nudes and semi-nudes and current online-safety guidance; DfE filtering and monitoring standards/guidance; DfE non-school alternative provision voluntary national standards; Current local safeguarding partnership procedures and thresholds for Wiltshire, Dorset and the learner’s relevant authority; Crea Pax linked policies and procedures listed in section 2.

POLICY 02 | 2026-27

Whistleblowing

Owner: Martha Bache, Director and Proprietor. Operational safeguarding: Martha Bache, DSL; Stephanie Selby, DDSL. Health and safety: Edwin Ralph.

Version: 2026-27.1 | Approved and effective: 17 October 2026

Approved by: Martha Bache, Director and Proprietor | Next review: September 2027, or earlier if required.

1 Purpose

Crea Pax is committed to a culture of openness, safeguarding and accountability. Anyone working for or on behalf of Crea Pax must be able to raise a genuine concern about unsafe, unlawful, dishonest or improper practice without fear of retaliation. This policy supports early reporting so that concerns can be considered promptly and learners, staff and the organisation can be protected.

2 Scope

This policy applies to employees, apprentices, volunteers, contractors, trainees and others working for or on behalf of Crea Pax. It should be read alongside the Safeguarding and Child Protection Policy, Staff Behaviour / Code of Conduct, Complaints Policy and relevant employment procedures.

3 What whistleblowing means

Whistleblowing is the raising of a concern in the public interest about wrongdoing or risk. Examples may include:

- a safeguarding culture or practice that may place learners at risk;
- a criminal offence, fraud, dishonesty or deliberate concealment of wrongdoing;
- serious breaches of health and safety, animal welfare, legal or regulatory duties;
- deliberate misuse of information or serious data protection failures;
- conduct that creates a serious risk to learners, staff, visitors or the public;
- a failure to act on a known serious concern.

A person raising a concern does not need proof. They should have a reasonable belief that the information is substantially true and raise it honestly.

4 What should use another route

A concern about a child at risk of harm must be acted on immediately under the Safeguarding and Child Protection Policy; whistleblowing must never delay a safeguarding referral. Concerns or allegations about an adult working with children, including low-level concerns, must follow the safeguarding/allegations route. Personal employment grievances are normally dealt with through the relevant employment process. Complaints about the service are dealt with under the Complaints Policy, unless the matter is safeguarding or whistleblowing in nature.

5 Internal reporting routes

Concerns may be raised verbally or in writing. Staff should provide as much factual information as they reasonably can, including what happened, when, who was involved and why the matter causes concern.

Usual route	Martha Bache - Proprietor / DSL 07730 476738 | martha@creapax.com
Safeguarding support	Stephanie Selby - DDSL steph@creapax.com
If the concern involves Martha Bache	Stephanie Selby - DDSL steph@creapax.com
Immediate danger	Call 999. Do not wait for an internal response.

6 Safeguarding and allegations about adults

Where a concern relates to possible harm to a learner, an allegation against an adult, or behaviour that may meet the harm threshold, Crea Pax safeguarding procedures apply immediately. The DSL/DDSL must consider the appropriate local authority safeguarding and LADO route. If the concern is about the Proprietor/DSL, it must not be reported to her first; the alternative route above should be used and external advice/referral sought as appropriate.

7 External reporting and advice

A worker may seek external advice or raise a concern externally where this is appropriate, particularly where the concern cannot safely be raised internally, the internal response is inadequate, or the concern involves senior leadership.

- NSPCC Whistleblowing Advice Line: 0800 028 0285 | help@nspcc.org.uk
- Wiltshire LADO: lado@wiltshire.gov.uk; safeguarding concerns may also be raised through Wiltshire IFD: 0300 456 0108 (out of hours 0300 456 0100).
- Dorset LADO: 01305 221122 | lado@dorsetcouncil.gov.uk. Dorset Family Support & Advice Line: 01305 228558; out of hours 01305 221000.
- Police: 101 for non-emergencies; 999 where there is immediate danger.

Nothing in this policy prevents a person from obtaining independent legal or professional advice or making a protected disclosure to an appropriate prescribed body where the law permits.

8 How Crea Pax will respond

Crea Pax will take concerns seriously, assess immediate safeguarding or safety risks, determine the appropriate person or external body to consider the matter, and keep a proportionate written record. Action may include safeguarding referral, LADO consultation, investigation, risk management, changes to practice, disciplinary or contractual action, training, or referral to another authority.

The person raising the concern will be told, where reasonably possible and lawful, that the concern has been received and whether appropriate action has been taken. Confidential information about another person or an investigation may not be shared.

9 Confidentiality and anonymous concerns

Crea Pax will respect confidentiality as far as reasonably possible. Information will be shared only where necessary to assess or act on the concern, meet safeguarding duties or comply with law. Anonymous concerns will be considered on their merits, although anonymity can make investigation and feedback more difficult.

10 Protection from retaliation

No person should be subjected to bullying, victimisation, disadvantage or retaliation for raising a genuine concern in good faith. Any retaliation will itself be treated seriously. Knowingly making a false or malicious allegation is different from raising a concern that later proves unfounded and may be addressed under the relevant conduct procedure.

11 Records

Whistleblowing records will be stored securely with access restricted to those who need the information. Records will distinguish the concern, risk assessment, decisions, referrals, actions, outcome and learning. Safeguarding records will be managed under safeguarding record-keeping requirements.

12 Training, monitoring and review

Whistleblowing and alternative reporting routes are covered through staff induction and refresher training. The Proprietor monitors themes and learning, without compromising confidentiality. Where a concern involves the Proprietor, oversight must be independent of her as far as practicable. This policy will be reviewed at least annually and sooner following significant changes in law, statutory guidance, local arrangements, organisational structure or practice.

POLICY 03 | 2026-27

Staff behaviour and code of conduct

Owner: Martha Bache, Director and Proprietor. Operational safeguarding: Martha Bache, DSL; Stephanie Selby, DDSL. Health and safety: Edwin Ralph.

Version: 2026-27.1 | Approved and effective: 17 October 2026

Approved by: Martha Bache, Director and Proprietor | Next review: September 2027, or earlier if required.

1 Purpose and safeguarding culture

This Code sets the standards expected of every adult working for or on behalf of Crea Pax. Its purpose is to protect learners, protect staff from avoidable ambiguity or allegations, maintain professional boundaries and support a culture in which concerns are identified and reported early. Learner welfare and safety take priority over convenience, familiarity or personal relationships.

2 Scope

The Code applies to employees, apprentices, trainees, volunteers, contractors and anyone acting in a position of trust at Crea Pax, whether on site, off site, transporting learners, communicating electronically or representing Crea Pax elsewhere. Compliance is a condition of working within the provision.

3 Expected professional conduct

- treat learners with dignity, patience, fairness and respect;
- use calm, trauma-informed and SEND-aware practice and recognise behaviour as communication;
- follow safeguarding, health and safety, animal welfare, risk assessment and emergency procedures;
- work within their role, competence, training and authorisation;
- be punctual, reliable, appropriately dressed and fit to carry out duties safely;
- challenge unsafe or inappropriate practice and report concerns promptly;
- maintain accurate, factual and timely records;
- avoid conduct inside or outside work that could undermine professional trust or learner safety.

4 Professional boundaries and positions of trust

Staff must maintain clear adult-child boundaries even where relationships are warm, informal or long-standing. Staff must not seek friendship, emotional dependence, secrecy or a relationship with a learner outside the professional role. They must not share unnecessary personal information, encourage a learner to keep secrets, show favouritism, use sexualised or humiliating language, or behave in a way that could reasonably be interpreted as grooming or boundary-blurring.

Gifts must be modest, transparent and appropriate. Significant or unusual gifts offered or received should be discussed with the DSL. Staff must not lend or borrow money from learners or enter private financial arrangements with them.

5 Communication, phones, social media and digital conduct

- Use Crea Pax-approved communication routes for learner-related work.
- Do not add, follow, message or communicate privately with current learners through personal social media or personal accounts.
- Do not give learners personal contact details unless specifically authorised for a defined operational reason.
- Do not use a personal device to create or retain learner photographs, video, recordings or confidential records.
- Keep passwords and devices secure and prevent learners accessing staff accounts or confidential information.
- Report concerning online contact, content, cyberbullying, exploitation or boundary issues to the DSL/DDSL.

6 Photography, recording and publicity

Images or recordings of learners may only be created for an authorised Crea Pax purpose, on an approved device or system, and in accordance with the learner’s current consent and safeguarding arrangements. Educational evidence and public/social-media use are separate purposes and must not be treated as interchangeable. Staff must not publish identifiable learner information from personal accounts.

7 Physical contact, personal care and first aid

Appropriate physical contact may sometimes be necessary for first aid, safety, practical instruction, reassurance or an agreed support need. Contact must be proportionate, appropriate to the learner and situation, and transparent. Staff should explain what they are doing where practicable and respect communication, sensory and trauma needs.

Staff must never use physical contact as punishment, engage in sexualised, intimate or playful contact that could be misinterpreted, or use force outside lawful and necessary safety intervention. Any significant physical intervention or concerning contact must be recorded and reported in line with Crea Pax procedures.

8 11 work and visibility

Crea Pax frequently provides 1:1 and small-group support. 1:1 work is not inherently unsafe and should remain purposeful, risk assessed and professionally transparent. Staff should work in observable or interruptible spaces where reasonably practicable, ensure colleagues know where sessions are taking place, follow learner-specific risk controls and record relevant concerns or incidents. A learner’s individual needs may require a different arrangement, including 2:1 staffing.

9 Behaviour, de escalation and restrictive intervention

Staff use relational, trauma-informed and de-escalation approaches. They must not shame, threaten, intimidate, deliberately provoke or use punitive responses that disregard SEND or known needs. Physical intervention is a last resort to prevent serious harm and must be necessary, proportionate, recorded and reviewed. Staff must seek help early where risk is increasing.

10 Animals and animal assisted activity

Animal-assisted activity is a core part of Crea Pax provision. Staff must model calm, respectful animal handling and follow species-specific welfare, hygiene, biosecurity, supervision and risk controls. Learners must not be pressured into animal contact. Staff must stop an activity where the learner, animal or others are becoming unsafe or distressed. Only staff who are trained, competent and authorised may undertake restricted animal-care tasks, use relevant equipment or administer animal medication.

11 Transporting learners

Only authorised Crea Pax drivers may transport learners. Drivers must meet Crea Pax licence, insurance, vehicle and suitability requirements and follow the learner's transport/collection arrangements and risk assessment. Journeys must remain professional and safeguarding concerns arising during transport must be reported. Staff must not make unauthorised private transport arrangements with learners or families.

12 Alcohol, drugs, medication and fitness for work

Staff must not work while impaired by alcohol, illegal drugs, misuse of medication, fatigue or any other condition that makes them unsafe to carry out their role. Prescribed or over-the-counter medication that may materially affect safe working should be considered through confidential health/safety arrangements where necessary. Smoking and vaping must follow Crea Pax site rules and must never take place in learner areas or during direct learner supervision.

13 Confidentiality and information sharing

Learner and staff information is confidential and must be accessed, discussed, stored and shared only for legitimate work purposes. Staff must not promise a learner absolute confidentiality. Safeguarding information must be shared with the DSL/DDSL or appropriate authority where necessary to protect a child. Conversations about learners must not take place where they can be overheard by people who do not need the information.

Where an approved AI-assisted workflow is used, a competent person checks the exact draft against the source observations and current learner plan. Management review of wording and authorisation to file are separate steps. Only an explicitly authorised final record is entered in the designated official document. Simulations and test records must never be filed as evidence of real attendance, progress or safeguarding activity.

14 Low level concerns and allegations about adults

All concerns about adult behaviour must be taken seriously, including behaviour that does not appear to meet the harm threshold but is inconsistent with this Code or causes a sense of unease. Staff must report low-level concerns promptly to the DSL/Proprietor so patterns can be identified and appropriate action taken.

Concerns or allegations that may meet the harm threshold must be handled under the Safeguarding and Child Protection Policy and appropriate LADO arrangements. Staff must not investigate the allegation themselves, question witnesses inappropriately or alert the person who is the subject of the concern where doing so could compromise safeguarding action.

15 Concerns about the Proprietor and DSL

Where a concern relates to Martha Bache as Proprietor/DSL, it must not be reported to her first. Report to Stephanie Selby, DDSL (steph@creapax.com), and seek the appropriate local authority/LADO advice or referral. If Steph is implicated or unavailable, use the external safeguarding route directly. The Whistleblowing Policy provides additional reporting routes.

16 Whistleblowing and duty to challenge

Staff have a responsibility to challenge unsafe practice and must not assume someone else will report it. No member of staff should suffer retaliation for raising a genuine safeguarding or whistleblowing concern. Where internal reporting is inappropriate or ineffective, staff may use the external routes set out in the Whistleblowing Policy.

17 Personal relationships, conflicts and family connections

Crea Pax includes staff who may have family or personal relationships with one another. These relationships do not remove professional accountability. Staff must declare conflicts that could affect decision-making, confidentiality, supervision, safeguarding or the fair handling of concerns. A family relationship must never prevent a concern being reported or an alternative reporting route being used.

18 Health and safety, equipment and competence

Staff must follow risk assessments, COSHH controls, fire and emergency procedures, manual-handling guidance and equipment instructions. Machinery, vehicles, chemicals, medication and specialist animal-care tasks must only be used or undertaken by staff who are trained, competent and authorised. Staff must report hazards, defects, accidents, incidents and near misses promptly.

19 Visitors and external professionals

Staff must support Crea Pax visitor controls, challenge unknown or unaccompanied persons appropriately and ensure visitors receive required safeguarding and emergency information. Learner information must not be shared with visitors unless there is a legitimate need and lawful basis.

20 Breaches of this Code

A breach may result in safeguarding action, additional supervision or training, restriction of duties, disciplinary or contractual action, referral to the LADO, police, DBS or another relevant body, depending on the nature and seriousness of the concern. Crea Pax will prioritise immediate safety and fair, proportionate decision-making.

21 Staff acknowledgement and review

This Code is covered during induction and staff refresher training. All staff and relevant contractors are expected to read it, understand the reporting routes and raise questions where anything is unclear. It is reviewed at least annually and sooner following changes to statutory guidance, local arrangements, Crea Pax practice, staffing structure or learning from incidents.

POLICY 04 | 2026-27

Online safety and acceptable use

Owner: Martha Bache, Director and Proprietor. Operational safeguarding: Martha Bache, DSL; Stephanie Selby, DDSL. Health and safety: Edwin Ralph.

Version: 2026-27.1 | Approved and effective: 17 October 2026

Approved by: Martha Bache, Director and Proprietor | Next review: September 2027, or earlier if required.

1 Purpose and status

Crea Pax regards online safety as part of safeguarding, not as a separate technical issue. This policy sets out how digital technology is used safely, responsibly and proportionately within our alternative provision, including Crea Pax-managed laptops and other devices, internet access, email, cloud services, messaging, photography and video, social media, online learning, artificial intelligence (AI) tools and any personal device used in connection with Crea Pax work.

The policy should be read alongside the Safeguarding and Child Protection Policy, Staff Behaviour / Code of Conduct, Data Protection & GDPR Policy, Behaviour & Anti-Bullying Policy and Prevent arrangements. It reflects Keeping Children Safe in Education 2026 and current Department for Education expectations for filtering and monitoring.

2 Our setting and proportionate approach

Crea Pax is a small, highly supervised alternative provision supporting learners with SEMH and SEND needs through 1:1, 2:1 and small-group provision. Technology use is therefore managed through a combination of appropriate technical controls, direct adult supervision, individual risk assessment and clear professional boundaries.

Online safety arrangements must reflect the age, needs, vulnerabilities and risk profile of each learner. SEND, communication differences, trauma, impulsivity, social vulnerability and previous online harm may increase risk and must be considered when deciding what access and support are appropriate.

3 Roles and responsibilities

Martha Bache, Proprietor and DSL, has overall responsibility for online safeguarding, ensuring appropriate arrangements are in place, responding to safeguarding concerns and reviewing this policy and associated controls.

Stephanie Selby, DDSL, supports safeguarding oversight and responds to concerns in the DSL's absence. Edwin Ralph, Health & Safety Lead, supports operational risk management where digital equipment or physical safety is involved. All staff must understand the online safety arrangements, supervise learners appropriately and report safeguarding or technical concerns without delay.

Where external IT support or a technology provider is used, Crea Pax remains responsible for ensuring that safeguarding, data protection and access arrangements are suitable for the provision.

4 The four areas of online risk

Crea Pax recognises that online risks commonly fall across four overlapping areas: content (what a learner may see), contact (who may communicate with or target them), conduct (how a learner behaves online) and commerce (financial, advertising, gambling, scam or other commercial risks). Staff also remain alert to online bullying, exploitation, grooming, sexual harassment, harmful sexual behaviour, radicalisation, self-harm or suicide content, misinformation and emerging risks linked to AI-generated or manipulated material.

5 Acceptable use by learners

Learners may use digital technology where it supports their agreed learning, communication or wellbeing and where staff judge the activity to be safe. Access is supervised and may be adapted or restricted according to age, individual need, risk assessment or the purpose of the session.

Learners are expected to follow staff instructions, treat others respectfully, protect personal information, avoid attempting to bypass safety controls and tell a trusted adult if they see or receive anything worrying, upsetting, threatening or inappropriate. A learner will not be punished simply for reporting something that has made them feel unsafe.

Where a learner's own phone or device is present, its use may be limited during sessions. Individual arrangements may be made where a device is needed for communication, accessibility, medical reasons or an agreed support plan.

6 Acceptable use by staff and other adults

Staff must use Crea Pax-approved accounts, systems and devices for learner-related records and communications wherever these are provided. Learner information must not be routinely stored on personal devices. Passwords and access credentials must be kept secure and must not be shared.

Staff must not form private online relationships with learners, add or follow learners through personal social-media accounts, use disappearing-message services for professional learner communication, or communicate with learners through personal channels unless an exceptional safeguarding situation makes this unavoidable and the contact is immediately reported and recorded.

Professional communication must be purposeful, transparent and capable of appropriate oversight. Staff must report accidental access to inappropriate material, suspicious messages, cyber-security concerns, lost devices or information sent to the wrong recipient promptly.

7 Photography, video and audio

Images, video or audio of learners may only be created for an agreed Crea Pax purpose and in accordance with the learner's current consent arrangements, safeguarding needs and data-protection requirements. Publicity or social-media use requires the appropriate separate permission and must never be assumed from educational-recording consent.

Crea Pax-approved equipment should be used. Personal devices must not be used to photograph or record learners as routine practice. If an exceptional safeguarding or emergency circumstance requires otherwise, the material must be transferred securely as soon as practicable, removed from the personal device and the circumstances reported to the DSL.

8 Internet access, filtering and monitoring

Crea Pax will take reasonable and proportionate steps to limit learners' exposure to illegal, inappropriate and harmful online material. Technical filtering and monitoring arrangements will be considered alongside direct staff supervision; neither replaces the other.

Filtering and monitoring arrangements will be reviewed at least once each academic year and sooner following a significant change, incident, new device, new service or identified safeguarding risk. The review will consider the learners using technology, the devices and locations involved, the effectiveness and limitations of current controls and any action required.

Staff must remain able to see and supervise learner device use where appropriate. If unsuitable material can be accessed, filtering or monitoring appears not to be working, or restrictions unreasonably prevent legitimate learning, staff must report this so that it can be reviewed and recorded. No filtering system is treated as a substitute for professional vigilance.

9 Artificial intelligence and emerging technology

AI tools may be used only where their use is appropriate to the learner, activity and safeguarding context. Staff must consider privacy, age suitability, inaccurate or fabricated output, harmful or biased material, manipulation of images or voices, academic integrity and the risk of entering personal or confidential information into an external system.

Identifiable learner, safeguarding, medical, SEND or other confidential information must not be entered into public or unapproved generative-AI tools. Any organisational AI tool must be specifically approved for the intended data and purpose after the relevant data-protection assessment. Generated material must be checked by a competent adult before use.

Where an approved AI-assisted workflow is used, a competent person checks the exact draft against the source observations and current learner plan. Management review of wording and authorisation to file are separate steps. Only an explicitly authorised final record is entered in the designated official document. Simulations and test records must never be filed as evidence of real attendance, progress or safeguarding activity.

New platforms or integrations require an assessment of lawful basis, special-category conditions, supplier contracts, security, access, retention, transfers and any DPIA required before use with the intended information. These policy rules do not establish that an integration or automation is operational or that a product has been approved for every category of personal data.

Crea Pax-approved Google Workspace and ChatGPT work arrangements, where authorised for the specific purpose and data, must follow the Data Protection Policy. Personal accounts and unapproved integrations must not be used to bypass access restrictions.

10 Online communication and remote activity

Where Crea Pax uses video calls, online meetings or remote learning, the same safeguarding and professional-boundary expectations apply as they do on site. Approved platforms and accounts should be used; the purpose and participants should be clear; staff should work in an appropriate environment; and any significant safeguarding concern must be recorded and escalated through normal procedures.

Parents/carers and commissioning professionals should be clear about the nature of planned remote contact where this is relevant to the learner's provision.

11 Social media and public content

Crea Pax may use social media for legitimate organisational communication and to celebrate the provision. Only authorised adults may post on behalf of Crea Pax. Identifiable learner content may only be published where appropriate consent is in place and publication is safe.

Staff must maintain professional boundaries online and must not publish confidential information, safeguarding material or content that identifies a learner without authority. Personal online activity must not undermine safeguarding, confidentiality or professional trust.

12 Cyberbullying, harmful contact and online incidents

Online bullying, threats, sexual harassment, coercion, exploitation, grooming, harmful sexual behaviour or discriminatory abuse are treated seriously whether they occur on a Crea Pax device or elsewhere. Where an incident affects a learner's safety or welfare, staff must respond through safeguarding and behaviour procedures and liaise with the commissioning school, parent/carer or external agencies as appropriate.

Staff should preserve relevant evidence where safe and lawful to do so, but must not unnecessarily view, copy, forward or request harmful or indecent material. Suspected illegal imagery or serious online harm must be referred immediately to the DSL/DDSL for appropriate action.

13 Prevent and radicalisation

Online activity can expose learners to extremist material, manipulation and radicalising influences. Staff receive Prevent awareness as part of safeguarding training and must report concerns promptly to the DSL/DDSL. Crea Pax will follow its safeguarding procedures and the appropriate Wiltshire or Dorset pathway where further advice or referral is required.

14 Data protection, confidentiality and cyber security

Digital information must be handled in accordance with the Crea Pax Data Protection & GDPR Policy. Devices must be secured when unattended, software and security updates must not be deliberately disabled, and staff must take reasonable care when using email, cloud storage, shared documents and portable equipment.

Personal data should be shared only with those who have a legitimate need to receive it and through an appropriate method. Suspected data breaches, phishing, compromised accounts, lost equipment or unauthorised access must be reported promptly to Martha Bache so that safeguarding, recovery and ICO-reporting requirements can be considered.

15 Responding to an online safety concern

If a learner discloses online harm, or staff identify concerning online activity, staff must listen, remain calm, avoid investigating beyond what is necessary to establish the immediate concern, preserve relevant information where appropriate, and report to the DSL/DDSL without delay.

If a child is in immediate danger, staff must call 999. Safeguarding referrals and information sharing will follow the Crea Pax Safeguarding and Child Protection Policy and the relevant local-authority arrangements. Concerns about the conduct of an adult must follow the Staff Behaviour / Code of Conduct and safeguarding allegations/low-level-concern procedures.

16 Training and learner education

Online safety is included in staff safeguarding updates and induction. Staff are expected to understand the risks relevant to Crea Pax learners, the reporting route, professional boundaries and the filtering/monitoring arrangements in use.

Learners are supported in an age- and need-appropriate way to understand privacy, consent, respectful communication, scams, misinformation, harmful content, online relationships, reporting concerns and how to seek help. Teaching is adapted to communication, SEND and emotional needs rather than relying on a one-size-fits-all approach.

17 Recording, monitoring and review

Online safety incidents with safeguarding significance are recorded within safeguarding systems. Technical concerns and actions arising from filtering/monitoring checks should also be recorded so that patterns and recurring weaknesses can be identified.

This policy is reviewed at least annually and sooner where there is a safeguarding incident, significant technology change, change in statutory guidance, change in local arrangements or evidence that current controls are not effective.

Key reporting contacts

DSL / Proprietor	Martha Bache - 07730 476738 - martha@creapax.com
DDSL	Stephanie Selby - steph@creapax.com
Concern involving Proprietor	Stephanie Selby (DDSL) - steph@creapax.com
Immediate danger	999

Reference framework

Keeping Children Safe in Education 2026 (Department for Education); DfE Meeting Digital and Technology Standards in Schools and Colleges - Filtering and Monitoring: Core Standard (current 2026 guidance); UK GDPR and Data Protection Act 2018; Prevent Duty guidance for England and Wales; Crea Pax Safeguarding and Child Protection Policy 2026.

POLICY 05 | 2026-27

Safer recruitment

Owner: Martha Bache, Director and Proprietor. Operational safeguarding: Martha Bache, DSL; Stephanie Selby, DDSL. Health and safety: Edwin Ralph.

Version: 2026-27.1 | Approved and effective: 17 October 2026

Approved by: Martha Bache, Director and Proprietor | Next review: September 2027, or earlier if required.

1 Purpose and commitment

Crea Pax is committed to safeguarding and promoting the welfare of children and young people. Safer recruitment is part of that safeguarding system: it is intended to deter, identify and reject people who may be unsuitable to work with learners, while ensuring recruitment decisions are fair, proportionate, evidence-based and properly recorded.

This policy applies to employees, apprentices, trainees, volunteers, self-employed contractors and other adults engaged by Crea Pax where their role may bring them into contact with learners or safeguarding information. It should be read alongside the Safeguarding and Child Protection Policy, Staff Behaviour / Code of Conduct, Whistleblowing Policy and Single Central Record (SCR).

2 Framework

Crea Pax uses Keeping Children Safe in Education (KCSIE) 2026 Part Three as its principal safer-recruitment benchmark, together with current Disclosure and Barring Service (DBS) eligibility guidance and applicable employment, equality, right-to-work and data-protection requirements. As an alternative provision commissioned by schools and local authorities, Crea Pax also considers relevant commissioner and local safeguarding expectations.

Where a legal requirement applies only to a particular type of school or college, Crea Pax will not present that requirement as automatically applying to Crea Pax. Instead, it will apply the requirement where legally applicable and otherwise use the relevant KCSIE standard as safeguarding best practice.

3 Responsibilities

- Martha Bache, Director / Proprietor and DSL, has overall responsibility for safer recruitment, suitability decisions and oversight of the SCR.
- At least one person involved in recruitment should have appropriate safer-recruitment knowledge or training. Crea Pax will keep this competence under review and refresh it where required.
- Anyone participating in recruitment must declare relevant conflicts of interest and maintain confidentiality.
- No person may be placed into duties beyond the checks, supervision, competence or authorisation appropriate to that role.

4 Planning and advertising

Before recruitment begins, Crea Pax will define the role, duties, safeguarding responsibilities, working pattern and level of contact with children. This determines the checks that are legally available and appropriate, including whether the role is regulated activity with children.

Recruitment information should make Crea Pax's safeguarding commitment clear and explain that appropriate vetting and pre-appointment checks will be required. Job descriptions or role descriptions should identify responsibility for safeguarding and promoting learner welfare where relevant.

5 Application and shortlisting

Applicants should provide sufficient information to establish identity, qualifications where relevant, employment or education history, and suitability for the role. CV information may support an application but will not be relied upon alone where a fuller application or employment history is needed.

Crea Pax will scrutinise gaps, inconsistencies, unexplained periods and repeated changes where relevant to safeguarding. Shortlisting decisions will be based on the requirements of the role and recorded proportionately.

In line with the KCSIE safer-recruitment benchmark, Crea Pax carries out an appropriate online search on shortlisted candidates as part of due diligence and tells candidates that this may occur. Relevant public information is explored fairly at interview; private accounts are not accessed and findings are considered in context.

6 References

References will normally be sought directly from appropriate referees and, where practicable, before appointment. They should help verify employment or education history and provide relevant information about suitability. Open testimonials or references supplied only by the candidate will not be treated as equivalent to a directly verified reference.

For a person entering their first employment, an appropriate school, college, training-provider or other suitable reference may be used where there is no previous employer. Any requirement that is genuinely not applicable will be recorded as such rather than creating artificial evidence.

7 Interview and suitability assessment

Interviews and suitability discussions will explore the applicant's experience, values, motivation to work with children, understanding of safeguarding, professional boundaries and any relevant gaps or concerns. Crea Pax may use scenario or values-based questions where helpful. Information disclosed during recruitment will be considered fairly, lawfully and in relation to the role.

8 Pre appointment checks

The checks required depend on the individual and the role. Crea Pax will determine and record what is required rather than applying every possible check indiscriminately. As applicable, checks may include:

- identity and address evidence;
- right to work in the United Kingdom;
- Enhanced DBS and Children's Barred List information where the role is legally eligible;
- references and employment/education history;

- relevant qualifications and professional status;
- overseas checks or additional information where a person has lived or worked outside the UK and this is appropriate;
- prohibition, restriction or management checks where relevant to the actual role and legal eligibility;
- health or adjustment information at the appropriate stage, handled lawfully and confidentially; and
- any commissioner-specific check that is lawful, relevant and proportionate.

A criminal record does not automatically prevent appointment. Information will be considered in context, including relevance to the role, seriousness, circumstances, time elapsed, safeguarding risk and applicable legal protections.

9 DBS, barred list checks and regulated activity

Crea Pax will assess each role against current DBS eligibility guidance. It will request only the level of criminal-record information that it is legally entitled to request. Where a role constitutes regulated activity with children and is eligible, the appropriate Enhanced DBS check with Children's Barred List information will be sought.

From 1 September 2026 the previous supervision exemption for relevant supervised volunteer activity with children was removed. Supervision alone therefore no longer takes an otherwise qualifying frequent activity outside regulated activity. Crea Pax will take this into account when assessing volunteers and other roles under the current definition.

DBS certificate numbers, check dates, barred-list information where applicable, Update Service status/checks and relevant decisions are recorded securely on the SCR or associated compliance records. Crea Pax does not require routine photocopying of DBS certificates merely to create a duplicate personnel file.

10 DBS Update Service and rechecking

Where an individual is subscribed to the DBS Update Service and Crea Pax has the required consent and certificate information, a status check may be used where legally appropriate. Crea Pax will periodically review whether existing DBS information remains appropriate to the role, including after role changes, breaks in service, commissioner requirements or safeguarding concerns. A fresh DBS application will be obtained where necessary.

11 Starting work while a check is outstanding

Starting duties before every check is complete is exceptional and must never be treated as routine. Where legally permissible and judged necessary, the Director / DSL must make and record a role-specific safeguarding decision. Controls may include continuous supervision, restriction from direct or unsupervised learner work, limits on duties, a written risk assessment and prompt completion of the outstanding check.

The fact that a person is supervised does not change whether qualifying activity is regulated activity under the post-1 September 2026 definition. Crea Pax will therefore distinguish between DBS eligibility and the temporary safeguarding controls used while a check is being processed.

Supervision must never be used to bypass a legally required barred-list or other pre-start check. Where the applicable rules do not permit the proposed duties to begin, they must not begin. Any permitted exceptional arrangement must identify the completed essential checks,

outstanding evidence, named supervisor, allowed duties, restrictions, review date and decision-maker. The check remains outstanding until evidence is received and verified.

12 Apprentices, young workers and trainees

Apprentices, trainees and young workers are subject to the same principle of role-appropriate safer recruitment. Their age, experience, competence and level of responsibility will also be considered through induction, supervision and risk assessment. A person awaiting a required check will not be given unsupervised learner duties merely because they are an apprentice, trainee or young worker.

13 Volunteers

Volunteer roles will be assessed individually according to the activity undertaken, frequency and current DBS eligibility rules. Since 1 September 2026, supervision no longer provides the former exemption from regulated activity for otherwise qualifying supervised volunteer activity. Volunteers undertaking regulated activity must not be barred from working with children and Crea Pax will obtain the appropriate check where required.

Occasional visitors or helpers who do not meet the regulated-activity criteria will be managed using proportionate checks, supervision and visitor controls appropriate to their actual role.

14 Contractors and visiting professionals

For self-employed contractors engaged directly by Crea Pax, checks will be determined from the work they actually perform and their contact with learners. Where an external organisation supplies a professional or contractor, Crea Pax may obtain written assurance of appropriate vetting from that organisation and will verify identity on arrival where relevant. Adults who are not appropriately vetted for unsupervised learner contact will be supervised or kept away from learners as appropriate.

15 Existing staff, role changes and ongoing suitability

Safer recruitment does not end on appointment. Crea Pax expects staff and contractors to disclose relevant changes that may affect suitability, including criminal charges or convictions, safeguarding restrictions, professional restrictions or other matters required by policy. Annual suitability declarations, supervision, training records and SCR reviews support ongoing oversight.

Where duties materially change, Crea Pax will reconsider whether additional checks, training, risk assessment or competence sign-off are required.

16 Single Central Record and evidence

Crea Pax maintains an SCR as its central workforce vetting record. It records the checks and evidence appropriate to each person and role, including dates and outcomes where required. Historical entries are retained appropriately; new checks and training are added rather than rewriting history.

The SCR is audited periodically and whenever significant workforce changes occur. Gaps, anomalies, expired evidence or checks requiring review are recorded and actioned. Supporting recruitment and training evidence is stored securely with access limited to those who need it.

The SCR job title and role assessment must match actual current duties. Recruitment records identify employees, apprentices, volunteers and contractors accurately. Former workers are

removed from the active list while necessary historical evidence is retained securely. Policy publication does not certify that every individual check has been completed.

17 Concerns arising during or after recruitment

Any safeguarding information arising during recruitment will be considered before appointment. If concerns arise after appointment, Crea Pax will follow its Safeguarding and Child Protection, Staff Behaviour / Code of Conduct and Whistleblowing arrangements, including LADO consultation or referral where appropriate.

Where the legal conditions for a DBS barring referral are met, Crea Pax will make the required referral. This duty is separate from referrals to children's social care, the police or LADO and will not be delayed because another process is underway.

18 Data protection, confidentiality and retention

Recruitment and vetting information is sensitive personal data. Crea Pax will collect only what is necessary, restrict access, store information securely, and retain or dispose of records in accordance with data-protection requirements and its retention arrangements. Information obtained for safer recruitment will not be used for unrelated purposes.

19 Induction

Appointment is followed by role-appropriate induction. This includes safeguarding arrangements, KCSIE 2026 Part One, the Staff Behaviour / Code of Conduct, whistleblowing and low-level concerns, emergency arrangements, health and safety, confidentiality and data protection, learner-specific information where needed, and Crea Pax procedures relevant to the role. Additional animal, equipment, transport or practical-work competence is confirmed before independent responsibility is given.

20 Monitoring and review

The Director / Proprietor and DSL monitors this policy through SCR audits, recruitment-file checks, workforce changes, safeguarding learning and commissioner or local-authority feedback. The policy will be reviewed by September 2027, or sooner following changes to legislation, KCSIE, DBS eligibility rules, local arrangements or Crea Pax practice.

POLICY 06 | 2026-27

Behaviour and anti bullying

Owner: Martha Bache, Director and Proprietor. Operational safeguarding: Martha Bache, DSL; Stephanie Selby, DDSL. Health and safety: Edwin Ralph.

Version: 2026-27.1 | Approved and effective: 17 October 2026

Approved by: Martha Bache, Director and Proprietor | Next review: September 2027, or earlier if required.

1 Purpose and ethos

Crea Pax provides a small, trauma-informed alternative provision for learners whose needs may include social, emotional and mental health (SEMH) needs, SEND, neurodiversity, anxiety, previous exclusion or difficulty accessing conventional education. Our approach is relational and strengths-based. We understand behaviour as communication and seek to understand the need, emotion, experience or barrier behind it while maintaining clear boundaries and keeping everybody safe.

The purpose of this policy is to promote emotional and physical safety, positive relationships, respectful behaviour and effective learning; to prevent and respond to bullying and child-on-child abuse; and to ensure that staff respond consistently, proportionately and in a way that reflects each learner’s individual needs.

2 Scope

This policy applies to all learners attending or receiving provision from Crea Pax and to all employees, apprentices, volunteers, contractors and visitors involved in provision. It applies on the Crea Pax site, during animal-assisted and outdoor activities, on local or off-site activities, during transport where Crea Pax is responsible, and to relevant online or digital behaviour that affects learner safety or wellbeing.

3 Core principles

- Emotional and physical safety comes first.
- Behaviour is considered in context and is not separated from SEND, communication, trauma, sensory needs, mental health or safeguarding.
- Learners are treated with dignity. Staff remain calm, curious, predictable and boundaried.
- Regulation and co-regulation may be needed before reflection, problem-solving or learning can take place.
- Positive behaviour is developed through relationships, modelling, meaningful activity, clear expectations and appropriate support rather than punishment alone.
- Consequences, where needed, are reasonable, proportionate, educational and connected to safety or repairing harm.
- Bullying, discriminatory behaviour, sexual harassment, harmful sexual behaviour and other child-on-child abuse are never dismissed as banter or an inevitable part of growing up.

4 Roles and responsibilities

Proprietor and DSL Martha Bache

Has overall responsibility for this policy, ensures behaviour practice remains consistent with safeguarding requirements, oversees serious or repeated incidents and ensures concerns are shared with commissioning schools, families and statutory agencies where appropriate.

Deputy DSL Stephanie Selby

Supports safeguarding and behaviour oversight, staff practice, restorative work and communication with learners, families and partner professionals.

Health and Safety Lead Edwin Ralph

Supports operational risk management, environmental controls, incident review and changes to risk assessments where behaviour creates or is affected by health and safety risks.

All staff

All staff must model respectful behaviour, follow individual learner plans and risk controls, use agreed de-escalation and regulation approaches, record significant incidents accurately and report safeguarding concerns without delay.

5 Expectations and individualisation

Crea Pax keeps expectations simple and accessible: treat people, animals, property and the environment with care; follow reasonable safety instructions; communicate needs where possible; and allow others to learn and feel safe. Expectations are explained in ways that reflect a learner’s age, development, communication profile, SEND and current level of regulation.

Equal treatment does not always mean identical treatment. Reasonable adjustments and individual support may include reduced demands, visual prompts, processing time, movement, quiet space, sensory support, access to a trusted adult, animal-assisted activity, changes to group size or staffing, and planned step-away or regulation opportunities.

6 Supporting positive behaviour and engagement

Staff use proactive strategies to reduce distress and increase engagement. These may include predictable routines, preparation for transitions, clear choices, achievable tasks, co-regulation, emotional coaching, Motivational Interviewing approaches, CBT-informed tools, creative or practical activity, outdoor learning and carefully planned Animal-Assisted Interventions.

Praise and reinforcement should be genuine, specific and appropriate to the learner. Staff recognise effort, communication, safe choices, kindness, independence, persistence and successful use of regulation strategies.

7 Dysregulation, distress and unsafe behaviour

When a learner becomes distressed or dysregulated, staff prioritise safety and reduce escalation. Depending on the learner and situation, staff may reduce language and demands, increase space, remove unnecessary people or hazards, offer a familiar regulating activity, provide access to a trusted adult or safer area, and use the learner’s individual support/risk plan.

Staff do not use humiliation, intimidation, shouting as a behaviour-management strategy, collective punishment, deprivation of food or drink, or sanctions that knowingly aggravate a learner’s disability, SEND or emotional distress.

Where there is immediate risk, staff may stop an activity, move other learners, remove accessible hazards or unsafe equipment, increase staffing, contact a parent/carer or commissioning school, or end the session if this is necessary to maintain safety. Significant events are reviewed so that plans and controls can be improved.

8 Physical contact and restrictive intervention

Crea Pax does not use physical intervention as a routine behaviour-management strategy. Staff should use prevention, de-escalation, environmental changes and relational approaches wherever possible. Any physical intervention must be lawful, necessary and proportionate to the immediate risk and must use the minimum force required for the shortest practicable time.

Any significant physical intervention or incident involving physical contact for safety must be recorded, communicated to the DSL and parent/carer/commissioner as appropriate, and reviewed. Safeguarding concerns arising from an incident are managed under the Safeguarding and Child Protection Policy.

Crea Pax does not assume that statutory search or use-of-force powers granted to a particular class of school automatically apply to this provision. Staff act only within an applicable lawful basis and their role, training and competence. Physical intervention is a last resort to prevent significant harm, not a means of punishment, enforcing task completion or stopping a capacitous adult choosing to leave.

9 Individual risk assessment and support planning

Where a learner presents additional behavioural, emotional, medical, sensory, self-harm, absconding, aggression or other safety risks, Crea Pax uses an individual risk assessment and support plan. This identifies known triggers or stressors, early signs, communication needs, helpful and unhelpful responses, staffing requirements, environmental controls, regulation strategies and emergency/escalation arrangements.

Plans are informed by the learner, family, commissioning school and relevant professional information and are reviewed after significant incidents or changes in need, and routinely as part of placement oversight.

10 Bullying and child on child abuse

Crea Pax does not tolerate bullying or child-on-child abuse. Behaviour may occur face-to-face or online and may include repeated verbal or physical intimidation, exclusion, coercion, discriminatory abuse, cyberbullying, sexual harassment or violence, harmful sexual behaviour, sharing sexual imagery, upskirting, initiation or hazing-type behaviour, or abuse within intimate personal relationships between children.

Staff remain alert to the fact that learners with SEND, communication differences or previous trauma may be particularly vulnerable to being targeted, may find it harder to report concerns, or may communicate distress through changes in behaviour.

11 Responding to bullying or peer abuse

All reports are taken seriously. Staff listen without blaming, avoid promising confidentiality, ensure immediate safety, preserve relevant evidence where appropriate and report safeguarding concerns promptly to the DSL/DDSL. The needs and wishes of the learner who has experienced harm are considered alongside the safety and support needs of all learners involved.

Responses may include increased supervision, changes to groups or activities, individual support, restorative work where safe and appropriate, education about relationships and boundaries, risk-assessment changes, family and school liaison, safeguarding referral or police involvement where thresholds are met. Restorative work is never used to pressure a learner into contact with somebody who has harmed them.

12 Discriminatory and prejudicial behaviour

Racist, sexist, homophobic, biphobic, transphobic, ableist, faith-based or other discriminatory language or behaviour is challenged and addressed. Staff consider both education and safeguarding needs, record significant incidents and monitor patterns. Reasonable adjustments or SEND do not mean that harmful behaviour is ignored; they inform how it is understood and responded to.

13 Searching, confiscation and prohibited or unsafe items

Crea Pax prioritises voluntary cooperation and de-escalation. Where an item presents a safety or safeguarding concern, staff may ask a learner to hand it over and secure it. Any search or confiscation must be lawful, necessary, proportionate and sensitive to the learner’s dignity, SEND, trauma history and safeguarding needs. Where the situation falls outside staff competence or presents immediate danger, staff should secure safety and seek support from the DSL, commissioning school, parent/carer or police as appropriate rather than escalating risk through an unsafe search.

Any search linked to a safeguarding concern, weapon, suspected illegal substance or sexual imagery must be reported immediately to the DSL and recorded.

Staff do not undertake forced searches under assumed school powers. If voluntary cooperation cannot safely resolve the concern, maintain immediate safety, involve the DSL and seek police or other appropriate assistance. Suspected sexual imagery is not viewed, copied, forwarded or searched for by staff.

14 Animals, outdoor areas and practical activities

Animals are an important part of Crea Pax provision and must never be used as a punishment, threat or bargaining tool. Learners are supported to interact with animals safely and respectfully, according to individual risk assessment, staff instruction and animal welfare requirements. Staff may immediately end or redirect animal contact where a learner, animal or other person could be harmed.

The same principle applies to tools, cooking equipment, sports equipment, fire-based activities, machinery and other practical resources: access is based on risk, competence, supervision and current regulation, not simply age or preference.

15 Leaving the learning area, refusal and missing learners

A learner who needs space should be supported through their agreed plan wherever possible. Staff do not create an avoidable confrontation solely because a learner refuses an activity. However, leaving an agreed safe area, attempting to leave the site or becoming unaccounted for is treated according to the learner's risk assessment and Crea Pax missing-learner procedures. Safeguarding and immediate safety take priority.

16 Recording, communication and review

Significant behaviour incidents are recorded factually and without judgement. Records should distinguish observation from what a learner or other person reports and, where relevant, include the context, antecedents or triggers, behaviour observed, risks, staff response and de-escalation used, injuries or damage, outcome, learner voice, notifications and follow-up actions.

Parents/carers and commissioning schools are informed in line with the seriousness of the incident, safeguarding requirements and placement arrangements. Patterns are considered alongside attendance, safeguarding, SEND and learner-progress information rather than viewing incidents in isolation.

17 Suspension, pause or ending a placement

Crea Pax aims to maintain placements through appropriate support, reasonable adjustment and multi-agency planning. A session or placement may nevertheless need to be paused, reviewed or ended where risks cannot be managed safely within the provision, where the placement no longer meets need, or following serious circumstances requiring commissioner review.

Any such decision is made with the commissioning school/local authority as appropriate and considers safeguarding, SEND, transition and continuity of support. Crea Pax does not use informal exclusion or simply send a learner away without appropriate communication and safeguarding consideration.

18 Links with safeguarding and other policies

Behaviour that causes concern may be an indicator of abuse, neglect, exploitation, mental ill-health, unmet SEND, peer abuse or other safeguarding need. Staff must not allow a behaviour-management response to replace a safeguarding response. Where there is a safeguarding concern, the Safeguarding and Child Protection Policy takes precedence.

This policy should be read alongside the Safeguarding and Child Protection Policy, Staff Behaviour / Code of Conduct, Online Safety & Acceptable Use Policy, Attendance & CME Policy, SEND Policy, Equality & Diversity Policy, Health & Safety Policy, Risk Assessment Policy and Missing Learner procedure.

19 Training, monitoring and review

Behaviour expectations, de-escalation, safeguarding, SEND-informed practice and relevant individual learner plans are covered through induction, staff training, supervision and team discussion. The Proprietor/DSL monitors significant incidents and patterns, with the H&S Lead involved where environmental or operational risk is relevant.

This policy is reviewed at least annually and sooner following significant incidents, changes to statutory guidance, local authority requirements, staffing or provision, or where monitoring identifies a need for change.

POLICY 07 | 2026-27

Attendance and children missing education

Owner: Martha Bache, Director and Proprietor. Operational safeguarding: Martha Bache, DSL; Stephanie Selby, DDSL. Health and safety: Edwin Ralph.

Version: 2026-27.1 | Approved and effective: 17 October 2026

Approved by: Martha Bache, Director and Proprietor | Next review: September 2027, or earlier if required.

1 Purpose and safeguarding principle

Crea Pax regards attendance as an important safeguarding indicator and a shared responsibility with commissioning schools, local authorities, parents/carers and other professionals. Because Crea Pax is an alternative provision and learners may attend for only part of their education programme, Crea Pax records attendance at the sessions it is commissioned to deliver and communicates attendance information promptly to the body responsible for the learner's overall education.

This policy sets out how Crea Pax records expected attendance, responds to non-attendance, identifies patterns or welfare concerns, shares information and supports learners to engage with provision. It should be read alongside the Safeguarding and Child Protection Policy, Missing Learner Immediate Action Procedure, Behaviour and Anti-Bullying Policy, SEND Policy and Data Protection arrangements.

2 Scope

This policy applies to every learner commissioned to attend Crea Pax, whether the placement is school-commissioned, local-authority commissioned, EOTAS or another agreed arrangement. It applies to on-site, off-site and other commissioned Crea Pax sessions. It also applies to all staff, apprentices, volunteers and contractors involved in recording, monitoring or responding to attendance.

3 Crea Pax's role and the role of the commissioner

Crea Pax is not the admitting school and does not remove learners from a school admission roll. The commissioning school or local authority retains its own statutory responsibilities for the learner's education, attendance and, where relevant, Children Missing Education processes. Crea Pax supports those responsibilities by maintaining accurate records of the sessions it delivers, sharing information without delay and escalating safeguarding concerns.

A learner who is registered at a school is not, solely because of absence, a child missing education within the statutory definition. CME refers to a child of compulsory school age who is not registered at a school and is not receiving suitable education otherwise. Nevertheless, repeated, unexplained or concerning absence from Crea Pax may indicate safeguarding risk, disengagement or that a learner is not receiving the education intended for them and must be acted upon.

4 Expected sessions and attendance records

For each learner, Crea Pax records the commissioned day, session and expected times. Attendance is recorded for every commissioned session and includes whether the learner attended, was absent, arrived late, left early or had another relevant variation. Actual arrival and departure information is recorded where needed so that Crea Pax can account for who is on site and provide accurate information to commissioners.

Attendance information must be factual. Staff must not assume a reason for absence. Where a parent/carer, school, transport provider or other professional gives a reason, this should be recorded as reported information.

Actual attendance, arrival and departure, shortened sessions and changes to expected hours must be distinguished from planned or commissioned hours. The current approved attendance record is the source for commissioner returns. Booking/calendar entries or an unverified draft note do not establish actual attendance. Any electronic sign-in or automated return must be approved, tested and explicitly brought into use before it replaces existing recording.

5 Arrival and registration

Attendance is checked promptly at the beginning of the learner’s commissioned session, normally within the first 10 minutes. Staff also remain alert to expected learners who have not arrived, including where transport arrangements are in place.

Where a learner arrives late or leaves early, the actual time and known reason should be recorded. Changes to collection, transport or independent-departure arrangements must follow the learner’s agreed consent and safety arrangements.

6 Planned or explained absence

Parents/carers and commissioning bodies should inform Crea Pax as soon as possible when a learner will not attend. Where Crea Pax has received a credible explanation through the agreed route, the absence is recorded and shared with the commissioner as required. Staff should still raise the matter with the DSL where the explanation, pattern or surrounding information creates a safeguarding concern.

7 Unexplained non attendance immediate response

An unexplained failure to attend an expected Crea Pax session is treated as a potential welfare issue until the circumstances are understood. The response is proportionate to the learner’s known vulnerabilities and individual risk information.

- Within approximately 10-15 minutes of the expected start time, check available information and follow the communication route agreed for that placement. This may involve the parent/carer, commissioner or transport provider; it is not a universal contact chain. Contact and escalation are sooner where individual risk requires it.
- Within 30 minutes of unexplained non-attendance: notify the commissioning school/local authority contact in accordance with Crea Pax’s established attendance-reporting arrangements and record the action taken.
- If contact remains unsuccessful or information increases concern: the DSL/DDSL reviews the learner’s vulnerabilities, safeguarding history, transport arrangements and known risks, contacts additional agreed/emergency contacts where appropriate and decides whether further welfare action or statutory escalation is required.

- Where there is reason to believe a learner is in immediate danger, missing in circumstances creating immediate risk, or requires urgent assistance, staff must call 999 rather than waiting for an administrative timescale.

A home visit is not automatic. It may only be considered where appropriate, safe, consistent with the commissioning arrangement and risk assessed. Staff must not undertake unsafe or unplanned welfare visits.

8 Safeguarding and patterns of absence

The DSL/DDSL considers attendance in the wider safeguarding picture. Particular attention is given to repeated unexplained absence, sudden changes in attendance, transport failures, anxiety or distress associated with attendance, unexplained withdrawal, possible exploitation, neglect, domestic abuse, mental-health risk, self-harm concerns, peer difficulties or information suggesting that the learner's whereabouts are unknown.

Crea Pax does not wait for a fixed number of absences before acting on a safeguarding concern. Information is shared with the commissioning school/local authority and, where thresholds are met, the relevant safeguarding pathway is followed.

9 SEND, SEMH and barriers to attendance

Many Crea Pax learners have SEND, SEMH needs, neurodiversity, sensory differences, trauma histories or anxiety that can affect attendance and engagement. Absence or refusal is therefore explored with curiosity rather than treated simply as non-compliance. Staff consider communication needs, transport, relationships, sensory/environmental factors, previous experiences, health and the suitability of the current plan.

Where appropriate, Crea Pax works with the learner, family and commissioner on reasonable adjustments, gradual engagement, trusted-adult support, changes to timing or activity, regulation strategies and other agreed measures. Crea Pax does not independently change a commissioned timetable without appropriate agreement.

10 Children Missing Education (CME)

Crea Pax will promptly share information where it becomes aware that a child may meet, or may be at risk of meeting, the statutory definition of CME. This includes circumstances where a child's education status or whereabouts are unclear, where an intended placement has not begun and suitable education may not otherwise be in place, or where information raises concern that the child is not receiving suitable education.

The local authority has the statutory duty to make arrangements to identify children missing education. Crea Pax cooperates with reasonable enquiries, provides relevant attendance and placement information, and follows Wiltshire or Dorset routes as applicable. Crea Pax does not itself remove a learner from a school roll or determine that a child is CME.

11 Learner missing during a Crea Pax session

A learner who fails to arrive is not managed in exactly the same way as a learner whose location becomes unknown after they have arrived at Crea Pax. If a learner leaves a session without agreement, absconds or cannot be located during provision, staff must follow the Crea Pax Missing Learner - Immediate Action Procedure immediately, alongside the learner's individual risk/support plan. Known vulnerabilities may require police or safeguarding escalation without delay.

12 Communication with commissioning schools and local authorities

Crea Pax provides attendance information in the format and frequency agreed with commissioners, including required weekly or other returns. Significant concerns are not held until the next routine return. Unexplained absence, concerning patterns and safeguarding information are communicated promptly through the appropriate contact route.

Where a learner attends more than one setting or provision, Crea Pax works to ensure that information is sufficiently clear for the commissioner to understand the learner's actual attendance at Crea Pax and any known barriers or concerns.

13 Recording, information sharing and retention

Attendance records, contact attempts, explanations received, decisions and escalation actions must be recorded accurately and stored securely. Information is shared on a need-to-know basis in accordance with safeguarding duties, UK GDPR, the Data Protection Act 2018 and Crea Pax's Data Protection arrangements. Data protection is not a barrier to sharing information necessary to safeguard a child.

14 Roles and responsibilities

Proprietor and DSL Martha Bache

Has overall oversight of attendance safeguarding, ensures unexplained or concerning absence is acted upon, liaises with commissioners and statutory services where required, and monitors patterns that may indicate risk or barriers to education.

Deputy DSL Stephanie Selby

Supports attendance and safeguarding oversight, follows up concerns where delegated and ensures relevant information reaches the DSL and commissioning professionals.

All staff

Record attendance and relevant times accurately, report unexpected non-attendance or departure promptly, follow individual plans and escalation procedures, and avoid making unsupported assumptions about absence.

15 Monitoring and review

Attendance is reviewed as part of Crea Pax's safeguarding and quality-assurance arrangements. Patterns, repeated transport problems, persistent non-attendance and emerging barriers are considered with commissioning schools/local authorities and inform learner support and risk planning.

This policy is reviewed at least annually and sooner where statutory guidance, local authority requirements, commissioning arrangements, safeguarding practice or Crea Pax procedures change.

16 Key guidance

Keeping Children Safe in Education 2026; DfE Working together to improve school attendance - statutory guidance, current version; DfE Children missing education - statutory guidance, updated September 2025; DfE Alternative provision - statutory guidance, current version; Education Act 1996 and School Attendance (Pupil Registration) (England) Regulations 2024, where applicable.

POLICY 08 | 2026-27

Risk assessment

Owner: Martha Bache, Director and Proprietor. Operational safeguarding: Martha Bache, DSL; Stephanie Selby, DDSL. Health and safety: Edwin Ralph.

Version: 2026-27.1 | Approved and effective: 17 October 2026

Approved by: Martha Bache, Director and Proprietor | Next review: September 2027, or earlier if required.

1 Purpose

Crea Pax uses risk assessment to support safe, meaningful participation rather than to remove all challenge or opportunity. Risk assessment is part of everyday safeguarding, health and safety, animal welfare and learner support. It helps staff identify foreseeable hazards, understand who may be affected, put proportionate controls in place and review whether those controls remain effective.

This policy replaces the previous Risk Assessment Policy and reflects Crea Pax’s current alternative provision, including indoor learning, fields and paddocks, animal-assisted interventions, practical activities, transport and off-site learning. It should be read alongside the Safeguarding and Child Protection Policy, Health & Safety Policy, Behaviour & Anti-Bullying Policy, Fire and Emergency arrangements, animal procedures and individual learner plans.

2 Scope

This policy applies to employees, apprentices, volunteers, contractors, visitors where relevant, and all learners participating in Crea Pax provision. It covers premises and environmental risks, learner-specific risks, activities, animals, equipment, transport, off-site work, emergencies and changes in circumstances.

3 Responsibilities

- Martha Bache, Proprietor / DSL: overall accountability; ensures significant safeguarding and learner-specific risks are considered and that high-risk decisions are appropriately authorised.
- Edwin Ralph, Health & Safety Lead: leads operational risk assessment, environmental and equipment safety review, incident learning and implementation of controls.
- All staff: follow recorded controls, use dynamic risk assessment, stop or adapt unsafe activity, report hazards and changes promptly, and contribute information relevant to learner and activity risk.
- Staff leading an activity remain responsible for checking that the planned controls are suitable at the point of delivery.

4 Principles

- Risk assessments must be suitable, sufficient, proportionate and understandable to the people using them.
- The learner’s needs, communication, SEND, SEMH presentation, known triggers, strengths and support strategies must be considered where relevant.

- A diagnosis or behaviour label is not itself a risk. Assessments identify the specific foreseeable harm, context and controls.
- Controls should support participation and independence wherever this can be achieved safely.
- Safeguarding and health-and-safety risks may overlap and should not be managed in isolation.
- Risk assessment is a live process. Staff must respond to changing weather, behaviour, staffing, animals, equipment, environment or other circumstances.

5 Types of risk assessment used at Crea Pax

- General/site assessments - buildings, learning areas, fields, paddocks, access routes and routine environmental hazards.
- Activity assessments - cooking, gardening, sports, practical work, tools, equipment and other planned activities.
- Animal-related assessments - species, handling, feeding, hygiene, zoonoses, paddock/shelter activity, animal behaviour and welfare.
- Learner-specific Risk Assessment & Support Plans - individual vulnerabilities, medical/SEND/SEMH needs, self-harm or absconding risk where relevant, aggression, sensory/communication needs, staffing levels, animal interaction, transport and emergency support.
- Young worker/apprentice assessments - experience, maturity, supervision, equipment, animals, chemicals and other age-related considerations.
- Transport/off-site assessments - journey, driver/vehicle, destination, staffing, communication, emergency arrangements and learner-specific needs.
- Fire, emergency and other specialist assessments - maintained separately where a more detailed assessment is required.
- Dynamic assessment - real-time judgement during an activity or changing situation.

6 Risk assessment process

The person completing or reviewing an assessment should identify the activity or situation, the hazards and potential harm, who may be affected, existing controls, whether further controls are required, and who is responsible for completing them. The assessment should record a clear judgement of residual risk using the Crea Pax assessment format where applicable.

Controls should be specific. Statements such as “staff to be vigilant” are not sufficient on their own where a practical control can be identified. Controls may include supervision, staffing level, separation, PPE, equipment restrictions, environmental changes, training/competency, communication, consent, timing, safe routes, emergency arrangements or stopping an activity.

7 Learner specific assessment and support

Crea Pax uses learner-specific risk assessment to understand what helps an individual participate safely. Relevant information may come from the learner, parent/carer, commissioning school or local authority, EHCP, health or safeguarding information, previous incidents and staff observation. Only information necessary for safe support should be included and shared on a need-to-know basis.

Where a learner requires enhanced staffing, including 2:1 support, this must be clearly recorded with the circumstances in which it is required. Plans should identify triggers or early

indicators where known, helpful regulation/de-escalation approaches, communication needs, safe spaces/routes, emergency responses and actions staff should avoid.

The learner profile holds the broader background and agreed goals; the Risk Assessment and Support Plan specifies risks and controls; the Staff Critical Information Summary gives concise operational instructions. Staff use the current authorised versions. Sensitive safeguarding narratives are kept separately, with necessary safety instructions shared on a need-to-know basis.

8 Dynamic risk assessment

A written assessment cannot predict every event. Staff continuously assess conditions and may pause, adapt, relocate or stop an activity when circumstances change. Examples include deterioration in weather, a learner becoming dysregulated, an animal showing signs of stress, equipment failure, an unexpected visitor or hazard, or staffing becoming insufficient for the planned activity.

Dynamic decisions that materially change the risk, reveal a new hazard or lead to an incident should be recorded and used to update the relevant written assessment where appropriate.

9 Animal assisted and outdoor provision

Animal interaction is planned around both human safety and animal welfare. Staff consider the species and individual animal, learner presentation, supervision, safe handling, hygiene, zoonotic risk, feeding, gates and fencing, weather, ground conditions, shelter, escape routes and the animal’s ability to move away. Learners must follow staff direction and must not undertake animal handling, treatment or equipment use beyond the activity and level of supervision authorised for them.

Animals may be removed from an activity, or the activity stopped, if the animal’s welfare, behaviour or environmental conditions indicate that continuation would be unsafe or inappropriate.

10 Equipment, machinery, substances and practical tasks

Equipment and substances are risk assessed according to their use, user competence and environment. Staff and apprentices must not use machinery, powered equipment, chemicals or animal medicines independently unless they have been trained, assessed as competent where required and authorised for that task. Manufacturer instructions, COSHH controls, PPE, safe storage and supervision requirements must be followed.

11 Off site activities and transport

Routine and specific off-site activities are assessed proportionately. Staff consider the location, journey, learner needs, staffing, communication, public interaction, weather, first aid, toilets, emergency access and arrangements if the planned location becomes unsuitable. Drivers and vehicles must meet Crea Pax transport requirements. A charged phone or other reliable communication method must be available.

12 Fire, lockdown and emergency planning

Risk assessment links directly to Crea Pax emergency arrangements. Staff must know the relevant evacuation routes, people assembly point, arrangements for accounting for learners, visitors and staff, and the separate arrangements for animals where applicable. Individual evacuation needs are considered through a PEEP or equivalent individual plan where required. Lockdown or security risks are managed under the relevant Crea Pax procedure.

13 Incidents, accidents and near misses

Accidents, incidents and near misses are reviewed for learning. The H&S Lead and DSL consider whether a risk assessment, learner plan, staffing arrangement, training requirement or environmental control needs to change. A lack of injury does not prevent a near miss from identifying an important control failure or new hazard.

14 Recording, access and version control

Current risk assessments are stored so that relevant staff can access the information they need before and during provision. Superseded versions may be retained where needed to demonstrate decision-making or incident history. Sensitive learner-specific information is stored and shared securely in accordance with safeguarding and data-protection requirements.

15 Review triggers

Risk assessments are reviewed at planned intervals appropriate to the risk and sooner when circumstances change. A review is required where relevant following:

- an accident, incident, near miss or safeguarding event;
- a significant change in a learner’s needs, behaviour, health or support arrangements;
- a change to premises, layout, activity, animals, equipment, chemicals, transport or staffing;
- new guidance, manufacturer information or legal requirements;
- staff feedback or dynamic assessment showing that existing controls are ineffective;
- the introduction of a new activity or foreseeable hazard.

16 Training and competence

Staff receive risk-assessment and health-and-safety information appropriate to their role. Specialist tasks require appropriate instruction, supervision and competence. Crea Pax records training and competency evidence where this is relevant to safe practice. New staff, apprentices and contractors must understand the controls relevant to the work they undertake.

17 Monitoring and review of this policy

The Proprietor and Health & Safety Lead monitor the quality and implementation of risk assessments through site checks, incident review, staff feedback, learner-specific review and quality assurance. This policy is reviewed at least annually and sooner following significant changes to legislation, guidance, premises, provision or Crea Pax practice.

POLICY 09 | 2026-27

Health and safety

Owner: Martha Bache, Director and Proprietor. Operational safeguarding: Martha Bache, DSL; Stephanie Selby, DDSL. Health and safety: Edwin Ralph.

Version: 2026-27.1 | Approved and effective: 17 October 2026

Approved by: Martha Bache, Director and Proprietor | Next review: September 2027, or earlier if required.

1 Statement of intent

Crea Pax Ltd is committed to providing, so far as is reasonably practicable, a safe and healthy environment for learners, staff, apprentices, contractors and visitors. Health and safety is integral to safeguarding and to the safe delivery of Crea Pax alternative provision, including indoor learning, outdoor areas, animal-assisted work, practical activities, transport and off-site learning.

Crea Pax aims to identify foreseeable hazards, put proportionate controls in place, maintain safe systems of work, provide suitable information and training, learn from incidents and enable learners to participate in purposeful activity without removing appropriate challenge or independence.

2 Scope and legal framework

This policy applies across Crea Pax premises and activities and to employees, apprentices, volunteers and contractors where relevant. It is informed by the Health and Safety at Work etc. Act 1974, the Management of Health and Safety at Work Regulations 1999, COSHH requirements, RIDDOR requirements, fire-safety duties and relevant education and safeguarding guidance. It should be read with Crea Pax risk assessments and the Safeguarding, Risk Assessment, First Aid, Fire and Emergency, Behaviour, Online Safety and animal procedures.

3 Responsibilities

- Martha Bache, Proprietor / DSL: holds overall responsibility for health and safety, ensures suitable arrangements and resources are in place, and considers safeguarding implications of health-and-safety concerns.
- Edwin Ralph, Health & Safety Lead: leads day-to-day health-and-safety arrangements, site and equipment checks, risk assessment, incident review and follow-up actions.
- All staff and apprentices: take reasonable care of themselves and others, follow risk assessments and safe systems, use equipment only as authorised, report hazards promptly and stop or adapt activity where safety cannot be maintained.
- Contractors and visitors: must follow Crea Pax instructions and site controls relevant to their work or visit.

4 Risk assessment and safe systems of work

Crea Pax maintains proportionate general, activity, animal, learner-specific, transport/off-site and specialist risk assessments. Dynamic risk assessment is expected when conditions change. Individual learner Risk Assessment & Support Plans identify relevant medical, SEND, SEMH, behavioural, sensory, communication, staffing and emergency needs. Where enhanced staffing such as 2:1 support is required, this is recorded and followed.

Activities may be paused, adapted, relocated or stopped if controls are insufficient. New hazards, incidents and significant changes are used to review written assessments. Further detail is set out in the Crea Pax Risk Assessment Policy.

5 Premises, access and environmental safety

Learning spaces, access routes, fields, paddocks, shelters, kit rooms and other areas used by Crea Pax are checked for foreseeable hazards. Staff consider slips and trips, damaged fixtures, gates and fencing, lighting, weather, ground conditions, access/egress, water, hygiene, animal areas and separation from private residential areas. Defects or hazards are reported to the Health & Safety Lead and controlled until rectified.

Learners are accompanied and supervised according to their individual needs and the activity. Areas, equipment or routes that are not authorised for learners remain restricted.

6 Fire and emergency arrangements

Crea Pax maintains fire-detection and firefighting equipment appropriate to the current site arrangements and tests/checks it at the required intervals. Staff must know the available exits and evacuation routes. The people assembly point is specified in the current staff emergency plan. No person should delay evacuation to collect belongings or equipment, and nobody should re-enter until authorised.

Emergency information and any grab bag are maintained at the designated staff location. Staff retrieve them only if immediately accessible without delaying evacuation. People take priority; animal evacuation follows the controlled animal emergency plan and is undertaken only when safe.

Lockdown/security arrangements, missing-learner procedures and individual evacuation needs are covered by separate procedures. A PEEP or equivalent individual plan is used where a learner or staff member needs additional evacuation support.

7 First aid and medical needs

Suitable first-aid supplies must be accessible across the learning centre, kit rooms, outdoor activities and authorised vehicles. Staff are briefed on current locations, including first-aid provision in the Learning Centre. Emergency services are summoned when required and parents/carers and commissioners are informed appropriately.

Medication is stored securely and administered or supported only in accordance with written consent/instructions and the learner’s plan. Administration is recorded. Emergency medication must remain accessible in accordance with the individual plan. Animal medicines are stored separately from human medication and managed under animal-welfare procedures.

8 Accidents, incidents and near misses

Accidents, incidents and near misses must be recorded promptly and reported to the Health & Safety Lead. The DSL is involved where safeguarding is relevant. Events are reviewed for lessons about staffing, learner support, environment, equipment, activity planning or training. RIDDOR reporting is considered where the statutory criteria are met; not every accident is reportable.

9 Animals, hygiene and zoonotic risk

Animal-assisted work is managed to protect both people and animal welfare. Staff consider species and individual-animal behaviour, learner presentation, supervision, gates/fencing, safe handling, feeding, hygiene, zoonoses, weather and escape routes. Hand hygiene is required after animal contact and before eating or food preparation. Animal areas, waste and equipment are managed to reduce contamination and cross-infection.

Staff undertaking animal-care duties must be competent for the task or appropriately supervised. Learners and apprentices do not independently handle animal medicines, powered equipment or higher-risk procedures unless specifically trained, assessed and authorised.

10 Equipment, machinery and electrical safety

Equipment is selected, maintained and used for its intended purpose. Defective equipment is removed from use or clearly isolated. Powered machinery and specialist equipment are restricted to authorised users who have received suitable instruction and, where required, competency sign-off. This includes equipment such as the electric quad, powered animal-waste equipment, strimmer and generator.

Electrical equipment, leads, chargers and appliances are visually monitored and maintained appropriately. Charging and fuelled equipment are kept away from incompatible ignition and storage risks.

11 Hazardous substances and fuel

Hazardous substances are identified, stored securely and assessed under COSHH where required. Safety data and manufacturer instructions are followed. Cleaning/laundry substances, plant-care products, fuel and animal treatments are stored in suitable designated locations and kept inaccessible to learners unless an activity has been specifically risk assessed and supervised.

Petrol is stored externally in approved containers within locked storage, away from buildings, hay, learners and ignition sources. Smoking and vaping are prohibited in learner areas and around animals, hay, fuel, charging or other fire-risk locations.

12 Food safety, cooking and allergens

Cooking and food activities are supervised according to learner need and activity risk. Staff consider food hygiene, heat, sharps, cross-contamination, dietary requirements and allergens. Known allergies, dietary restrictions and emergency responses must be checked before food is provided or prepared. The lead for the activity confirms the current practical controls and instructions before it starts; a written policy is not evidence that a separate operational procedure has already been completed.

13 Manual handling, PPE and occupational safety

Staff avoid hazardous lifting where reasonably practicable and use safer methods, assistance or equipment where needed. Suitable PPE is provided for tasks that require it and must be worn as directed. Outdoor work, animal handling, cleaning, waste handling, chemicals and machinery are assessed for appropriate clothing, footwear, gloves, eye or other protection.

14 Young workers, apprentices and competence

Young workers and apprentices receive additional consideration because of age, experience and familiarity with hazards. They are subject to a specific risk assessment, appropriate supervision and task restrictions. No worker undertakes powered-equipment work or another higher-risk task independently until the necessary training, competence and authorisation are confirmed.

15 Lone working, staffing and personal safety

Staffing arrangements reflect the learner, activity and environment. Staff must not continue an activity if the available staffing no longer meets the identified controls. Lone-working arrangements, where applicable, require a suitable assessment, communication/check-in arrangements and a clear means of obtaining help. Learners are not left unsupported contrary to their individual plan.

16 Transport and off site activity

Only approved drivers and suitable vehicles may be used for learner transport. Relevant driving-licence and insurance evidence is maintained, with MOT/tax status checked where applicable. Seatbelts and professional boundaries apply at all times. Off-site work considers destination, staffing, communication, first aid, learner needs, weather, public interaction and emergency arrangements.

17 Contractors, visitors and site information

Visitors and contractors are given proportionate information relevant to their presence on site, including safeguarding contacts, emergency arrangements, the Vegetable Garden assembly point, first-aid arrangements and any restricted areas. Contractors remain responsible for safe working within their competence and must inform Crea Pax of hazards created by their work.

18 Training, consultation and reporting concerns

Staff receive health-and-safety information and training appropriate to their responsibilities. Crea Pax records relevant training and competency evidence and refreshes training when required. Staff are expected to raise hazards, near misses and concerns without delay and may use the Whistleblowing Policy where a serious safety concern is not being addressed through normal reporting routes.

19 Monitoring, records and review

The Proprietor and Health & Safety Lead monitor health-and-safety practice through site checks, risk-assessment review, incident and near-miss learning, equipment and safety records, staff feedback and quality-assurance activity. Records are retained securely and made available for inspection where appropriate.

This policy is reviewed at least annually and sooner following a significant incident, change to premises or provision, new equipment or activity, relevant legal/guidance change, or evidence that existing arrangements are no longer effective.

Current operational instructions must be accessible to staff before the activity or session. Where a referenced procedure, assessment, briefing or training record is incomplete, the responsible lead must establish safe arrangements before the relevant activity proceeds; it must not be treated as implemented simply because it is named in this policy.

POLICY 10 | 2026-27

First aid

Owner: Martha Bache, Director and Proprietor. Operational safeguarding: Martha Bache, DSL; Stephanie Selby, DDSL. Health and safety: Edwin Ralph.

Version: 2026-27.1 | Approved and effective: 17 October 2026

Approved by: Martha Bache, Director and Proprietor | Next review: September 2027, or earlier if required.

1 Purpose and scope

Crea Pax is committed to providing prompt and appropriate first aid when a learner, member of staff, visitor or contractor becomes ill or is injured. This policy applies across the Crea Pax site, animal and outdoor areas, vehicles used for Crea Pax purposes, and authorised off-site activities. It should be read alongside the Health & Safety, Risk Assessment, Safeguarding and Child Protection, Behaviour and Anti-Bullying, and Fire and Emergency Procedures policies.

2 Responsibilities

- Martha Bache, Proprietor/DSL, has overall responsibility for ensuring suitable first-aid arrangements are in place and that safeguarding implications are acted upon.
- Edwin Ralph, Health & Safety Lead, oversees first-aid equipment, checks, incident review and health-and-safety follow-up.
- First-aid-trained staff provide first aid within the limits of their training and competence. Staff must not undertake procedures for which they are not trained.
- All staff must summon appropriate help, make the area safe, report incidents, follow individual health-care information and ensure learners are appropriately supervised.

3 First aid provision and equipment

First-aid provision is readily accessible, including in the Learning Centre. Other locations include:

- the Staff Room within the Learning Facility/garage area;
- the Girls Kit Room;
- the Boys Kit Room;
- a portable first-aid bum bag for activities and immediate response; and
- first-aid kits carried in Crea Pax vehicles used for learner transport or off-site work.

Kits are checked and replenished routinely and after use. Sterile items and eyewash are checked for intact packaging and expiry dates. Single-use gloves and other appropriate PPE are used where there is a risk of contact with blood or bodily fluids. Crea Pax does not currently have an on-site automated external defibrillator (AED); staff should follow 999 instructions and access a community AED only where this does not delay essential care or emergency response.

Martha Bache, Stephanie Selby and Grace Bache are the named first aiders. At least one is on site during every learner session. The Health & Safety Lead checks kit distribution and replenishment and monitors first-aid training and renewal dates.

4 Immediate response to illness or injury

- Make the situation safe and assess the person without putting others at unnecessary risk.
- Give first aid within competence and call another trained adult where helpful.
- Call 999 without delay where the condition is serious, life-threatening or beyond the competence/resources available on site.
- Ensure other learners remain safely supervised and preserve privacy and dignity as far as practicable.
- Inform the parent/carer or emergency contact as appropriate and notify the DSL where there is a safeguarding concern.
- Record the incident, treatment, outcome and relevant communications as soon as practicable.

5 When emergency medical help is required

Staff must use professional judgement and should err on the side of seeking emergency help. 999 should be called for serious breathing difficulty or anaphylaxis, loss of consciousness, seizure requiring emergency assistance, severe bleeding, suspected serious head/spinal injury, suspected major fracture, severe burns, poisoning, rapidly deteriorating illness, or any other situation where urgent medical treatment may be required. Staff should follow emergency-service instructions and must not transport a seriously ill or injured person in a private vehicle instead of calling an ambulance when emergency care is indicated.

6 Head injuries

Any head injury is assessed carefully. Emergency help is sought for red-flag symptoms or significant mechanism of injury. Parents/carers are informed of a learner head injury and given relevant information about what happened and any symptoms observed. The learner is monitored while remaining at Crea Pax and is not returned to an activity where doing so would be unsafe.

7 Medical needs and medication

Known medical needs, allergies and emergency arrangements must be identified through learner intake information and, where required, an Individual Health Care Plan or equivalent agreed plan. Medication is handled only in accordance with written consent/instructions and Crea Pax procedures. Administration is recorded on the appropriate medication administration record (MAR).

- Routine medication is stored securely and access is limited to authorised staff.
- Emergency medication must remain readily accessible to the staff who may need to use it and must not be made inaccessible by routine locked storage.
- Medication requiring refrigeration is stored in the designated medication fridge and temperature monitoring is recorded.
- Expiry dates, quantities and instructions are checked when medication is received and periodically thereafter.
- Staff do not administer medication or undertake specialist medical procedures unless authorised, competent and, where necessary, trained.

Staff follow each learner's agreed self-administration or staff-support arrangements. Human and animal medication are stored separately. Medication and animal-medicine fridge temperatures are checked and recorded each operating weekday, Monday to Friday; the

required range is determined from the relevant medicine instructions and agreed procedure. Any reading outside range is escalated promptly and affected medicines are not assumed suitable for use without appropriate advice.

8 Allergies, anaphylaxis and food related incidents

Allergy information must be available to staff who need it. Food preparation, animal feed, environmental exposure and off-site activities are considered in individual risk assessment. Where a learner has prescribed emergency medication, staff follow the learner-specific plan and their training. Suspected anaphylaxis is a medical emergency: call 999 and use prescribed emergency medication in accordance with the learner's plan and staff training.

9 Off site activities and transport

A suitable portable first-aid kit and charged means of communication are taken on off-site activities. Staff consider the learner's medical needs, location, access for emergency services, environmental and animal-related hazards, and any additional equipment or medication required. First aid given off site is recorded to the same standard as first aid on site.

10 Animal, outdoor and practical activity injuries

Crea Pax activities may involve animals, fields, woodland, gardening, cooking and practical equipment. Cuts, scratches, bites, kicks, stings, burns, splashes and contamination risks are managed according to the injury, activity risk assessment and infection-control principles. Wounds are cleaned and covered appropriately; medical advice is sought where there is concern about infection, significant animal injury, tetanus risk or other complications. Animal welfare first aid is separate from human first aid and must not replace appropriate medical care for a person.

11 Infection prevention and bodily fluids

- Wear disposable gloves when contact with blood, vomit or other bodily fluids is reasonably anticipated.
- Wash hands thoroughly after first aid and dispose of contaminated waste safely.
- Clean and disinfect contaminated surfaces/equipment using the appropriate product and COSHH controls.
- Any significant exposure to blood or bodily fluids is reported promptly so that medical advice can be sought where required.

12 Recording, parent and carer communication and review

All first-aid treatment and significant illness/injury events are recorded promptly. Records should state the date and time, person involved, what happened, injury or symptoms observed, treatment/action taken, outcome, who was informed and by whom. Accident, incident and near-miss reporting arrangements are used where applicable. Parents/carers are informed proportionately, and promptly where an injury, illness or treatment is significant or requires follow-up.

The Health & Safety Lead and/or Proprietor reviews significant incidents, patterns and near misses and updates risk assessments or controls where needed. Safeguarding concerns are reported immediately under the Safeguarding and Child Protection Policy.

13 RIDDOR and external reporting

The Health & Safety Lead, with the Proprietor, considers whether an incident is reportable under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR). A report is made only where the legal reporting criteria are met; hospital attendance or treatment alone does not automatically make an incident RIDDOR-reportable. Other notifications are made to commissioners, insurers or relevant authorities where required.

For a non-worker, including a learner, a work-related accident resulting in death or the person being taken directly from the scene to hospital for treatment is considered under the applicable reporting criteria. Diagnostic checks alone are not treatment for this purpose. The responsible person checks the full criteria and reporting timescale against current HSE guidance.

14 Training and competence

Crea Pax maintains sufficient first-aid capability for the activities and people present. Formal first-aid qualifications are monitored for expiry and renewed as required. Staff who are not currently qualified must still know how to summon help, contact 999, locate first-aid equipment and emergency medication, and support the emergency response. Training needs are reviewed following changes in learners, activities, staffing or incidents.

15 Review

This policy is reviewed at least annually and sooner following a significant incident, material change to provision, change in legislation or guidance, or where monitoring identifies that arrangements should be strengthened.

POLICY 11 | 2026-27

Missing learner immediate action

Owner: Martha Bache, Director and Proprietor. Operational safeguarding: Martha Bache, DSL; Stephanie Selby, DDSL. Health and safety: Edwin Ralph.

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Approved by: Martha Bache, Director and Proprietor | Next review: September 2027, or earlier if required.

1 Purpose and principle

A learner whose whereabouts become unknown during Crea Pax provision is treated as an immediate safeguarding concern. The response is risk-led: staff act without delay, maintain supervision of other learners, share accurate information and escalate to police or other agencies when the circumstances require it. The safety of learners and staff takes priority over attempting to physically prevent a learner from leaving or entering an unsafe area to search.

2 Scope and definitions

This procedure applies on the Crea Pax site, during outdoor or animal-based learning, in vehicles, on community or off-site activities and during any Crea Pax-arranged session. It applies where a learner who was in Crea Pax care cannot be located, has left an agreed safe area without permission, has separated from staff off-site, or has left following dysregulation and their location or safety cannot be confirmed.

Non-attendance at the start of a commissioned session is managed first under the Attendance and CME Policy. It becomes a missing-person safeguarding matter where information indicates that the learner may be missing or at risk, rather than simply absent from provision.

3 Prevention and preparation

- Learner Risk Assessment and Support Plans identify known absconding, hiding, self-harm, exploitation, road-safety, communication, sensory or dysregulation risks and the staffing/control measures required.
- Arrival, attendance, collection and departure arrangements are clear, including authorised collectors and any agreed independent departure.
- Staff know the site, gates and safe routes. Learners are accompanied appropriately outdoors and staffing is adjusted where a learner requires 2:1 support.
- Off-site activities identify boundaries, meeting points, contact arrangements and what staff will do if a learner separates from the group.
- Staff carry or have prompt access to a charged phone/radio and relevant emergency information.

4 Immediate response do not wait for a fixed time threshold

As soon as a learner is unaccounted for, the member of staff must alert the DSL/DDSL or most senior available staff member and establish the last confirmed sighting, time, direction of travel, clothing and any immediate risk information. Staff must not wait 10, 20 or 30 minutes before escalating where the learner is vulnerable or danger may be immediate.

- Confirm that the learner has not moved to another known part of the site or been legitimately collected/departed.
- Conduct a proportionate search of immediately accessible and safe areas, including likely quiet/hiding places, without leaving other learners inadequately supervised.
- Use radio/phone communication so staff do not duplicate searches and so one person coordinates the response.
- If appropriate and safe, call or message the learner using an approved contact route and encourage them to identify their location or return to a safe meeting point.
- Review the learner plan immediately for known triggers, preferred regulation strategies, likely destinations and risks.
- Preserve information that may assist police, including last sighting, direction, messages and relevant CCTV if available.

5 Calling police and emergency services

Call 999 immediately where there is an immediate threat to life or serious harm. Examples include a learner moving towards a busy road or water, suspected self-harm or suicidal intent, serious medical vulnerability, suspected abduction/exploitation, or another circumstance requiring an emergency police response.

Where the learner is missing and there is no immediate threat requiring 999, police should be contacted promptly using 101 or the route advised by police. The decision must be based on the individual risk and circumstances, not on waiting for a predetermined number of minutes. Any staff member may call emergency services if delay would place the learner at greater risk.

6 Parents and carers, commissioner and safeguarding agencies

- The parent/carer is contacted promptly unless doing so would increase safeguarding risk or police/children’s social care advise otherwise.
- The commissioning school or local authority is informed promptly in accordance with the learner’s placement arrangements. Where the incident began as unexplained non-attendance, the Attendance and CME Policy requirement to notify the commissioner within 30 minutes still applies.
- The DSL considers whether Wiltshire Integrated Front Door, Dorset Family Support and Advice Line, or another relevant children’s social care service must be contacted.
- Known risks such as exploitation, self-harm, family conflict or contextual safeguarding concerns are shared with police/social care where relevant and lawful.

7 Search safety and boundaries

Staff must not pursue a learner in a way that increases risk, use unsafe physical force simply to stop them leaving, enter water, traffic, private property or another hazardous environment, or leave the remaining group unsafe. If a learner is visible but moving away, staff should maintain observation where safe, communicate calmly, update the coordinator/police and avoid escalating the situation. Physical intervention is only used where lawful, necessary and proportionate to prevent immediate harm, in line with Crea Pax policy and the learner’s plan.

8 If a learner leaves the Crea Pax site

The senior staff member coordinates the response. Staff should identify the exit used and likely direction, consider roads, fields, woodland, water and other local hazards, and deploy staff only where this can be done safely without compromising supervision. Gates and exits must not be locked in a way that creates an evacuation risk. Where police are involved, staff follow police instructions and provide accurate information about the learner and local environment.

9 Off site and transport situations

If a learner separates from staff off-site, staff use the agreed meeting point and search arrangements in the activity risk assessment, alert the venue where appropriate and escalate according to individual risk. During transport, the driver must stop only where safe. Staff must not create a road traffic danger by attempting to physically manage a learner while a vehicle is moving. If a learner leaves a stationary vehicle, the response is based on the immediate location and risks.

10 When the learner is found or returns

- Confirm immediate physical and emotional safety and provide first aid or emergency medical help if required.
- Use a calm, non-punitive and trauma-informed response; the priority is regulation, safety and understanding what happened.
- Notify the parent/carer, commissioner, DSL and police/other agencies involved that the learner has been located, following any instructions they give.
- Consider whether the learner can safely continue the session or needs collection, medical assessment or another safeguarding response.
- Do not conduct an intensive debrief while the learner remains dysregulated. Obtain essential safety information first and follow up when appropriate.

11 Recording and review

The incident must be recorded as soon as practicable. The record should include the time and place last seen, when the learner was identified as missing, staff present, searches/actions taken, calls and notifications, risk-based decisions, police/social care involvement, time/location found, learner presentation, any injury or first aid, parent/carer and commissioner communication, and follow-up actions.

The DSL and Health & Safety Lead review the incident and any near misses. Relevant learner plans, PEEP, staffing levels, site/activity risk assessments and placement arrangements are updated where needed. Repeated incidents or increasing risk may require a multi-agency/commissioner review and reconsideration of whether the placement can be delivered safely.

12 Safeguarding and confidentiality

Information is shared on a need-to-know basis to protect the learner. A missing episode may reveal safeguarding concerns that require a separate child protection response. Staff must record disclosures or concerning information and report them to the DSL in accordance with the Safeguarding and Child Protection Policy.

13 Staff briefing, practice and review

Staff are briefed on this procedure as part of safeguarding, attendance, behaviour and emergency arrangements. Scenario discussion or drills may be used where proportionate, particularly for learners with known risks. This procedure is reviewed annually and sooner after a missing episode, significant near miss, change in the site/learner cohort, or updated statutory/local guidance.

POLICY 12 | 2026-27

Fire safety and emergency procedures

Owner: Martha Bache, Director and Proprietor. Operational safeguarding: Martha Bache, DSL; Stephanie Selby, DDSL. Health and safety: Edwin Ralph.

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Approved by: Martha Bache, Director and Proprietor | Next review: September 2027, or earlier if required.

1 Purpose and scope

Crea Pax is committed to preventing fire and responding quickly and safely to fire, smoke and other emergencies. This policy applies to learners, staff, volunteers, contractors and visitors across the Crea Pax site and to Crea Pax-led off-site activities. It should be read alongside the Health & Safety, Risk Assessment, First Aid, Missing Learner and Safeguarding policies, the current fire risk assessment and site-specific emergency information.

The overriding principle is simple: protect life first. No person is expected to fight a fire, rescue animals, collect possessions or re-enter a building where doing so could place them at risk.

2 Responsibilities

- Martha Bache, Proprietor / DSL, holds overall responsibility for ensuring appropriate fire and emergency arrangements are in place and reviewed.
- Edwin Ralph, Health & Safety Lead, supports operational checks, fire risk assessment, equipment arrangements, drill records, hazard follow-up and staff understanding of procedures.
- All staff must know the evacuation routes, assembly arrangements and learner-specific support needs; keep escape routes clear; report defects or hazards promptly; and follow emergency instructions.
- Staff responsible for a learner remain responsible for supporting that learner during an evacuation unless responsibility is clearly handed over.

3 Current fire safety arrangements

Crea Pax uses a combination of automatic detection, staff communication, clear escape routes, suitable extinguishing equipment and evacuation procedures. The current arrangements include:

- Appropriate fire detection, warning and firefighting arrangements are maintained in accordance with the current fire risk assessment. The public policy does not reproduce the controlled inventory, key arrangements or equipment locations.
- Current firefighting equipment is identified in the controlled fire risk assessment and staff briefing, with inspection and servicing recorded.
- Fire extinguishers are provided for trained/competent adults only where safe to use and where there is a clear escape route. Evacuation always takes priority.

- Escape routes and doors must be usable whenever premises are occupied. Staff check emergency egress before sessions and report defects immediately. Security controls must not prevent safe escape.
- Radios are available to staff for site communication. Phones/WhatsApp may support communication but are not the primary fire-warning method.
- Emergency information and any grab bag are kept in the designated staff location. Retrieval must never delay evacuation or require re-entry. Access and contents are checked through the controlled staff procedure.

4 Raising the alarm and immediate action

Anyone discovering fire, smoke or another condition requiring evacuation must raise the alarm immediately and clearly. Where radios are in use, the standard message is:

“FIRE, FIRE, FIRE - [location]. Evacuate people to the Vegetable Garden.”

- Call 999 as soon as it is safe to do so. Give the full site address and the clearest available information about the location and nature of the fire.
- Evacuate by the nearest safe route. Do not stop for bags, coats or equipment.
- Close doors behind you where this can be done without delaying escape.
- Do not enter smoke, cross an unsafe area or return to a building once evacuated.
- Follow Fire and Rescue Service instructions on arrival; their directions take precedence.

5 People assembly and accounting

Primary people assembly point: as specified in the staff emergency plan.

- Staff take learners and visitors directly to the Vegetable Garden by the safest available route.
- A roll call is completed using the current attendance/sign-in information. Staff report immediately if anyone is unaccounted for and give emergency services the best available information about their last known location.
- Nobody leaves the assembly point unless directed by the person coordinating the emergency or emergency services.
- Where an individual learner has additional needs affecting evacuation - including mobility, sensory needs, communication, dysregulation, freezing, hiding or refusal - their Individual Risk Assessment & Support Plan/PEEP must identify the support required.

6 Animal emergency arrangements

People are always the first priority. Animals are moved only when the fire or emergency directly threatens them, a safe route exists, sufficient competent adults are available and doing so will not delay human evacuation or require re-entry.

A separate controlled animal emergency plan identifies suitable holding areas, safe routes, species-specific handling, transport and competent staff. Animals are moved only if directly threatened and the conditions above are met. Staff follow the current plan and emergency-service instructions; no learner is tasked with rescuing animals.

7 Evacuation from outdoor areas and paddocks

The Crea Pax site includes fields, paddocks, woodland and animal areas with more than one route or gated exit. Staff must use the route that moves people away from the hazard rather than automatically returning toward the Learning Facility. Gates used for emergency egress are kept operable and staff know the access codes. Learners remain accompanied and accounted for throughout.

8 Fire prevention and higher risk areas

- Hay, bedding and other combustible materials are managed to reduce ignition risk and kept away from inappropriate heat or electrical sources.
- Petrol and other fuels are stored securely in suitable containers, separated from ignition sources and learner access, in accordance with risk assessment. Exact storage details are maintained in controlled site information.
- The generator, electric quad and powered machinery are used only by authorised/competent people and are isolated/stored safely when not in use.
- The livestock heat lamp is for temporary sick-animal use only. It must be guarded, securely restrained, positioned with safe clearances from combustible material and removed when no longer required.
- Smoking and vaping are prohibited in learner areas and around buildings, animals, hay, fuels and combustible storage. Any designated staff-only location must remain away from charging, generator and fuel-storage areas.
- Electrical defects, damaged plugs/leads, blocked exits, unsafe storage, missing keys or defective detection/fire equipment must be reported and acted upon promptly.

9 Fire service access and water

Emergency-service access is kept clear and current site access and water information is available to attending crews. A staff member meets and directs crews where safe; this does not delay evacuation or leave learners unsupported.

10 Fire drills, checks and training

- Fire and evacuation procedures form part of staff induction and refresher training.
- Drills are carried out periodically and whenever significant changes make a further drill appropriate. Drill records identify date, participants, evacuation/roll-call issues and actions required.
- Where site arrangements change, the Health and Safety Lead arranges an appropriate drill and records the findings and actions. A planned drill must not be recorded as completed before it takes place.
- Routine checks include escape routes and doors, detection, firefighting equipment, emergency information and any learner-specific evacuation arrangements. Defects are recorded and followed up.

The alarm/detection test is completed weekly on Monday morning before learners arrive and entered in the fire safety log. A missed, failed or unsatisfactory test is escalated promptly to the Health and Safety Lead, and safe arrangements are established before affected areas are used. Other checks and servicing follow the fire risk assessment and relevant instructions.

11 Other emergencies and lockdown

Not every emergency requires evacuation. Medical emergencies, severe weather, threats, missing learners, utilities failure or intruders are managed according to the risk. Where danger is outside, staff may need to secure learners instead of moving them towards it. The Health and Safety Lead must ensure staff have current site-specific security/lockdown instructions covering communication, safe locations, 999, accounting and all-clear arrangements. This public policy does not establish that a separate lockdown document has been completed. Fire or smoke requiring escape always takes priority.

12 Off site activities

For off-site activities, staff identify the venue’s emergency arrangements, safe exits and an appropriate temporary assembly point before or on arrival. Staff keep access to attendance/emergency information and a charged phone. Venue instructions are followed unless doing so would create an immediate greater danger. Crea Pax staff remain responsible for accounting for the learners in their care.

13 After an emergency or drill

- First aid and welfare support are provided as required.
- Parents/carers, commissioning schools/local authorities and safeguarding leads are informed where appropriate to the incident.
- The event is recorded, including decisions, timings, injuries, missing-person concerns, emergency-service involvement and any equipment used.
- The H&S Lead and Proprietor review the event or drill, update risk assessments/procedures where required and ensure actions are completed before normal use resumes where necessary.

14 Records and review

Crea Pax retains the current fire risk assessment and relevant records of alarm/detection checks, extinguisher servicing, drills, training, incidents and remedial actions. This policy is reviewed at least annually and sooner after a fire, significant near miss, material premises or staffing change, change to emergency arrangements, or relevant legal/guidance update.

15 Related documents

Health & Safety Policy; Risk Assessment Policy; First Aid Policy; Missing Learner - Immediate Action Procedure; Safeguarding & Child Protection Policy; Individual Learner Risk Assessment & Support Plans/PEEPs; Fire Risk Assessment; COSHH records; site emergency information; Lockdown Procedure.

POLICY 13 | 2026-27

Data protection and GDPR

Owner: Martha Bache, Director and Proprietor. Operational safeguarding: Martha Bache, DSL; Stephanie Selby, DDSL. Health and safety: Edwin Ralph.

Version: 2026-27.1 | Approved and effective: 17 October 2026

Approved by: Martha Bache, Director and Proprietor | Next review: September 2027, or earlier if required.

1 Scope and legal framework

This policy applies to personal information handled by Crea Pax about learners, parents/carers, staff, apprentices, volunteers, contractors, visitors and other identifiable people. It covers paper and digital records, email, photographs/video, attendance and safeguarding information, staff records, information received from commissioning schools/local authorities, and information created through Crea Pax provision.

Crea Pax works in accordance with the UK GDPR, Data Protection Act 2018 and other applicable UK data-protection and safeguarding law. Data protection does not prevent appropriate safeguarding information sharing. Where information must be shared to protect a child or another person, staff must follow safeguarding procedures and share information that is necessary and proportionate.

2 Accountability and responsibilities

- Crea Pax Ltd is responsible for determining and documenting its data-protection responsibilities for the processing it undertakes. Its role may differ according to the particular processing and commissioning arrangement; controller/processor status must be considered by reference to who determines the purposes and means of the processing, not assumed from a label in a contract.
- Martha Bache, Director / Proprietor, is the Data Protection Lead and is responsible for oversight of data protection, information-rights requests, breach assessment and liaison with commissioners or the Information Commissioner’s Office (ICO) where required.
- All staff must maintain confidentiality, use approved systems and accounts, follow access controls, report suspected breaches immediately, and only access personal information needed for their role.
- Where Crea Pax uses a service provider to process personal information on its behalf, appropriate contractual and security arrangements must be in place.

3 Data protection principles

Crea Pax will process personal information lawfully, fairly and transparently; collect it for specified and legitimate purposes; use only what is adequate, relevant and necessary; keep it accurate where necessary; retain it only for as long as required; and protect it with appropriate security. Crea Pax will be able to demonstrate its compliance with these principles.

4 Lawful bases and special category information

A lawful basis is identified for each purpose. Depending on the activity this may include contract, legal obligation, vital interests, legitimate interests, recognised legitimate interests, consent, or public task where Crea Pax itself is carrying out a qualifying task or function with a clear basis in law. Crea Pax will not describe processing as “public task” merely because a school or local authority commissioned the service.

Where legitimate interests is relied upon, Crea Pax considers the purpose, necessity and impact on the individual, with particular care where children’s information is involved. Consent is used only where it is genuinely optional and can be withdrawn without detriment.

Health, SEND and other special category information, and criminal-offence information where applicable, require an additional legal condition under data-protection law. Crea Pax will identify and document the relevant condition, including safeguarding or substantial-public-interest conditions where appropriate.

5 Information Crea Pax may hold

- identity and contact information for learners, parents/carers, staff and relevant professionals;
- commissioning, referral, timetable, attendance, arrival/departure and transport information;
- SEND, EHCP-related information, communication needs, medical/allergy information, medication records and individual support/risk information;
- safeguarding concerns, disclosures, referrals and multi-agency information;
- session notes, progress information, reports, behaviour/incident records and evidence of learning;
- photographs/video where there is an identified educational, evidential or publicity purpose and the appropriate permissions/lawful basis;
- recruitment, safer recruitment, training, payroll, emergency-contact and employment/contractor records; and
- accident, first-aid, health and safety, visitor and compliance records.

Crea Pax applies data minimisation: records should be factual, relevant and proportionate. Staff must not create speculative, excessive or unnecessarily sensitive records.

6 Privacy information and collection

People should be told, in clear and accessible language, what information Crea Pax collects, why it is used, who it may be shared with, how long it is likely to be kept, and how to exercise their rights. Information received from commissioners or other professionals remains subject to the same security and necessity principles. Children and young people should receive explanations appropriate to their age and understanding where practicable.

7 Security, access and working practices

- Digital records must be held in approved, access-controlled systems. Staff must use strong passwords and device locking and must not share account credentials.
- Paper records containing personal or safeguarding information must be secured when not in active use and not left visible to learners, visitors or unauthorised people.
- Learner information must not be routinely stored on personal phones or personal cloud accounts. Personal messaging/social-media accounts must not be used as a substitute for approved work systems.

- Personal information sent by email must be checked carefully before sending, including recipient addresses and attachments. Sensitive information should be shared using the most secure practical method available.
- Access is role-based and need-to-know. Family relationships or familiarity within the Crea Pax team do not create an entitlement to access information outside a person's work responsibilities.
- Printed records and confidential waste must be disposed of securely. Devices or storage media must be securely erased or destroyed before disposal or reuse where appropriate.

8 Safeguarding and information sharing

Staff must never withhold information needed to safeguard a child because of a mistaken belief that data protection prevents sharing. Where there is a safeguarding concern, information may be shared with the DSL/DDSL, commissioning school or local authority, children's social care, police, health professionals or other relevant agencies where there is a lawful and necessary basis.

Only information relevant to the purpose should be shared. Staff should record significant safeguarding information-sharing decisions, including what was shared, with whom, why and, where relevant, why consent was not sought or why information was shared despite objection. The Safeguarding and Child Protection Policy takes operational precedence when responding to an immediate safeguarding concern.

9 Commissioning schools, local authorities and other organisations

Crea Pax receives and returns information as part of commissioned alternative provision. The respective data-protection roles of Crea Pax and the commissioner depend on the actual processing arrangement. Crea Pax may act as an independent controller for some activities and may process information on behalf of another controller for others. Contracts/data-sharing arrangements should accurately describe those roles and responsibilities.

Information shared in reports, attendance returns, safeguarding communications and reviews must be limited to what is necessary for the agreed purpose and sent to the correct authorised recipient.

10 Photographs, video and publicity

Educational/evidential photography and public-facing publicity are separate purposes and should not be treated as a single blanket permission. Images must only be taken for an identified Crea Pax purpose, using approved arrangements, and stored securely. Public website or social-media use requires the appropriate permission/lawful basis and must respect any restrictions recorded for the learner. Staff must not publish learner images through personal accounts.

Consent, where relied upon, may be withdrawn for future use. Withdrawal cannot necessarily undo material already lawfully published or processing that relies on another lawful basis, and this should be explained where relevant.

11 Individual rights and subject access requests

Individuals have rights under data-protection law, including rights to be informed and, depending on the circumstances and lawful basis, access, rectification, erasure, restriction, objection and data portability. Requests do not need to use legal terminology and must be passed promptly to the Data Protection Lead.

Subject access requests are normally answered without undue delay and within one month, subject to lawful extensions or exemptions. Identity may be verified where necessary. Information about other people, safeguarding material, legal privilege or other exempt information may need to be withheld or redacted following a case-by-case assessment. A parent/carer does not automatically have an unrestricted right to all information about a child; the child's rights, capacity, best interests and applicable law must be considered.

12 Accuracy and correction

Staff should record observations and professional information accurately, distinguish fact from opinion where relevant, and correct factual inaccuracies when identified. A disagreement with a professional judgement does not automatically make the record inaccurate; where appropriate, the individual's differing view may be recorded.

13 Retention and secure disposal

Crea Pax will maintain a retention schedule or documented retention decisions for the categories of records it holds. Retention periods must reflect the purpose of the record, statutory or contractual requirements, safeguarding guidance, limitation periods, insurance requirements and any commissioner instructions that lawfully apply. Records must not be retained indefinitely "just in case".

Ordinary enquiries that do not lead to a placement or service are deleted 12 months after the last contact, including retained enquiry emails and saved form submissions. Where information becomes part of a placement, safeguarding concern, complaint or other record requiring separate retention, the relevant rules apply. Records held for a commissioner follow the applicable agreement and legal requirements.

14 Personal data breaches

A personal data breach includes accidental or unlawful loss, destruction, alteration, unauthorised disclosure of, or access to, personal information. Examples include sending information to the wrong recipient, losing a device or paper file, inappropriate access, publishing information accidentally, or a compromised account.

- Any suspected breach must be reported immediately to Martha Bache / the Data Protection Lead. Staff should preserve evidence and take safe steps to contain the incident without concealing or deleting relevant information.
- Crea Pax will record the breach, assess the type and sensitivity of information, number and vulnerability of people affected, likely consequences and mitigation.
- Where a breach is likely to result in a risk to people's rights and freedoms, Crea Pax will notify the ICO without undue delay and, where feasible, within 72 hours of becoming aware of it. Where the threshold is not met, the decision and rationale should still be recorded.
- Where a breach is likely to result in a high risk to an affected person, Crea Pax informs that person without undue delay unless a lawful exception applies. The decision, legal basis and any alternative protective action are recorded.
- If Crea Pax is acting as a processor for the affected information, it will notify the relevant controller without undue delay in accordance with the applicable agreement.

15 Data protection impact assessments and new systems

Before introducing processing likely to create a high risk to individuals, Crea Pax will consider whether a Data Protection Impact Assessment (DPIA) is required. Privacy and security should be considered when adopting new software, attendance/sign-in systems, online services, AI tools, monitoring arrangements or other technology that will process learner or staff information.

16 Artificial intelligence and automated tools

Staff must not enter identifiable learner, safeguarding, medical, SEND, staff or other confidential information into public or unapproved AI systems. Any AI or automated tool used for work must be approved for the intended data and purpose. Human professional judgement remains responsible for decisions and records; AI output must not be treated as verified fact simply because it has been generated by a system.

Learner records are organised in controlled learner files: referral and placement information, learner profile and journey, individual risk assessment and support plan, staff critical information, session records, progress and outcomes, reports, and placement reviews. Each record has a clear purpose and designated location; a shared chat, calendar entry or email is not automatically the authoritative learner record.

Authorised staff use individual work accounts and access only the information needed for their role. Dated observations identify their author, actual session date and information source. Safeguarding records remain in the separately protected safeguarding system; ordinary session records contain only the minimum operational cross-reference needed for safe support.

Where an approved AI-assisted workflow is used, a competent person checks the exact draft against the source observations and current learner plan. Management review of wording and authorisation to file are separate steps. Only an explicitly authorised final record is entered in the designated official document. Simulations and test records must never be filed as evidence of real attendance, progress or safeguarding activity.

New platforms or integrations require an assessment of lawful basis, special-category conditions, supplier contracts, security, access, retention, transfers and any DPIA required before use with the intended information. These policy rules do not establish that an integration or automation is operational or that a product has been approved for every category of personal data.

17 Data incidents, complaints and ICO contact

Concerns about Crea Pax handling of personal information should be raised with Martha Bache in the first instance so they can be investigated and addressed. Individuals also have the right to complain to the Information Commissioner’s Office. Data-protection complaints are handled alongside, but are distinct from, the Crea Pax Complaints Policy.

18 Training, monitoring and review

Data protection, confidentiality and secure information handling form part of staff induction and refresher training. Breaches, near misses, information-rights requests, changes in systems and commissioner requirements are used to improve practice. This policy will be reviewed by September 2027 or sooner following relevant legal/regulatory change, a significant data incident, new technology or material change to Crea Pax processing.

Related Crea Pax documents

Safeguarding and Child Protection Policy; Online Safety & Acceptable Use Policy; Staff Behaviour / Code of Conduct; Attendance & CME Policy; Safer Recruitment Policy; Health & Safety Policy; Complaints Policy; learner intake/consent documentation; staff confidentiality and information-security procedures; retention schedule and data-breach log.

Reference framework

UK General Data Protection Regulation (UK GDPR); Data Protection Act 2018; Data (Use and Access) Act 2025 as in force; current Information Commissioner’s Office guidance; and relevant safeguarding/information-sharing requirements. This policy should be read with current ICO guidance because data-protection guidance and statutory provisions may change during the policy period.

POLICY 14 | 2026-27

Complaints

Owner: Martha Bache, Director and Proprietor. Operational safeguarding: Martha Bache, DSL; Stephanie Selby, DDSL. Health and safety: Edwin Ralph.

Version: 2026-27.1 | Approved and effective: 17 October 2026

Approved by: Martha Bache, Director and Proprietor | Next review: September 2027, or earlier if required.

1 Purpose and principles

Crea Pax is committed to providing safe, respectful and high-quality alternative provision. Concerns and complaints are welcomed as an opportunity to resolve problems, learn and improve. Complaints will be handled fairly, proportionately, without discrimination and as promptly as reasonably possible. A learner will not be disadvantaged because they, or someone acting for them, has raised a concern or complaint.

This policy provides an accessible route for learners, parents/carers, commissioning schools and local authorities, professionals, visitors and members of the public to raise concerns about Crea Pax services, conduct or decisions.

2 Scope and exclusions

This policy applies to complaints about Crea Pax provision, staff practice, communication, service delivery, premises, activities or other matters for which Crea Pax is responsible.

Some matters must follow a different process and will be redirected immediately where appropriate:

- a safeguarding concern or concern that a child may be at risk of harm;
- an allegation or low-level concern about a member of staff, contractor or volunteer;
- a whistleblowing concern raised by a worker;
- a data protection complaint or request requiring action under UK data protection law;
- an employment, disciplinary or grievance matter; or
- a matter that is primarily the responsibility of the commissioning school, local authority, police, social care or another statutory body.

Where a complaint contains more than one type of concern, Crea Pax may separate the issues so that safeguarding, employment or statutory matters are dealt with through the correct route while the remaining complaint is considered under this policy.

Crea Pax plans to seek OCR approval but has not yet submitted an application and does not currently offer OCR qualifications. Future qualification delivery is conditional on confirmed centre and qualification approval. Complaints about service or administration follow this policy; assessment appeals and suspected malpractice follow their separate qualification procedures when applicable.

3 Accessibility and support

A complaint does not have to use legal language or a particular form. Crea Pax will make reasonable adjustments so that children, young people and adults with SEND, communication needs, literacy difficulties or other barriers can raise concerns. This may include accepting a complaint verbally, helping the person record it, using an advocate or trusted adult, or providing information in a more accessible format.

Learners are encouraged to speak to any trusted member of staff. Staff receiving a learner complaint must take it seriously, record it appropriately and ensure it reaches the correct person.

4 Stage 1 informal concern

Where appropriate, concerns should first be raised with the relevant staff member or with Martha Bache, Director / Proprietor. Many issues can be resolved quickly through clarification, discussion or an agreed action.

Crea Pax will normally aim to respond to an informal concern within 5 working days. A person may move directly to Stage 2 where the matter is serious, they are uncomfortable approaching the staff member involved, or informal resolution would not be appropriate.

5 Stage 2 formal complaint

A formal complaint should normally be sent to Martha Bache at martha@creapax.com. If the complainant cannot make the complaint in writing, Crea Pax will make reasonable arrangements to record it accurately and confirm the substance of the complaint with them.

Crea Pax will normally:

- acknowledge the complaint within 5 working days;
- clarify the issues and the outcome sought where necessary;
- consider relevant records and speak with relevant people;
- keep an open mind and avoid prejudging the outcome;
- protect confidential and safeguarding information; and
- provide a written outcome normally within 15 working days of acknowledgement.

If more time is reasonably required because of complexity, staff absence, safeguarding or another external process, the complainant will be told the reason and given a revised timescale. The outcome will explain whether the complaint is upheld, partly upheld or not upheld, any appropriate action, and how to request a review.

6 Complaints about the Proprietor

Where a complaint concerns Martha Bache personally, she must not investigate or decide it. Contact Stephanie Selby, DDSL, at steph@creapax.com to coordinate the response and arrange a suitably independent reviewer, or contact the commissioning school or local authority directly. Steph is the initial contact, not the independent reviewer. Reviewers must be uninvolved in the events and disclose conflicts, including personal and family connections. An alternative is appointed where impartiality could be undermined. Safeguarding allegations follow the safeguarding and LADO route immediately.

7 Stage 3 review

If the complainant remains dissatisfied with the Stage 2 outcome, they may request a review, normally within 10 working days of receiving it. The request should explain why they believe the complaint was not handled fairly or adequately.

The review will focus on whether the complaint was investigated fairly, relevant information was considered, conclusions were reasonable on the available evidence, and appropriate action was identified. Wherever reasonably practicable, the review will be undertaken by a person who was not involved in the original investigation. Crea Pax will normally issue the review outcome within 15 working days. This concludes the internal Crea Pax complaints process.

8 Safeguarding and allegations

Safeguarding is not delayed while a complaint is investigated. Any information suggesting that a child may be at risk of harm must be passed immediately to the DSL or DDSL and managed under the Safeguarding and Child Protection Policy. Allegations about adults working with children are considered under safeguarding procedures, including referral to the relevant Local Authority Designated Officer (LADO) where the threshold is met. Emergency concerns must be referred to emergency services without delay.

9 Commissioning schools and local authorities

Crea Pax works in partnership with commissioning schools and local authorities. A complaint may need to be shared with the commissioner where it concerns the placement, commissioned service, attendance, safeguarding, funding or contractual arrangements, or where the commissioner has its own complaint or quality-assurance responsibilities. Information will be shared on a lawful and need-to-know basis.

Nothing in this policy prevents a complainant from contacting the commissioning school, local authority, safeguarding service, police, Information Commissioner or another competent body where that route is appropriate. Crea Pax will not state that its internal process must be completed first where law, safeguarding or the external body permits direct contact.

For a complaint about an OCR qualification delivered under confirmed approval, the internal complaints route and the correct qualification procedure normally apply before referral to Cambridge OCR. OCR publishes complaints@ocr.org.uk and its current students, parents and carers complaints guidance. Crea Pax checks the applicable awarding-body route and timescales at the time; a complaint is not a substitute for an assessment appeal, malpractice or reasonable-adjustment process.

10 Confidentiality and fairness

Complaints will be handled with appropriate confidentiality. Information will be shared only with those who need it to consider the complaint, safeguard a person, obtain professional advice or meet a legal or commissioning requirement. The person complained about will normally be given a fair opportunity to respond, subject to safeguarding, legal and confidentiality restrictions.

Crea Pax will distinguish between fact, allegation, opinion and professional judgement and will keep an appropriate record of the evidence considered and the reasons for decisions.

11 Anonymous complaints

Anonymous complaints will be considered according to the seriousness, credibility and information available. The absence of a named complainant may limit the investigation, but it will never prevent action where safeguarding, safety or other serious concerns are identified.

12 Persistent, unreasonable or abusive behaviour

Crea Pax will not label a complaint unreasonable merely because it is persistent, challenging or critical. However, proportionate communication arrangements may be introduced where behaviour becomes abusive, threatening, discriminatory, excessively repetitive, or places unreasonable demands on staff after the issues have been fully addressed. Measures may include a single point of contact, agreed communication method or reasonable limits on frequency. Any restriction will be explained and kept under review. Threats or immediate safety concerns may be referred to the police.

13 Records and data protection

Crea Pax will keep an appropriate record of formal complaints, investigations, outcomes, actions and learning. Complaint records will be stored securely and access restricted. Retention will follow the Crea Pax retention schedule, legal requirements and any applicable commissioning or insurance requirements rather than a single blanket period for every complaint.

Personal data will be processed in accordance with the Crea Pax Data Protection & GDPR Policy. Complaint responses may withhold or redact third-party, safeguarding, employment or other confidential information where disclosure would be inappropriate or unlawful.

14 Learning and service improvement

The Proprietor reviews complaints and concerns for recurring themes, safeguarding implications, training needs, communication issues and opportunities to improve policy or practice. Relevant learning may lead to changes in risk assessments, staff guidance, procedures or commissioning discussions. Lessons will be shared with staff where appropriate without unnecessary disclosure of personal information.

15 Monitoring and review

This policy will be reviewed at least annually and sooner where a complaint identifies a procedural weakness, the service changes materially, or relevant legislation, statutory guidance or commissioning requirements change.

Related documents

Safeguarding and Child Protection Policy 2026; Staff Behaviour / Code of Conduct Policy 2026; Whistleblowing Policy 2026; Data Protection & GDPR Policy 2026; Health & Safety Policy 2026; Behaviour & Anti-Bullying Policy 2026.

POLICY 15 | 2026-27

Curriculum and therapeutic approach

Owner: Martha Bache, Director and Proprietor. Operational safeguarding: Martha Bache, DSL; Stephanie Selby, DDSL. Health and safety: Edwin Ralph.

Version: 2026-27.1 | Approved and effective: 17 October 2026

Approved by: Martha Bache, Director and Proprietor | Next review: September 2027, or earlier if required.

1 Purpose and status of this statement

This statement explains the curriculum and therapeutic approach used by Crea Pax Ltd as an alternative provision for children and young people with a range of special educational needs, social, emotional and mental health needs, barriers to school attendance and other vulnerabilities. It describes how education, practical learning, relationships, outdoor experiences and animal-assisted work are brought together to support engagement, regulation, confidence and progress.

Crea Pax is an alternative provision and does not replace the statutory responsibilities of a learner's school, local authority or other commissioner. Each placement is planned around the learner's commissioned provision, identified needs, EHCP outcomes where applicable, and agreed goals.

Crea Pax provides therapeutic interventions and therapeutic support within its educational and wellbeing provision. This wording does not mean that every session is counselling or clinical therapy, and Crea Pax does not present routine provision as a substitute for specialist mental-health, medical or clinical services.

2 Our approach

Our approach is relational, trauma-informed, strengths-based and highly individualised. We recognise that many learners need to feel physically and emotionally safe, understood and regulated before they can engage consistently with learning. Behaviour is considered in context and may communicate unmet need, anxiety, overwhelm, sensory difficulty, uncertainty or previous experiences.

- build trusted relationships and predictable routines;
- use co-regulation and calm, respectful communication;
- offer meaningful choice while maintaining safe boundaries;
- reduce unnecessary demands and barriers without lowering aspirations;
- use interests, practical tasks, animals and the outdoor environment as routes into engagement and learning;
- support increasing independence, self-advocacy and readiness for wider education, training or community participation.

3 Curriculum intent

The curriculum is designed to help learners reconnect with learning and develop the personal, social and practical foundations that make sustained educational engagement possible. Individual placements may emphasise different areas according to age, need and commissioning outcomes.

- SEMH development: emotional literacy, regulation, resilience, confidence and coping strategies.
- Communication and relationships: conversation, turn-taking, teamwork, self-advocacy, boundaries and positive interaction with adults and peers.
- Learning behaviours: curiosity, persistence, problem solving, following instructions, planning and completing tasks.
- Independence and life skills: cooking, food preparation, animal care, gardening, growing produce, organisation and responsibility.
- Physical and outdoor learning: movement, practical activity, sensory regulation, nature-based learning and appropriate challenge.
- Supported academic learning where commissioned and appropriate, including personalised tasks and life-skills opportunities. Crea Pax plans to seek OCR approval; no application has yet been submitted. Accredited delivery requires confirmed centre and qualification approval and suitable staffing.

4 Animal assisted and outdoor learning

Animal-assisted and outdoor learning are distinctive parts of Crea Pax provision. Activities may include observation, feeding, husbandry, preparing equipment, gardening and caring for environments. Participation is not dependent on physical contact with an animal. Only suitable animals and activities authorised under the current licence and any written local-authority confirmation are used for exhibition; animal presence at the site does not itself establish authorisation.

Animal-assisted activities are planned for an educational, relational or wellbeing purpose and are delivered within Crea Pax safeguarding, risk-assessment, hygiene and animal-welfare arrangements. Animal welfare takes priority: animals must be able to move away, rest and have their individual needs respected. Learners are taught that standing back, observing body language and respecting an animal's choice are valuable forms of participation.

Crea Pax holds a Keeping or Training Animals for Exhibition licence. Animal activities are therefore supported by written procedures, competent handling, species-appropriate welfare arrangements and emergency planning.

5 Therapeutic interventions and informed practice

Crea Pax may draw on evidence-informed approaches to help learners understand themselves, communicate, regulate and engage. These are adapted to the learner and used within staff competence and role boundaries.

- Motivational Interviewing-informed practice: exploring motivation, values, ambivalence, goals and ownership of change.
- CBT-informed tools: noticing links between thoughts, feelings, physical responses and behaviour; identifying triggers; and developing practical coping strategies.
- Trauma-informed practice: emotional and physical safety, predictability, co-regulation, choice, collaboration and avoidance of unnecessary re-traumatisation.

- Animal-assisted and nature-based interventions: purposeful interaction, observation and practical activity to support regulation, confidence, communication and responsibility.

Where a learner requires clinical assessment, diagnosis, counselling, psychotherapy, medical treatment or specialist mental-health intervention beyond Crea Pax's role, this remains the responsibility of appropriately qualified services and the learner's wider professional network.

6 What a session may look like

There is no single Crea Pax lesson format. A session may combine structured learning with practical and relational work. Depending on the learner and their agreed outcomes, activities may include:

- animal care and husbandry; gardening, growing and environmental tasks;
- cooking, food preparation and other life-skills activities;
- creative work, art, play-based activity, quizzes, games or sport;
- supported academic or qualification-related work;
- reflective conversation, goal-setting and therapeutic interventions;
- peer activities designed to practise communication, teamwork and social confidence;
- quiet regulation, movement or sensory breaks when these enable safe re-engagement.

Activities are adapted in real time when a learner becomes overwhelmed, dysregulated or unable to access the original plan. Changing the route into learning is not treated as failure; staff retain the intended outcome while responding proportionately to need and safety.

Placements may use morning, afternoon or full-day sessions. Tailored sessions and flexible hours can be agreed where possible, taking account of learner needs, commissioning arrangements, safe staffing and availability. A gradual introduction or change in hours is agreed and recorded rather than assumed.

7 Personalisation, SEND and reasonable adjustments

Learners are not expected to fit a standard programme. Staff consider referral information, EHCPs and professional reports where supplied, learner and family views, communication needs, sensory needs, medical information, known triggers, strengths, interests and risk information. Reasonable adjustments are made so that learners can participate as safely and meaningfully as possible.

Support may include 1:1 or, where risk and need require it, 2:1 staffing; reduced group demand; visual or verbal preparation; supported transitions; access to quieter spaces; movement or sensory regulation; modified activities; additional processing time; and carefully planned peer interaction.

8 Safeguarding, safety and welfare

Safeguarding is embedded throughout curriculum delivery. Staff follow the Crea Pax Safeguarding and Child Protection Policy, Behaviour and Anti-Bullying Policy, Risk Assessment Policy, Health and Safety Policy, First Aid Policy and Missing Learner procedure. Concerns are reported to the DSL or DDSL and statutory or commissioning partners are contacted where required.

Learner-specific risk assessment and support planning informs staffing, activities, animal contact, off-site learning, transport, medical needs, emergency arrangements and any known risk of self-harm, aggression, absconding or other significant concern. Staff may stop or change an activity whenever safety or welfare cannot be maintained.

9 Planning, goals and progress

Provision is planned from the learner's starting point and the outcomes agreed with the commissioner. Progress may be academic, practical, social, emotional, behavioural or related to independence and attendance. Crea Pax therefore uses evidence that is proportionate to the placement rather than relying on a single measure.

- session observations and staff notes;
- attendance and ability to remain engaged in provision;
- progress towards individual Crea Pax or commissioned goals;
- examples of learning, practical competence and increasing independence;
- changes in communication, participation, peer interaction, regulation and help-seeking;
- learner voice, family information and commissioner feedback where appropriate.

Weekly or periodic reports are provided where agreed with schools or local authorities. Reports are evidence-led and distinguish observed progress from information reported by the learner or others.

10 Partnership with commissioners, families and professionals

Crea Pax works collaboratively with commissioning schools, local authorities, families and relevant professionals. Information is shared in line with safeguarding and data-protection requirements. Where an EHCP or multi-agency plan is in place, Crea Pax contributes information relevant to its role and supports agreed outcomes within the scope of the placement.

The commissioning body retains responsibility for the learner's overall education programme, statutory duties and decisions about placement, curriculum entitlement and reintegration unless a different legal arrangement applies.

11 Staff competence and professional boundaries

Staff work within their training, competence and role. Crea Pax maintains safeguarding, health and safety, animal-handling and relevant operational training and provides additional training or supervision where a role requires it. Staff do not describe themselves as delivering a regulated clinical service unless they are appropriately qualified, insured and specifically working within that professional role.

12 Review and quality assurance

Martha Bache, Director / Proprietor and DSL, is responsible for oversight of this statement and the quality of the provision. Curriculum and intervention approaches are reviewed through learner progress, incident and safeguarding learning, staff reflection, commissioner feedback, changes in learner need and Crea Pax quality-assurance processes.

This statement will be reviewed at least annually and earlier where legislation, statutory guidance, commissioning expectations, licensing requirements or Crea Pax practice materially change.

13 Related Crea Pax documents

This statement should be read alongside the Safeguarding and Child Protection Policy; SEND Policy; Equality and Diversity Policy; Behaviour and Anti-Bullying Policy; Attendance and CME Policy; Risk Assessment Policy; Health and Safety Policy; First Aid Policy; Online Safety and Acceptable Use Policy; Data Protection and GDPR Policy; and relevant learner-specific plans and risk assessments.

POLICY 16 | 2026-27

Equality and diversity

Owner: Martha Bache, Director and Proprietor. Operational safeguarding: Martha Bache, DSL; Stephanie Selby, DDSL. Health and safety: Edwin Ralph.

Version: 2026-27.1 | Approved and effective: 17 October 2026

Approved by: Martha Bache, Director and Proprietor | Next review: September 2027, or earlier if required.

1 Purpose and commitment

Crea Pax is committed to equality of opportunity, dignity, respect and inclusion for learners, staff, families, visitors, contractors and partner professionals. We aim to remove avoidable barriers, make reasonable adjustments where required, challenge discrimination and create a setting in which difference is understood and valued.

Many learners attending Crea Pax have SEND, SEMH needs, disabilities, sensory or communication differences, disrupted educational experiences or other vulnerabilities. Equality at Crea Pax therefore does not mean treating everyone identically; it means recognising individual need and providing fair, proportionate support so that learners can participate safely and meaningfully.

2 Legal and practice framework

This policy is informed by the Equality Act 2010, Human Rights Act 1998, Children and Families Act 2014, SEND Code of Practice: 0 to 25 years, Keeping Children Safe in Education 2026 and relevant commissioning requirements. It should be read alongside Crea Pax policies on safeguarding, SEND, behaviour and anti-bullying, curriculum and therapeutic approach, safer recruitment, complaints, data protection, online safety, health and safety and risk assessment.

Crea Pax is a commissioned alternative provision. Where statutory duties sit with a learner's school, local authority or other commissioner, Crea Pax works with that body and does not represent itself as replacing those duties.

3 Protected characteristics

The Equality Act 2010 protects people from unlawful discrimination in relation to protected characteristics. These are:

- age;
- disability;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race;
- religion or belief;
- sex; and
- sexual orientation.

The way particular Equality Act provisions apply can differ according to context. Crea Pax nevertheless expects respectful, non-discriminatory practice across its work with children, adults and partner organisations.

4 Forms of discrimination and unacceptable conduct

Crea Pax will not tolerate unlawful direct or indirect discrimination, harassment or victimisation. Bullying, prejudicial language, stereotyping, targeted exclusion and discriminatory online behaviour are addressed promptly. Concerns may also require safeguarding action where there is risk of harm, exploitation, hate-related behaviour or another child-protection concern.

Staff must avoid assumptions about a person based on diagnosis, disability, culture, race, religion, sex, sexual orientation, gender identity, family circumstances or any other characteristic. Learner behaviour is considered in context, including communication, trauma, SEND and regulation needs, without excusing harm to others.

5 Reasonable adjustments, disability and SEND

Crea Pax anticipates and responds to barriers that may disadvantage disabled learners and those with SEND. Reasonable adjustments are considered individually and may include changes to communication, routines, environment, sensory demand, pace, task presentation, staffing, movement breaks, equipment, access to quieter spaces, arrival/departure arrangements and participation in animal, practical or off-site activities.

Adjustments are planned with reference to available information such as EHCPs, risk assessments, health information, professional advice, learner and parent/carer views and commissioner expectations. Safety controls should be proportionate and, wherever possible, the least restrictive option that safely enables participation.

Where a requested adjustment cannot safely or reasonably be provided, Crea Pax will explain the concern and work with the learner, family and commissioner to identify an appropriate alternative.

6 Admissions, referrals and access to provision

Referral and placement decisions are based on whether Crea Pax can safely and appropriately meet the learner's identified needs within the commissioned provision, staffing, environment and scope of service. Decisions must not be based on prejudice or stereotypes.

Information about disability, SEND, medical need, communication, behaviour, mobility, safeguarding and risk is sought so that support and reasonable adjustments can be planned. Where needs exceed what Crea Pax can safely provide, this is discussed transparently with the commissioner rather than framed as a judgement about the learner.

7 Inclusive curriculum and therapeutic support

Crea Pax uses relational, trauma-informed, strengths-based and SEND-aware practice. Learning may include animal-assisted activities, outdoor learning, practical and life skills, cooking, creative activities, supported academic work, emotional literacy and therapeutic interventions or therapeutic support. Routine provision is not presented as counselling, psychotherapy or a clinical mental-health service.

Activities are adapted so that learners can engage in ways appropriate to their needs. Staff promote respect for different identities and experiences, challenge stereotypes appropriately and avoid forcing learners to disclose personal information in order to participate.

8 Religion, belief, culture and identity

Crea Pax respects different religions, beliefs, cultures, family structures and identities. Reasonable arrangements are considered for matters such as dietary requirements, religious observance, clothing, privacy and participation in activities, subject to safeguarding, animal welfare, food safety and health and safety requirements.

Learners should be supported to discuss identity safely and respectfully. Staff do not promote personal political or religious views to learners and must maintain appropriate professional boundaries.

9 Staff, recruitment and employment

Recruitment, induction, training, allocation of work, development and employment decisions are undertaken fairly and without unlawful discrimination. Reasonable adjustments for disabled staff or applicants are considered where required. Safer recruitment and safeguarding requirements apply to all appointments and are not displaced by this policy.

Staff are expected to model inclusive language and behaviour, challenge discrimination and report concerns. Discriminatory conduct by a member of staff may be managed under safeguarding, low-level concerns, disciplinary or other appropriate procedures depending on the circumstances.

10 Responding to discriminatory incidents

A discriminatory incident, allegation or pattern of prejudicial behaviour is taken seriously. The response is proportionate to age, development, SEND, communication and the circumstances, while keeping the safety and dignity of those affected central.

- ensure immediate safety and provide appropriate support;
- listen to and record the concern accurately;
- inform the DSL where there may be safeguarding implications;
- consider whether parents/carers, the commissioner or another agency should be informed;
- use educational, restorative and behaviour-support approaches where appropriate;
- record relevant incidents and actions; and
- review patterns, risk assessments, support plans, staffing or training where lessons can be learned.

Retaliation or victimisation against a person for raising an equality concern is unacceptable.

11 Learner voice and communication

Learners are given age- and communication-appropriate ways to express views, raise concerns and say when something feels unfair or inaccessible. Staff should not assume that verbal discussion is the only valid way to communicate. Visual, written, supported or other communication methods may be used where helpful.

A learner raising an equality concern must be listened to without being required to use legal terminology or identify a protected characteristic correctly.

12 Complaints and safeguarding

Equality concerns may be raised through the Crea Pax Complaints Policy. A complaint that indicates possible abuse, exploitation, discriminatory harassment, staff misconduct or another safeguarding concern is referred to the DSL and managed under safeguarding procedures without waiting for the complaints process to conclude.

Complaints about the Proprietor, allegations against adults and matters requiring external referral are handled through the appropriate independent, commissioning, LADO or statutory route.

13 Roles and responsibilities

Martha Bache Director and Proprietor and DSL

- has overall responsibility for implementation and review of this policy;
- ensures equality considerations are reflected in policies, learner planning and workforce practice;
- oversees safeguarding implications and patterns of concern; and
- works with commissioners where needs, access or reasonable adjustments require joint planning.

All staff

- treat people with dignity and respect;
- make and follow agreed reasonable adjustments;
- challenge and report discriminatory behaviour;
- use inclusive, professional language; and
- identify barriers to participation and raise them promptly.

Learners

Learners are supported to treat others respectfully, understand boundaries, express concerns and repair harm where appropriate. Expectations are taught and supported in ways that recognise developmental, SEND and communication needs.

14 Monitoring and review

Crea Pax considers equality and inclusion through learner progress and engagement, attendance, behaviour and incident information, safeguarding themes, complaints, reasonable-adjustment needs, staff feedback and commissioner feedback. Monitoring is proportionate to the size and nature of the provision and is used to identify barriers or patterns requiring action.

This policy is reviewed at least annually and sooner where legislation, statutory guidance, commissioning requirements, significant incidents or Crea Pax practice changes make this necessary.

15 Related documents

Safeguarding and Child Protection Policy 2026; SEND Policy; Behaviour & Anti-Bullying Policy 2026; Curriculum & Therapeutic Approach Statement 2026; Complaints Policy 2026; Data Protection & GDPR Policy 2026; Health & Safety Policy 2026; Risk Assessment Policy 2026; Safer Recruitment Policy 2026.

POLICY 17 | 2026-27

Special educational needs and disabilities

Owner: Martha Bache, Director and Proprietor. Operational safeguarding: Martha Bache, DSL; Stephanie Selby, DDSL. Health and safety: Edwin Ralph.

Version: 2026-27.1 | Approved and effective: 17 October 2026

Approved by: Martha Bache, Director and Proprietor | Next review: September 2027, or earlier if required.

1 Introduction

Crea Pax provides alternative provision for children and young people, many of whom have Special Educational Needs and Disabilities (SEND), including social, emotional and mental health (SEMH) needs, neurodevelopmental differences, communication needs, sensory differences and anxiety-related barriers to education.

Our approach is relational, trauma-informed, strengths-based and highly individualised. Crea Pax provides educational, therapeutic-support, animal-assisted and practical learning opportunities; it is not a replacement for statutory SEND assessment, specialist health provision, counselling or clinical treatment unless a separately commissioned qualified professional is providing that service.

2 Purpose and legal framework

This policy explains how Crea Pax identifies and responds to SEND within its role as an alternative provision and how it works with commissioning schools, local authorities, parents/carers and other professionals.

It is informed by the Children and Families Act 2014, Equality Act 2010, SEND Code of Practice: 0 to 25 years, Keeping Children Safe in Education 2026 and relevant local authority arrangements. The commissioning school or local authority retains its statutory responsibilities for SEND, including duties relating to EHCPs, SEN support and reviews where applicable.

3 Principles

Crea Pax works from the principle that behaviour may communicate an unmet need, difficulty, distress or barrier. Staff seek to understand the learner before making assumptions about behaviour or engagement.

- learner voice and dignity are central to planning;
- reasonable adjustments should reduce barriers without compromising safety;
- strengths, interests and trusted relationships are used to support engagement;
- needs and risk are reviewed dynamically rather than treated as fixed;
- support is least restrictive and proportionate;
- partnership with the learner, family and commissioner strengthens outcomes.

4 Referral, information and assessment

Before or at the start of placement, Crea Pax seeks sufficient information to understand the learner's needs and determine whether the provision can support them safely and meaningfully. Information may include EHCPs, SEN support plans, risk assessments, behaviour/support plans, medical information, safeguarding information relevant to safe provision, professional reports, parent/carer information and the learner's own views.

Crea Pax does not diagnose SEND. Staff observations may identify emerging or unmet needs and these are shared with the commissioning body and, where appropriate, parents/carers so that statutory or specialist assessment can be considered by the responsible organisation.

5 Individualised support and reasonable adjustments

Support is matched to the learner rather than applied as a fixed programme. Reasonable adjustments are considered proactively and reviewed as needs change.

- predictable routines and advance preparation for change;
- reduced language, chunked instructions, visual prompts and additional processing time;
- quiet space, sensory breaks, movement and regulation opportunities;
- adjusted pace, task length or cognitive load;
- choice of indoor/outdoor or practical routes to engagement where appropriate;
- gradual introduction to peers, unfamiliar staff, animals or activities;
- adapted communication and supported self-advocacy;
- individual arrival, transition or collection arrangements where commissioned and safe.

6 Individual plans, risk and staffing

Relevant SEND information is translated into practical staff guidance. This may include an Individual Learner Risk Assessment & Support Plan, Staff Critical Information Summary, communication or sensory profile, medical/healthcare information, behaviour support strategies and a PEEP where evacuation needs require one.

Staffing is determined by assessed need and the commissioned arrangement. Some learners may require continuous 1:1 support and, where risk or need requires it, 2:1 staffing. Higher staffing is a safety/support measure and must not be used as a punitive response.

Learner records are organised in controlled learner files: referral and placement information, learner profile and journey, individual risk assessment and support plan, staff critical information, session records, progress and outcomes, reports, and placement reviews. Each record has a clear purpose and designated location; a shared chat, calendar entry or email is not automatically the authoritative learner record.

Relevant staff must read the current Learner Profile, Risk Assessment and Support Plan, and Staff Critical Information before providing support. A PEEP or equivalent emergency support plan is completed where an individual needs additional help. Plans are updated when need or risk changes and after relevant incidents.

7 Curriculum, learning and engagement

SEND support is embedded in Crea Pax's curriculum and therapeutic-support approach. Learning may include animal-assisted activities, outdoor learning, practical tasks, cooking, gardening, creative work, life skills, supported academic activity, emotional literacy, communication and relationship-building.

Staff distinguish between inability, anxiety, overload, communication difficulty and deliberate refusal wherever possible. Participation can be built gradually through observation, invitation, modelling, reduced prompting, supported participation and increasing independence.

8 Communication and learner voice

Learners are supported to express preferences, concerns and views in ways accessible to them. Staff allow processing time and use visual, verbal, practical or other communication supports where appropriate. A learner should not be disadvantaged because they communicate distress, consent, refusal or understanding differently.

9 SEMH, regulation and behaviour

SEMH needs are treated as SEND where applicable and are considered alongside safeguarding, attendance and behaviour. Staff use predictable routines, co-regulation, trusted relationships, de-escalation, sensory/regulation strategies and proportionate boundaries. Behaviour incidents are reviewed for unmet need, triggers, communication factors and reasonable adjustments as well as immediate safety.

10 Animal assisted and practical activities

SEND does not automatically prevent participation in animal-assisted, outdoor, cooking or practical learning. Activities are individually risk assessed and adapted where necessary. Staff consider sensory needs, allergies, mobility, communication, impulse control, fear, animal welfare and the learner's ability to understand and follow safety instructions.

Animal welfare remains a non-negotiable part of safe participation. A learner may be offered an alternative activity or increased support where an activity cannot be made safe for the learner, other people or an animal.

11 Attendance and access to provision

Crea Pax recognises that SEND, anxiety, sensory needs and SEMH can create significant barriers to attendance. Staff record attendance accurately, communicate concerns promptly and work with the commissioner to understand barriers and reasonable adjustments. Crea Pax does not independently alter a learner's statutory education entitlement or attendance expectations; such decisions remain with the responsible school/local authority.

12 Safeguarding and SEND

Children with SEND can face additional safeguarding vulnerabilities. Staff remain alert to communication barriers, dependency on adults, peer isolation, difficulty recognising or reporting abuse, online vulnerability and the risk that signs of harm may be incorrectly attributed to SEND or behaviour.

Safeguarding concerns are reported immediately in accordance with the Safeguarding and Child Protection Policy. SEND must never be used to explain away a safeguarding indicator.

13 Working with families, commissioners and professionals

Crea Pax works collaboratively with parents/carers, commissioning schools, local authorities, SENCOs and relevant health, social care and specialist professionals. Information is shared lawfully and proportionately. Crea Pax contributes observations and progress information to reviews, including EHCP or multi-agency reviews when requested and relevant.

14 Progress, recording and review

Progress is considered against the learner's individual commissioned goals and may include engagement, regulation, communication, relationships, confidence, independence, attendance, practical skills and readiness for learning as well as educational outcomes. Staff observations and session records inform regular reports to commissioners.

Where progress stalls, risk changes or a learner's needs appear to exceed the placement's current capacity, Crea Pax will discuss this with the commissioner and seek review rather than allowing an unsafe or unsuitable arrangement to continue unexamined.

15 Equality, dignity and inclusion

Learners with SEND are treated with dignity and high expectations appropriate to their individual circumstances. Crea Pax seeks to remove avoidable barriers without lowering safety standards or assuming that every learner with the same diagnosis requires the same adjustment. Restrictive or exclusionary responses are avoided where a safe, reasonable alternative is available.

16 Roles and responsibilities

Martha Bache, Director / Proprietor & DSL, has overall responsibility for implementation, ensuring SEND is integrated with safeguarding, risk management and quality assurance. All staff are responsible for knowing and applying the individual information relevant to learners they support, recording concerns and progress, and raising changes in need promptly. The commissioning school/local authority retains the statutory SEND responsibilities that attach to the learner's education and placement.

17 Monitoring and review

This policy is reviewed at least annually and sooner following significant changes in legislation or guidance, changes to Crea Pax practice, a serious incident, safeguarding learning, commissioner feedback or evidence that SEND arrangements require improvement.

POLICY 18 | 2026-27

Governance and oversight

Owner: Martha Bache, Director and Proprietor. Operational safeguarding: Martha Bache, DSL; Stephanie Selby, DDSL. Health and safety: Edwin Ralph.

Version: 2026-27.1 | Approved and effective: 17 October 2026

Approved by: Martha Bache, Director and Proprietor | Next review: September 2027, or earlier if required.

1 Purpose and governance model

Crea Pax Ltd is a small, proprietor-led alternative provision. Governance is therefore proportionate to the size and structure of the organisation rather than based on a governing board. The Director / Proprietor retains overall accountability and is supported by designated safeguarding and health and safety leadership, staff responsibilities, commissioner oversight and external quality assurance.

This statement explains how Crea Pax maintains oversight of safeguarding, learner welfare, educational and therapeutic support, staffing, safer recruitment, health and safety, animal welfare, data protection, complaints and service improvement. It should be read alongside the relevant Crea Pax policies and operational records.

2 Leadership and accountability

Director and Proprietor and DSL Martha Bache

Holds overall responsibility for strategic leadership, safeguarding leadership, policy approval and review, safer recruitment oversight, the Single Central Record, quality of provision, commissioner liaison, complaints, data protection oversight and ensuring identified actions are followed through.

Deputy DSL Stephanie Selby

Supports safeguarding leadership and provides cover for the DSL. She contributes to day-to-day learner welfare, safeguarding decision-making, communication and implementation of agreed procedures.

Health and Safety Lead Edwin Ralph

Leads operational health and safety oversight, including risk assessment, fire and emergency arrangements, environmental safety, incident learning and practical site controls, reporting significant matters to the Proprietor.

All staff and contractors

Every person working for Crea Pax is responsible for following policy, maintaining professional boundaries, reporting safeguarding and safety concerns promptly, working within competence and contributing to reflective improvement.

3 External accountability and commissioning

Crea Pax is accountable to the schools, local authorities and other bodies that commission placements. Crea Pax provides information reasonably required for placement monitoring and quality assurance and engages with review meetings, safeguarding processes and multi-agency work relevant to individual learners.

Wiltshire quality assurance and other commissioner reviews provide external scrutiny of the provision. Where an external review identifies an action, Crea Pax records the action, assigns responsibility and monitors completion. External scrutiny complements, but does not replace, the Proprietor's responsibility for safe and effective operation.

4 Safeguarding oversight

Safeguarding is a standing governance priority. The DSL maintains oversight of concerns, referrals, allegations and low-level concerns, attendance concerns, missing or absconding incidents and patterns that may indicate increased risk. The DDSL provides support and cover in accordance with the Safeguarding and Child Protection Policy.

- The Single Central Record and safer recruitment evidence are reviewed and corrected when staffing or checking requirements change.
- Staff safeguarding knowledge is refreshed and statutory guidance updates are incorporated into practice.
- Serious or recurring concerns are escalated to the appropriate safeguarding, LADO, police, social care or commissioning route without waiting for an internal governance cycle.

5 Quality of provision and learner outcomes

Oversight is based on evidence from actual provision rather than a fixed meeting timetable. Crea Pax reviews learner attendance, engagement, regulation, communication, independence, safety, agreed goals and relevant EHCP or commissioner outcomes through session records, weekly reporting, individual plans and professional discussion.

The frequency and form of review are proportionate to learner need and commissioning requirements. Emerging concerns or significant changes trigger review when they occur rather than being held until a scheduled meeting.

- Learner voice and observed responses are used to adjust support and reasonable adjustments.
- Parents/carers and commissioners contribute information where appropriate.
- Individual risk assessments and support plans are updated when needs, risks, staffing or activities change.
- Progress information is shared with commissioners in the agreed format and frequency.

6 Workforce oversight

The Proprietor maintains oversight of workforce suitability, role clarity, induction, safeguarding training, competence, supervision arrangements and professional development. Records include the Single Central Record, contracts or contractor arrangements, role descriptions, training evidence and other suitability information appropriate to the role.

Staffing decisions take account of learner risk and need, including where 1:1 or 2:1 support is required. Young workers, apprentices and staff developing competence are given additional controls, supervision and task restrictions where necessary.

7 Health, safety, fire and emergency oversight

The Health & Safety Lead and Proprietor review hazards, risk assessments, fire and emergency arrangements, accidents, incidents and near misses. Controls are updated following changes to premises, equipment, activities, staffing or learner needs, and after incidents or drills where learning is identified.

Emergency arrangements include evacuation, learner-specific support and PEEPs where required, visitor arrangements, first aid, missing learner procedures and distinct lockdown/security responses. Fire evacuation always takes priority where fire or smoke makes remaining in place unsafe.

8 Animal welfare and animal assisted provision

Because animals form an important part of Crea Pax provision, governance includes animal welfare and licensing compliance. The Proprietor ensures that licence conditions, welfare records, emergency arrangements, competent handling, staff training, medicine controls, hygiene and risk assessments are maintained and reviewed.

Animal-assisted activities are planned around both learner and animal welfare. No educational or therapeutic objective takes priority over the safety or welfare of a learner, staff member or animal.

Animal exhibition is governed by Wiltshire Council licence LC202406-16017, held by Martha Bache, valid 5 May 2025 to 4 May 2028. Requested licence variations remain pending; they are not granted authorisation. Crea Pax plans to seek OCR approval but has not yet applied. Qualification delivery and related public claims require the necessary confirmed approvals.

9 Information governance, complaints and records

Governance includes secure record keeping, confidentiality, data protection, appropriate information sharing and timely response to data incidents. Complaints are recorded and considered for learning, safeguarding implications and service improvement in accordance with the Complaints Policy.

Records are retained according to their purpose, legal or contractual requirements and relevant retention arrangements. Governance records should provide a clear audit trail of significant decisions, actions and reviews without creating unnecessary bureaucracy.

Learner records are organised in controlled learner files: referral and placement information, learner profile and journey, individual risk assessment and support plan, staff critical information, session records, progress and outcomes, reports, and placement reviews. Each record has a clear purpose and designated location; a shared chat, calendar entry or email is not automatically the authoritative learner record.

The policy register identifies the current authorised version, owner, review date, intended audience and status of each document. Superseded versions are archived. The public core portfolio, controlled operational instructions, animal-welfare and licensing system, qualification governance and restricted learner/workforce records are maintained as distinct sets. A document is not marked complete solely because a template or draft exists.

10 Monitoring, assurance and improvement

Crea Pax uses a proportionate assurance cycle. The following are reviewed at a frequency appropriate to risk, statutory requirements and commissioner expectations, and sooner whenever circumstances require:

- safeguarding concerns, attendance and learner welfare;
- learner progress, SEND support and placement goals;
- staffing, safer recruitment, SCR accuracy, training and competence;
- health and safety, fire, accidents, incidents, near misses and site risks;
- animal welfare, licence requirements and animal-related risk;
- complaints, data protection issues and patterns requiring action;
- policies, procedures and action plans arising from quality assurance or external review.

The Proprietor records significant actions and checks completion. Evidence of oversight may include policy review records, SCR audits, training records, risk assessments, incident records, learner reports, commissioner correspondence, quality assurance feedback and action plans.

11 Review of this statement

This statement is reviewed at least annually and earlier where there is a significant change to statutory guidance, commissioning expectations, staffing structure, premises, the nature of provision or lessons from an incident or external quality assurance review.

Reference links

Primary sources consulted for the targeted reconciliation on 17 October 2026. These checks do not constitute a certification of legal compliance or implementation. Local contacts and procedures must be rechecked when used.

Department for Education - Keeping children safe in education 2026

Department for Education - Working together to safeguard children 2026

Department for Education - Information sharing to safeguard children and young people

Department for Education - Regulated activity and removal of the supervision exemption

Wiltshire Council - LADO consultation and referral form

Wiltshire Council - Safeguarding Vulnerable People Partnership contact information

Dorset Council - Worried about a child

Dorset Council - Safeguarding adults report a concern

Dorset Nexus - Safeguarding advisors and LADO

Cambridge OCR - Complaints for students parents and carers

Information Commissioner - Guidance on AI and data protection

Information Commissioner - UK GDPR breach reporting

Health and Safety Executive - First aid employer responsibilities

Health and Safety Executive - RIDDOR key definitions

NSPCC - Whistleblowing Advice Line

Department for Education - Children missing education guidance