

**THE GATEWAY**
LEARNING CENTRE

COMMISSIONER READY DOCUMENT

Operator Policy Pack 2026–27

Safeguarding, welfare, education and operational standards | Effective 1 September 2026

Provider	The Gateway Learning Centre
Address	139 The Highway, London E1W 2BP
Email	admin@theglc.co.uk
Effective from	1 September 2026

IMPORTANT CONTROL NOTE

Controlled completion fields: company legal name and number; telephone; Deputy DSL; first-aid lead; health and safety lead; maximum capacity; group sizes; staffing ratios; insurance certificate number and indemnity limits.

Contents and document control

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Each policy requires formal proprietor approval before the approval field is completed or the document is described as approved.

Safeguarding and Child Protection

Policy owner	Proprietor / Centre Director
Operational lead	Zara Rahman, Headteacher
Relevant lead	Rhizlane Gesir, DSL and SENCO
Effective date	1 September 2026

Approval date	1 September 2026
Review date	August 2027 or earlier following change/incident

Purpose and status

To safeguard and promote the welfare of every child attending Gateway and establish an immediate, accountable response to concerns.

Gateway is a non-school alternative provision. Relevant school guidance is adopted as a good-practice benchmark where it does not directly impose a legal duty on Gateway.

Core principles

- The child's welfare is paramount.
- All staff maintain professional curiosity and act on concerns immediately.
- Gateway works with commissioners, home schools, the local authority, police, health and other relevant agencies.
- Safeguarding information is shared lawfully, proportionately and without delay where safety requires it.

Operational requirements

25. Rhizlane Gesir is the Designated Safeguarding Lead. A Deputy DSL must be formally appointed before opening.
26. All staff receive induction and safeguarding training before unsupervised work and regular updates thereafter.
27. Concerns are recorded factually on the same working day and passed immediately to the DSL.
28. Immediate danger is reported to emergency services. Other concerns are referred through Tower Hamlets Multi-Agency Support Team or the child's responsible authority.
29. Allegations about adults are reported to the proprietor and Local Authority Designated Officer; concerns about the proprietor are referred directly to the LADO.
30. Child-on-child abuse, exploitation, serious violence, online harm, domestic abuse, neglect, radicalisation, missing education and mental health indicators are treated as safeguarding matters.
31. Parents are normally involved unless doing so may increase risk or prejudice an investigation.
32. Records are confidential, securely stored, transferred promptly and retained in accordance with the retention schedule.

Responsibilities and assurance

- The proprietor provides oversight and resources.
- Zara Rahman provides operational education leadership.
- Rhizlane Gesir leads safeguarding and SEND matters.
- Staff implement the policy and report concerns immediately.
- Implementation is monitored through records, audits, incidents, complaints and placement reviews.

References

- Children Act 1989 and 2004
- Working Together to Safeguard Children
- Keeping Children Safe in Education 2026, adopted as a safeguarding benchmark where applicable
- DfE Non-school Alternative Provision Voluntary National Standards 2025
- DfE Alternative Provision statutory guidance, updated 2025

Effective: 1 September 2026 | Approved by: [TO COMPLETE BEFORE USE] | Approval date: 1 September 2026 | Review: August 2027

Staff Code of Conduct

Policy owner	Proprietor / Centre Director
Operational lead	Zara Rahman, Headteacher
Relevant lead	Rhizlane Gesir, DSL and SENCO
Effective date	1 September 2026
Approval date	1 September 2026
Review date	August 2027 or earlier following change/incident

Purpose and status

To define safe, respectful and professionally accountable conduct for every adult working at Gateway.

Gateway is a non-school alternative provision. Relevant school guidance is adopted as a good-practice benchmark where it does not directly impose a legal duty on Gateway.

Core principles

- Adults maintain appropriate boundaries and remain responsible for their conduct.
- Conduct must protect children, public confidence and the reputation of the provision.

Operational requirements

33. Use only approved communication channels and devices.
34. Never develop secretive, sexual, exploitative, favouritist or dependency-forming relationships.
35. Avoid one-to-one situations that cannot be observed or interrupted unless risk assessed.
36. Do not photograph, transport, contact or meet pupils outside agreed arrangements.
37. Declare gifts, conflicts, personal relationships, criminal matters and safeguarding concerns.
38. Report low-level concerns and breaches promptly; do not investigate them personally.
39. Physical contact must be necessary, proportionate and appropriate to the child's needs.
40. Social media must never compromise confidentiality or professional boundaries.

Responsibilities and assurance

- The proprietor provides oversight and resources.
- Zara Rahman provides operational education leadership.
- Rhizlane Gesir leads safeguarding and SEND matters.
- Staff implement the policy and report concerns immediately.
- Implementation is monitored through records, audits, incidents, complaints and placement reviews.

References

- Children Act 1989 and 2004
- Working Together to Safeguard Children
- Keeping Children Safe in Education 2026, adopted as a safeguarding benchmark where applicable
- DfE Non-school Alternative Provision Voluntary National Standards 2025
- DfE Alternative Provision statutory guidance, updated 2025

Effective: 1 September 2026 | Approved by: [TO COMPLETE BEFORE USE] | Approval date: 1 September 2026 | Review: August 2027

Safer Recruitment

Policy owner	Proprietor / Centre Director
Operational lead	Zara Rahman, Headteacher
Relevant lead	Rhizlane Gesir, DSL and SENCO
Effective date	1 September 2026
Approval date	1 September 2026
Review date	August 2027 or earlier following change/incident

Purpose and status

To prevent unsuitable people from working with children and maintain auditable recruitment decisions.

Gateway is a non-school alternative provision. Relevant school guidance is adopted as a good-practice benchmark where it does not directly impose a legal duty on Gateway.

Core principles

- No person starts regulated activity until required checks are complete and verified.
- Recruitment decisions are based on evidence, scrutiny and recorded risk assessment.

Operational requirements

41. Use a role description, person specification and safeguarding statement.
42. Obtain application history, identity, right to work, qualifications, two references and explanations of gaps.
43. Undertake enhanced DBS and children's barred-list checks where legally eligible and required.
44. Complete overseas checks where relevant and online searches at the shortlisting stage where appropriate.
45. At least one interviewer must be safer-recruitment trained.
46. Record checks on a single central record and retain recruitment evidence securely.
47. Agency staff require named, person-specific written confirmation of checks.
48. Any exception or pending check requires documented legal eligibility, risk assessment, supervision and proprietor approval.

Responsibilities and assurance

- The proprietor provides oversight and resources.
- Zara Rahman provides operational education leadership.
- Rhizlane Gesir leads safeguarding and SEND matters.
- Staff implement the policy and report concerns immediately.
- Implementation is monitored through records, audits, incidents, complaints and placement reviews.

References

- Children Act 1989 and 2004
- Working Together to Safeguard Children
- Keeping Children Safe in Education 2026, adopted as a safeguarding benchmark where applicable
- DfE Non-school Alternative Provision Voluntary National Standards 2025
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Effective: 1 September 2026 | Approved by: [TO COMPLETE BEFORE USE] | Approval date: 1 September 2026 | Review: August 2027

Managing Allegations and Low-Level Concerns

Policy owner	Proprietor / Centre Director
Operational lead	Zara Rahman, Headteacher
Relevant lead	Rhizlane Gesir, DSL and SENCO
Effective date	1 September 2026
Approval date	1 September 2026
Review date	August 2027 or earlier following change/incident

Purpose and status

To ensure concerns about adults are identified, recorded, referred and resolved fairly and safely.

Gateway is a non-school alternative provision. Relevant school guidance is adopted as a good-practice benchmark where it does not directly impose a legal duty on Gateway.

Core principles

- The threshold for sharing a concern is low; staff do not determine whether it is serious before reporting.
- Children and adults receive fair, confidential and timely treatment.

Operational requirements

49. Report allegations immediately to the proprietor or nominated case manager.
50. Consult the LADO where behaviour may have harmed a child, may constitute an offence, indicates risk or raises suitability concerns.
51. Report low-level concerns that are inconsistent with the code of conduct even if no allegation is made.
52. Preserve evidence and avoid informal investigation or promises of confidentiality.
53. Consider immediate safeguarding arrangements, including removal from duties where necessary and proportionate.
54. Record decisions, referrals, outcomes and learning; identify patterns across low-level concerns.

Responsibilities and assurance

- The proprietor provides oversight and resources.
- Zara Rahman provides operational education leadership.
- Rhizlane Gesir leads safeguarding and SEND matters.
- Staff implement the policy and report concerns immediately.
- Implementation is monitored through records, audits, incidents, complaints and placement reviews.

References

- Children Act 1989 and 2004
- Working Together to Safeguard Children
- Keeping Children Safe in Education 2026, adopted as a safeguarding benchmark where applicable
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- DfE Alternative Provision statutory guidance, updated 2025

Effective: 1 September 2026 | Approved by: [TO COMPLETE BEFORE USE] | Approval date: 1 September 2026 | Review: August 2027

Behaviour and Anti-Bullying

Policy owner	Proprietor / Centre Director
Operational lead	Zara Rahman, Headteacher
Relevant lead	Rhizlane Gesir, DSL and SENCO
Effective date	1 September 2026
Approval date	1 September 2026
Review date	August 2027 or earlier following change/incident

Purpose and status

To create a calm, safe and respectful environment using predictable, relational and proportionate responses.

Gateway is a non-school alternative provision. Relevant school guidance is adopted as a good-practice benchmark where it does not directly impose a legal duty on Gateway.

Core principles

- Behaviour is communication but does not excuse harm.
- Expectations are taught explicitly and adjustments reflect SEND without lowering safety standards.
- Bullying, discriminatory abuse, sexual harassment and retaliation are not tolerated.

Operational requirements

55. Agree individual regulation, support and safety strategies at placement start.
56. Use de-escalation, restorative discussion and proportionate consequences.
57. Record significant incidents and notify commissioners and parents in line with the placement agreement.
58. Investigate bullying promptly, support those harmed and address the behaviour and underlying need.
59. Searches, confiscation and physical intervention are used only within lawful, trained and recorded arrangements.

60. Review placement suitability where risk cannot be safely managed; termination is a last resort with transition planning.

Responsibilities and assurance

- The proprietor provides oversight and resources.
- Zara Rahman provides operational education leadership.
- Rhizlane Gesir leads safeguarding and SEND matters.
- Staff implement the policy and report concerns immediately.
- Implementation is monitored through records, audits, incidents, complaints and placement reviews.

References

- Children Act 1989 and 2004
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Effective: 1 September 2026 | Approved by: [TO COMPLETE BEFORE USE] | Approval date: 1 September 2026 | Review: August 2027

Attendance and Missing Child

Policy owner	Proprietor / Centre Director
Operational lead	Zara Rahman, Headteacher
Relevant lead	Rhizlane Gesir, DSL and SENCO
Effective date	1 September 2026
Approval date	1 September 2026
Review date	August 2027 or earlier following change/incident

Purpose and status

To know where every pupil is, respond immediately to unexplained absence and provide accurate commissioner reporting.

Gateway is a non-school alternative provision. Relevant school guidance is adopted as a good-practice benchmark where it does not directly impose a legal duty on Gateway.

Core principles

- Attendance is a safeguarding matter.
- Gateway records attendance only for commissioned sessions and does not replace the home school's statutory register unless legally agreed.

Operational requirements

61. Maintain a session register with arrival and departure times.
62. Contact the agreed responsible adult immediately after unexplained non-arrival within the placement protocol.
63. Escalate inability to establish safety to the home school, commissioner, parent and relevant safeguarding services.
64. Report patterns of absence, lateness or missing education at placement reviews and earlier where risk requires.
65. Use agreed procedures for children who leave the site without permission.
66. Retain attendance records and provide them promptly to commissioners.

Responsibilities and assurance

- The proprietor provides oversight and resources.
- Zara Rahman provides operational education leadership.
- Rhizlane Gesir leads safeguarding and SEND matters.
- Staff implement the policy and report concerns immediately.
- Implementation is monitored through records, audits, incidents, complaints and placement reviews.

References

- Children Act 1989 and 2004
- Working Together to Safeguard Children
- Keeping Children Safe in Education 2026, adopted as a safeguarding benchmark where applicable
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Effective: 1 September 2026 | Approved by: [TO COMPLETE BEFORE USE] | Approval date: 1 September 2026 | Review: August 2027

SEND and Reasonable Adjustments

Policy owner	Proprietor / Centre Director
Operational lead	Zara Rahman, Headteacher
Relevant lead	Rhizlane Gesir, DSL and SENCO
Effective date	1 September 2026
Approval date	1 September 2026
Review date	August 2027 or earlier following change/incident

Purpose and status

To identify and reduce barriers, support EHCP outcomes and make reasonable adjustments without claiming needs Gateway cannot safely meet.

Gateway is a non-school alternative provision. Relevant school guidance is adopted as a good-practice benchmark where it does not directly impose a legal duty on Gateway.

Core principles

- Children with SEND are entitled to dignity, ambition, participation and protection from discrimination.
- Suitability is assessed individually and reviewed as needs change.

Operational requirements

67. Obtain the EHCP, professional reports, strategies, risk information and pupil/parent views before placement.
68. Map agreed support to relevant Section F provision and outcomes where Gateway is commissioned to contribute.
69. Use assess-plan-do-review cycles, adaptive teaching and accessible communication.
70. Record reasonable adjustments and their effectiveness.
71. Seek specialist advice where needed and escalate unmet provision to the commissioner.
72. Do not accept or continue a placement where staffing, premises or expertise cannot safely meet need.

Responsibilities and assurance

- The proprietor provides oversight and resources.
- Zara Rahman provides operational education leadership.
- Rhizlane Gesir leads safeguarding and SEND matters.
- Staff implement the policy and report concerns immediately.
- Implementation is monitored through records, audits, incidents, complaints and placement reviews.

References

- Children Act 1989 and 2004
- Working Together to Safeguard Children
- Keeping Children Safe in Education 2026, adopted as a safeguarding benchmark where applicable
- DfE Non-school Alternative Provision Voluntary National Standards 2025
- DfE Alternative Provision statutory guidance, updated 2025
- Children and Families Act 2014
- SEND Code of Practice 0 to 25 years
- Equality Act 2010

Effective: 1 September 2026 | Approved by: [TO COMPLETE BEFORE USE] | Approval date: 1 September 2026 | Review: August 2027

Admissions, Referral and Placement

Policy owner	Proprietor / Centre Director
Operational lead	Zara Rahman, Headteacher
Relevant lead	Rhizlane Gesir, DSL and SENCO
Effective date	1 September 2026
Approval date	1 September 2026
Review date	August 2027 or earlier following change/incident

Purpose and status

To ensure referrals are lawful, suitable, transparent and supported by a written commissioning agreement.

Gateway is a non-school alternative provision. Relevant school guidance is adopted as a good-practice benchmark where it does not directly impose a legal duty on Gateway.

Core principles

- Gateway is a non-school alternative provision and does not independently determine EOTAS status.
- Admission is not confirmed until suitability, safeguarding and commissioning arrangements are complete.

Operational requirements

73. Accept referrals from schools, local authorities and authorised professionals; parent enquiries are directed to the responsible commissioner.
74. Review education, SEND, health, safeguarding, behaviour, risk and attendance information.
75. Meet the pupil and family where appropriate and obtain their views.
76. Specify hours, curriculum, outcomes, safeguarding roles, transport, meals, medication, attendance coding, reporting and funding in writing.
77. Set review and reintegration or exit dates at placement start.
78. Gateway will not accept an arrangement that would cause it to operate unlawfully as an unregistered independent school.

Responsibilities and assurance

- The proprietor provides oversight and resources.
- Zara Rahman provides operational education leadership.
- Rhizlane Gesir leads safeguarding and SEND matters.
- Staff implement the policy and report concerns immediately.
- Implementation is monitored through records, audits, incidents, complaints and placement reviews.

References

- Children Act 1989 and 2004
- Working Together to Safeguard Children
- Keeping Children Safe in Education 2026, adopted as a safeguarding benchmark where applicable
- DfE Non-school Alternative Provision Voluntary National Standards 2025
- DfE Alternative Provision statutory guidance, updated 2025
- Children and Families Act 2014 section 61

Effective: 1 September 2026 | Approved by: [TO COMPLETE BEFORE USE] | Approval date: 1 September 2026 | Review: August 2027

Health and Safety

Policy owner	Proprietor / Centre Director
Operational lead	Zara Rahman, Headteacher
Relevant lead	Rhizlane Gesir, DSL and SENCO
Effective date	1 September 2026
Approval date	1 September 2026
Review date	August 2027 or earlier following change/incident

Purpose and status

To manage foreseeable risks to pupils, staff, visitors and contractors through competent assessment and review.

Gateway is a non-school alternative provision. Relevant school guidance is adopted as a good-practice benchmark where it does not directly impose a legal duty on Gateway.

Core principles

- The proprietor retains overall accountability and delegates operational tasks to competent persons.
- Risk is reduced so far as reasonably practicable without unnecessarily limiting education.

Operational requirements

79. Complete premises, activity, pupil-specific and fire risk assessments.
80. Maintain statutory inspections, servicing, accident records and emergency arrangements.
81. Consult staff, provide instruction and protective equipment, and monitor implementation.
82. Control contractors, hazardous substances, electrical equipment, manual handling, slips, trips and security risks.
83. Report notifiable incidents under RIDDOR where thresholds are met.
84. Review after incidents, changes to premises, activities or pupil needs.

Responsibilities and assurance

- The proprietor provides oversight and resources.
- Zara Rahman provides operational education leadership.
- Rhizlane Gesir leads safeguarding and SEND matters.
- Staff implement the policy and report concerns immediately.
- Implementation is monitored through records, audits, incidents, complaints and placement reviews.

References

- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- RIDDOR 2013
- DfE Non-school AP Voluntary National Standards 2025

Effective: 1 September 2026 | Approved by: [TO COMPLETE BEFORE USE] | Approval date: 1 September 2026 | Review: August 2027

First Aid and Medical Needs

Policy owner	Proprietor / Centre Director
Operational lead	Zara Rahman, Headteacher
Relevant lead	Rhizlane Gesir, DSL and SENCO
Effective date	1 September 2026
Approval date	1 September 2026
Review date	August 2027 or earlier following change/incident

Purpose and status

To provide timely first aid and safe support for known medical needs during commissioned attendance.

Gateway is a non-school alternative provision. Relevant school guidance is adopted as a good-practice benchmark where it does not directly impose a legal duty on Gateway.

Core principles

- Care plans are individual, current and agreed before attendance.
- Medication is administered only with authority, competence and accurate records.

Operational requirements

85. Appoint trained first-aid personnel and display arrangements.
86. Obtain emergency contacts, medical information, healthcare plans and consent before placement.
87. Store medicines securely, accessibly and according to instructions; record receipt, administration and return.
88. Call emergency services when required and inform parents and commissioners promptly.
89. Record accidents and treatment and review recurring patterns.
90. Provide emergency medication and staff training for conditions such as asthma, epilepsy or anaphylaxis where relevant.

Responsibilities and assurance

- The proprietor provides oversight and resources.
- Zara Rahman provides operational education leadership.
- Rhizlane Gesir leads safeguarding and SEND matters.
- Staff implement the policy and report concerns immediately.
- Implementation is monitored through records, audits, incidents, complaints and placement reviews.

References

- Health and Safety (First-Aid) Regulations 1981
- DfE guidance on supporting pupils with medical conditions, used as good-practice benchmark

Effective: 1 September 2026 | Approved by: [TO COMPLETE BEFORE USE] | Approval date: 1 September 2026 | Review: August 2027

Physical Intervention and Positive Handling

Policy owner	Proprietor / Centre Director
Operational lead	Zara Rahman, Headteacher
Relevant lead	Rhizlane Gesir, DSL and SENCO
Effective date	1 September 2026
Approval date	1 September 2026
Review date	August 2027 or earlier following change/incident

Purpose and status

To ensure physical intervention is rare, lawful, necessary, proportionate and followed by review.

Gateway is a non-school alternative provision. Relevant school guidance is adopted as a good-practice benchmark where it does not directly impose a legal duty on Gateway.

Core principles

- De-escalation and prevention come first.
- Intervention is never used as punishment, pain compliance or for staff convenience.

Operational requirements

91. Use trained staff and pupil-specific plans where foreseeable risk exists.
92. Use reasonable force only to prevent injury, serious damage, disorder or other lawful grounds, using the minimum necessary.
93. Protect breathing, circulation, dignity and communication; avoid prohibited or high-risk techniques.
94. Summon assistance and end intervention at the earliest safe moment.
95. Record immediately, inform the DSL, parent and commissioner, check for injury and offer debrief.
96. Review plans and make safeguarding or LADO referrals where concerns arise.

Responsibilities and assurance

- The proprietor provides oversight and resources.
- Zara Rahman provides operational education leadership.
- Rhizlane Gesir leads safeguarding and SEND matters.
- Staff implement the policy and report concerns immediately.
- Implementation is monitored through records, audits, incidents, complaints and placement reviews.

References

- Education and Inspections Act 2006 reasonable force provisions where applicable
- DfE use of reasonable force guidance
- DfE Non-school AP Voluntary National Standards 2025

Effective: 1 September 2026 | Approved by: [TO COMPLETE BEFORE USE] | Approval date: 1 September 2026 | Review: August 2027

Online Safety

Policy owner	Proprietor / Centre Director
Operational lead	Zara Rahman, Headteacher
Relevant lead	Rhizlane Gesir, DSL and SENCO
Effective date	1 September 2026
Approval date	1 September 2026
Review date	August 2027 or earlier following change/incident

Purpose and status

To protect pupils from online harm while teaching safe, critical and responsible use of technology.

Gateway is a non-school alternative provision. Relevant school guidance is adopted as a good-practice benchmark where it does not directly impose a legal duty on Gateway.

Core principles

- Online safety is integrated with safeguarding.
- Filtering supports but never replaces supervision, education and professional vigilance.

Operational requirements

97. Use managed accounts, age-appropriate access, filtering and monitoring proportionate to risk.
98. Define acceptable use for pupils, staff and visitors.
99. Teach privacy, scams, exploitation, harmful content, misinformation, cyberbullying and reporting.
100. Report online safeguarding concerns to the DSL and preserve evidence without forwarding harmful material unnecessarily.
101. Review filtering and monitoring at least annually and after incidents or technology change.
102. Apply data protection and secure-device requirements to remote and off-site learning.

Responsibilities and assurance

- The proprietor provides oversight and resources.

- Zara Rahman provides operational education leadership.
- Rhizlane Gesir leads safeguarding and SEND matters.
- Staff implement the policy and report concerns immediately.
- Implementation is monitored through records, audits, incidents, complaints and placement reviews.

References

- Children Act 1989 and 2004
- Working Together to Safeguard Children
- Keeping Children Safe in Education 2026, adopted as a safeguarding benchmark where applicable
- DfE Non-school Alternative Provision Voluntary National Standards 2025
- DfE Alternative Provision statutory guidance, updated 2025
- UK GDPR and Data Protection Act 2018

Effective: 1 September 2026 | Approved by: [TO COMPLETE BEFORE USE] | Approval date: 1 September 2026 | Review: August 2027

Equality, Diversity and Accessibility

Policy owner	Proprietor / Centre Director
Operational lead	Zara Rahman, Headteacher
Relevant lead	Rhizlane Gesir, DSL and SENCO
Effective date	1 September 2026
Approval date	1 September 2026
Review date	August 2027 or earlier following change/incident

Purpose and status

To prevent unlawful discrimination, advance equality and ensure reasonable access to Gateway services.

Gateway is a non-school alternative provision. Relevant school guidance is adopted as a good-practice benchmark where it does not directly impose a legal duty on Gateway.

Core principles

- Every person is treated with dignity and respect.
- Protected characteristics, SEND and socioeconomic disadvantage inform barrier removal and monitoring.

Operational requirements

103. Make reasonable adjustments to admissions, curriculum, communication and the environment.
104. Record and respond to discriminatory incidents.
105. Use inclusive, age-appropriate materials and avoid stereotyping.
106. Monitor access, participation, sanctions, complaints and outcomes for possible disparities.
107. Provide information in accessible formats where reasonably required.
108. Review physical and digital accessibility and publish an accessibility statement.

Responsibilities and assurance

- The proprietor provides oversight and resources.
- Zara Rahman provides operational education leadership.
- Rhizlane Gesir leads safeguarding and SEND matters.
- Staff implement the policy and report concerns immediately.
- Implementation is monitored through records, audits, incidents, complaints and placement reviews.

References

- Equality Act 2010
- Human Rights Act 1998
- Children and Families Act 2014

Effective: 1 September 2026 | Approved by: [TO COMPLETE BEFORE USE] | Approval date: 1 September 2026 | Review: August 2027

Complaints

Policy owner	Proprietor / Centre Director
Operational lead	Zara Rahman, Headteacher
Relevant lead	Rhizlane Gesir, DSL and SENCO
Effective date	1 September 2026
Approval date	1 September 2026
Review date	August 2027 or earlier following change/incident

Purpose and status

To provide an accessible, fair and timely route for concerns and complaints.

Gateway is a non-school alternative provision. Relevant school guidance is adopted as a good-practice benchmark where it does not directly impose a legal duty on Gateway.

Core principles

- Concerns should be resolved early where possible without preventing formal escalation.
- No pupil is disadvantaged because a complaint is made in good faith.

Operational requirements

109. Stage 1: raise the concern with the relevant staff member or centre leader; acknowledge within two working days and respond normally within five.
110. Stage 2: submit a formal written complaint to the proprietor; acknowledge within three working days and provide a reasoned response normally within ten.
111. Stage 3: request an impartial review by a person not directly involved; provide findings normally within fifteen working days.
112. Safeguarding allegations follow safeguarding procedures and are not delayed by the complaints process.
113. Keep confidential records of the complaint, evidence, outcome and action.
114. Advise complainants of commissioner or legal escalation routes where relevant.

Responsibilities and assurance

- The proprietor provides oversight and resources.
- Zara Rahman provides operational education leadership.
- Rhizlane Gesir leads safeguarding and SEND matters.
- Staff implement the policy and report concerns immediately.
- Implementation is monitored through records, audits, incidents, complaints and placement reviews.

References

- Consumer Rights Act 2015 where applicable
- UK GDPR and Data Protection Act 2018
- DfE Non-school AP Voluntary National Standards 2025

Effective: 1 September 2026 | Approved by: [TO COMPLETE BEFORE USE] | Approval date: 1 September 2026 | Review: August 2027

Data Protection and Privacy

Policy owner	Proprietor / Centre Director
Operational lead	Zara Rahman, Headteacher
Relevant lead	Rhizlane Gesir, DSL and SENCO
Effective date	1 September 2026
Approval date	1 September 2026
Review date	August 2027 or earlier following change/incident

Purpose and status

To process personal data lawfully, fairly, securely and transparently.

Gateway is a non-school alternative provision. Relevant school guidance is adopted as a good-practice benchmark where it does not directly impose a legal duty on Gateway.

Core principles

- Collect only necessary information and keep it accurate, secure and no longer than required.
- Safeguarding information may be shared without consent where lawful and necessary to protect a child.

Operational requirements

115. Identify a lawful basis and additional condition for special-category data.
116. Provide privacy notices to pupils, parents, staff and contacts.
117. Use role-based access, secure transfer, strong authentication and breach reporting.
118. Complete due diligence and agreements for processors and information sharing.
119. Respond to rights requests within statutory timescales.
120. Report qualifying breaches to the ICO within 72 hours and affected individuals where required.
121. Maintain a retention schedule and securely destroy records.

Responsibilities and assurance

- The proprietor provides oversight and resources.
- Zara Rahman provides operational education leadership.
- Rhizlane Gesir leads safeguarding and SEND matters.
- Staff implement the policy and report concerns immediately.
- Implementation is monitored through records, audits, incidents, complaints and placement reviews.

References

- UK GDPR
- Data Protection Act 2018
- ICO guidance

Effective: 1 September 2026 | Approved by: [TO COMPLETE BEFORE USE] | Approval date: 1 September 2026 | Review: August 2027

Whistleblowing

Policy owner	Proprietor / Centre Director
Operational lead	Zara Rahman, Headteacher
Relevant lead	Rhizlane Gesir, DSL and SENCO
Effective date	1 September 2026
Approval date	1 September 2026
Review date	August 2027 or earlier following change/incident

Purpose and status

To enable workers to raise concerns about wrongdoing, unsafe practice or concealment without retaliation.

Gateway is a non-school alternative provision. Relevant school guidance is adopted as a good-practice benchmark where it does not directly impose a legal duty on Gateway.

Core principles

- Concerns are heard seriously, handled discreetly and escalated independently where necessary.
- Victimisation for protected disclosure is prohibited.

Operational requirements

122. Raise concerns with the centre leader, proprietor or designated independent contact according to the subject.
123. Safeguarding concerns must also be reported through safeguarding procedures.
124. Record the concern, acknowledge it promptly, assess immediate risk and decide an investigation route.
125. Protect confidentiality as far as possible but do not promise anonymity.
126. Permit external disclosure to prescribed bodies where legal conditions apply.
127. Monitor for retaliation and take corrective action.

Responsibilities and assurance

- The proprietor provides oversight and resources.
- Zara Rahman provides operational education leadership.
- Rhizlane Gesir leads safeguarding and SEND matters.
- Staff implement the policy and report concerns immediately.
- Implementation is monitored through records, audits, incidents, complaints and placement reviews.

References

- Public Interest Disclosure Act 1998
- Employment Rights Act 1996
- NSPCC whistleblowing advice line for child protection concerns

Effective: 1 September 2026 | Approved by: [TO COMPLETE BEFORE USE] | Approval date: 1 September 2026 | Review: August 2027

Prevent and Safeguarding from Radicalisation

Policy owner	Proprietor / Centre Director
Operational lead	Zara Rahman, Headteacher
Relevant lead	Rhizlane Gesir, DSL and SENCO
Effective date	1 September 2026
Approval date	1 September 2026
Review date	August 2027 or earlier following change/incident

Purpose and status

To identify vulnerability to radicalisation, provide proportionate support and make timely safeguarding referrals.

Gateway is a non-school alternative provision. Relevant school guidance is adopted as a good-practice benchmark where it does not directly impose a legal duty on Gateway.

Core principles

- Prevent concerns are safeguarding concerns and are considered alongside the child's wider context.
- Discussion, lawful belief and critical thinking are not confused with extremism.

Operational requirements

128. Complete a documented Prevent risk assessment for the provision and review it after significant change.
129. Train staff to recognise and report indicators of vulnerability, influence, grooming and extremist content.
130. Pass concerns immediately to the DSL for contextual assessment and proportionate action.
131. Consult the responsible school, local authority Prevent lead or police where specialist advice is required.

132. Make Channel or safeguarding referrals through agreed local routes when thresholds are met.
133. Record rationale, information sharing, actions and review without discriminatory assumptions.
134. Teach age-appropriate online resilience, critical thinking, respect and lawful democratic participation.

Responsibilities and assurance

- The proprietor provides oversight and resources.
- Zara Rahman provides operational education leadership.
- Rhizlane Gesir leads safeguarding and SEND matters.
- Staff implement the policy and report concerns immediately.
- Implementation is monitored through records, audits, incidents, complaints and placement reviews.

References

- Counter-Terrorism and Security Act 2015
- Prevent duty guidance for England and Wales
- KCSIE 2026
- Working Together to Safeguard Children

Effective: 1 September 2026 | Approved by: [TO COMPLETE BEFORE USE] | Approval date: 1 September 2026 | Review: August 2027

Curriculum, Teaching and Assessment

Policy owner	Proprietor / Centre Director
Operational lead	Zara Rahman, Headteacher
Relevant lead	Rhizlane Gesir, DSL and SENCO
Effective date	1 September 2026
Approval date	1 September 2026
Review date	August 2027 or earlier following change/incident

Purpose and status

To secure an ambitious, suitable and age-appropriate programme linked to each placement purpose and next destination.

Gateway is a non-school alternative provision. Relevant school guidance is adopted as a good-practice benchmark where it does not directly impose a legal duty on Gateway.

Core principles

- Every pupil receives purposeful education rather than supervision alone.
- Teaching starts from assessed need and retains high expectations with appropriate adaptation.

Operational requirements

135. Agree curriculum entitlement, commissioned subjects and intended outcomes before placement.
136. Complete baseline assessment promptly and use it to plan an individual learning pathway.
137. Provide age-appropriate primary and secondary programmes with clear separation where required.
138. Plan English, mathematics, personal development and other agreed learning in sufficient depth.
139. Use regular formative assessment, work scrutiny and progress review to adapt teaching.
140. Report attendance, engagement, attainment and progress against agreed or EHCP outcomes to commissioners.
141. Plan reintegration, transition, accreditation or preparation for adulthood from the start.

Responsibilities and assurance

- The proprietor provides oversight and resources.
- Zara Rahman provides operational education leadership.
- Rhizlane Gesir leads safeguarding and SEND matters.
- Staff implement the policy and report concerns immediately.
- Implementation is monitored through records, audits, incidents, complaints and placement reviews.

References

- Education Act 1996 section 19 where applicable to commissioning authorities
- DfE Alternative Provision statutory guidance 2025
- DfE Non-school AP Voluntary National Standards 2025
- SEND Code of Practice 0 to 25 years

Effective: 1 September 2026 | Approved by: [TO COMPLETE BEFORE USE] | Approval date: 1 September 2026 | Review: August 2027

Risk Assessment

Policy owner	Proprietor / Centre Director
Operational lead	Zara Rahman, Headteacher
Relevant lead	Rhizlane Gesir, DSL and SENCO
Effective date	1 September 2026
Approval date	1 September 2026
Review date	August 2027 or earlier following change/incident

Purpose and status

To identify foreseeable harm and implement proportionate controls for premises, activities and individual pupils.

Gateway is a non-school alternative provision. Relevant school guidance is adopted as a good-practice benchmark where it does not directly impose a legal duty on Gateway.

Core principles

- Risk assessment supports safe participation and is not used as a blanket barrier to inclusion.
- Controls have named owners, timescales and review triggers.

Operational requirements

142. Complete general premises, fire, activity and individual pupil risk assessments before relevant use.
143. Consider vulnerability, behaviour, medical needs, SEND, staffing, transport, visitors and off-site activity.
144. Record hazards, persons at risk, existing controls, further action and residual risk.
145. Share controls with all staff who need to implement them and check understanding.
146. Review following incidents, changes in need, staffing, premises or activity and at scheduled intervals.
147. Escalate risks that cannot be adequately controlled to the proprietor and commissioner; do not commence unsafe activity.

Responsibilities and assurance

- The proprietor provides oversight and resources.
- Zara Rahman provides operational education leadership.
- Rhizlane Gesir leads safeguarding and SEND matters.
- Staff implement the policy and report concerns immediately.
- Implementation is monitored through records, audits, incidents, complaints and placement reviews.

References

- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- Regulatory Reform (Fire Safety) Order 2005
- DfE Non-school AP Voluntary National Standards 2025

Effective: 1 September 2026 | Approved by: [TO COMPLETE BEFORE USE] | Approval date: 1 September 2026 | Review: August 2027

Fire, Lockdown and Emergency Procedures

Policy owner	Proprietor / Centre Director
Operational lead	Zara Rahman, Headteacher
Relevant lead	Rhizlane Gesir, DSL and SENCO
Effective date	1 September 2026
Approval date	1 September 2026
Review date	August 2027 or earlier following change/incident

Purpose and status

To provide clear, practised arrangements for evacuation, lockdown, shelter and other foreseeable emergencies.

Gateway is a non-school alternative provision. Relevant school guidance is adopted as a good-practice benchmark where it does not directly impose a legal duty on Gateway.

Core principles

- Life safety takes priority and instructions must be accessible to every child and adult.
- Plans reflect the actual premises, pupils and neighbouring occupiers.

Operational requirements

148. Maintain a current fire risk assessment, emergency plan, escape routes, assembly point and personal emergency evacuation plans where required.
149. Test alarms and emergency lighting and retain servicing, drill and defect records.
150. Provide staff induction on evacuation, calling emergency services, registers and visitor accountability.
151. Practise evacuation and proportionate lockdown procedures, considering trauma and SEND.
152. Keep emergency contacts, grab information, first-aid supplies and communication arrangements accessible.
153. Notify parents, commissioners and authorities after significant incidents and complete a documented debrief.

154. Review plans after every drill, incident or material premises change.

Responsibilities and assurance

- The proprietor provides oversight and resources.
- Zara Rahman provides operational education leadership.
- Rhizlane Gesir leads safeguarding and SEND matters.
- Staff implement the policy and report concerns immediately.
- Implementation is monitored through records, audits, incidents, complaints and placement reviews.

References

- Regulatory Reform (Fire Safety) Order 2005
- Health and Safety at Work etc. Act 1974
- DfE emergency planning guidance
- DfE Non-school AP Voluntary National Standards 2025

Effective: 1 September 2026 | Approved by: [TO COMPLETE BEFORE USE] | Approval date: 1 September 2026 | Review: August 2027

Educational Visits and Off-Site Learning

Policy owner	Proprietor / Centre Director
Operational lead	Zara Rahman, Headteacher
Relevant lead	Rhizlane Gesir, DSL and SENCO
Effective date	1 September 2026
Approval date	1 September 2026
Review date	August 2027 or earlier following change/incident

Purpose and status

To ensure visits and community learning are educationally purposeful, approved, staffed and risk managed.

Gateway is a non-school alternative provision. Relevant school guidance is adopted as a good-practice benchmark where it does not directly impose a legal duty on Gateway.

Core principles

- The same safeguarding and welfare standards apply away from the centre.
- Planning is proportionate to the activity, environment and pupil group.

Operational requirements

155. Obtain proprietor or delegated approval before the visit and name a competent visit leader.
156. Assess travel, venue, supervision, SEND, medical, behavioural, weather and emergency risks.
157. Confirm consent arrangements, emergency contacts, medication, first aid and accessible participation.
158. Set staff roles, headcounts, meeting points, missing-child response and communication arrangements.
159. Use vetted providers and verify insurance or accreditation where relevant.
160. Record incidents, notify commissioners and parents as agreed and evaluate the visit afterwards.

Responsibilities and assurance

- The proprietor provides oversight and resources.
- Zara Rahman provides operational education leadership.
- Rhizlane Gesir leads safeguarding and SEND matters.
- Staff implement the policy and report concerns immediately.
- Implementation is monitored through records, audits, incidents, complaints and placement reviews.

References

- Health and Safety at Work etc. Act 1974
- DfE health and safety advice for schools used as a benchmark
- DfE Non-school AP Voluntary National Standards 2025

Effective: 1 September 2026 | Approved by: [TO COMPLETE BEFORE USE] | Approval date: 1 September 2026 | Review: August 2027

Staff Induction, Training and Supervision

Policy owner	Proprietor / Centre Director
Operational lead	Zara Rahman, Headteacher
Relevant lead	Rhizlane Gesir, DSL and SENCO
Effective date	1 September 2026
Approval date	1 September 2026
Review date	August 2027 or earlier following change/incident

Purpose and status

To ensure every adult is competent, supported and accountable before working with pupils.

Gateway is a non-school alternative provision. Relevant school guidance is adopted as a good-practice benchmark where it does not directly impose a legal duty on Gateway.

Core principles

- No adult undertakes duties for which required checks, induction or competence are incomplete.
- Training is refreshed in response to role, risk, guidance and learning from incidents.

Operational requirements

161. Complete role-specific induction before unsupervised work, including safeguarding, conduct, reporting, emergency procedures, SEND and confidentiality.
162. Require all staff to read KCSIE 2026 Part One and record understanding as Gateway's safeguarding benchmark.
163. Provide DSL, Deputy DSL, safer-recruitment, first-aid, Prevent and specialist training appropriate to assigned responsibilities.
164. Maintain a dated training matrix, certificates, supervision notes and identified renewal dates.
165. Provide regular supervision and welfare support for staff undertaking complex safeguarding or behaviour work.

166. Address competence gaps immediately through restriction of duties, support, retraining or formal action.

Responsibilities and assurance

- The proprietor provides oversight and resources.
- Zara Rahman provides operational education leadership.
- Rhizlane Gesir leads safeguarding and SEND matters.
- Staff implement the policy and report concerns immediately.
- Implementation is monitored through records, audits, incidents, complaints and placement reviews.

References

- KCSIE 2026
- Working Together to Safeguard Children
- Health and Safety at Work etc. Act 1974
- DfE Non-school AP Voluntary National Standards 2025

Effective: 1 September 2026 | Approved by: [TO COMPLETE BEFORE USE] | Approval date: 1 September 2026 | Review: August 2027

Business Continuity and Critical Incidents

Policy owner	Proprietor / Centre Director
Operational lead	Zara Rahman, Headteacher
Relevant lead	Rhizlane Gesir, DSL and SENCO
Effective date	1 September 2026
Approval date	1 September 2026
Review date	August 2027 or earlier following change/incident

Purpose and status

To maintain safeguarding, communication and essential education functions during disruption or critical incidents.

Gateway is a non-school alternative provision. Relevant school guidance is adopted as a good-practice benchmark where it does not directly impose a legal duty on Gateway.

Core principles

- Pupil safety, accurate information and clear command arrangements come first.
- Continuity plans do not create unsafe or unlawful substitute provision.

Operational requirements

167. Identify critical functions, decision makers, deputies, emergency contacts and communication channels.
168. Plan for loss of premises, utilities, technology, key staff, transport, records and suppliers.
169. Maintain secure backups and controlled access to essential pupil and safeguarding information.
170. Agree closure, relocation or remote-learning decisions with commissioners and communicate promptly to families.
171. Record decisions, welfare checks, attendance arrangements and safeguarding escalations during disruption.
172. Test and review the plan at least annually and after any activation.

Responsibilities and assurance

- The proprietor provides oversight and resources.
- Zara Rahman provides operational education leadership.
- Rhizlane Gesir leads safeguarding and SEND matters.
- Staff implement the policy and report concerns immediately.
- Implementation is monitored through records, audits, incidents, complaints and placement reviews.

References

- Civil Contingencies Act 2004 context
- UK GDPR and Data Protection Act 2018
- DfE emergency planning guidance
- DfE Non-school AP Voluntary National Standards 2025

Effective: 1 September 2026 | Approved by: [TO COMPLETE BEFORE USE] | Approval date: 1 September 2026 | Review: August 2027

Record Keeping and Information Sharing

Policy owner	Proprietor / Centre Director
Operational lead	Zara Rahman, Headteacher
Relevant lead	Rhizlane Gesir, DSL and SENCO
Effective date	1 September 2026
Approval date	1 September 2026
Review date	August 2027 or earlier following change/incident

Purpose and status

To maintain accurate, secure and retrievable records and share information lawfully when necessary for education, safety and accountability.

Gateway is a non-school alternative provision. Relevant school guidance is adopted as a good-practice benchmark where it does not directly impose a legal duty on Gateway.

Core principles

- Records are factual, timely, attributable and distinguish observation from opinion.
- Data protection is not a barrier to necessary safeguarding information sharing.

Operational requirements

173. Maintain secure pupil, attendance, assessment, safeguarding, incident, medical, recruitment and commissioning records.
174. Use role-based access and approved secure transfer methods.
175. Record the lawful purpose, recipient and rationale for significant information sharing.
176. Transfer safeguarding records promptly and securely to the responsible setting or authority when required.
177. Apply a documented retention schedule and legal hold where complaints, incidents or proceedings require preservation.
178. Report suspected data loss or unauthorised access immediately and follow breach-assessment procedures.

Responsibilities and assurance

- The proprietor provides oversight and resources.
- Zara Rahman provides operational education leadership.
- Rhizlane Gesir leads safeguarding and SEND matters.
- Staff implement the policy and report concerns immediately.
- Implementation is monitored through records, audits, incidents, complaints and placement reviews.

References

- UK GDPR
- Data Protection Act 2018
- KCSIE 2026
- Information sharing advice for safeguarding practitioners

Effective: 1 September 2026 | Approved by: [TO COMPLETE BEFORE USE] | Approval date: 1 September 2026 | Review: August 2027