ST TERESA of CALCUTTA
Catholic Academy Trust

# ALTERNATIVE PROVISION AND OFF-SITE POLICY

## Policy Control Sheet

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| 14 | **Applies to** | ☒ All Staff<br>☐ Support Staff<br>☐ Teaching Staff | |
| 15 | **Consulted on with relevant stakeholders (Union, legal, staff)** | ☐ Y ☒ N | |

## Summary of Changes

| Date | Version | Action | Summary of Changes |
|---|---|---|---|
| Term 1, 26/27 | 1.0 | New Policy | |

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## 1.0 Aims

Our mission as a Catholic Academy Trust is to Make Christ Known and improve the lives of our communities, children and young people, and stakeholders. We aim to educate the whole person and enable every child to flourish academically, socially, emotionally, physically and spiritually.

Alternative Provision (AP) and Off-Site Direction (OSD) may support pupils experiencing barriers to learning, attendance, engagement or wellbeing. Arrangements must be lawful, proportionate, focused on the pupil's best interests and time-limited where required.

This policy sets out Trust expectations for commissioning, implementing and reviewing AP and OSD. Neither should replace inclusive practice, appropriate SEND provision, reasonable adjustments, pastoral support or effective attendance and behaviour interventions.

The commissioning school retains responsibility for ensuring that:

- Suitable, ambitious education meets the pupil's age, ability, aptitude and needs.
- Safeguarding, attendance, welfare and progress are monitored.
- SEND provision, reasonable adjustments and equality duties are met.
- Providers are appropriately checked and placements remain safe and suitable.
- Pupils and parents/carers are involved, and the pupil's views considered.
- Placements have clear objectives, timescales and review arrangements.
- Reintegration or appropriate next steps are planned from the outset.
- Required Local Authority notifications are made and accurate records maintained.

AP and OSD must never be used as informal exclusion, to circumvent suspension or permanent exclusion procedures, unlawfully remove a pupil from the school roll, address staffing pressures, avoid SEND responsibilities or unjustifiably reduce educational entitlement.

Every pupil educated away from their usual setting must remain safe, visible, supported and appropriately educated.

## 2.0 Legislation and Guidance

This policy must be read alongside current legislation, statutory guidance and relevant local arrangements, including:

- *Keeping Children Safe in Education* (2026).
- *Arranging Alternative Provision: A Guide for Local Authorities and Schools* (February 2025).
- *Suspension and Permanent Exclusion from Maintained Schools, Academies and Pupil Referral Units in England, Including Pupil Movement* (July 2026).
- *Working Together to Improve School Attendance* and *Working Together to Safeguard Children* (applicable versions).
- *Children Missing Education*, *Behaviour in Schools* and, where relevant, *Mental Health and Behaviour in Schools*.

- *Non-school Alternative Provision: Voluntary National Standards*.
- Education Act 1996; Education Act 2002; Education and Inspections Act 2006.
- Children and Families Act 2014; Equality Act 2010.
- *School Attendance (Pupil Registration) (England) Regulations 2024*.
- *Special Educational Needs and Disability Code of Practice: 0 to 25 Years*.
- *Education (Provision of Full-Time Education for Excluded Pupils) (England) Regulations 2007*, as amended.
- *Education (Educational Provision for Improving Behaviour) Regulations 2010*, as amended, including applicable 2026 amendments.
- Relevant independent school registration requirements, Trust governance arrangements and funding agreements.
- Ofsted Education Inspection Framework (effective from 7 September 2026) and associated inspection guidance, as applicable.

Schools must verify and follow the requirements applicable to the school type and legal basis of each arrangement. Statutory requirements take precedence over this policy. Commissioned AP placements and their endings must be notified to the Local Authority in accordance with DfE guidance and local procedures.

## 3.0 Definitions

### 3.1 Alternative Provision (AP)

AP is education arranged for a pupil of compulsory school age who would otherwise not receive suitable education because of exclusion, illness or other reasons. It may also support pupils who are suspended or directed off-site to improve behaviour.
Provision may be delivered by a pupil referral unit (PRU), another school, an independent provider, further education college, hospital school or other suitable setting. Every placement must have clear educational objectives, appropriate provision and arrangements for monitoring and review. The commissioning school retains its applicable responsibilities.

### 3.2 Off-Site Direction (OSD)

OSD is a temporary arrangement requiring a pupil to attend another education setting to improve future behaviour. It should be considered when in-school interventions or targeted support have been unsuccessful or are inappropriate.

OSD must have a lawful basis, be authorised, proportionate and time-limited, and follow applicable requirements for consultation, notification, information-sharing, attendance and review. The proposed maximum period must be discussed and agreed during planning. Alternatives must be considered before it ends.

OSD must not be used as punishment for past behaviour or to circumvent exclusion procedures.

### 3.3 Internal Inclusion

Internal inclusion includes school-based provision outside a pupil's usual classroom or timetable, such as nurture, inclusion units and targeted pastoral interventions.

It must have clear objectives, maintain appropriate educational entitlement and be reviewed for impact. It must not become an informal or indefinite exclusion. Any separate statutory requirements must be followed.

### 3.4 Commissioned and Unregistered AP

Commissioned AP is education arranged through an external provider. Before a placement begins, the school must establish and record that the provider operates lawfully and can deliver safe, suitable education.

Due diligence must cover:

- Safeguarding leadership, policies, reporting and staff suitability checks.
- Ofsted registration requirements and the provider's legal status.
- Curriculum, teaching, assessment, qualifications and progression.
- Capacity to meet SEND, medical, communication and individual needs.
- Attendance monitoring, unexplained absence and emergency arrangements.
- Behaviour support, supervision, health and safety, insurance and risk assessments.
- Premises, transport, off-site activities and subcontracted provision.
- Information-sharing, recordkeeping, incident reporting and communication.
- Staffing capacity and notification of significant changes.

Schools must not rely solely on approved-provider lists or provider assurances. Written confirmation of relevant checks and reporting responsibilities must be obtained.

The DfE's voluntary national standards should inform quality assurance of non-school AP. For unregistered providers, schools must establish whether registration is legally required, assess the provision and record their rationale and additional safeguards. Full-time provision requires particular scrutiny of registration requirements.

A written agreement must define the education, responsibilities, safeguarding, attendance, information-sharing, reporting and review arrangements.

## 4.0 Roles and Responsibilities

### 4.1 Board of Directors

Through agreed governance arrangements and the Head of Safeguarding and Attendance, the Board will:

- Oversee policy implementation and statutory compliance.
- Seek assurance on safeguarding, educational quality and outcomes.

- Monitor placement numbers, duration, attendance, progress, reintegration and pupil characteristics.
- Identify disproportionate use, particularly for pupils with SEND or other vulnerabilities.
- Challenge inappropriate, prolonged or ineffective placements and ensure concerns are addressed.

Operational monitoring may be delegated, but governance responsibilities remain.

### 4.2 Headteacher

The Headteacher retains overall responsibility for the school's applicable duties. Before approving a placement, they must be satisfied that it is lawful, necessary, proportionate and in the pupil's best interests; needs and risks have been assessed; provider checks are complete; and suitable education, safeguarding, attendance, SEND and review arrangements are in place.

The Headteacher must ensure appropriate pupil and parental involvement, required notifications, accurate records, prompt escalation of concerns and planned reintegration or next steps.

For statutory OSD, the Headteacher must ensure the governing body or Trust fulfils its applicable legal responsibilities. Operational duties may be delegated, but accountability must remain clear.

### 4.3 Designated Safeguarding Lead (DSL)

The DSL will:

- Contribute to placement decisions and safeguarding risk assessments.
- Ensure relevant safeguarding information is securely shared before placement.
- Confirm provider safeguarding contacts and reporting arrangements.
- Monitor concerns, incidents, unexplained absence and changing risks.
- Record, refer and escalate concerns promptly.
- Liaise with relevant agencies and review placement suitability when concerns arise.

Particular consideration must be given to children in care, children with a social worker, those subject to child protection or child-in-need arrangements, pupils at risk of exploitation or going missing, and pupils with significant SEND, medical, mental health or other vulnerabilities.

Necessary safeguarding information must be shared appropriately; data protection must not prevent necessary safeguarding action. Pupils must know how to raise concerns.

### 4.4 Special Educational Needs Coordinator (SENCO)

The SENCO will advise on SEND, reasonable adjustments and the suitability of proposed provision, and monitor progress, wellbeing and support effectiveness.

For pupils with an Education, Health and Care (EHC) plan, the school must continue to meet its statutory duties, consider specified provision and consult the Local Authority where required. Changes to a placement named in an EHC plan must follow statutory procedures. AP or OSD must not circumvent SEND duties or replace required specialist provision.

### 4.5 Attendance Lead

The Attendance Lead will ensure that:

- Attendance is accurately recorded under applicable regulations and guidance.
- Provider attendance information is received promptly and checked.
- Non-arrival and unexplained absence are followed up immediately to establish the pupil's whereabouts.
- Attendance concerns are considered alongside safeguarding, welfare and progress.
- Repeated absence and missing-from-education concerns are escalated.
- Records reflect actual arrangements.

Where a pupil attends another school under OSD, code D must be used where applicable. The school must not rely solely on provider attendance records.

### 4.6 Alternative Provision Lead

Where appointed, the AP Lead will coordinate referrals, documentation, provider checks, liaison, quality assurance, reviews, progress monitoring, reintegration and reporting, escalating concerns promptly.

### 4.7 Alternative Provision Providers

Providers must:

- Deliver safe, suitable education meeting identified needs.
- Maintain appropriate safeguarding, staff suitability, health and safety and behaviour arrangements.
- Immediately report safeguarding concerns, allegations, serious incidents and unexplained absence.
- Supply timely attendance, progress and engagement information.
- Report significant changes to pupil circumstances, staffing, premises, registration or subcontracting.
- Participate in reviews, support reintegration where appropriate and cooperate with quality assurance.
- Follow agreed information-sharing and recordkeeping procedures.

### 4.8 Parents, Carers and Pupils

Parents/carers should contribute to planning and reviews, support attendance, share relevant information and raise concerns. Schools must explain the placement's purpose, timetable, expectations, communication arrangements and complaints process.

Pupils must be supported to express their views, understand the placement and identify a trusted person to approach if concerned. Their views must be recorded and considered in light of age, maturity, SEND and individual circumstances. Where their wishes are not followed, reasons should be explained sensitively.

## 5.0 Principles and Decision-Making

AP and OSD must be based on an individual assessment of need, circumstances and best interests.

Before agreeing a placement, the school must consider:

- Attainment, curriculum access and barriers to learning.
- SEND, EHC plan provision, disability and reasonable adjustments.
- Safeguarding, welfare, attendance, behaviour and health needs.
- Family circumstances, relationships and sense of belonging.
- Previous interventions and their effectiveness.
- Pupil and parental views and relevant professional advice.
- Likely effects on educational outcomes, wellbeing and future opportunities.

Alternatives should include adaptive teaching, pastoral and SEND support, reasonable adjustments, attendance interventions, internal inclusion, Early Help, multi-agency support and specialist outreach.

AP should not normally be the first response. An immediate placement may exceptionally be necessary to safeguard pupils or staff or maintain access to education. Such decisions must be lawful, necessary, proportionate and supported by appropriate educational and safeguarding arrangements.

Schools must comply with the Equality Act 2010 and SEND duties, considering whether disability, SEND, health, communication or other individual circumstances contribute to the difficulties experienced. Reasonable adjustments must be considered, and placement patterns monitored for disproportionate impact on pupils with SEND, disabilities or other protected characteristics.

AP or OSD may support pupils at risk of exclusion, address attendance barriers, aid reintegration, meet medical or mental health needs, provide specialist or vocational learning, or improve engagement. Each case must be considered individually.

Neither arrangement may be used as informal exclusion, to circumvent statutory procedures, address staffing pressures, avoid SEND responsibilities or continue indefinitely without appropriate authority, objectives and review.

## 6.0 Placement Planning and Education

Before a placement begins, the school must complete a written plan that meets applicable statutory requirements and includes:

- Rationale, assessed needs and relevant background.
- Pupil views and parental involvement.
- Provider, location, start date, proposed duration and review dates.
- Timetable, curriculum, teaching, assessment and intended outcomes.

- Any education retained at the home school.
- Safeguarding risks, controls and information-sharing arrangements.
- SEND provision, reasonable adjustments and health support.
- Attendance monitoring, absence escalation and communication.
- Responsibilities of the school and provider.
- Reintegration, alternative next steps and arrangements for changing or ending the placement.

The overall package must provide suitable education appropriate to the pupil's needs and legal entitlement. Curriculum access, qualifications and progression must be considered to prevent disadvantage.

### 6.1 Part-Time Provision

Full-time education should normally be provided where required. Part-time provision must have an evidenced, individual rationale, a documented timetable and a plan to increase provision or return to full-time education where appropriate.

The school must coordinate education across settings, monitor progress and review arrangements regularly. Part-time provision must not be used to manage behaviour or staffing pressures or unjustifiably reduce educational entitlement.

## 7.0 Suspension, Permanent Exclusion and Off-Site Direction

### 7.1 Following Suspension or Permanent Exclusion

Where AP follows suspension or permanent exclusion, schools must comply with the July 2026 statutory guidance and applicable requirements for suitable education, timescales, attendance, safeguarding, SEND, information-sharing and registration.

For suspensions, the school must meet its duties concerning education during the initial period and subsequent AP arrangements. Following permanent exclusion, responsibility for arranging education must be established under the relevant statutory framework.

AP must not retrospectively replace suspension, circumvent exclusion procedures or misrepresent absence or pupil movement. Parents/carers, the Local Authority, social worker and Virtual School Head must be involved where required or appropriate.

### 7.2 Statutory Off-Site Direction

OSD must be a lawful, temporary and properly planned educational intervention intended to improve future behaviour. Schools must establish the applicable legal basis and follow requirements for their school type.

Planning must address needs, previous interventions, safeguarding, SEND, reasonable adjustments, pupil and parental views, and professional advice. The school must record why the direction is appropriate and why previous interventions have failed or are unsuitable.

The written plan must specify the rationale, intended outcomes, proposed maximum period, provision, safeguarding, monitoring and review arrangements. Alternatives, including return to the home school or a lawful managed move, must be considered before the period ends.

### 7.3 Notification and Information-Sharing

Schools must meet applicable notification requirements, including written notice to parents/carers, the Local Authority and other relevant parties. For statutory OSD, this includes applicable requirements for notice no later than two school days before attendance begins.

The Local Authority must be involved where required, including for pupils with EHC plans. All notifications and correspondence must be retained.

Before placement, the school must securely share relevant information with the receiving setting and, where appropriate, the Local Authority. This includes attainment, SEND, adjustments, safeguarding, support strategies, attendance, behaviour, medical needs and relevant contacts.

### 7.4 Reviews and Ending a Direction

Schools must monitor OSD throughout and meet statutory review requirements. Reviews must consider the pupil's views, attendance, progress, curriculum access, behaviour, wellbeing, safeguarding, provision suitability and outcomes. Decisions, reasons and actions must be recorded and communicated. Applicable rights to request review meetings must be respected.

Before the agreed maximum period ends, the school must consider return to the home school, continuation under a lawful and justified arrangement, another suitable placement or an alternative appropriate route. Changes and extensions must be authorised, documented and communicated as required.

A managed move is distinct from temporary OSD. OSD must not become informal removal from the school roll or a trial admission. Suitable education and safeguarding must continue during transitions.

### 7.5 Managed Moves

A managed move is a process leading to the permanent transfer of a pupil to another mainstream school. It should be considered as a planned intervention where this is in the pupil's best interests and must be voluntary and agreed by all parties involved, including parents/carers and the admission authority of the receiving school.

A managed move must not be used to pressure parents/carers into accepting a transfer, circumvent suspension or permanent exclusion procedures, or unlawfully remove a pupil from the school roll. Trial admissions and trial managed moves are not permitted. Where a temporary placement is required to improve behaviour, the school must consider the appropriate off-site direction arrangements.

Before a managed move is agreed, the schools must consider the pupil's educational, SEND, safeguarding, attendance and welfare needs, including reasonable adjustments and any support required. The original school and receiving school must ensure that relevant information is shared before the move, including prior and current attainment, academic potential, a current risk assessment, risk-management advice and effective support strategies.

Where the pupil has an Education, Health and Care (EHC) plan, the original school must contact the Local Authority before contemplating a managed move. The relevant statutory duties and procedures for amending the plan must be followed where applicable.

The schools must agree clear arrangements for transition, induction, support, communication and monitoring, with the pupil's views considered and recorded. The receiving school should ensure that appropriate provision is in place to support the pupil's safety, wellbeing, attendance, engagement and educational progress.

A managed move is a permanent transfer, not a trial placement. The pupil must be registered at only one school. Once the move becomes permanent, the original school's admission register must be updated and the receiving school must register the pupil in accordance with the applicable requirements. Where a managed move follows a period of off-site direction, the pupil's removal from the original school's admission register must take place when the move becomes permanent.

The Trust will monitor the use and outcomes of managed moves to identify whether they are supporting pupils effectively and to consider any patterns of disproportionate use involving pupils with SEND or other vulnerabilities.

## 8.0 Safeguarding, Monitoring and Quality Assurance

The commissioning school must maintain oversight throughout every placement. Monitoring must reflect the pupil's needs and identified risks; provider reports alone may be insufficient where direct contact or visits are necessary.

Schools must record:

- Rationale, assessment and decision-making.
- Pupil and parental involvement.
- Provider checks, agreements and risk assessments.
- Placement plan, outcomes and duration.
- Attendance, unexplained absence and follow-up.
- Progress, curriculum access, safeguarding and significant incidents.
- Reviews, decisions, notifications and communications.
- Quality assurance, reintegration and next steps.

Monitoring must cover attendance, safeguarding, educational quality, progress, engagement, SEND provision, reasonable adjustments, pupil experience and intended outcomes. Schools should maintain regular contact with the pupil, provider and parents/carers and undertake proportionate visits or other direct checks.

Quality assurance should also consider the relevant expectations of the Ofsted Education Inspection Framework (effective from 7 September 2026), including the impact of provision on pupils' safety, inclusion, attendance, progress and educational outcomes.

Safeguarding concerns, allegations, serious incidents, unexplained absence and significant changes in risk must be addressed promptly. Schools must follow safeguarding procedures, make

referrals where required, record decisions, reassess risks and consider changing or ending the placement.

Where provision becomes unsafe, unsuitable or unable to meet the pupil's needs, the school must act without delay and maintain alternative suitable education and safeguarding arrangements.

### 8.1 Trust Oversight and Governance

The Trust will use audits, visits, data analysis and reviews to monitor provider quality, attendance, outcomes, placement duration, part-time arrangements, safeguarding, reintegration and statutory compliance.

Monitoring must identify patterns, including disproportionate placement of pupils with SEND or other vulnerabilities, and inform improvements in inclusion, behaviour, attendance and safeguarding.

Schools must report in line with Trust arrangements and promptly escalate significant safeguarding, legal or provider-quality concerns. The Board or delegated governance body will receive regular assurance on placement use, duration, impact, pupil characteristics, outcomes and reintegration. Identified concerns must lead to appropriate action.

### 8.2 Policy Review

This policy will be reviewed at least annually, or sooner if legislation, statutory guidance, Local Authority arrangements or Trust practice changes. Related procedures, checklists, agreements and recording arrangements must also be reviewed.

## 9.0 Supporting Documents

This policy should be read alongside:

- Safeguarding and Child Protection Policy.
- Attendance Policy and Children Missing Education procedures.
- Behaviour Policy.
- Suspension and Permanent Exclusion Procedure
- SEND Policy
- Part-Time Timetable Policy.
- Alternative Provision and Off-Site Direction Quality Assurance Checklist.
- Local Authority AP and OSD notification procedures.
- Data Protection, Information-Sharing and Risk Assessment procedures.
- Ofsted Education Inspection Framework (effective from 7 September 2026) and associated inspection guidance, as applicable.