



POLICIES & PROCEDURES HANDBOOK

Alternative Provision and Education Services Across Wales

Version: 1.0 | Date: 28th August 2026 | Review cycle: Annually, and sooner following significant changes to law, Welsh Government guidance, commissioning requirements or service delivery.

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How to use this handbook

These policies form DNA Education’s core organisational framework. They should be read alongside the DNA Education Safeguarding & Child Protection Policy and Safeguarding Procedures / Staff Handbook. Because DNA Education operates across Wales, local safeguarding, Children Missing Education, emergency and referral arrangements must be confirmed for the local authority in which each learner is receiving provision. Where a school or local authority commissions DNA Education, the commissioner’s lawful requirements and agreed contractual procedures also apply. Nothing in this handbook prevents staff from contacting social services, police or emergency services directly where a child is at immediate risk. Safeguarding always takes priority over internal administrative processes.

Key Welsh framework reflected in these policies

- Social Services and Well-being (Wales) Act 2014 and associated safeguarding guidance.
- Working Together to Safeguard People guidance and the Wales Safeguarding Procedures.
- Welsh Government safeguarding guidance for education and organisations working with children.

- Additional Learning Needs and Education Tribunal (Wales) Act 2018 and Additional Learning Needs Code for Wales 2021.
- Welsh Government Reducing Restrictive Practices Framework.
- Equality Act 2010, UK GDPR and Data Protection Act 2018, Health and Safety at Work etc. Act 1974 and other applicable UK/Welsh law.

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1. Staff Code of Conduct / Professional Boundaries Policy

Purpose

To set clear standards of professional behaviour for everyone working for or on behalf of DNA Education and to protect children and young people from harm, abuse of trust and inappropriate relationships.

Application

This policy applies to DNA Education activity in Wales and to all relevant staff, contractors and volunteers unless a section states otherwise. It should be applied proportionately to the learner, setting and commissioned service.

Scope

Applies to employees, directors, tutors, coaches, mentors, contractors, agency workers, volunteers and visitors undertaking work for DNA Education across Wales.

Standards of conduct

- Put the safety, welfare, dignity and best interests of learners first.
- Treat learners fairly, respectfully and without discrimination.
- Maintain clear professional boundaries and avoid favouritism or relationships that could create dependency, secrecy or an abuse of trust.
- Use appropriate language and never humiliate, intimidate, threaten, sexualise or ridicule a learner.
- Never form a sexual or romantic relationship with a learner or exploit a position of trust.
- Do not share excessive personal information, personal social-media accounts or inappropriate photographs with learners.
- Use DNA Education-approved communication channels wherever practicable. Any exceptional direct communication must be necessary, transparent and authorised.
- Do not give or accept inappropriate gifts, money or favours.
- Do not consume alcohol or illegal drugs while working or attend work impaired.
- Maintain confidentiality, while recognising that safeguarding information must be shared when necessary to protect a child.

One-to-one work

One-to-one provision must take place in an appropriate, risk-assessed environment. Staff should preserve visibility and accountability wherever practicable and follow agreed lone-working arrangements.

Physical contact

Physical contact must be appropriate, necessary and proportionate to the situation. Staff must follow the Physical Intervention / Restrictive Practice Policy where intervention is required to prevent harm.

Transport

Staff must not transport learners in personal vehicles unless this has been authorised, insured, risk assessed and agreed within the learner's arrangements.

Concerns about adults

Any concern about the behaviour of a member of staff or another adult must be reported promptly to the Designated Safeguarding Person (DSP) or Deputy DSP. If the concern relates to the DSP, who is also DNA Education's senior safeguarding lead / proprietor, it must be reported to the Deputy DSP and, where appropriate, directly to the relevant local authority Designated Officer / allegations-management route or police. Internal reporting must never delay external safeguarding action.

Breaches

Breaches may result in disciplinary action, termination of contract and/or referral to safeguarding, regulatory or law-enforcement bodies.

Recording, escalation and review

Relevant decisions, concerns and incidents must be recorded accurately and stored securely. Safeguarding concerns must be escalated under the DNA Education Safeguarding & Child Protection Policy. This policy will be reviewed at least annually and after significant incidents, legal/guidance changes or identified weaknesses.

2. Safer Recruitment Policy

Purpose

To ensure that DNA Education recruits and engages people who are suitable to work with children and young people and embeds safeguarding throughout recruitment.

Application

This policy applies to DNA Education activity in Wales and to all relevant staff, contractors and volunteers unless a section states otherwise. It should be applied proportionately to the learner, setting and commissioned service.

Principles

Safeguarding is a core recruitment responsibility. DNA Education will use fair, consistent and proportionate selection processes and will not permit unsupervised work until required checks are satisfactorily completed.

Pre-recruitment

Roles will include clear duties, person specifications and safeguarding responsibilities. Advertisements and applicant information will make DNA Education's commitment to safeguarding clear.

Selection and interview

Identity, relevant qualifications, experience and employment history will be scrutinised. Gaps, inconsistencies or unexplained periods will be explored. Interviews will include questions about safeguarding, professional boundaries and suitability to work with learners.

References

Appropriate references will be sought and scrutinised. Where practicable, references will be obtained directly from the referee rather than relying only on documents supplied by the applicant. Concerns or inconsistencies will be followed up.

DBS and other checks

DNA Education will undertake the level of Disclosure and Barring Service (DBS) check legally appropriate to the role and regulated activity. Barred-list checks and other statutory checks will be undertaken where applicable. Identity and right-to-work checks will also be completed.

Overseas history

Where an applicant has lived or worked overseas, DNA Education will consider appropriate additional checks or evidence of suitability, recognising that these do not replace required UK checks.

Contractors and agencies

DNA Education will obtain appropriate written assurance that required checks have been completed for agency and contracted workers and may inspect evidence where necessary.

Induction and ongoing suitability

New workers will receive safeguarding induction, this Code of Conduct and relevant procedures. Suitability is an ongoing requirement; staff must disclose relevant changes in circumstances where legally required or relevant to their role.

Records

Recruitment and vetting information will be retained securely in accordance with data-protection requirements and DNA Education retention arrangements.

Recording, escalation and review

Relevant decisions, concerns and incidents must be recorded accurately and stored securely. Safeguarding concerns must be escalated under the DNA Education Safeguarding & Child Protection Policy. This policy will be reviewed at least annually and after significant incidents, legal/guidance changes or identified weaknesses.

3. Whistleblowing Policy

Purpose

To enable people working for DNA Education to raise serious concerns safely and without fear of retaliation.

Application

This policy applies to DNA Education activity in Wales and to all relevant staff, contractors and volunteers unless a section states otherwise. It should be applied proportionately to the learner, setting and commissioned service.

Concerns covered

Safeguarding failures; abuse or neglect; unsafe practice; serious professional-boundary breaches; fraud; corruption; unlawful conduct; discrimination; deliberate concealment of wrongdoing; or serious breaches of policy or legal duties.

How to raise a concern

Concerns should normally be raised with the DSP or Deputy DSP. If the concern relates to the DSP, who is also DNA Education's senior safeguarding lead / proprietor, it must be raised with the Deputy DSP and, where appropriate, the relevant local authority Designated Officer / allegations-management route, police, regulator, professional body or other prescribed body.

Safeguarding priority

Where a child may be at immediate risk, staff must use safeguarding procedures immediately. The whistleblowing process must never delay a referral to social services or police.

Confidentiality and anonymity

DNA Education will protect the identity of a person raising a concern as far as reasonably possible, but complete confidentiality cannot be guaranteed where disclosure is necessary for safeguarding, legal proceedings or a fair investigation. Anonymous concerns will be considered on their merits.

Protection

DNA Education will not tolerate victimisation or detrimental treatment of anyone who raises a genuine concern in good faith.

Knowingly false allegations

A concern raised honestly will not attract disciplinary action merely because it is unsubstantiated. Deliberately malicious or knowingly false allegations may be dealt with under disciplinary arrangements.

External routes

Where internal reporting is inappropriate or ineffective, staff may raise concerns with the relevant local authority safeguarding service, police, regulator, professional body or other prescribed body as appropriate.

Recording, escalation and review

Relevant decisions, concerns and incidents must be recorded accurately and stored securely. Safeguarding concerns must be escalated under the DNA Education Safeguarding & Child Protection Policy. This policy will be reviewed at least annually and after significant incidents, legal/guidance changes or identified weaknesses.

4. Behaviour Policy

1. Purpose

This policy establishes a consistent, relational, trauma-aware and rights-respecting approach to behaviour. Its purpose is to promote safety, learning, dignity, inclusion and positive development while helping learners understand the impact of their choices, repair harm and build the skills needed to participate successfully in education and their communities.

DNA Education recognises that behaviour may communicate unmet need, distress, fear, sensory overload, communication difficulty, previous trauma or a barrier to learning. Understanding the possible function of behaviour does not mean ignoring harm or removing appropriate boundaries. Staff will combine curiosity and support with clear, predictable expectations and proportionate responses.

2. Scope and status

This policy applies to all DNA Education activity in Wales, including one-to-one tuition, group provision, online learning, community and sports-based activity, educational visits, work-related activity and transport arranged or directly supervised by DNA Education. It may also apply to conduct outside a session where that conduct creates a safeguarding risk or materially affects the safety or operation of the provision.

The policy must be applied proportionately to the learner, setting, risk assessment, individual plan and commissioning agreement. Where a commissioner's procedure also applies, DNA Education will work with the commissioner while maintaining its own safeguarding and legal responsibilities.

DNA Education is an alternative education provider and does not describe a suspension or termination of its service as a statutory school exclusion. Any decision affecting a learner's school registration, statutory exclusion or entitlement to education remains with the legally responsible school, local authority or other body.

3. Principles

Every learner has the right to learn, feel safe, be respected, be heard and be treated fairly.

Relationships, prevention, co-regulation, predictable routines and early support are the foundations of positive behaviour.

Responses will be individualised, reasonable, proportionate and the least restrictive available.

Staff will distinguish between the learner and the behaviour; labels, humiliation, threats, sarcasm and degrading treatment are prohibited.

The impact of additional learning needs (ALN), disability, communication needs, trauma, culture, language, identity and safeguarding circumstances will be considered.

Restorative work will prioritise accountability, repair, reconnection and future support rather than punishment for its own sake.

Learners will not lose access to food, drink, toilets, necessary medication, safeguarding support or their basic entitlement to dignity as a consequence.

Welsh and English language needs and preferences will be respected in communication and planning.

4. Legal and guidance framework

This policy is informed by relevant legislation and Welsh guidance, including, where applicable:

Equality Act 2010, including the duty to make reasonable adjustments and avoid disability discrimination;

Additional Learning Needs and Education Tribunal (Wales) Act 2018 and the Additional Learning Needs Code for Wales 2021;

Children Act 1989 and Children Act 2004;

Social Services and Well-being (Wales) Act 2014 and Wales Safeguarding Procedures;

Human Rights Act 1998 and the United Nations Convention on the Rights of the Child;

Welsh Government, Reducing Restrictive Practices Framework;

Welsh Government guidance concerning behaviour, bullying and exclusions, where relevant to the learner's registered school or PRU;

Data Protection Act 2018 and UK GDPR.

Guidance written specifically for maintained schools or pupil referral units is applied by analogy only where appropriate and does not alter DNA Education's legal status or the commissioner's statutory responsibilities.

5. Responsibilities

5.1 Director / designated policy lead

Ensure the policy is implemented, resourced, communicated and reviewed.

Ensure staff receive induction, behaviour-support, de-escalation, safeguarding, ALN and equality training appropriate to their role.

Oversee serious incidents, placement reviews, complaints and quality assurance.

Monitor patterns, including repeated incidents, restrictive practices and possible disproportionate impact on protected or vulnerable groups.

5.2 Designated Safeguarding Person (DSP)

Advise where behaviour may indicate abuse, exploitation, neglect, harmful sexual behaviour, criminal exploitation, self-harm or another safeguarding concern.

Ensure safeguarding referrals and records are managed under the DNA Education Safeguarding & Child Protection Policy and Wales Safeguarding Procedures.

Support decisions about information sharing, immediate safety and multi-agency working.

5.3 Staff, contractors and volunteers

Model calm, respectful and professional behaviour and maintain appropriate boundaries.

Know the learner's plan, risk assessment, communication needs, reasonable adjustments and agreed support strategies.

Plan engaging, appropriately pitched learning and reduce avoidable triggers.

Use approved de-escalation and recording procedures and seek support promptly.

Report safeguarding concerns immediately and never investigate them independently.

5.4 Learners

Learners will be supported, according to age and understanding, to know the expectations, express what helps them, take responsibility where appropriate and contribute to restorative and support planning. A learner's inability to comply during distress will be considered without minimising the impact on others.

5.5 Parents, carers and commissioners

Share relevant information that may affect safety, regulation, attendance or learning.

Participate in reviews and support agreed strategies where practicable.

Tell DNA Education promptly about concerns, absence or significant change in circumstances.

Work collaboratively on consistent support while recognising that safeguarding information may sometimes be shared without consent.

6. Behaviour expectations

Expectations will be taught, explained in accessible language and adapted where reasonable. DNA Education uses three shared expectations:

Expectation	What this may look like
Ready	Attend and participate as agreed; bring or use the equipment provided; communicate when support or a break is needed; use phones and devices as agreed.
Respectful	Use non-threatening and non-discriminatory language; listen and allow others to contribute; respect privacy, boundaries, property, equipment and the environment.
Safe	Follow reasonable safety instructions; remain within agreed areas; do not bring or use dangerous or prohibited items; tell an adult about a risk or concern.

Expectations are goals to be supported, not a rigid test applied without regard to disability, ALN, trauma, communication or developmental need.

7. Prevention and individual support

Staff should prevent avoidable difficulty through thoughtful planning. Support may include:

consistent staffing, routines and transitions;

clear instructions, visual prompts, task chunking and processing time;

choice within safe and realistic boundaries;

sensory, communication or environmental adjustments;

planned movement, regulation or rest breaks;

access to a trusted adult and agreed help signal;

appropriately challenging, relevant and achievable learning;

individual behaviour support, safety or risk-management planning;

multi-agency advice and review of the learner's Individual Development Plan or other plan.

Where behaviour changes significantly or repeatedly, staff must consider whether this signals a safeguarding concern, unmet ALN, ill health, medication issue, bullying, exploitation or an unsuitable programme.

8. Positive recognition

Positive behaviour, effort, regulation, repair and progress should be noticed specifically and authentically. Depending on the learner and commissioned service, recognition may include:

specific verbal or written praise;

constructive feedback linked to personal goals;

sharing progress with parents, carers and commissioners;

certificates, responsibilities or agreed individual rewards;

celebrating improved attendance, engagement, perseverance, kindness or successful repair.

Recognition must be age-appropriate and must not shame, publicly rank or disadvantage other learners. Reward systems must not be used to remove basic rights or essential support.

9. Graduated response to behaviour

Staff use professional judgement rather than a rigid tariff. They may move directly to a safety response when the risk requires it. Wherever practicable, the following sequence should guide practice:

Stage	Staff action
1. Connect and regulate	Remain calm; check wellbeing; reduce stimulation or demand where appropriate; use co-regulation and allow processing time.
2. Remind and redirect	State the expectation briefly; describe the required behaviour; redirect attention and show a clear route back into learning.
3. Offer choices and adjustments	Offer two safe, realistic choices; adapt the task or environment; provide an agreed regulation break with appropriate supervision.
4. Restore and repair	When regulated, explore what happened and its impact; agree how harm can be repaired and what support is needed.
5. Review support	Consult the learner, family, commissioner and relevant professionals; update

Stage	Staff action
	plans, adjustments, risk assessment or programme.
6. Safety response	Pause or end the activity/session if risk cannot be safely managed; obtain help; follow emergency, safeguarding and serious-incident procedures.

Consequences must be explained, related to the behaviour and aimed at safety, learning or repair. Examples include completing learning at another time, restoring an environment, returning or repairing property where lawful and agreed, reviewing access to a particular activity following a risk assessment, or participating in restorative work. Financial liability must not be imposed on a learner informally and any claim for damage must be handled by senior management under the relevant agreement and law.

10. Regulation breaks and removal from an activity

A regulation break is a supportive opportunity to reduce distress and regain readiness; it is not isolation or punishment. Any change of space must be for the shortest appropriate time, with suitable supervision, access to support and a clear plan for return.

A learner may be removed from an activity or a session may be ended where this is necessary and proportionate to protect safety or prevent serious disruption that cannot otherwise be managed. Staff must:

Assess immediate risk and summon appropriate support.

Explain the decision simply, where doing so is safe.

Maintain appropriate supervision and safeguarding arrangements.

Inform the designated lead and, according to the plan and level of risk, the parent/carer and commissioner.

Record the decision, alternatives attempted, duration, impact and follow-up.

Plan reintegration or call a placement review before further attendance where necessary.

A learner must not be sent away without a safe handover or an agreed safeguarding arrangement. Staff must consider the risk created by ending a session, including travel, exploitation, self-harm, missing episodes and home circumstances.

11. Restorative practice

Restorative conversations take place only when participants are sufficiently regulated and it is safe and appropriate. Participation must not be coerced, and restorative work does not replace safeguarding action, disciplinary investigation or support for a person harmed.

Questions may include:

What happened?

What were you thinking or feeling at the time?

Who has been affected, and how?

What do you need now?

What could help put things right?

What can adults do differently to support you?

How can we reduce the chance of this happening again?

12. Serious incidents

Serious incidents may include violence, credible threats, possession or suspected use of a weapon or dangerous item, serious damage, theft, fire-setting, suspected alcohol or drug supply/use, discriminatory abuse, harmful sexual behaviour, sexual harassment, serious bullying, exploitation, missing episodes or conduct creating an immediate safeguarding risk.

Staff must prioritise immediate safety, use the least restrictive response available, seek emergency assistance where required, preserve evidence where relevant, obtain medical help and notify the DSP/Deputy DSP without delay. Parents/carers and commissioners will normally be informed promptly unless doing so would create risk, prejudice safeguarding action or conflict with professional advice.

Police should not be used as a routine behaviour-management response. They may be contacted where there is an emergency, an immediate serious threat, suspected criminal conduct requiring police assistance, a missing-person concern or safeguarding need. Staff should follow senior escalation where circumstances allow, but must call 999 where there is an immediate risk to life or serious harm.

Where a dangerous or prohibited item is suspected, staff must manage the immediate risk and seek senior or police support as appropriate. DNA Education staff must not conduct intimate searches. Any search or confiscation must be lawful, proportionate, authorised under DNA Education procedures and undertaken with safeguarding and dignity at the forefront.

13. Bullying, discrimination and harmful sexual behaviour

All reports will be taken seriously, recorded and assessed. DNA Education will support the person harmed, address the behaviour of the person responsible, consider safeguarding referral thresholds and work with commissioners and other agencies. Responses must recognise that a learner may be both vulnerable and responsible for harmful behaviour.

Incidents involving race, religion or belief, sex, sexual orientation, gender reassignment, disability, age or another protected or identity-related characteristic must be recorded accurately and reviewed for safeguarding, equality and reporting implications. This section should be read with the Anti-Bullying, Equality, Safeguarding and Online Safety policies.

14. Online behaviour and personal devices

Learners must follow the Online Safety / Acceptable Use Policy and any individual device agreement. Staff may require a device to be put away or access to DNA Education systems to be restricted where this is necessary, proportionate and consistent with the learner's plan. Suspected online abuse, exploitation, sexual imagery, threats or criminal conduct must be referred immediately under safeguarding procedures. Staff must not investigate a learner's private account or demand passwords outside an authorised and lawful process.

15. Restrictive practices and physical intervention

Restrictive practice is not a routine behaviour-management strategy. DNA Education seeks to prevent and reduce its use in accordance with the Welsh Government Reducing Restrictive Practices Framework. Any restrictive intervention must be lawful, necessary, proportionate to the immediate risk, the least restrictive available and used for the shortest possible time.

Only staff who are appropriately trained and authorised may use planned physical intervention. In an unforeseen emergency, a member of staff may take reasonable and proportionate action to protect a person from immediate harm, consistent with law and training. Restrictive practice must never be used to punish, humiliate, secure general compliance or compensate for inadequate staffing or planning.

Any use must be reported immediately, recorded in detail, notified to the designated lead, reviewed for injury and safeguarding concerns, and communicated to parents/carers and commissioners in accordance with policy and the learner’s plan. The learner and staff should be offered appropriate post-incident support and debriefing. See the DNA Education Physical Intervention / Restrictive Practice Policy for full procedures.

16. Temporary suspension, placement review and ending provision

DNA Education will seek to maintain provision through adjustment and multi-agency planning. Temporary suspension or termination of a placement/programme is a last-resort contractual and safety decision, not a statutory school exclusion.

It may be considered where there is an immediate or continuing risk that cannot be safely managed within current resources or arrangements; where essential information or agreed safeguards are unavailable; or where the commissioned placement is no longer suitable or its terms cannot be met. Before a non-emergency decision, DNA Education will, where practicable:

- Consult the learner and consider their wishes and communication needs.
- Review reasonable adjustments, ALN provision, safeguarding information, risk assessments and previous support.
- Consult parents/carers, the commissioner and relevant professionals.
- Consider alternative staffing, location, timetable, activity, phased return or additional support.
- Record the rationale, alternatives considered, decision-maker, duration and review arrangements.
- Agree how education, supervision and safeguarding responsibility will be maintained by the responsible commissioner or setting.

In an emergency, DNA Education may end a session immediately to protect safety, but must arrange a safe handover, notify relevant parties promptly and convene a review as soon as practicable. Only the authorised Director or delegated senior lead may approve a temporary suspension beyond the current session or terminate provision, subject to the commissioning agreement.

17. Recording and reporting

Any behaviour warranting a formal response must be recorded promptly, factually and securely. DNA Education uses an ABC-informed record, expanded to include the response and review:

Element	Record
Antecedent / context	What happened beforehand; relevant demands, environment, communication,

Element	Record
	wellbeing or known trigger without speculation.
Behaviour	Observable words and actions; date, time, location, duration and people present.
Consequence / response	What staff and others did; de-escalation and adjustments attempted; outcome and immediate impact.
Risk and safeguarding	Injury, damage, missing episode, alleged crime, discrimination, restrictive practice or safeguarding concern.
Voice and follow-up	Learner's account when available; notifications; restorative action; plan/risk-assessment changes; person responsible and review date.

Records must avoid blame, sarcasm, emotive language, unsupported conclusions and unnecessary personal information. Injuries, accidents, restrictive practices, safeguarding concerns and data breaches must also be recorded through the relevant specialist procedure. Records will be retained and shared in accordance with the Data Protection / Privacy Policy and commissioning requirements.

18. Communication following incidents

The level and timing of communication will reflect seriousness, safeguarding, confidentiality and the learner's plan. Serious incidents should normally be reported to the designated lead immediately and to the commissioner and parent/carer on the same day, unless safeguarding advice indicates otherwise. Information about other learners will not be disclosed. Where an allegation concerns a staff member, the Managing Allegations / Safeguarding procedure must be followed and the matter must not be treated solely as behaviour management.

19. Reintegration and review

Following a significant incident or break in attendance, DNA Education will plan a safe, supportive return. A reintegration or placement review should consider the learner's account, impact on others, current risk, reasonable adjustments, changes to teaching or environment, restorative work, staff support, communication arrangements and a review date. Reintegration must not depend upon a forced apology or admission.

20. Monitoring, equality and quality assurance

The policy lead will review behaviour information at appropriate intervals to identify patterns by learner, activity, location, time, staff response and type of incident. Monitoring will include the frequency and duration of removals, suspensions, placement endings and restrictive practices and will consider possible disproportionate impact associated with disability, ALN, race, sex or other protected or vulnerability-related factors.

Findings will inform training, supervision, risk assessment, staffing, programme design and commissioner discussions. Serious incidents and repeated patterns will trigger earlier review rather than waiting for the annual policy cycle.

21. Complaints and learner voice

Learners and parents/carers will be told, in an accessible way, how to raise a concern or complaint and will not be disadvantaged for doing so. A learner may ask for support from a trusted adult or advocate. Complaints will be handled under the DNA Education Complaints Policy. Safeguarding concerns will be referred immediately and will not wait for the completion of a complaint process.

22. Training and staff support

Induction and refresher training will be proportionate to role and may cover trauma-aware practice, relational approaches, de-escalation, ALN, communication, equality, safeguarding, restorative work, incident recording, lone working and restrictive practice. Staff involved in a serious incident will receive management support, an opportunity for reflective debrief and referral to further wellbeing support where appropriate. Debriefing must focus on learning and must not replace formal safeguarding, disciplinary or investigation processes.

23. Related DNA Education policies and procedures

Safeguarding Policy and Safeguarding Procedures / Staff Handbook

Anti-Bullying Policy

Equality, Diversity and Inclusion Policy

Additional Learning Needs procedures

Attendance and Children Missing Education Procedure

Online Safety / Acceptable Use Policy

Physical Intervention / Restrictive Practice Policy

Staff Code of Conduct / Professional Boundaries Policy

Health and Safety Policy and Risk Assessment Procedures

Lone Working Policy

Educational Visits / Off-Site Activities Policy

Complaints Policy

Data Protection / Privacy Policy

First Aid / Medical Needs Policy

24. Review

This policy will be reviewed at least annually and sooner following a significant incident, complaint, safeguarding review, change in law or Welsh guidance, commissioning requirement, evidence of disproportionate impact or an identified weakness in practice. Amendments will be communicated to relevant staff and incorporated into training and learner-facing information.

Appendix A – Staff incident checklist

Make the situation safe and obtain emergency or medical help if required.

Use calm, least-restrictive de-escalation and follow the learner's plan.

Inform the DSP/Deputy DSP promptly.

Check wellbeing and injury for everyone affected.

Record objective facts, staff actions, notifications and the learner's voice.

Complete any separate accident, safeguarding or restrictive-practice record.

Inform parent/carer and commissioner as required, observing confidentiality.

Plan restoration, reintegration and support; update plans and risk assessments.

Arrange staff support and management review where appropriate.

Appendix B – Useful Welsh guidance

Welsh Government, Reducing Restrictive Practices Framework: <https://www.gov.wales/reducing-restrictive-practices-framework-html>

Welsh Government, Challenging bullying and harassment: <https://www.gov.wales/challenging-bullying-and-harassment-html>

Welsh Government, Exclusion from schools and pupil referral units: <https://www.gov.wales/exclusion-schools-and-pupil-referral-units-pru>

Welsh Government, Additional Learning Needs Code for Wales 2021: <https://www.gov.wales/additional-learning-needs-code>

Links and guidance status should be checked at each policy review. This policy should be read alongside the applicable commissioning agreement and local safeguarding arrangements.

5. Anti-Bullying Policy

Purpose

To prevent and respond effectively to bullying so that learners can participate in DNA Education provision safely and with dignity.

Application

This policy applies to DNA Education activity in Wales and to all relevant staff, contractors and volunteers unless a section states otherwise. It should be applied proportionately to the learner, setting and commissioned service.

Definition

Bullying may be physical, verbal, relational, sexual, discriminatory, prejudicial or online. It may involve repeated behaviour or a serious incident involving an imbalance of power or significant harm.

Prevention

DNA Education will set clear expectations, promote respectful relationships and inclusion, teach safe online behaviour where relevant, challenge prejudicial language and provide accessible ways for learners to report concerns.

Reporting

Learners may report bullying to any trusted member of DNA Education staff. Parents/carers and professionals may also report concerns. All reports will be taken seriously.

Response

- Ensure immediate safety.
- Listen to the learner without blame.
- Record the facts and preserve relevant evidence.
- Inform the DSP where there is a safeguarding element.
- Speak to those involved separately and fairly.
- Agree proportionate support and action.
- Inform parents/carers and commissioners where appropriate.
- Monitor for recurrence or retaliation.

Discriminatory bullying

Bullying related to protected characteristics, Welsh language, disability, ALN or other identity factors will be addressed under this policy and the Equality, Diversity and Inclusion Policy.

Online bullying

Online incidents connected to learners or DNA Education provision will be managed under this policy and the Online Safety / Acceptable Use Policy.

Recording, escalation and review

Relevant decisions, concerns and incidents must be recorded accurately and stored securely. Safeguarding concerns must be escalated under the DNA Education Safeguarding & Child Protection Policy. This policy will be reviewed at least annually and after significant incidents, legal/guidance changes or identified weaknesses.

6. Online Safety / Acceptable Use Policy

Purpose

To enable safe, lawful and responsible use of technology, online services and digital communication within DNA Education.

Application

This policy applies to DNA Education activity in Wales and to all relevant staff, contractors and volunteers unless a section states otherwise. It should be applied proportionately to the learner, setting and commissioned service.

Acceptable use

- Use devices, accounts and networks for legitimate educational/business purposes.
- Keep passwords and authentication details secure.
- Use only authorised software and services.
- Respect copyright, confidentiality and privacy.
- Report suspicious, harmful, illegal or inappropriate material promptly.

Prohibited use

- Bullying, harassment, threats or discriminatory abuse.
- Accessing, creating or distributing illegal or grossly inappropriate content.
- Attempting to bypass security controls or gain unauthorised access.
- Sharing confidential learner or staff information without lawful authority.
- Impersonating others or using technology for fraud or exploitation.

Staff–learner communication

Staff should use approved professional channels. Personal social-media accounts should not be used to connect with learners. Any exceptional use of messaging must be necessary, authorised, transparent and consistent with safeguarding and professional-boundary requirements.

Images and recordings

Images or recordings of learners may only be created, stored or shared for an authorised purpose and in accordance with consent, safeguarding and data-protection arrangements.

Online safeguarding

Concerns about grooming, exploitation, harmful sexual behaviour, cyberbullying, extremist content, self-harm content, coercion or inappropriate contact must be reported immediately to the DSP.

Monitoring and security

DNA Education may apply proportionate monitoring, filtering, access controls and audit measures to organisational systems where lawful and necessary.

Personal devices

Where personal devices are authorised for work, staff remain responsible for confidentiality, security, secure storage and prompt reporting of loss or compromise.

Recording, escalation and review

Relevant decisions, concerns and incidents must be recorded accurately and stored securely. Safeguarding concerns must be escalated under the DNA Education Safeguarding & Child Protection Policy. This policy will be reviewed at least annually and after significant incidents, legal/guidance changes or identified weaknesses.

7. Attendance and Children Missing Education Procedure

Purpose

To promote regular participation, identify unexplained absence quickly and ensure concerns about children missing education are escalated appropriately across Wales.

Application

This policy applies to DNA Education activity in Wales and to all relevant staff, contractors and volunteers unless a section states otherwise. It should be applied proportionately to the learner, setting and commissioned service.

Attendance records

DNA Education will accurately record attendance for every planned session, including arrival/departure where relevant, non-attendance and known reasons.

Unexpected absence

Where a learner does not attend as expected, staff will follow the learner-specific and commissioning arrangements for contacting parents/carers, schools or local authorities. Staff must not assume that unexplained absence is harmless.

Escalation

Repeated absence, persistent lateness, unexplained non-attendance, sudden disengagement or inability to establish a learner's whereabouts must be escalated to the relevant manager and commissioner. Safeguarding concerns must be referred to the DSP.

Children Missing Education

DNA Education operates across Welsh local authorities. Where a learner may be missing education, DNA Education will work with the commissioning school/local authority and follow the Children Missing Education arrangements of the relevant Welsh local authority.

Immediate risk

If there is reason to believe a child is missing and at immediate risk of significant harm, staff must contact police/emergency services and the relevant safeguarding service without delay.

Information sharing

Attendance information will be shared with schools, local authorities, parents/carers and professionals where lawful, necessary and consistent with commissioning arrangements.

Re-engagement

DNA Education will work collaboratively to understand barriers to attendance and support re-engagement, including consideration of ALN, anxiety, transport, safeguarding, family circumstances and the suitability of the programme.

Recording, escalation and review

Relevant decisions, concerns and incidents must be recorded accurately and stored securely. Safeguarding concerns must be escalated under the DNA Education Safeguarding & Child Protection Policy. This policy will be reviewed at least annually and after significant incidents, legal/guidance changes or identified weaknesses.

8. Health and Safety Policy

Purpose

To protect the health, safety and welfare of learners, staff, visitors and others affected by DNA Education activities.

Application

This policy applies to DNA Education activity in Wales and to all relevant staff, contractors and volunteers unless a section states otherwise. It should be applied proportionately to the learner, setting and commissioned service.

Responsibilities

DNA Education leadership will provide suitable arrangements, risk assessments, information, training and resources. All workers must take reasonable care of themselves and others, follow instructions and report hazards or defects.

Risk assessment

Premises, activities, equipment, travel, off-site work and individual learner needs will be risk assessed as appropriate. Controls must be implemented before activities proceed.

Premises and equipment

Learning environments must be suitable, accessible where required, maintained and free from avoidable hazards. Equipment must be appropriate, maintained and used by competent people.

Fire and emergencies

Relevant sites will have arrangements for evacuation, fire, lockdown/serious incident response and contacting emergency services. Staff must familiarise themselves with site procedures.

Accidents and near misses

Accidents, injuries, dangerous occurrences and near misses must be reported promptly and recorded. DNA Education will consider whether statutory reporting requirements apply.

Violence and aggression

Risks of violence or aggression will be assessed and managed through staffing, environment, information sharing, de-escalation, lone-working controls and individual plans.

Training and review

Health and safety information and training will reflect staff roles. Arrangements will be reviewed following incidents, significant changes or identified weaknesses.

Recording, escalation and review

Relevant decisions, concerns and incidents must be recorded accurately and stored securely. Safeguarding concerns must be escalated under the DNA Education Safeguarding & Child Protection Policy. This policy will be reviewed at least annually and after significant incidents, legal/guidance changes or identified weaknesses.

9. Equality, Diversity and Inclusion Policy

Purpose

To ensure DNA Education provides fair, inclusive and respectful services across Wales and removes avoidable barriers to participation.

Application

This policy applies to DNA Education activity in Wales and to all relevant staff, contractors and volunteers unless a section states otherwise. It should be applied proportionately to the learner, setting and commissioned service.

Commitment

DNA Education will prevent unlawful discrimination, harassment and victimisation; promote equality of opportunity; value diversity; and foster respectful relationships.

Protected characteristics

DNA Education will act consistently with the Equality Act 2010 and consider the protected characteristics of age, disability, gender reassignment, marriage/civil partnership where relevant, pregnancy/maternity, race, religion or belief, sex and sexual orientation.

Reasonable adjustments

Reasonable adjustments will be considered for disabled learners and staff. Learning delivery will also consider ALN, communication needs, sensory needs and accessibility.

Welsh language and context

DNA Education works across Wales and respects Welsh language, culture and identity. Language preference and Welsh-medium needs will be considered in commissioning, communication and person-centred planning, subject to the service agreed and available provision.

Curriculum and practice

Materials, examples and activities should avoid stereotyping and should support dignity, inclusion and respect. Discriminatory language or behaviour will be challenged.

Recruitment and employment

Employment decisions will use fair, objective and role-relevant criteria.

Monitoring

DNA Education will review complaints, incidents, participation and feedback to identify potential barriers or patterns of inequality.

Recording, escalation and review

Relevant decisions, concerns and incidents must be recorded accurately and stored securely. Safeguarding concerns must be escalated under the DNA Education Safeguarding & Child Protection Policy. This policy will be reviewed at least annually and after significant incidents, legal/guidance changes or identified weaknesses.

10. Complaints Policy

Purpose

To provide an accessible, fair and timely process for concerns about DNA Education services.

Application

This policy applies to DNA Education activity in Wales and to all relevant staff, contractors and volunteers unless a section states otherwise. It should be applied proportionately to the learner, setting and commissioned service.

Who may complain

Learners, parents/carers, commissioners, partner organisations and other people directly affected by DNA Education services may raise concerns or complaints.

Stage 1 – informal resolution

Where appropriate, concerns should first be raised with the member of staff or manager responsible. DNA Education will seek prompt, practical resolution.

Stage 2 – formal complaint

If unresolved or serious, a complaint may be submitted in writing to DNA Education. It should describe the issue, relevant dates/evidence and desired outcome where known. Reasonable support will be offered where a complainant cannot easily make a written complaint.

Investigation and response

A person with appropriate independence will consider the complaint, gather relevant information and provide a reasoned outcome within a reasonable timeframe. Where delay is unavoidable, the complainant will be updated.

Safeguarding complaints

Safeguarding allegations take priority over the complaints process. DNA Education will not investigate in a way that compromises a child-protection or police investigation.

Commissioned provision

Where services are commissioned by a Welsh local authority or school, DNA Education will cooperate with applicable contractual or commissioner complaint/escalation routes.

Fairness

No learner should be disadvantaged for making a complaint in good faith. Vexatious or abusive behaviour may be managed proportionately without preventing legitimate safeguarding concerns from being heard.

Learning

Complaints and outcomes will be recorded and reviewed for service improvement.

Recording, escalation and review

Relevant decisions, concerns and incidents must be recorded accurately and stored securely. Safeguarding concerns must be escalated under the DNA Education Safeguarding & Child Protection Policy. This policy will be reviewed at least annually and after significant incidents, legal/guidance changes or identified weaknesses.

11. Data Protection / Privacy Policy

Purpose

To ensure DNA Education handles personal information lawfully, fairly, transparently and securely.

Application

This policy applies to DNA Education activity in Wales and to all relevant staff, contractors and volunteers unless a section states otherwise. It should be applied proportionately to the learner, setting and commissioned service.

Legal framework

DNA Education will comply with applicable UK data-protection law, including the UK GDPR and Data Protection Act 2018.

Data-protection principles

Personal data will be processed lawfully, fairly and transparently; collected for specified purposes; limited to what is necessary; kept accurate; retained no longer than necessary; and protected with appropriate security.

Lawful bases

DNA Education will identify an appropriate lawful basis for each processing activity and an additional condition where special-category or criminal-offence data is processed. Consent will only be relied upon where it is genuinely appropriate.

Safeguarding information

Safeguarding information may be shared without consent where lawful and necessary to protect a child or another person. Staff must never promise absolute confidentiality to a learner.

Information sharing

Information will be shared with schools, Welsh local authorities, health services, safeguarding bodies and other partners only where there is a lawful and proportionate basis.

Security

Access controls, secure storage, strong authentication, secure transfer and appropriate disposal will be used according to risk. Staff must not use insecure personal systems for confidential data unless expressly authorised.

Data breaches

Loss, accidental disclosure, unauthorised access or other suspected personal-data breaches must be reported immediately to the person responsible for data protection so that risk and any notification duties can be assessed.

Individual rights

DNA Education will facilitate applicable rights of access, rectification, erasure, restriction, objection and other rights, subject to lawful exemptions.

Privacy notices and retention

Appropriate privacy information and retention arrangements will be maintained for learners, families, staff and other data subjects.

Recording, escalation and review

Relevant decisions, concerns and incidents must be recorded accurately and stored securely. Safeguarding concerns must be escalated under the DNA Education Safeguarding & Child Protection Policy. This policy will be reviewed at least annually and after significant incidents, legal/guidance changes or identified weaknesses.

12. First Aid / Medical Needs Policy

Purpose

To ensure reasonable arrangements are in place for first aid, medical needs and medication during DNA Education provision.

Application

This policy applies to DNA Education activity in Wales and to all relevant staff, contractors and volunteers unless a section states otherwise. It should be applied proportionately to the learner, setting and commissioned service.

Medical information

Relevant medical, allergy and emergency information should be obtained before provision begins where necessary for safe delivery and updated when circumstances change.

Individual arrangements

Where a learner has significant or complex medical needs, DNA Education will work with parents/carers, the commissioner and relevant health professionals to understand the learner's plan and determine what DNA Education can safely provide.

First aid

Appropriately trained staff will provide first aid within the limits of their training. Emergency services will be called when necessary.

Medication

DNA Education staff will only administer medication where this is agreed, lawful, within competence, supported by clear written instructions/consent and subject to safe storage and recording arrangements. Staff will not make unauthorised changes to dosage.

Emergency medication

Where learners require emergency medication such as an adrenaline auto-injector or prescribed rescue medication, arrangements must be clear, accessible and supported by appropriate training.

Accidents and illness

Significant accidents, injuries or illness will be recorded and communicated to parents/carers and commissioners as appropriate. Safeguarding concerns arising from injuries or medical presentation must be referred to the DSP.

Infection and hygiene

Reasonable infection-control and hygiene measures will be followed, with additional measures introduced where public-health advice or individual risk requires them.

Recording, escalation and review

Relevant decisions, concerns and incidents must be recorded accurately and stored securely. Safeguarding concerns must be escalated under the DNA Education Safeguarding & Child Protection Policy. This policy will be reviewed at least annually and after significant incidents, legal/guidance changes or identified weaknesses.

13. ALN / Additional Learning Needs Policy

Purpose

To ensure DNA Education supports learners with additional learning needs through person-centred, inclusive practice consistent with the Welsh ALN system.

Application

This policy applies to DNA Education activity in Wales and to all relevant staff, contractors and volunteers unless a section states otherwise. It should be applied proportionately to the learner, setting and commissioned service.

Welsh framework

DNA Education will work consistently with the Additional Learning Needs and Education Tribunal (Wales) Act 2018, the Additional Learning Needs Code for Wales 2021 and relevant Welsh Government guidance, including guidance concerning education otherwise than at school (EOTAS) where applicable.

Principles

- Learners should be involved in decisions affecting them.
- Parents/carers should be meaningfully involved where appropriate.
- Support should be person-centred, strengths-based and focused on removing barriers to learning.
- Welsh or English language needs should be considered.
- Provision should be coordinated with schools, local authorities and relevant professionals.

Identifying needs

DNA Education staff will observe and record barriers to learning and share concerns through agreed routes. DNA Education will not diagnose ALN unless a suitably qualified professional is acting within an appropriate role.

Individual Development Plans (IDPs)

Where a learner has an IDP, DNA Education will understand the elements relevant to its commissioned role and support agreed additional learning provision within its competence and contract. DNA Education will contribute information to reviews when requested and appropriate.

Reasonable adjustments and teaching

Teaching, mentoring and activities will be adapted where reasonably possible, including pace, communication, environment, sensory demands, resources and methods of demonstrating learning.

EOTAS / Alternative Provision

Where DNA Education forms part of EOTAS or an alternative education package, responsibilities will be agreed clearly with the maintaining local authority/school. DNA Education will provide information required to review suitability, progress, attendance and support.

Transition and review

Changes in need, placement, risk or progress will be shared with the commissioner so that provision and the learner's plan can be reviewed.

Recording, escalation and review

Relevant decisions, concerns and incidents must be recorded accurately and stored securely. Safeguarding concerns must be escalated under the DNA Education Safeguarding & Child Protection Policy. This policy will be reviewed at least annually and after significant incidents, legal/guidance changes or identified weaknesses.

14. Risk Assessment Procedures

Purpose

To provide a consistent method for identifying and controlling risks in DNA Education activities.

Application

This policy applies to DNA Education activity in Wales and to all relevant staff, contractors and volunteers unless a section states otherwise. It should be applied proportionately to the learner, setting and commissioned service.

When required

Risk assessment will be proportionate to the activity and may cover premises, equipment, educational visits, travel, lone working, sports/practical activities, individual learners, behaviour, medical needs and safeguarding-related environmental risks.

Five-step process

- Identify hazards.
- Identify who could be harmed and how.
- Evaluate likelihood/severity and select controls.
- Record significant findings and implement controls.
- Review and revise when necessary.

Hierarchy of control

Where practicable, eliminate the hazard first. If it cannot be eliminated, reduce exposure through substitution, environmental/engineering controls, procedures, supervision, training and appropriate equipment.

Individual learner risk

Assessments should be informed by relevant information from the learner, family, school/local authority and professionals, while avoiding discriminatory assumptions. ALN, medical needs, behaviour, communication and known safeguarding factors should be considered.

Dynamic assessment

Staff must continually observe changing circumstances. If risk becomes unacceptable, the activity must be adapted, paused or stopped and additional support sought.

Recording and review

Significant assessments will identify the activity, hazards, controls, responsible person and review trigger/date. Reviews are required after significant incidents, material changes or new information.

Recording, escalation and review

Relevant decisions, concerns and incidents must be recorded accurately and stored securely. Safeguarding concerns must be escalated under the DNA Education Safeguarding & Child Protection Policy. This policy will be reviewed at least annually and after significant incidents, legal/guidance changes or identified weaknesses.

15. Lone Working Policy

Purpose

To protect staff and learners when DNA Education work is delivered by one member of staff without immediate support from colleagues.

Application

This policy applies to DNA Education activity in Wales and to all relevant staff, contractors and volunteers unless a section states otherwise. It should be applied proportionately to the learner, setting and commissioned service.

Planning

Lone working must be suitable for the learner, activity and environment. Managers will consider safeguarding history, behaviour, location, travel, communication, medical needs, staff competence and emergency response.

Minimum controls

- Staff must know who is aware of their location and expected finish time.
- A reliable means of communication must be available.
- Check-in arrangements will be used where risk indicates.
- Sessions should take place in suitable, professional environments.
- Staff must know emergency and escalation contacts.
- Higher-risk circumstances may require two staff or a different venue.

Home/community visits

Where work occurs in homes or community settings, staff should consider other occupants, pets, access/exit, known risks, privacy, travel and whether the environment allows safe professional practice.

Professional boundaries

Being alone with a learner does not reduce professional-boundary requirements. Staff should maximise transparency and accountability and avoid unnecessary secrecy or isolation.

Failure to check in

Missed check-ins or inability to contact a lone worker will trigger the agreed escalation process, which may include contacting the worker, venue, emergency contact or emergency services according to risk.

Right to withdraw

Staff may leave or stop an activity where they reasonably believe there is an imminent risk to safety and should report the circumstances promptly.

Review

Lone-working arrangements will be reviewed when the learner, venue, activity or risk profile changes or following an incident.

Recording, escalation and review

Relevant decisions, concerns and incidents must be recorded accurately and stored securely. Safeguarding concerns must be escalated under the DNA Education Safeguarding & Child Protection Policy. This policy will be reviewed at least annually and after significant incidents, legal/guidance changes or identified weaknesses.

16. Educational Visits / Off-Site Activities Policy

Purpose

To ensure educational visits, community learning, sport and other off-site activities are purposeful, inclusive and safely managed.

Application

This policy applies to DNA Education activity in Wales and to all relevant staff, contractors and volunteers unless a section states otherwise. It should be applied proportionately to the learner, setting and commissioned service.

Approval and purpose

Visits must have a clear educational/developmental purpose and appropriate internal approval. Responsibilities between DNA Education and any commissioning school/local authority must be clear.

Planning

Planning will consider venue, transport, staffing, learner needs, medical information, safeguarding, accessibility, weather, equipment, insurance, communication and emergency arrangements.

Risk assessment

A proportionate risk assessment must be completed. Higher-risk or specialist activities require suitable competence, provider assurance and additional controls.

Supervision

Staffing and supervision must reflect learner age, maturity, ALN, behaviour, activity, environment and identified risk rather than relying only on a fixed ratio.

Consent and information

Appropriate consent and essential information will be obtained in accordance with commissioning arrangements. Learners should receive clear expectations and safety information.

Welsh context

DNA Education will have regard to relevant Welsh Government educational visit guidance and recognised national good-practice resources, including OEAP guidance where appropriate.

Emergency arrangements

The visit leader must know how to contact DNA Education and emergency services and have necessary learner information available securely. Missing learner, serious injury and safeguarding procedures must be understood.

Review

Significant incidents, near misses and feedback will be recorded and used to improve future visits.

Recording, escalation and review

Relevant decisions, concerns and incidents must be recorded accurately and stored securely. Safeguarding concerns must be escalated under the DNA Education Safeguarding & Child Protection Policy. This policy will be reviewed at least annually and after significant incidents, legal/guidance changes or identified weaknesses.

17. Physical Intervention / Restrictive Practice Policy

Purpose

To minimise restrictive practices and ensure any unavoidable intervention is lawful, necessary, proportionate, person-centred and consistent with Welsh guidance.

Application

This policy applies to DNA Education activity in Wales and to all relevant staff, contractors and volunteers unless a section states otherwise. It should be applied proportionately to the learner, setting and commissioned service.

Welsh framework

DNA Education will work in accordance with the Welsh Government Reducing Restrictive Practices Framework and safeguarding guidance. The organisation's objective is to prevent and reduce restrictive practice and protect human rights, dignity and wellbeing.

Core principle

Restrictive practice must only be considered as a last resort to prevent harm where less restrictive approaches are insufficient. It must never be used as punishment, retaliation, humiliation, convenience, coercion for compliance or as a substitute for adequate staffing and support.

Prevention and de-escalation

Positive relationships, person-centred planning, understanding triggers, communication support, environmental adjustments, predictable routines, choice, reassurance and de-escalation will be prioritised.

Planned interventions

Where foreseeable risk indicates that restrictive intervention might be required, the learner's plan/risk assessment should identify prevention strategies, authorised responses, staff competence, communication with parents/carers and commissioner oversight.

Physical intervention

Only staff with appropriate training and competence may use planned physical intervention techniques. Any intervention must use the least restrictive option for the shortest necessary period and stop as soon as the immediate risk has passed.

Emergency/unplanned situations

In an unforeseen emergency, staff must act within the law and their competence to protect people from immediate harm, using no more force/restriction than is necessary and proportionate.

Prohibited approaches

Pain-inducing, degrading, punitive or dangerous practices are prohibited. Any indication that restrictive practice has been used inappropriately must be treated as a safeguarding concern.

Aftercare and recording

After an incident, the learner and staff should be checked for injury or distress and medical assistance obtained if required. The incident must be recorded promptly, including antecedents, de-escalation attempted, nature/duration of intervention, injuries, outcome and people informed.

Notification and safeguarding

The DSP/Deputy DSP must be informed. Parents/carers and commissioners will be notified in line with agreed arrangements. Safeguarding referrals will be made where there is concern about inappropriate practice, injury, abuse or significant harm.

Debrief and review

The learner should have an age- and communication-appropriate opportunity to be heard. Staff should debrief. The risk assessment/support plan must be reviewed, particularly after unplanned intervention or repeated incidents.

Training and governance

DNA Education will monitor incidents, patterns and training needs and will seek to reduce restrictive practices over time.

Recording, escalation and review

Relevant decisions, concerns and incidents must be recorded accurately and stored securely. Safeguarding concerns must be escalated under the DNA Education Safeguarding & Child Protection Policy. This policy will be reviewed at least annually and after significant incidents, legal/guidance changes or identified weaknesses.

Appendix A – Policy Implementation Checklist

- Insert DSL and deputy/management contact details.
- Maintain a current contact route for safeguarding referrals for every Welsh local authority in which DNA Education is operating.
- Issue relevant policies to staff and obtain confirmation of understanding.
- Complete role-appropriate safeguarding, first aid, health and safety, lone-working and restrictive-practice training.
- Maintain required recruitment/vetting records.
- Create standard forms for incidents, concerns, risk assessments, medication, complaints and restrictive-practice records.
- Review commissioner-specific requirements before each placement begins.
- Review the handbook at least annually and minute/record formal approval.

Appendix B – External Guidance Links

Welsh Government safeguarding guidance: <https://www.gov.wales/safeguarding-guidance>

Welsh Government ALN guidance for schools and local authorities: <https://www.gov.wales/additional-learning-needs-guidance-schools-and-local-authorities>

Welsh Government ALN legislative framework: <https://www.gov.wales/additional-learning-needs-legislative-framework>

Welsh Government reducing restrictive practices guidance: <https://www.gov.wales/reducing-restrictive-practices-children-and-adults>

Wales Safeguarding Procedures: <https://www.safeguarding.wales/>