

Lockdown, Shelter-in-place and Invacuation Policy

Lockdown, shelter-in-place and invacuation policy: document provenance

Approver	Trust board
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Policy authors	School and college trust leaders Estates centre of excellence Safeguarding leads
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Date of next review	May 2027
Summary of changes in this review	<ul style="list-style-type: none">• The policy has been rewritten in order to apply consistency across our trust with regards to fire evacuation plans and procedures. This was previously maintained locally but will now be supplemented by this trust wide policy.
Related policies and documents	<ul style="list-style-type: none">• Health and safety policy• Child protection and safeguarding policy• Risk management policy• Business continuity framework• Fire safety and evacuation policy• Please refer to section three for details of key relevant legislation

Unless there are legislative or regulatory changes in the interim, the policy will be reviewed as per the review cycle. Should no substantive change be required at this point, the policy will move to the next review cycle.



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1.0 Policy statement

- 1.1 Dixons Academies Trust (our trust) is committed to ensuring the health and safety of students, staff and visitors whilst they are on our premises. Our lockdown, shelter-in-place and invacuation policy applies to all aspects of these processes and procedures at all of our trust sites.

2.0 Scope and purpose

- 2.1 The purpose of this policy is to ensure the safety of all students, staff and visitors within our premises by establishing a clear and consistent, and legally compliant approach to lockdown, shelter-in-place and invacuation.
- 2.2 The policy supports compliance with statutory duties including the Education and Training (Welfare of Children) Act 2021 and forthcoming Protect Duty (referred to throughout as Martyn's Law), while aligning with national guidance to promote a safe, prepared, and resilient learning environment.
- 2.3 The welfare of our staff, students and visitors is paramount, and we are committed to having in place procedures that will support informed and sensitive management of procedures.
- 2.4 This policy applies to all our trust schools, colleges and premises, including those operated under Private Finance Initiative (PFI) contracts. It encompasses all permanent and temporary occupants of trust premises, including:
- students (EYFS, primary, secondary, post-16)
 - all staff including teaching and associate staff as well as staff employed via third party arrangements
 - visitors, volunteers, and contractors
 - external providers operating on school grounds
 - any other persons known to be on site
- 2.5 The policy covers all aspects of lockdown, shelter-in-place and invacuations including planning, roles and responsibilities, training, drills, personal emergency evacuation plans (PEEPs), communication protocols and post-incident review procedures.
- 2.6 The policy applies during normal operating hours and any time the site is occupied for relevant activities, including lettings, extracurricular events, and holiday provision.
- 2.7 This policy does not include information about fire safety and evacuation as these are detailed in a separate policy.
- 2.8 The lockdown, shelter-in-place and invacuations policy is guided by the following principles:
- safety first: the welfare and protection of students, staff, and visitors is the highest priority in any emergency
 - clarity and consistency: all procedures must be clearly understood, consistently applied across all academies, and regularly reviewed to maintain readiness
 - inclusivity safeguarding: emergency protocols must account for the diverse needs of the school community, including those with SEND, vulnerabilities, and protected characteristics, in line with the Equality Act 2010
 - preparedness through training: staff and students are entitled to regular training, drills, and communication that ensure confidence and competence in responding to emergencies
 - proportionate and contextual response: each academy must tailor its procedures to its site-specific risks, age phases, and community context, while adhering to trust-wide standards
 - legal compliance: aligns with legislation and guidance, including Martyn's Law
 - site-level ownership with trust oversight: combines strong site-based responsibility (led by principals and facilities managers) with strategic governance and auditing by our trust's estates and health & safety team
 - reflective improvement: learning from drills, incidents, and staff / student feedback is essential to strengthening policy effectiveness and fostering a culture of continuous improvement

3.0 Legal and statutory framework

- 3.1 Dixons is committed to ensuring the highest standards of emergency preparedness across all schools in the trust. This section sets out the legislative requirements, core statutory guidance, and best-practice documents that inform our lockdown, shelter-in-place and invacuation procedures. It ensures consistency with national regulations, Department for



Education (DfE) expectations, and the inspection frameworks of Ofsted and other statutory bodies.

3.2 Key statutory instruments

3.3 This policy is underpinned by the following primary legislation, which places legal duties on schools and academies to safeguard the health, safety, and wellbeing of students and staff:

- Children Act 1989 and Children Act 2004
- Education and Training (Welfare of Children) Act 2021
- Civil Contingencies Act 2004
- Health and Safety at Work etc. Act 1974
- The Management of Health and Safety at Work Regulations 1999
- Equality Act 2010
- The Education (Independent School Standards) Regulations 2014
- Martyn's Law – passed in April 2025, with full enforcement expected by April 2027

3.4 These instruments form the legal basis for our trust's responsibilities in emergency planning, safeguarding, risk management, and inclusive practice.

3.5 Core statutory guidance

3.6 Implementation of this policy reflects the following key statutory and government-issued guidance:

- Keeping Children Safe in Education
- Working Together to Safeguard Children
- EYFS Statutory Framework
- Emergency Planning and Response for Education, Childcare and Children's Social Care Settings
- Prevent Duty Guidance
- Run, Hide, Tell Guidance (NaCTSO)
- Developing Dynamic Lockdown Procedures (NaCTSO)

3.7 These documents inform the design and operational delivery of procedures across all academies.

3.8 Compliance with legislation and inspection frameworks

3.9 Our trust ensures full compliance with statutory safeguarding and health and safety obligations through:

- alignment with Ofsted's Education Inspection Framework and FE and Skills Inspection Framework
- ongoing review of site-specific risk assessments and emergency plans in accordance with HSE guidance (Managing Health and Safety in Schools – HSG268)
- proactive preparation for full compliance with Martyn's Law, including the designation of 'responsible persons' and implementation of counter-terrorism measures
- inclusion and accessibility planning in accordance with the Equality Act 2010, ensuring all students including those with SEND or protected characteristics are safeguarded during emergencies
- monitoring and reporting via SmartLog and internal audit processes led by our trust's health & safety team
- maintaining a clear governance and assurance framework to meet legal expectations and respond to inspection bodies

3.10 Each school or college maintains a current, reviewed lockdown, shelter-in-place and invacuation plan, centrally recorded and monitored by our estates centre of excellence team.

3.11 Drills, staff training and alarm system maintenance are conducted in line with legal and recommended timelines, with evidence logs maintained at local and trust level.

3.12 A central compliance dashboard is used to track actions, training completions and site safety reviews across our trust.

3.13 PFI-specific guidance and contractual compliance

3.14 Where lockdown, shelter-in-place and invacuation responsibilities are shared with a PFI (Private Finance Initiative) provider, our trust applies additional standards to ensure statutory compliance is not compromised by third-party arrangements.



4.0 Roles and responsibilities

4.1 Effective implementation of lockdown, shelter-in-place and invacuation procedures relies on clearly defined roles and responsibilities at every level of our trust and its academies. All stakeholders have a part to play in maintaining a culture of preparedness, safety, and coordinated response.

4.2 Trust board and school and college trust leaders

- Approve and oversee our trust-wide policy for lockdown, shelter-in-place and invacuation.
- Ensure compliance with statutory requirements, including the Education and Training (Welfare of Children) Act 2021 and Martyn's Law.
- Provide strategic direction and resource allocation to support training, risk assessment, and system readiness.
- Monitor implementation and impact through regular reports from our trust health & safety team.
- Ensure inclusion and safeguarding principles are embedded across all emergency planning.
- Oversee all external communication in relation to an incident.

4.3 Principal and senior leadership teams

- Lead local implementation of our trust policy, ensuring it is adapted to site-specific risks and reviewed annually.
- Liaise closely with the designated safeguarding lead and SENCO to ensure that plans are in place which meet the needs of all students, including writing individual student plans where required.
- Appoint a major incident coordinator and a designated 'responsible person' for compliance with Martyn's Law.
- Maintain active liaison with emergency services and the local resilience forum.
- Lead termly drills, ensure staff training is completed, and oversee post-incident debriefs.
- Coordinate emergency responses and ensure effective communication during incidents.

4.4 Estates centre of excellence

- Review and quality-assure site-level plans
- Provide guidance and training resources based on legal, statutory and other DfE guidance
- Maintain oversight of site compliance and responding to inspections

4.5 Estate teams

- Ensure all physical site security measures (e.g. locks, access controls, alarms) are functional and maintained.
- Support lockdown, shelter-in-place and invacuation activations by securing access points and assisting with movement to safe zones.
- Escort contractors to designated safe areas during incidents, if safe to do so.
- Maintain emergency equipment (e.g. radios, megaphones, signage) and report any faults promptly.
- Liaise with reception to ensure visitor and contractor protocols are followed.

4.6 Teaching and associate staff

- Follow all lockdown, shelter-in-place and invacuation procedures calmly and effectively.
- Maintain supervision and reassurance of students during drills and real incidents.
- Participate in annual training and provide feedback following drills.
- Account for all students via registers or headcounts and report concerns immediately.
- To be familiar with and follow the individual plans in place for students with SEND or vulnerabilities.

4.7 Students

- Follow staff instructions promptly during any lockdown, shelter-in-place or invacuation.
- Remain calm and move to designated safe areas without delay.
- Avoid using mobile phones or communicating externally unless instructed.
- Report any safety concerns or missing peers to staff discreetly.
- Participate in drills and understand their role in keeping the school community safe.



4.8 Visitors, contractors and volunteers

- In line with Management of Health and Safety at Work Regulations 1999, all non-permanent occupants must sign in upon arrival and receive the site specific induction pack which includes fire safety instructions (including nearest exits and assembly point).
- All visitors are required to follow staff directions during an evacuation.
- If working on site as a contractor, visitors must be briefed by the facilities manager and comply with safe work protocols (including hot works permits and fire watch procedures where relevant).
- Reception staff are responsible for bringing the visitor sign-in log to the assembly point to verify accountability.

4.9 Parents / carers

- Support our trust's emergency procedures by ensuring students understand the importance of lockdown, shelter-in-place and evacuation drills.
- Avoid contacting or collecting children during a live incident unless instructed by the principal or major incident coordinator.
- Review and respond to post-incident communications from the academy.
- Inform the academy of any concerns they have regarding their child during drills or emergencies.
- Reinforce key messages at home where requested, supporting their child to understand in line with their development and any individual or contextual factors.

4.10 Local resilience forum (LRF) and emergency services liaison

- Support in the coordination and implementation of academy lockdown, shelter-in-place and evacuation plans.
- Act on intelligence and guidance provided by counterterrorism or safeguarding partners (e.g. Prevent, police, children's social care).
- Collaborate in post-incident reviews to improve future preparedness.

4.11 PFI schools and colleges: roles, responsibilities, and legal interface

4.12 In schools or colleges operating under a Private Finance Initiative (PFI) contract, lockdown, shelter-in-place and evacuation safety responsibilities are shared between the school or college and the PFI Facilities Management (FM) provider, as outlined in the project agreement and FM contract. However, under the Regulatory Reform (Fire Safety) Order 2005, the principal remains the statutory responsible person for the site.

4.13 Principal (site responsible person)

4.14 The principal has operational responsibility for ensuring safety in their school or college. Duties include:

- ensuring drills are conducted in line with agreed timetables and after any significant change in occupancy or structure
- verifying that personal emergency evacuation plans (PEEPs) are in place and communicated
- leading post-drill reviews and ensuring lessons learned are addressed
- performing and recording safety once a cycle
- ensuring all staff and visitors have read and understand the induction pack

4.15 PFI FM provider responsibilities:

- Maintain lockdown systems in line with statutory testing and servicing requirements.
- Provide documented evidence of compliance, maintenance logs, and action plans upon request.

4.16 Academy responsibilities:

- Monitor resolution of high-risk findings and escalate delays through formal PFI contract governance routes.
- Ensure FM provider performance is regularly reviewed for compliance and inspection readiness.

4.17 Trust oversight:

- Our trust maintains audit and intervention rights under the PFI contract governance structure.
- Where legal compliance is at risk, our trust may escalate to the Local Authority, DfE, or Fire and Rescue Service, as appropriate.
- PFI schools or colleges are held to the same compliance expectations as non-PFI academies, with risks tracked via our trust's central compliance dashboard.



5.0 Definitions and types of emergency procedures

5.1 To ensure a consistent understanding across all academies, the following terms are used to describe different emergency procedures. Each type has a distinct purpose and sets of actions, depending on the nature and location of the threat.

5.2 What is a lockdown?

5.3 Lockdown is an immediate, site-wide response to a direct or imminent threat on or close to the school premises (e.g. intruder, armed individual, violent incident). This may include incidents such as external suspicious packages or devices where it is safer to lockdown than to evacuate. It involves securing people in safe locations, locking doors, and stopping movement throughout the site to protect life and prevent harm. All internal communication is controlled by the principal or major incident coordinator until the all-clear is given.

5.4 What is a shelter-in-place procedure?

5.5 Shelter-in-place refers to remaining indoors in a safe location when there is a hazard that does not require movement (e.g. poor air quality, chemical fumes, severe weather). This may include closing windows, sealing ventilation, or moving to specific internal zones. It differs from lockdown in that it is not driven by a security threat but by environmental safety.

5.6 What is an invacuation?

5.7 Invacuation is the controlled movement of students, staff, and visitors from outdoor or external areas into a safe location inside the building in response to an external threat in the vicinity (e.g. police activity, chemical spill, or civil disturbance nearby). It is a precautionary procedure designed to reduce exposure to potential harm outside while maintaining normal operations as far as possible.

5.8 What is an evacuation?

5.9 Evacuation is the process of safely removing individuals from a building or premises in response to an internal threat or hazard. This may include bomb threats or alerts of suspicious packages or devices where it is safe to evacuate the building. Evacuation plans are covered in the fire safety and evacuation policy.

6.0 Lockdown, shelter-in-place and invacuation plans

6.1 A proactive approach to emergency planning is essential to ensure the safety of all individuals on site. Each academy within our trust must implement robust, site-specific risk assessments and plans that address a wide range of threats, account for individual needs, and promote inclusive safeguarding.

6.2 Frequency and site level responsibility

6.3 Each academy must complete a trust-approved plan for lockdown, shelter-in-place and invacuation procedures, led by the health and safety team and in consultation with the principal.

6.4 Our trust expectation is that the plans must be reviewed annually at a minimum and an interim review is triggered immediately following:

- any significant structural changes or refurbishments
- a relevant incident or near miss
- a change in use of space or building occupancy

6.5 The principal is the designated responsible person at the academy level. They must ensure the plan is completed and reviewed within the required timescales.

6.6 These plans must:

- identify safe zones, evacuation routes, and communication methods
- identify and assess credible threats relevant to the site and local area
- reflect the site's unique layout, staffing, and student profile
- be reviewed after significant changes, incidents, or drills
- be stored centrally and monitored via SmartLog for compliance and audit purposes

6.7 Early years and post-16 provisions must include tailored sub-assessments reflecting the needs and contexts of these settings.

6.8 The facilities team supports the process by ensuring:



- any urgent or high-risk issues are immediately addressed in collaboration with the facilities manager and trust estates team
- access for external assessors or competent internal personnel
- relevant building plans, maintenance records, and equipment logs are available

6.9 Safeguarding and welfare considerations

6.10 Emergency planning must prioritise the wellbeing and safeguarding of all students. This includes:

- ensuring drills are age-appropriate and take into account the needs and experience of the students
- minimising distress to students with anxiety, trauma history, or safeguarding concerns
- recording any adaptations for individuals to ensure all students can be safe in an emergency
- embedding post-incident wellbeing support, including access to counselling, opportunities for reflection, and staff debriefs

6.11 The Designated Safeguarding Lead (DSL) must be involved in reviewing procedures to ensure safeguarding risks are fully considered.

6.12 Inclusive provision for SEND and vulnerable learners

6.13 Lockdown, shelter-in-place and invacuation procedures must be accessible and appropriate for all students. Each academy must:

- identify students who may need additional support
- develop individual action plans (e.g. Personal Emergency Evacuation Plans (PEEPs)) outlining roles, safe zones, and communication strategies
- train staff in how to support students with SEND or other vulnerabilities during emergencies
- provide alternative or adapted drill participation for students where required, with rationale documented and reviewed

7.0 Lockdown, shelter-in-place and / or invacuation procedures

7.1 The following procedures will be used for all incidents requiring either lockdown, shelter-in-place or invacuation. Where procedures are specific to one of the three types if incident this is detailed.

7.2 Evacuation procedures are covered in the fire evacuation policy.

7.3 Decisions to lockdown, shelter-in-place or invacuate must always prioritise proportionality and be guided by the nature and proximity of the threat.

7.4 Triggers and examples of incidents

Procedure	Trigger	Response	Typical Location
Evacuation	Fire, gas leak, internal hazard	Exit the building and move to a designated external assembly point	Outside (e.g. school field)
Invacuation	External hazard near the site (e.g. police incident)	Move all individuals indoors and secure access points	Indoors (classrooms or safe zones)
Lockdown	Immediate threat on-site (e.g. intruder, violence)	Stay in place, lock doors, remain silent and out of sight	Secure room or designated safe area
Shelter-in-Place	Environmental threat affecting air quality or mobility	Stay indoors, seal space, await further instructions	Indoors, away from vents / windows

7.5 Activation process and signals

7.6 Each academy must have a clear, unambiguous system for activating and communicating the need to lockdown, shelter-in-place or invacuate. The differences in signal for each of the types of incidents must be detailed in the individual academy plans. This includes:

- primary signal: a distinct pre-agreed tone, alarm, or coded verbal announcement (e.g. “lockdown procedure in effect”).
- secondary channels: backup communication through two-way radios, Microsoft Teams, or internal SMS alerts where available.



- fallback systems: if digital communication fails, staff must use manual signals such as megaphones, designated runners, or visual / auditory cues (e.g. flashing lights, airhorns).
- 7.7 The principal or major incident coordinator is responsible for confirming activation and managing the response centrally. All signals must be tested during drills and reviewed annually to ensure familiarity and clarity across the academy.

7.8 Specific lockdown or shelter-in-place requirements

- 7.9 All non-essential internal movement must cease immediately.
- 7.10 Staff must direct students quickly and calmly to the nearest safe location.
- 7.11 Corridors and shared areas should be cleared and secured.
- 7.12 No movement is permitted until the all-clear is formally issued.
- 7.13 Staff must:
- lock all external doors and gates immediately
 - disable automatic door systems where applicable
 - direct or escort visitors and contractors to secure areas
 - prioritise the security of EYFS and other vulnerable students' external access points
- 7.14 Staff in classrooms or other safe zones must:
- lock or secure doors and cover internal glass panels
 - turn off lights, close blinds, and ensure silence
 - move individuals away from sightlines (windows / doors)
 - conduct a register or headcount and remain in place until the all-clear is given

7.15 Specific invacuation procedures

- 7.16 Each academy must identify safe internal areas where students and staff can assemble during an invacuation. These may include classrooms, assembly halls, sports halls, or other secure internal spaces.
- 7.17 Areas must be large enough to accommodate groups and allow for supervision and safety.
- 7.18 Entry points should be secured once all individuals are inside.
- 7.19 Staff must guide students indoors calmly and efficiently, minimising panic or confusion.
- 7.20 Registers or headcounts must be taken as soon as safe to do so.
- 7.21 All movement must stop once individuals are safely inside and accounted for.
- 7.22 Staff should remain with their groups until the all-clear is given by the principal / major incident coordinator or emergency services.

8.0 Phase and context specific considerations

8.1 Early years and primary-specific protocols

- 8.2 Procedures should be developmentally appropriate and emotionally safe.
- 8.3 Use calm, reassuring or familiar language (e.g. 'let's go inside together' or 'time to be safe and cosy indoors'), rather than distressing language like 'lockdown' or 'danger'.
- 8.4 EYFS staff must always maintain visibility and close supervision.
- 8.5 Visual cues or familiar routines (e.g. story time, quiet play) should be used to help younger children settle.
- 8.6 Ensure indoor safe zones are developmentally appropriate and free from hazards.
- 8.7 Headcounts and staff ratios must be maintained, and adjustments for students with additional needs must be in place.

8.8 Post-16 specific protocols and considerations

- 8.9 Post-16 students may be in unstructured, unsupervised or off-site areas during an invacuation.
- 8.10 Training must include Run, Hide, Tell principles and self-directed safety procedures.
- 8.11 Students must be briefed in advance on where to go and how to respond if not in a supervised lesson.



- 8.12 Site-specific invacuation maps must include all post-16 areas and external pathways.
- 8.13 Systems such as SMS check-ins, digital attendance logs, or self-reporting via Teams may be used to confirm their safety. Emergency signals and check-in protocols (e.g. secure messaging or SMS) must be clearly communicated.
- 8.14 SEND specific considerations**
- 8.15 Students with SEND may need tailored support during incidents.
- 8.16 Each identified student must have an individual action plan (e.g. Personal Emergency Evacuation Plans (PEEPs)) outlining:
- safe locations
 - communication strategies
 - assigned support staff.
 - sensory or mobility accommodations
- 8.17 Staff must be aware of these plans and trained in how to apply them calmly and effectively.
- 8.18 Adjustments may include:
- visual supports (e.g. now / next boards, social stories)
 - sensory tools or noise-cancelling aids
 - physical assistance or buddy systems

9.0 Communication during and after an incident

- 9.1 The principal or major incident coordinator is responsible for initial and ongoing contact with emergency services during an incident.
- 9.2 No direct contact should be made with parent / carers during an incident. Post-incident communication will be coordinated by the principal and our trust's communications centre of excellence.
- 9.3 Only school and college trust leaders or communications centre of excellence are authorised to engage with the media.
- 9.4 All communications must be documented and retained for a minimum of three years to ensure safeguarding and audit compliance.
- 9.5 During incidents, all staff and students must refrain from posting on social media. Misinformation can escalate panic and compromise safety; only authorised messages should be shared publicly.
- 9.6 Post-incident briefings will include clear updates to dispel rumours and provide reassurance to parents and the community.

10.0 Training, drills and exercises

- 10.1 To ensure a safe and effective response to emergencies, all academies must embed regular, role-appropriate training and practical exercises into their operational routines. This includes induction, refresher training, scenario-based drills, and awareness education aligned with national guidance and statutory duties.
- 10.2 All staff must receive lockdown, shelter-in-place and invacuation training as part of their induction. Annual refresher training is mandatory for all employees and should include:
- details of policies and procedures
 - information about site-specific safe zones and risk protocols
 - details of inclusive support for SEND and vulnerable students
 - key roles (e.g. major incident coordinators, reception staff, estates teams) must complete role-specific training and participate in simulations
- 10.3 As part of compliance with the Prevent duty, all staff must be alert to risks related to radicalisation and terrorism. Ongoing awareness and vigilance are reinforced through safeguarding training, staff briefings, and scenario discussions.
- 10.4 Age-appropriate education must be delivered to ensure students understand what to do during a lockdown, shelter-in-place or invacuation. All students must participate in termly drills unless exempted with a documented rationale. Outcomes must be recorded in SmartLog and used to inform local risk assessment updates and training refinements.
- 10.5 Academies must train staff and students to respond flexibly, particularly in open-access areas (e.g. playgrounds, corridors).



- 10.6 Each academy must conduct at least one full lockdown, shelter-in-place or invacuation drill per term. Drills must:
- include a range of scenarios (e.g. lunch, unstructured time)
 - be evaluated using a standardised trust-wide form
 - involve a debrief for staff and, where appropriate, students

11.0 Safeguarding and mental health support

11.1 The physical safety of students and staff is the immediate priority during any emergency. However, safeguarding must also extend to emotional and psychological wellbeing. All academies must embed trauma-informed, inclusive post-incident support to reduce anxiety, build resilience, and maintain a safe, supportive learning environment.

11.2 Psychological first aid and trauma-informed practice

11.3 Staff must provide psychological first aid (PFA) following a lockdown or invacuation, offering calm reassurance and emotional regulation techniques.

11.4 Trauma-informed approaches must underpin all post-incident support, especially for vulnerable students or those with prior adverse experiences.

11.5 Key actions include:

- using non-judgmental listening
- normalising emotional reactions
- reassuring students about safety
- avoiding over-explanation or sensational language

11.6 Student welfare post-incident

11.7 All students must be offered space to reflect, talk, or decompress after a lockdown or invacuation event.

11.8 Follow-up should include:

- circle-time discussions (EY / primary) or tutor group conversations (secondary)
- individual check-ins for high-anxiety or at-risk students
- access to wellbeing or pastoral staff for targeted support

11.9 Parents / carers should be informed of the event, reassured of student safety, and advised of any observed signs of distress to monitor at home.

11.10 Staff wellbeing and debriefing

11.11 Staff involved in an incident must have access to structured debrief sessions.

11.12 Line managers or senior leadership should facilitate reflection, clarify events, and identify any residual stress. Where needed, referrals can be made to internal wellbeing champions or external support services.

11.13 Staff feedback should be used to improve future drills and protocols.

11.14 Referral pathways for ongoing support

11.15 Where a student or staff member continues to experience distress following an incident, clear referral pathways must be followed:

- students: DSL, pastoral teams, SENCO, school counsellor, or CAMHS referral (as appropriate)
- staff: access to our trust's Employee Assistance Programme (EAP) or occupational health services

11.16 Safeguarding disclosures linked to the event must be recorded and actioned in accordance with KCSIE and local safeguarding protocols.

11.17 SEND and mental health adaptations

11.18 Students with SEND or known mental health needs must receive individualised post-incident check-in and support if necessary, led by the SENCO and pastoral staff. This support may be provided by mental health professionals working within the academy already, such as Mental Health First Aiders (MHFA) or counsellors, and referral to external agencies should be made if needed.

11.19 Reasonable adjustments may include:



- reduced timetable or quiet space access
- support from trusted adults
- sensory regulation activities
- use of social stories or visual debriefs for understanding.

11.20 Any adaptations or observations must be recorded and reviewed with parents / carers and relevant professionals.

12.0 Post incident procedures

12.1 After any procedure activation, a structured post-incident response is essential to support recovery, ensure accountability, and strengthen future preparedness.

12.2 A formal debrief must be conducted within 48 hours of the incident, led by the principal and involving key staff. A comprehensive account must be completed using SmartLog as soon as possible after the incident. Reports should document:

- the nature of the threat
- actions taken (including timings)
- staff roles and decisions
- relevant communication logs (internal and external)
- any safeguarding concerns raised
- lessons learned and policy revision

12.3 All incidents must be reviewed to identify lessons learned and required changes to local procedures or trust-wide policies. Outcomes may include:

- amendments to signals or communication methods
- adjustments to drill routines or safe zone locations
- additional staff training needs

12.4 Revisions must be reflected in updated risk assessments, action plans, and included in the next scheduled staff training cycle.

12.5 Where appropriate, local authority, governors, and the Local Resilience Forum should be informed and involved in any wider review.

13.0 Data protection and information sharing

13.1 All emergency procedures must uphold the principles of data protection, ensuring that personal data is handled lawfully, fairly, and securely. Our trust is committed to maintaining compliance with the General Data Protection Regulation (GDPR) and guidance from the Information Commissioner's Office (ICO), even during crisis response.

13.2 Student privacy and emergency data

13.3 Access to student data (e.g. medical needs, EHCPs, contact details) during emergencies is strictly limited to staff with a legitimate safeguarding or operational need.

13.4 Emergency contact information and individual risk assessments must be kept up to date and securely accessible to designated personnel (e.g. DSL, SENCO, first aiders, SLT).

13.5 Any additional data collected during incidents (e.g. incident logs, welfare notes) must be recorded and retained securely on approved systems such as CPOMS or SmartLog.

13.6 Information sharing during emergencies

13.7 During a critical incident, information may be shared with emergency services, local authorities, or safeguarding partners where it is necessary to protect life, safety, or welfare.

13.8 Such sharing must follow the principles of:

- necessity
- proportionality



- timeliness
- security

- 13.9 Staff must not share any personal or incident-related information via unauthorised channels (e.g. personal phones, social media, or messaging apps).
- 13.10 A record must be kept of all external data disclosures made during or after an incident.

14.0 Monitoring and review

- 14.1 Dixons Academies Trust is committed to ensuring that all emergency response procedures remain effective, compliant, and aligned with national best practice. Monitoring, auditing, and review mechanisms are embedded to promote continuous improvement and accountability.
- 14.2 This policy will ordinarily be reviewed every year to ensure its continued appropriateness to current legislative, and organisational requirements.
- 14.3 All academies must undertake an annual audit of their lockdown, shelter-in-place and invacuation arrangements.
- 14.4 Audits must assess:
- physical security of access points
 - functionality of communication systems
 - staff training and student awareness
 - accuracy of risk assessments and safe zone plans
- 14.5 Findings must be logged and actions tracked via SmartLog. Our trust health and safety team may conduct spot checks.
- 14.6 Serious incidents or identified compliance risks must be escalated immediately through our trust's risk management framework.

