

Special Educational Needs and Disabilities Policy

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Equality and Inclusion Statement

Apex Specialist Education and all learning centres are committed to equality, inclusion, belonging and respect. This statement applies to every school policy and guides our work across all learning centres.

We promote equality of opportunity, value diversity and work to eliminate discrimination, harassment and victimisation. In accordance with the Equality Act 2010 and the Special Educational Needs and Disability Code of Practice, we provide an inclusive education that enables all pupils to participate fully, overcome barriers, develop their potential and achieve positive outcomes.

We recognise diversity as a strength to be respected, celebrated and reflected throughout school life. We strive to ensure everyone feels safe, valued, represented and that they belong. This commitment informs our governance, leadership, safeguarding, curriculum, provision and practice.

Our Commitment:

We are committed to:

- Eliminating discrimination, harassment, victimisation and other conduct prohibited by the Equality Act 2010.
- Advancing equality of opportunity between people who share a protected characteristic and those who do not.
- Fostering good relations between people who share a protected characteristic and those who do not.

Putting our Commitment into Practice:

The Proprietor, Governing Board and Leadership Team will:

- Consider equality implications and the impact of decisions, policies and practice on people with protected characteristics.
- Embed equality, accessibility and inclusion in the development and review of curriculum, provision and policies.
- Identify and seek to reduce or remove barriers to participation, learning, attendance, wellbeing and engagement.
- Promote belonging, positive relationships and high aspirations, particularly for pupils experiencing disadvantage or additional barriers.
- Respond to prejudice-based and discriminatory behaviour, including through safeguarding procedures where relevant.
- Monitor the implementation and impact of equality and inclusion across all learning centres.

Our commitment encompasses the protected characteristics identified in the Equality Act 2010: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

All members of our school community share responsibility for upholding equality, inclusion, belonging and respect in their conduct, relationships and implementation of school policies.

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01. Aims and Scope

Healey Learning Centre is one independent special school across three centres. We provide a broad and balanced education, adapted teaching and individual support so pupils can learn, communicate, participate and prepare for adult life. High expectations must be matched by suitable provision and an understanding of each pupil's starting point.

The school will involve pupils and parents in decisions, recognise strengths and aspirations, make reasonable adjustments and evaluate the effect of support. Attendance, behaviour and emotional wellbeing are considered alongside learning and progress. A diagnosis must not limit ambition or replace an individual assessment of need.

This policy retains the school's graduated approach, provision mapping, termly internal team-around-the-child meetings (iTAC), individual targets and coordinated work with external professionals. It applies to every member of staff and all school activities.

02. Legal and Guidance Framework

The school must meet the Independent School Standards, including suitable curriculum planning, teaching and provision for pupils with special educational needs and disabilities and the information made available to parents. Equality Act 2010 duties apply, including protection from disability discrimination, reasonable adjustments and accessibility planning.

The Children and Families Act 2014 and SEND Regulations 2014 govern EHC assessment, plans and reviews. The local authority remains responsible for securing the special educational provision specified in Section F of an EHCP. The school delivers the provision it is responsible for and works with the authority to resolve gaps promptly.

The school uses the SEND Code of Practice 0 to 25 years as its practice framework and complies with the statutory duties applicable to its status. Duties applying specifically to maintained schools, academies or section 41-approved institutions must not be assumed to apply identically to every independent school. The proprietor must maintain an accurate record of the school's registration and any section 41 approval and reflect this in admissions information.

Nothing in this policy represents the school as section 41-approved unless that approval is confirmed. Where it is approved and named in an EHCP, the associated statutory duties apply. Irrespective of approval status, the school will cooperate with lawful EHCP processes, implement agreed provision and use its resources effectively to meet pupils' needs.

Keeping Children Safe in Education 2026, the school's Safeguarding and Child Protection Policy and Ofsted's current framework and independent school inspection toolkit inform safeguarding and evaluation. Proposed SEND reforms are not treated as law before commencement.

03. Understanding Needs and Disability

A pupil has special educational needs where a learning difficulty or disability calls for special educational provision: educational or training provision additional to or different from that generally made for others of the same age in mainstream settings. A pupil may have SEND without a formal diagnosis or EHCP.

Disability under the Equality Act generally means a physical or mental impairment with a substantial and long-term adverse effect on normal daily activities, subject to the Act's detailed rules. SEND and disability overlap but are not interchangeable. English as an additional language does not itself constitute SEN.

3.1. Understanding the range of needs

The four broad areas of need are:

- Communication and interaction.
- Cognition and learning.
- Social, emotional and mental health.
- Sensory and/or physical needs.

These areas help staff understand and plan support. They are not separate categories into which every pupil must fit. A pupil may have needs across several areas, and their presentation and support requirements may change over time.

Assessment will identify the individual pupil's strengths, interests, aspirations and barriers to participation. A diagnosis does not determine ability, the level of support required or the outcomes a pupil can achieve. Support must not be delayed while a diagnosis is awaited.

The descriptions below guide staff understanding. They do not imply that every pupil with a particular condition has the same needs, or that the school can meet every possible need without considering its registration, staffing, resources and the individual placement.

3.2 Communication and Interaction

Pupils may need support to understand language, express their thoughts, communicate choices, follow discussions or participate in social interaction. Difficulties may become more apparent when language is unfamiliar, instructions are lengthy, the environment is busy or the pupil is distressed.

Staff will consider both understanding and expression. A pupil who speaks fluently may still have difficulty understanding questions, interpreting implied meaning or explaining what has happened.

Support may include:

- Clear language, with instructions broken into manageable steps.
- Additional processing time before expecting a response.

- Visual information, demonstrations and written prompts.
- Explicit teaching of vocabulary and checking understanding through practical responses.
- Communication aids or alternative methods of communication where required.
- Structured opportunities to practise communication in lessons and everyday situations.

Staff will respect the pupil's preferred communication methods. Communication support must remain available when the pupil is anxious or distressed.

3.3 Speech, language and communication needs

Speech, language and communication needs may affect speech sounds, understanding spoken language, expressing ideas, organising information or using communication in different situations.

Staff must not assume that difficulty following instructions is deliberate refusal. They will check whether the language, pace or presentation of the instruction is accessible.

Where specialist advice is required, the SENCO will coordinate involvement from speech and language therapy or other appropriate services. Agreed strategies must be shared with relevant staff and used consistently across lessons and social times.

Where a pupil uses augmentative or alternative communication, staff will support access to the agreed system throughout the school day and receive appropriate guidance in its use.

3.4. Autism

Autistic pupils have individual profiles of strengths and needs. Differences may involve communication, social interaction, sensory experiences, flexibility, predictability and responses to change. Autism does not in itself indicate a learning disability.

Some pupils may conceal or mask difficulties. An apparently settled presentation must not be the only measure of wellbeing; staff should consider the pupil's account, family observations, fatigue and differences between settings.

Support may include:

- Predictable routines and advance preparation for changes.
- Visual timetables and clear explanations of what will happen.
- Consistent language and opportunities to clarify uncertainty.
- Adjustments to noise, lighting, personal space and other sensory demands.
- Access to agreed regulation strategies and a suitable quieter space.
- Using interests and strengths to support engagement.
- Supported opportunities to develop relationships and participate without pressure to imitate a particular style of social interaction.

Staff will avoid requiring eye contact or suppressing harmless self-regulating movements as evidence of attention or appropriate behaviour. Support will focus on learning, communication, safety, wellbeing and participation.

3.5. Cognition and Learning

Pupils may need additional support to acquire, retain, retrieve or apply knowledge and skills. Needs may affect particular aspects of learning or extend across several curriculum areas.

Teachers will identify what the pupil understands, where learning has become insecure and which teaching approaches help. Assessment must distinguish, as far as possible, between learning difficulties, gaps in previous education, language barriers and difficulties accessing the assessment itself.

Support may include:

- Explicit teaching, modelling and guided practice.
- Breaking complex tasks into smaller steps.
- Revisiting important knowledge and providing sufficient practice.
- Concrete materials and practical examples before greater abstraction.
- Accessible texts and alternative ways to demonstrate understanding.
- Teaching pupils how to organise, check and complete work.
- Planned opportunities to apply learning in different subjects and everyday situations.

Adaptation must preserve appropriate challenge and access to meaningful curriculum content.

3.6. Specific Learning Difficulties

Specific learning difficulties affect particular aspects of learning. Examples include dyslexia, affecting aspects of literacy, and dyscalculia, affecting aspects of mathematical learning. Some pupils also experience significant difficulties with handwriting, coordination or organising written work.

A specific difficulty must not be taken as evidence of low overall ability. Pupils may show considerable strengths alongside areas requiring sustained support.

Teachers will identify the particular barrier and provide appropriate teaching and adjustments. These may include structured literacy or numeracy teaching, accessible presentation, reduced copying demands, additional processing time and suitable assistive technology.

Where assessment suggests developmental coordination difficulties, staff will seek appropriate advice and consider the effect on writing, practical tasks, equipment use and participation. Staff do not make clinical diagnoses.

3.7. Moderate Learning Difficulties

Pupils with moderate learning difficulties may require sustained support across several areas of learning, including literacy, numeracy, understanding concepts and applying skills independently.

Assessment must consider the pupil's learning history and response to suitable teaching. Low attainment alone must not be used to identify moderate learning difficulties.

Teaching will use clear explanations, manageable steps, practical experiences, repetition and carefully planned opportunities to revisit learning. Support will help pupils build independence and apply skills beyond the original lesson.

Staff will maintain ambitious individual expectations and recognise progress in curriculum knowledge, communication, problem-solving and practical independence. Decisions about qualifications and pathways must be based on evidence and aspirations rather than a diagnostic label alone.

3.8. Social, emotional and Mental Health Needs

Pupils may experience anxiety, low mood, difficulties regulating emotions, withdrawal, difficulties maintaining relationships or distress affecting participation and attendance.

Behaviour may indicate an unmet need, but it does not by itself establish a mental health condition.

Staff will consider communication, learning, sensory demands, health, relationships, bullying, previous experiences and safeguarding concerns.

Support may include:

- Consistent relationships with trusted adults.
- Predictable routines and clear, calmly communicated expectations.
- Planned check-ins and support to recognise and communicate feelings.
- Co-regulation and teaching of individual regulation strategies.
- Positive Behaviour Support plans where appropriate.
- Supported social opportunities and preparation for difficult situations.
- Joint planning with families and relevant professionals.

Clinical assessment and treatment remain the responsibility of appropriately qualified professionals.

Any concern about immediate safety, self-harm or possible abuse must follow safeguarding procedures without waiting for a SEND review.

3.9 Attention Deficit Hyperactivity Disorder

ADHD is a neurodevelopmental condition that may affect attention, activity levels and impulse control. Presentation varies: some pupils mainly experience difficulties with attention, while others also show more noticeable hyperactivity or impulsivity.

Staff will consider the demands of the task and environment before interpreting difficulties as a lack of

effort or deliberate non-compliance.

Support may include:

- Short, clear instructions and checks that the pupil knows how to begin.
- Breaking work into manageable stages.
- Visual reminders and help organising equipment and deadlines.
- Planned movement opportunities.
- Reducing unnecessary distractions.
- Timely feedback and support to return to a task.
- Consistent routines that help the pupil develop independence.

Medication and any associated healthcare arrangements are managed under the Supporting Pupils with Medical Conditions Policy. Educational support must continue according to need.

3.10 Attachment Difficulties and the Effects of Trauma

Some pupils may have experienced disrupted relationships, loss, neglect, abuse or other distressing events. These experiences may affect trust, emotional regulation, responses to uncertainty and relationships with adults or peers.

Staff must not assume that a pupil has experienced trauma because of their behaviour, or that a care history automatically indicates an attachment disorder. Attachment difficulties and clinically diagnosed attachment disorders are not interchangeable.

The school will provide predictable, respectful relationships, clear boundaries and sensitive preparation for changes. Staff will consider how separation, unfamiliar adults, transitions and perceived rejection may affect the individual pupil.

Support will be planned with the pupil, family and relevant professionals. Staff must not diagnose attachment disorders or use unassessed therapeutic approaches. Safeguarding concerns must be referred through the safeguarding procedures.

3.11 Sensory and/or Physical Needs

Pupils may have hearing, vision, physical or sensory needs affecting access to teaching, movement around school, practical activities, communication or personal care. Sensory differences may also occur alongside other needs.

Staff will consider the demands of classrooms, corridors, dining areas, social times, transport and educational visits. Adjustments may include accessible resources, seating arrangements, changes to lighting or noise, adapted equipment, movement opportunities and appropriate rest breaks.

Specialist equipment, physical assistance and individual programmes must be used in accordance with relevant professional advice and staff competence. Where required, arrangements will link to

healthcare, accessibility and emergency evacuation plans.

A quieter or low-arousal space may support regulation where suitable. Its use must be agreed, supervised as necessary and consistent with safeguarding and restrictive intervention procedures. It must not become an informal exclusion from education.

3.12 Understanding Overlapping and Changing Needs

Staff will consider how different needs interact. Difficulties with communication, for example, may contribute to anxiety, reduced participation or behaviour that communicates distress.

The school will listen to the pupil and family, compare information across settings and review provision when needs change. Support will be based on the whole pupil rather than a single label or assessment score.

04. Responsibilities and Contact

The proprietor and governing board ensure adequate resources, suitable premises, effective leadership and oversight of provision and outcomes across all centres. They hold leaders accountable for meeting agreed provision and for addressing barriers and discrimination.

Robert Cochrane, Headteacher, leads implementation and ensures that SEND is considered in curriculum, staffing, behaviour, attendance and safeguarding decisions. Janine Taylor is the school's SENCO and coordinates SEND provision across all three centres. The Headteacher will ensure that she has sufficient time, authority, resources and access to professional development to fulfil this role. Current contact arrangements will be available through the school office and published school information.

The SENCO coordinates assessment, provision mapping, targets, review meetings, EHCP processes and staff development. Subject teachers remain responsible for the learning and progress of pupils in their classes, including where support assistants or therapists contribute. Support staff deliver agreed strategies and report their impact, without replacing the teacher's planning and oversight.

Callan Glean is the whole-school DSL and coordinates safeguarding with centre leads Abbie Chadwick-Wood, Joanne Taylor and Nadine Sawicki. SEND information informs safeguarding decisions but does not replace investigation of possible harm through the correct procedures.

Families can contact the SENCO through 07900 461 584 or info@apex-specialisteducation.com. The school will provide an accessible contact route where a family cannot use telephone or email. Urgent safeguarding concerns should be reported directly to a safeguarding leader.

05. Admission and Transition into School

Before admission, review the EHCP where present, professional advice, previous education, attainment, communication, health, safety, attendance and the pupil's and family's views. Confirm the

support needed, staffing and specialist input, and whether the placement is within the school's registration and capacity.

The school will give an evidence-based response to consultations and requests. It must not promise provision that cannot be delivered or refuse a pupil solely by diagnostic label without considering individual needs and reasonable adjustments. The Admissions Policy sets out the decision and review process.

Plan transition with the pupil, family, placing authority and previous setting. This may include visits, photographs, visual information, meeting key staff and sharing effective strategies. A gradual start that reduces education must also meet the Attendance Policy's safeguards for temporary part-time timetables.

Complete initial baseline assessment promptly and a fuller post-admission review within the first 12 weeks, retaining the existing school commitment. Known provision and reasonable adjustments must begin when needed; the assessment period must not delay support already specified in an EHCP.

Transitions Within School and to the Next Placement

Transition planning applies to changes of class, teacher, centre, timetable and curriculum pathway, as well as admission and movement to another school, college, training provider or employment-related programme.

The SENCO will coordinate planning with relevant staff, the pupil, parents or carers and receiving professionals. The plan will identify:

- What is changing and when.
- The pupil's views, aspirations and likely concerns.
- Information the pupil needs in an accessible form.
- Visits, familiarisation and opportunities to meet key adults.
- Communication, sensory, medical and safeguarding arrangements.
- Provision, equipment and strategies that must continue.
- Who will share information and confirm that it has been received.
- When the transition will be reviewed.

Information sharing must be timely, relevant and secure. Staff will explain successful approaches and the circumstances in which difficulties arise, rather than relying solely on a list of diagnoses or incidents.

For pupils moving between the school's centres, leaders must confirm that required provision is available at the receiving centre. A move must not create an unplanned gap in support.

Preparation for the next stage will include appropriate opportunities to develop decision-making, self-advocacy, practical independence and understanding of available pathways. Support will reflect the

pupil's aspirations and assessed needs, with liaison continuing where necessary to promote continuity.

06. Assess–Plan–Do–Review

6.1. Assess

Use previous information, classroom assessment, observation, pupils' work, communication with the pupil and family, and relevant professional advice. Identify strengths and barriers across learning, communication, independence and wellbeing. Use the school's current assessment arrangements, including appropriate standardised assessments, curriculum assessment at Key Stage 3 and qualification-related assessment at Key Stage 4. Consider adjustments needed for the pupil to access assessment and interpret results in context. Assessment scores must be considered alongside professional judgement and evidence of everyday participation.

Where progress or participation is limited, assess whether teaching and provision have been delivered and whether the environment is accessible. Seek specialist assessment when needed. Urgent support must not be postponed while a diagnosis or report is awaited.

6.2. Plan

Agree clear outcomes and short-term SMART targets with the pupil and parents. Map the actual provision required to needs and EHCP outcomes, including frequency, duration, staffing, specialist advice, resources and review dates. Targets must not replace the specified provision itself.

Record relevant adjustments and strategies in accessible pupil plans. Staff who work with the pupil must understand their responsibilities and have secure access to the information needed. Link learning plans with PBS plans, healthcare plans and attendance support where relevant.

6.3. Do

Teachers adapt explanations, tasks, language, pace, materials and assessment while retaining an appropriately ambitious curriculum. Support may include visual timetables, structured teaching, communication aids, sensory adjustments, movement breaks, emotional regulation support, life skills and supported social opportunities.

Use interventions such as structured communication work, TEACCH-informed approaches or ELSA support only where appropriate to the pupil and delivered by staff with suitable training. Individual or small-group work must have a clear purpose and be connected to classroom learning. Review time out of lessons so that support does not unnecessarily narrow the curriculum.

Therapeutic provision must be delivered by appropriately qualified or supervised professionals. Record whether it is being provided as specified, attendance at sessions, advice to staff and its impact. Missed provision must be identified and addressed, not simply removed from the timetable.

6.3.1 The PACE Approach

Apex Specialist Education adopts PACE—Playfulness, Acceptance, Curiosity and Empathy—as a whole-school approach to relationships and communication. All staff are expected to apply its principles in ways suited to each pupil’s age, communication, development and individual needs.

PACE informs everyday teaching, pastoral support, transitions and responses to distress. Staff apply its principles as follows:

- **Playfulness:** using appropriate warmth, enjoyment and a light tone to build connection. Humour must be sensitive to the pupil and situation and must never ridicule, shame or minimise distress.
- **Acceptance:** acknowledging the pupil’s feelings and experience without judging their worth. Staff continue to set clear boundaries and respond to behaviour that causes harm.
- **Curiosity:** approaching difficulties with an open mind and seeking to understand the pupil’s perspective, without blame, interrogation or pressure to explain.
- **Empathy:** communicating that the pupil’s experience matters and offering calm support when situations feel difficult.

Staff will adapt their approach to the pupil’s communication and sensory needs. Some pupils benefit from fewer words, additional processing time, visual support or space before discussion. Playfulness will not be used where it increases anxiety or is unwelcome.

PACE will inform individual support and Positive Behaviour Support plans where relevant. Staff will consider the pupil’s views and review which approaches help them participate, communicate and recover from distress.

PACE is used within professional boundaries and alongside the school’s safeguarding, behaviour and SEND procedures. It does not replace specified EHCP provision, specialist assessment or treatment. Staff use of PACE does not mean that they are providing Dyadic Developmental Psychotherapy.

Where a pupil makes a disclosure or there is a concern about abuse, staff must follow safeguarding procedures immediately. Curiosity must not become leading questioning or an investigation into the disclosure.

6.4. Review

Review progress and provision at the agreed date and through termly iTAC meetings involving the pupil, parents, SENCO, relevant teachers and leaders. Use accessible ways to obtain views if the pupil or family cannot attend. Record what has improved, what remains difficult, provision delivered, and the changes needed.

Share termly progress information with parents and the placing authority as appropriate. If support is ineffective, reassess needs, teaching and delivery, involve specialists and seek an early EHCP review where necessary. Do not wait for the annual review when the placement or provision is becoming

unsuitable.

6.5 Practical Application and Generalisation

Support must help pupils use their learning beyond the activity or intervention in which it was first taught. Teachers and support staff will plan opportunities to practise and apply skills across subjects, relationships, social times and appropriate community activities.

An individual strategy may include structured teaching, visual information, communication practice, movement breaks, emotional regulation support, practical life skills or supported social opportunities. Named programmes will be used only where they meet an identified need and staff have the relevant training.

The provision map must show:

- The need or barrier being addressed.
- The intended outcome.
- The teaching, adjustment or intervention to be provided.
- Who will deliver it and when.
- How it connects with classroom teaching and the pupil's wider programme.
- How delivery and impact will be reviewed.

Staff will distinguish between completing an activity with adult support and using the skill independently. They will record the level of prompting, the circumstances in which success occurs and whether the pupil can apply the skill in another setting.

Support will be adjusted as independence develops, while retaining the assistance the pupil needs. Adult support must not unnecessarily replace the pupil's own choices, communication or participation.

Interventions will be reviewed where they repeatedly remove a pupil from the same curriculum subject, create dependency or do not produce the intended benefit. The SENCO and teachers will consider changes to the teaching or environment as well as changes to the intervention.

6.6 Recording the Level of Support

The SENCO will maintain an accurate record of pupils receiving SEN support and those with an Education, Health and Care Plan.

For pupils receiving SEN support, the school will record identified needs, agreed outcomes, provision, reasonable adjustments and review arrangements through the graduated approach.

For pupils with an EHCP, the provision map and individual plans must reflect the current plan and make clear how the school is delivering the provision for which it is responsible. Short-term targets support implementation and review; they do not replace the provision specified in the EHCP.

Where evidence indicates that a pupil may require an EHC needs assessment or a review of their

existing plan, the SENCO will discuss this with the pupil, family and relevant local authority. Existing support must continue while the request is considered.

Provision is arranged through the school's placement and funding arrangements. Staff must not assume that funding terminology or arrangements applying to maintained schools apply identically to this independent school.

07. EHCP Provision and Annual Reviews

The SENCO must maintain a current copy of each EHCP, check the provision against the timetable and provision map, and bring gaps to the Headteacher immediately. The school must liaise promptly with the local authority and relevant health or care body where provision is missing, or needs have changed. Funding discussions must not be used to conceal failure to deliver provision.

The local authority is responsible for reviewing an EHCP at least every 12 months. Where the school arranges the meeting on its behalf, it will follow the statutory process and the authority's lawful arrangements. Invite the parent or young person, relevant school staff, authority and health and care representatives, and obtain the pupil's views and professional contributions.

Give at least two weeks' notice and circulate advice and information at least two weeks before the meeting. Prepare and send the review report to the local authority and those invited within two weeks of the meeting, identifying recommendations and any differences of view. Track the authority's decision to maintain, amend or cease the plan, due within four weeks of the review meeting, and follow up delays.

A review meeting does not itself amend an EHCP. Continue to work from the operative plan while lawful amendment processes take place. If circumstances require urgent change, contact the authority promptly and agree safe interim action without representing that an informal agreement has replaced statutory provision.

From Year 9, reviews must address preparation for adulthood, including further education or employment, independent living, community participation and health. For secondary-to-post-16 transfer, work with the authority towards the applicable 31 March amendment deadline in the year of transfer. Begin transition planning early enough for visits, support and information sharing.

08. Participation and Partnership

Pupils should understand their support in a way suited to their communication and development. Offer choices, visual or practical methods, a trusted adult or an advocate where helpful. Do not equate limited speech or apparent agreement with a lack of views. Give due weight to the young person's developing rights and capacity.

Parents and carers are partners in understanding needs and evaluating support. Provide interpreters, accessible reports and flexible meeting arrangements where reasonably required. Record differing views respectfully and explain decisions and routes for challenge.

Work with educational psychologists, speech and language therapists, occupational therapists, specialist teachers, health services, CAMHS, social care, virtual schools and other appropriate agencies. Explain referrals, consent and lawful information sharing. Staff must not promise a diagnosis, treatment or external service that the school cannot guarantee.

09. Inclusion and Reasonable Adjustments

Plan adjustments before a pupil encounters avoidable disadvantage. Consider teaching and assessment, communication, sensory environment, equipment, trips, meals, clubs, social times, transport and transitions. Do not charge parents for reasonable adjustments required by the Equality Act.

The Accessibility Policy and Plan addresses participation in the curriculum, the physical environment and accessible information. Individual risk assessment should enable participation safely. Blanket exclusions from visits or activities based on SEND are not acceptable.

Behaviour responses must take account of disability, communication and unmet need. Use positive support and de-escalation. Restrictive intervention follows the separate policy and safeguarding Section 6.7; an EHCP or PBS plan cannot give blanket permission for restraint or seclusion.

Attendance concerns require support and appropriate education, not informal exclusion, pressure to home educate or an open-ended reduced timetable. The school must work with the placing authority where needs exceed current provision rather than end support without a lawful transition plan.

10. Safeguarding and wellbeing

Pupils with SEND may face additional barriers to recognition and reporting of abuse, including communication differences, isolation, dependency and assumptions that distress or injury is part of a condition. Staff must remain alert, listen and report concerns immediately under the safeguarding policy.

Teach personal safety, relationships, consent and online safety accessibly and at an appropriate developmental level. Respond to bullying, including disability-related bullying, promptly. Provide trusted adults and communication support so pupils can report concerns. Do not investigate a disclosure as part of a SEND assessment.

Medical, mental health and SEND plans must work together. Clinical interventions are undertaken only within professional competence. Share relevant information with the DSL where it indicates risk and follow the school's secure recording arrangements.

11. Staff Development and Records

The Headteacher and SENCO review expertise and training needs regularly. The school maintains an annual SEND development programme and regular internal CPD, including fortnightly twilight sessions where timetabled. Training covers the four broad areas of need and current pupil-specific

priorities, with supervision for specialist interventions.

PACE Training and Development

All staff are expected to adopt the PACE approach. Staff who have not yet completed appropriate training will receive it through the school's induction and continuing professional development programme. While awaiting training, they will receive guidance from trained colleagues and senior leaders.

The Headteacher and SENCO will maintain oversight of training coverage, identify outstanding training and arrange opportunities to refresh and develop practice. Training records will distinguish completed training from planned attendance.

Staff development will include practical application of PACE, adaptation for individual communication and sensory needs, maintaining boundaries and recognising when safeguarding or specialist support is required.

Leaders will review its use through staff reflection, observation and pupil feedback. Training attendance alone will not be treated as evidence of effective practice.

Weekly SEN updates may share practical strategies through approved secure staff channels. Sensitive pupil information must be limited to those who need it and must not be circulated indiscriminately by email. Maintain current plans and an audit trail of changes.

Keep SEND records accurate, secure and available to authorised staff. Record SEN support and EHCP status correctly in the management system and applicable returns. The school's independent placement funding arrangements must not be described as a maintained-school notional SEN budget. Transfer necessary records securely and promptly when pupils move.

12. Evaluation and Complaints

Leaders evaluate attainment and progress, curriculum access, EHCP outcomes, delivery of provision, independence, wellbeing, attendance and pupil and parent feedback. Review group patterns and individual experience without allowing small cohorts to identify pupils unnecessarily. Governance receives at least termly assurance, including unmet provision and action taken.

Families should raise concerns with the teacher or SENCO and may use the Complaints Policy if unresolved. Complaints about the school's provision are distinct from challenges to local-authority EHCP decisions. Signpost families to their local SEND Information, Advice and Support Service, the local offer and relevant mediation or Tribunal information. Using the school's procedure does not remove statutory rights.

Review this policy annually and when guidance, school provision or evaluation indicates change. Make information about the school's SEND arrangements available to parents and prospective parents, with accessible copies on request.

13. References and Review Basis

Guidance and legislation checked September 2026. Record approval, implementation and the next review date through the school's normal policy approval process.

- SEND Code of Practice 0 to 25 years
- Children and Families Act 2014 Part 3
- Special Educational Needs and Disability Regulations 2014
- Equality Act 2010
- Independent special schools approved under section 41
- Independent School Standards and April 2026 guidance
- Keeping children safe in education 2026
- Ofsted independent school inspection toolkit and operating guidance
- DDP Network — “What is meant by PACE?”