

REBUILDING CONFIDENCE  
REIMAGINING EDUCATION RESTORING FUTURES  
IMAGINE  
"A BRIGHTER FUTURE"



## Inclusive education, safeguarding and high expectations for all learners

<b>Document title</b>	Special Educational Needs and Disabilities (SEND) Policy
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## 1. Policy statement, purpose and principles

Imagine Wellbeing School (IW) is an independent specialist primary provision for children and young people with special educational needs and/or disabilities (SEND). We exist to rebuild confidence, reimagine education and restore futures through high nurture, high structure, and a communication-first approach.

This SEND Policy sets out how IW identifies, assesses, and meets the needs of pupils with SEND so that they:

- are safe, understood and able to communicate their needs;
- receive a high-quality education that is ambitious and appropriately personalised;
- make sustained progress from their starting points in knowledge, skills, independence and wellbeing;
- participate fully in school life and feel a strong sense of belonging; and
- are prepared for their next stage of education and for life in modern Britain.

It supports leaders in evidencing inclusion through clear systems, high expectations, rigorous monitoring, and a strong culture of safeguarding. It sits alongside, and must be read with, IW's Safeguarding and Child Protection Policy and IW's Curriculum documentation (including EQUALS-informed pathways and progression).

At IW, SEND is not a bolt-on service. SEND is the school's core business. Every member of staff is a teacher of pupils with SEND and a safeguarding practitioner. Our practice is rooted in the SEND Code of Practice's graduated approach (Assess, Plan, Do, Review) and in evidence-informed teaching, with careful adaptation that removes barriers without lowering ambition.

The principles that underpin this policy are:

- Child-centred and outcomes-focused: we start with the child's strengths, needs, voice and aspirations and work backwards from clear outcomes.
- Early identification and timely action: we do not wait for failure; we identify emerging needs quickly and respond with targeted support.
- High expectations and ambition: we aim high for every pupil, with pathways that build towards meaningful end points.
- Collaboration: we work in partnership with parents and carers, the local authority, health and social care, and external specialists.
- Inclusion and belonging: pupils are included in the life of the school, with reasonable adjustments and dignity at the heart of our decisions.
- Safeguarding and wellbeing: we recognise increased vulnerabilities for pupils with SEND and put robust protection, supervision and support in place.
- Continuous improvement: we evaluate impact, learn from evidence and refine provision over time.

## 2. Alignment with statutory duties, inspection and standards

This policy supports IW's compliance with statutory duties and the regulatory expectations for independent schools. In particular, it aligns with:

- the Children and Families Act 2014 and associated regulations, including duties relating to EHCPs;
- the SEND Code of Practice (0-25);
- the Equality Act 2010, including the duty to make reasonable adjustments and to avoid discrimination arising from disability;

- Keeping Children Safe in Education (KCSIE), recognising that pupils with SEND may face additional safeguarding vulnerabilities;
- the Independent School Standards (ISS), particularly:
- Part 1 (Quality of education provided): curriculum, teaching, assessment, and the support required for pupils to make progress;
- Part 2 (Spiritual, moral, social and cultural development): values, respect, and preparation for life in modern Britain;
- Part 3 (Welfare, health and safety): safeguarding, behaviour, attendance, risk assessment and wellbeing;
- Part 4 (Suitability of staff): safer recruitment and staff conduct;
- Part 5 (Premises and accommodation): accessibility and suitability for SEND;
- Part 6 (Provision of information): transparent information for parents and commissioners, including SEN information; and
- Part 7 (Complaints): clear routes to raise concerns and seek resolution.

IW also reflects the direction of travel in inspection regarding inclusion. Leaders and staff must be able to demonstrate that:

- pupils' needs are identified quickly and accurately, including emerging or changing needs;
- the school has high expectations for pupils with SEND and provides specialist-informed support that reduces barriers to learning and wellbeing;
- the school uses a graduated approach effectively, with trained staff implementing it consistently; and
- leaders have a secure understanding of pupils' needs and the progress they make, using appropriate evidence to drive decisions and improvements.

To evidence these expectations, IW maintains an "inclusion evidence bank" which includes (but is not limited to):

- clear admission, baseline and review documentation;
- provision maps and therapy plans linked to outcomes;
- purposeful curriculum pathways and evidence of ambitious end points;
- case sampling showing impact over time; and
- safeguarding and wellbeing records that demonstrate vigilance and effective multi-agency working.

### 3. Scope, definitions and SEND at IW

#### Scope

This policy applies to all pupils and prospective pupils, including those with:

- an Education, Health and Care Plan (EHCP);
- a diagnosis (for example, autism, ADHD, dyslexia, developmental language disorder, sensory processing difficulties);
- emerging needs that are under assessment; and/or
- social, emotional and mental health needs requiring special educational provision.

#### Definition of SEND

A pupil has SEND if they have a learning difficulty or disability that requires special educational provision. Special educational provision means educational provision that is additional to, or different from, that made generally for other children of the same age.

IW recognises four broad areas of need (SEND Code of Practice):

- Communication and interaction (including speech, language and communication needs and autism)
- Cognition and learning (including moderate/severe learning difficulties and specific learning difficulties)
- Social, emotional and mental health (including trauma, anxiety, attachment needs, ADHD and related presentations)
- Sensory and/or physical needs (including sensory processing, physical disability, visual/hearing impairment and medical needs)

SEND in a specialist setting

Many pupils at IW will have complex, overlapping needs. A single pupil may sit across more than one broad area and may have needs that fluctuate depending on context, sensory load, anxiety, health, relationships and environmental triggers.

IW therefore uses a holistic profile rather than a single label. Profiles include:

- strengths and interests;
- communication profile (including receptive/expressive language and preferred modes);
- sensory profile and regulation needs;
- learning profile (including cognition, memory, processing and executive functioning);
- SEMH/attachment profile and trauma-informed considerations;
- health/medical profile; and
- risk profile (including safeguarding, exploitation risk, self-harm risk and peer risks).

Disability and reasonable adjustments

Where a pupil meets the definition of disability under the Equality Act 2010, IW will make reasonable adjustments so the pupil is not placed at a substantial disadvantage compared to peers. IW recognises that “reasonable” is context-specific and must be reviewed as needs change. Adjustments may be physical, curricular, communicative, behavioural, sensory or procedural.

## 4. IW provision model and curriculum pathways (EQUALS-informed)

IW’s curriculum and provision are designed around the needs of pupils who have experienced disrupted education, high anxiety, complex SEND, and/or barriers to attendance and engagement. Our ambition is for every pupil to experience success, belonging, and progress.

Curriculum pathways

IW uses EQUALS-informed pathways and the Engagement Model where appropriate, to ensure that pupils working below age-related expectations have a curriculum that is ambitious, meaningful and measurable.

Pathways typically include:

- Pre-formal / engagement-led: for pupils working at early developmental levels who require learning through sensory exploration, interaction, communication and regulation.
- Informal: for pupils who learn best through play-based and experiential approaches, functional communication, early cognition and independence.
- Semi-formal: for pupils developing symbolic understanding and readiness for more structured subject learning, with functional literacy/numeracy and increasing independence.

- Formal: for pupils able to access aspects of the National Curriculum with adaptation, scaffolded instruction and assistive technologies.

Pathway decisions are not permanent labels. They are reviewed regularly and may be mixed by subject or by phase. Leaders ensure that pupils are placed on appropriate, ambitious pathways and that pathways are refined when evidence indicates a better fit.

Ambitious end points

IW defines ambitious endpoints for each pathway. End points include:

- communication independence (including AAC where required);
- regulation and emotional literacy;
- literacy, numeracy and wider knowledge (at an appropriate level);
- functional life skills and independence;
- social participation and relationships; and
- preparation for next steps (including transition readiness).

Implementation: “high nurture, high structure”

IW’s SEND provision is implemented through consistent routines, predictable environments, and emotionally attuned adult support. We protect learning time, reduce cognitive load, and teach pupils how to be ready to learn through regulation, communication, and relational safety.

Teaching is adapted through:

- explicit modelling and structured teaching sequences;
- small steps and overlearning where needed;
- visual supports and scaffolds that are gradually reduced as independence grows;
- carefully planned sensory supports and movement breaks;
- language-rich environments with adult modelling and talk routines; and
- skilled deployment of teaching assistants to promote access and independence, not dependency.

Therapeutic integration

IW integrates therapy-led approaches into everyday teaching. External professionals contribute to staff training, programme design and review. Therapy recommendations are embedded in classroom routines so that pupils experience consistent strategies throughout the day.

## **4.1 SEND Information Report and transparency for families and commissioners**

IW provides clear information to parents/carers and commissioning partners about SEND provision. This includes a SEND Information Report (published and updated regularly) that explains:

- the types of need IW typically supports;
- admission and referral routes;
- how IW identifies needs and monitors progress;
- how IW works with parents/carers and multi-agency partners;
- curriculum pathways and how learning is adapted;
- pastoral and wellbeing support;

- therapy input and how it is integrated;
- how complaints and concerns can be raised; and
- key contacts (including SENCO and DSL).

Transparency is essential to trust and to placement sustainability. IW will be honest about what we can provide and what would require additional commissioning or bespoke arrangements.

## 5. Admissions, referrals and suitability

IW is a specialist setting. Placement decisions must be safe, lawful and in the best interests of the child and the school community. IW works closely with local authorities and parents to ensure placements are appropriate, sustainable and capable of delivering the pupil's EHCP outcomes.

### Admissions principles

- Admissions are non-discriminatory and comply with the Equality Act 2010.
- IW admits pupils where the placement is suitable, safe and can meet needs without compromising the welfare of others.
- Decisions are evidence-based and consider the pupil's needs, risks and the provision available.
- IW is transparent with parents and local authorities about what we can offer and any additional requirements.

### Referral and information gathering

Before admission (or as part of an in-year transfer), IW requests and reviews relevant information such as:

- EHCP and latest annual review paperwork (where applicable);
- educational psychology reports and specialist reports (SaLT, OT, CAMHS, paediatrics);
- current/previous school reports, attainment information and behaviour/support plans;
- safeguarding information (including child protection plans, CIN/CP history, or contextual safeguarding concerns);
- health information, medication and healthcare plans;
- attendance history and any EBSA factors;
- risk assessments and any restrictive intervention records; and
- views of the child and family, including strengths, triggers and successful strategies.

### Suitability assessment and transition planning

IW undertakes a suitability assessment, which may include:

- a pre-placement visit (child and parent/carer);
- observation in the current setting (where possible and appropriate);
- assessment of communication, regulation and learning readiness;
- review of sensory profile and environmental needs;
- initial risk assessment (including safeguarding, exploitation risk and self-harm risk); and
- a proposed transition plan (phased, flexible and personalised).

IW recognises that transition itself can be a barrier. A phased transition may include shorter sessions, key adult attachment, visual supports, predictable routines, and family collaboration. For some pupils, transition planning will consist of multi-agency meetings.

## Placement sustainability

IW will clearly document what support is required for placement sustainability, including:

- staffing ratios and key adult requirements;
- therapy input and programmes;
- environment adjustments (sensory, accessibility, communication);
- transport considerations;
- behaviour/regulation support plans; and
- any additional funding requirements linked to the provision.

If IW identifies that the placement is no longer suitable despite reasonable adjustments and additional support, leaders will work with the local authority and parents to review provision and agree next steps, always prioritising the child's safety and education.

## 6. Identification of need and the graduated approach (Assess, Plan, Do, Review)

IW quickly and accurately identifies needs, including emerging or changing ones. Staff are trained to recognise indicators of need, and leaders ensure that information is triangulated across observation, assessment, family insight and specialist advice.

### Assess

Assessment at IW is purposeful and proportionate. It may include:

- baseline assessments for communication, literacy, numeracy and cognition;
- functional skills and independence profiles;
- sensory processing checklists and observations;
- SEMH and wellbeing screening (for example, anxiety indicators and attachment-informed profiles);
- classroom-based diagnostic assessment and observation over time;
- pupil voice methods adapted to the child's communication needs (for example, symbols, photos, choice boards, assisted communication); and
- professional reports and specialist assessments where required.

Assessment is never a one-off event. It is an ongoing cycle used to understand barriers, triggers, motivators and learning readiness.

### Plan

Planning ensures that support is targeted, evidence-based and shared with all relevant staff. Plans may include:

- an Individual Education Plan (IEP) or Individual Support Plan (ISP) with SMART outcomes;
- a provision map showing what support is in place, frequency and intended impact;
- therapy programmes integrated into daily routines;
- risk assessments and positive handling plans where necessary;
- Individual Behaviour Plans that focus on function, skill-building and regulation;
- a personal timetable where a bespoke programme is required (used carefully, time-limited and reviewed);
- adjustments for communication access (AAC, visuals, simplified language);
- exam access arrangements (where appropriate for age and need); and

- an attendance support plan where barriers to attendance exist.

Plans are co-produced with parents/carers and, where appropriate, the pupil. Co-production means:

- outcomes are understood and meaningful;
- strategies are practical and consistent; and
- There is a shared understanding of roles, responsibilities and review points.

## Do

Implementation is the responsibility of all staff. Leaders ensure:

- class teachers plan and deliver high-quality teaching with appropriate adaptation;
- teaching assistants are deployed to increase access and independence (not to create learned helplessness);
- therapy programmes and strategies are embedded in teaching and routines;
- staff record key information consistently, including progress against small steps, engagement and wellbeing; and
- communication supports are used across the day (not only in “speech sessions”).

Staff use evidence-informed approaches including explicit instruction, modelling, guided practice, overlearning and retrieval practice where appropriate. For pupils on engagement-led pathways, staff use the Engagement Model to plan meaningful next steps.

## Review

IW reviews progress at least termly, and more frequently where needs are changing rapidly or risk is increasing. Reviews consider:

- progress towards outcomes and next steps;
- impact of interventions (entry/exit information where appropriate);
- pupil voice and wellbeing indicators;
- safeguarding and attendance considerations;
- whether adjustments remain appropriate; and
- whether specialist involvement is required.

Review outcomes may include maintaining the plan, adapting strategies, adding or removing interventions, requesting further assessment, or initiating EHCP-related action.

## Record keeping

IW maintains accurate records including:

- assessment summaries and baseline profiles;
- provision mapping and intervention logs;
- IEP/ISP documentation and review notes;
- therapy reports and programmes;
- safeguarding and wellbeing logs; and
- communication and engagement evidence (including photos, learning journals, work samples and observations).

These records ensure continuity, accountability and clear evidence of impact over time.

## 7. Education, Health and Care Plans (EHCPs) and annual reviews

Many pupils at IW will have an EHCP. IW ensures that EHCP provision is delivered as written and that outcomes are actively pursued through coherent planning, teaching and specialist support.

### EHCP implementation

- The SENCO ensures all staff working with the pupil understand the EHCP needs, provision and outcomes.
- Teachers translate EHCP outcomes into short-term learning and wellbeing targets within IEPs/ISPs.
- Provision is mapped and monitored to ensure it is delivered consistently.
- Where a pupil requires specific therapy provision, IW integrates programmes into daily routines and ensures staff are trained to deliver recommended strategies.

### Annual review cycle

IW conducts EHCP annual reviews in line with statutory requirements. The SENCO leads the process and ensures that:

- parents/carers are invited and supported to contribute meaningfully;
- the pupil's voice is captured in an accessible way;
- advice is requested from relevant professionals (education, health, social care);
- a clear report is produced, including progress towards outcomes and recommendations;
- any proposed amendments are evidence-based and clearly explained; and
- paperwork is shared promptly with the local authority within required timeframes.

### Interim reviews

IW may call interim reviews when:

- needs to change significantly;
- risk increases or safeguarding concerns arise;
- placement sustainability is in question;
- attendance deteriorates, or EBSA escalates; or
- progress stalls despite appropriate provision.

### Preparing for transitions within EHCPs

Where a pupil is approaching transition (for example, from KS2 to secondary), IW:

- begins planning early, typically from Year 5;
- liaises with potential receiving settings to share practical strategies and documents;
- supports pupils with visits, visuals, social stories and transition books;
- supports parents through information, meetings and joint planning; and
- contributes to local authority planning to secure the most appropriate next step.

IW's aim is that EHCP review processes are not administrative exercises but meaningful cycles that drive improved outcomes and experiences for pupils.

## 8. Teaching, learning and assessment for pupils with SEND

High-quality teaching is the foundation of SEND provision at IW. Targeted interventions and specialist support supplement, but never replace, strong teaching.

Curriculum intent and implementation

IW's curriculum:

- is broad and balanced and includes literacy, numeracy and wider curriculum experiences appropriate to the pathway;
- is ambitious and identifies clear end points for all pupils, including those working significantly below age-related expectations;
- is sequenced so pupils build knowledge and skills over time, with explicit links to prior learning;
- develops language and vocabulary intentionally across subjects;
- prioritises the foundations of communication, early reading, spelling, handwriting and mathematics, while recognising that some pupils will require alternative routes to competence; and
- includes personal development, relationships education, physical development and preparation for life.

Adaptive teaching

Adaptive teaching at IW includes:

- clear modelling and explicit teaching;
- scaffolding that is carefully reduced as independence develops;
- chunking and pacing to reduce cognitive load;
- multi-sensory approaches and concrete representations;
- pre-teaching and overlearning where necessary;
- structured talk and language modelling, including sentence stems and vocabulary rehearsal;
- use of assistive technology and AAC supports; and
- structured opportunities for retrieval and application.

Assessment

IW uses assessment to check understanding and to inform next steps. Assessment is proportionate and appropriate to each pupil's pathway and needs. It may include:

- teacher observation and formative checks (including visuals, practical demonstration and alternative response modes);
- small-step progress frameworks and developmental milestones;
- standardised assessments where appropriate and meaningful;
- engagement measures for pupils using the Engagement Model; and
- therapy progress measures (for example, communication targets and sensory regulation goals).

Leaders ensure assessment information is used to:

- inform teaching adaptations and intervention selection;
- monitor progress over time at the individual and group level;
- identify barriers that require additional action; and
- evaluate the impact of curriculum design and provision.

## Deployment of teaching assistants

Teaching assistants at IW are trained and deployed to:

- enable access to high-quality teaching;
- scaffold independence and reduce reliance over time;
- support communication and regulation proactively; and
- deliver targeted interventions with fidelity and coaching.

Teachers retain responsibility for learning outcomes. TAs support but do not replace teacher accountability.

## 8.1 Literacy, reading and communication foundations

IW places particular emphasis on the foundations that enable pupils to access learning and the wider world:

- communication and language;
- early reading and comprehension;
- writing (including handwriting or alternative means);
- spelling and phonological awareness; and
- mathematical understanding and number sense.

### Early reading and phonics

Where appropriate, pupils at the early stages of learning to read are taught through a systematic synthetic phonics approach. Staff adapt phonics teaching so that it is accessible for pupils with SEND through:

- reduced group sizes and increased repetition;
- multi-sensory phonics routines;
- careful vocabulary selection and pre-teaching;
- short, frequent practice sessions;
- assistive technology where needed; and
- alternative routes for pupils for whom phonics is not an appropriate pathway, focusing instead on functional literacy and communication.

### Writing and recording

IW recognises that handwriting can be a significant barrier for some pupils. Reasonable adjustments include:

- alternative recording methods (typing, speech-to-text, adult scribing, photo evidence);
- adapted tools (pencil grips, sloped boards, specialist seating);
- fine motor programmes and OT advice embedded in daily practice; and
- explicit instruction in transcription skills where appropriate.

### Communication-first across the curriculum

All staff use “communication-first” practice by:

- simplifying language without oversimplifying concepts;
- using visual supports and modelling;
- checking understanding through alternative response methods;
- giving processing time and reducing verbal overload; and

- teaching and revisiting key vocabulary and concepts in meaningful contexts.

This focus supports both learning and safeguarding, because pupils who can communicate effectively are better able to seek help, express discomfort and advocate for themselves.

## 9. Supporting pupils across the four broad areas of need

IW provides specialist-informed support across the four broad areas of need. In practice, support is integrated rather than siloed, recognising overlap and interdependence.

### 9.1 Communication and interaction

Many pupils have speech, language and communication needs (SLCN) and/or autism. IW:

- creates a communication-rich environment with predictable routines, visuals and structured talk;
- uses AAC as required (for example, PECS, communication books, symbols, voice output communication aids);
- teaches functional communication explicitly (requesting, refusing, commenting, asking for help, self-advocacy);
- uses social stories and explicit teaching of social understanding where appropriate;
- provides language interventions and programmes guided by SaLT advice; and
- ensures staff adapt their communication style (processing time, simplified language, checking understanding, visual reinforcement).

### 9.2 Cognition and learning

IW supports pupils with learning difficulties and specific learning difficulties through:

- explicit instruction and overlearning;
- structured, cumulative teaching sequences;
- use of manipulatives, visual supports and multi-sensory methods;
- targeted literacy and numeracy interventions (including phonics where appropriate);
- assistive technology (for example speech-to-text, typing support, overlays);
- memory and executive function supports (task boards, checklists, timers, breakdown of tasks); and
- alternative ways to demonstrate learning (practical demonstration, oral explanation, visuals).

### 9.3 Social, emotional and mental health (SEMH)

IW recognises that SEMH needs may be both a barrier to learning and a legitimate need requiring special educational provision. Our approach includes:

- trauma-informed practice, relational safety and consistent adult responses;
- explicit teaching of regulation and emotional literacy (for example, Zones of Regulation or similar structured programmes);
- predictable routines and transitional supports to reduce anxiety;
- EBSA-informed strategies, including gradual exposure, safe base, flexible entry and family collaboration;
- restorative approaches and problem-solving conversations;
- therapeutic support pathways, including referral to CAMHS or other services where appropriate; and
- behaviour support that is functional, skill-building and dignified.

### 9.4 Sensory and/or physical needs

IW supports pupils with sensory processing and/or physical needs through:

- sensory profiling and personalised sensory diets where recommended;
- planned movement breaks and access to regulation spaces;
- environmental adjustments (lighting, noise reduction, seating, equipment);
- OT/physio-informed programmes integrated into daily routines;
- accessibility adaptations, risk assessments and personal evacuation plans where required; and
- support for pupils with medical conditions via Individual Healthcare Plans and staff training.

Across all areas, IW aims to build independence, confidence and self-advocacy, so pupils increasingly understand what helps them and can communicate this to others.

## 9.5 Specialist intervention, provision mapping and exit criteria

Interventions at IW are selected because they match need and are likely to have an impact. IW avoids “intervention for intervention’s sake”.

### Selecting interventions

When selecting an intervention, leaders consider:

- the pupil’s identified barrier and underlying need;
- the evidence base for the approach (where available);
- the skill and training required to deliver it well;
- how it complements, rather than replaces, high-quality teaching; and
- how progress will be measured.

### Provision mapping

IW uses provision maps to document:

- what support is in place (universal, targeted, specialist);
- who delivers it, how often and for how long;
- intended outcomes and success criteria;
- how it links to EHCP/IEP outcomes; and
- how the impact will be reviewed.

### Exit criteria

Each targeted intervention has exit criteria so that pupils are not kept in programmes longer than necessary. Exit criteria may include:

- targets met and skills generalised to everyday contexts;
- lack of progress despite fidelity, leading to a change of approach;
- pupil needs changing, requiring different provision; or
- transition to a different pathway.

Interventions are reviewed at least termly. Where a pupil is not making expected progress, leaders act quickly to adjust support rather than waiting for an annual review.

## 10. Inclusion, participation and wider school life

Inclusion at IW means more than physical presence. It means active participation, belonging and equitable access to opportunities.

Participation in the wider curriculum and enrichment

IW ensures pupils with SEND:

- access enrichment, trips, visitors and community learning, with reasonable adjustments and risk assessments;
- participate in assemblies, celebrations, performances and pupil leadership opportunities in ways that are accessible and meaningful;
- have a voice in shaping aspects of school life (clubs, activities, class texts, themes);
- are supported to develop friendships and positive peer relationships; and
- are represented and respected in the curriculum, including through texts and resources that reflect diversity.

Reasonable adjustments for participation

Adjustments may include:

- additional adult support for off-site visits;
- adapted transport arrangements;
- preparatory visits, transition plans and visual supports;
- sensory supports (ear defenders, quiet spaces, reduced group sizes);
- alternative tasks that maintain ambition but remove barriers; and
- adapted communication methods for participation.

Equality and anti-bullying

IW recognises that pupils with SEND may be at increased risk of bullying, peer-on-peer abuse and discrimination (including ableism). We:

- teach pupils how to seek help and how to stay safe, in ways they can understand;
- monitor peer interactions and intervene early;
- record, analyse and respond to bullying and prejudice-based incidents;
- train staff to recognise and challenge discriminatory language and behaviour; and
- work with families and external agencies to address patterns and safeguard pupils.

Alternative provision and off-site education

Where a pupil receives education off-site (for example, as part of a planned reintegration package), IW retains responsibility for the pupil's welfare and education. Leaders:

- ensure placements are commissioned appropriately and are in the pupil's best interests;
- ensure safeguarding and attendance systems track the pupil daily;
- quality assure provision and curriculum suitability; and
- review placements regularly, with clear plans and outcomes.

IW's aim is for all pupils, including those facing the highest barriers, to experience a rich, purposeful education and to feel they belong.

## 11. Safeguarding and SEND (KCSIE)

Safeguarding is the golden thread through IW's SEND provision. IW recognises that pupils with SEND can face additional risks, including:

- communication barriers that make disclosure more difficult;
- greater dependence on adults for care and support;
- social isolation, low confidence and vulnerability to grooming;
- increased risk of peer-on-peer abuse and bullying;
- difficulties recognising unsafe situations; and
- online exploitation and coercion.

The DSL and safeguarding team ensure that safeguarding practice is adapted for SEND. This includes:

- accessible reporting routes and trusted adults;
- use of visuals and communication supports to help pupils share concerns;
- careful attention to behaviour as possible communication of distress or harm;
- consistent recording and escalation through safeguarding systems;
- multi-agency working and information sharing where necessary; and
- robust supervision and risk management in high-risk contexts.

### Managing allegations against adults

IW follows local authority procedures for managing allegations against adults, including referral to the appropriate designated officer where criteria are met. Leaders ensure staff are supported, that processes are fair and timely, and that pupil safety remains paramount.

### Child-on-child abuse

IW recognises that pupils with SEND may be both vulnerable to harm and may display harmful behaviour due to unmet needs, trauma, impulsivity or difficulties with boundaries. IW's approach includes:

- clear behavioural expectations taught explicitly and revisited regularly;
- protective supervision and structured routines;
- early identification of harmful patterns and robust risk assessments;
- targeted teaching of consent, boundaries, relationships and online safety adapted to need;
- restorative and educative responses alongside appropriate consequences; and
- multi-agency involvement where required.

### Online safety

IW teaches online safety in an accessible, repetitive and practical way. Staff monitor technology use, teach safe use explicitly, and work with parents to reinforce safety at home. Where there is evidence of exploitation risk, IW works with safeguarding partners promptly.

### Safeguarding supervision and staff support

Working with complex SEND and safeguarding need can be emotionally demanding. IW provides:

- supervision and debrief opportunities for staff involved in high-risk incidents;
- clear lines of reporting and decision-making;

- ongoing safeguarding training and updates; and
- a culture of open challenge and reflective practice so that safeguarding remains strong.

Safeguarding and SEND provision are inseparable: safe pupils learn, and learning strengthens safety through communication, confidence and trusted relationships.

### **11.1 Risk assessment, personal evacuation plans and accessibility**

IW's approach to SEND includes robust risk assessment, dignity and accessibility. For pupils with additional vulnerabilities or physical needs, IW uses:

- individual risk assessments linked to learning, behaviour, off-site education and medical needs;
- personal evacuation plans (PEEPs) where required, considering mobility, sensory needs, understanding and anxiety;
- accessibility adaptations in line with the Accessibility Plan and premises requirements; and
- staff training so that risk management is proactive, consistent and calm.

Risk assessment is not used to restrict pupils unnecessarily. It is used to enable safe participation by identifying hazards, controls, and support strategies, and by regularly reviewing plans.

## **12. Behaviour, attendance and regulation as SEND provision**

At IW, we understand behaviour through a SEND lens. Behaviour is communication. Many behaviours reflect unmet needs, anxiety, sensory overload, trauma triggers, communication difficulties or gaps in regulation skills.

Behaviour support principles

- We teach, model and practise expected behaviours explicitly.
- We aim to reduce barriers and triggers through proactive planning, not reactive sanctions.
- We use functional assessment to understand the purpose of behaviour.
- We make reasonable adjustments and do not penalise pupils for disability-related behaviours.
- We use de-escalation and regulation strategies as first-line responses.
- Physical intervention is used only as a last resort, proportionate, and in line with training and policy.

Individual Behaviour Plans and Positive Handling Plans

Where appropriate, pupils may have:

- an Individual Behaviour Plan (IBP) linked to the graduated approach;
- a risk assessment and positive handling plan;
- a regulation toolkit and sensory plan; and
- a reintegration plan after significant incidents.

These plans are reviewed regularly and shared with relevant staff.

Attendance and EBSA

IW recognises that anxiety and unmet needs can drive non-attendance. We work proactively to:

- identify early signs of EBSA and barriers to attendance;
- co-produce attendance plans with families and the local authority;
- use flexible, time-limited approaches where required to rebuild routines;

- provide a safe base and predictable transitions;
- monitor attendance closely and analyse patterns; and
- ensure that safeguarding considerations are central when pupils are absent.

IW aims to increase pupils' readiness to attend by improving their sense of belonging, relationships, regulation, and success in learning.

## 12.1 Restrictive intervention monitoring and safeguarding oversight

IW is committed to reducing the need for restrictive intervention. Where physical intervention is used as a last resort, leaders ensure:

- staff are trained and refreshed appropriately;
- incidents are recorded factually and reviewed promptly;
- patterns are analysed to identify triggers, staffing needs and environmental factors;
- parents/carers are informed in line with policy and agreements;
- post-incident support is provided for pupils and staff; and
- learning is translated into proactive strategies within IBPs and sensory/regulation plans.

The Headteacher and DSL maintain oversight to ensure that restrictive practice is not normalised and that safeguarding risks are identified early. Where a pattern indicates unmet need or unsafe circumstances, leaders escalate appropriately and involve multi-agency partners as needed.

## 13. Roles and responsibilities

Supporting pupils with SEND is a whole-school responsibility. Clear roles ensure accountability and consistency.

### Proprietary Body

The Proprietary Body is responsible for:

- ensuring IW meets statutory duties and the Independent School Standards;
- approving the SEND Policy and monitoring its implementation;
- ensuring appropriate resources are allocated to SEND provision (staffing, training, therapies, premises);
- receiving and scrutinising inclusion and SEND reports, including progress and safeguarding information; and
- ensuring complaints are handled fairly and in line with policy.

### Headteacher

The Headteacher is responsible for:

- creating a culture of high expectations and inclusion;
- ensuring the curriculum is ambitious and appropriately adapted for pupils with SEND;
- ensuring staff are trained and supervised appropriately;
- monitoring the quality of teaching and provision for pupils with SEND; and
- ensuring safeguarding systems are strong and responsive.

### SENCO

The SENCO provides strategic and operational leadership of SEND. Responsibilities include:

- coordinating identification, assessment and the graduated approach;
- ensuring EHCP provision is implemented and monitored;
- maintaining accurate SEND records and provision maps;
- providing guidance and coaching to staff on SEND practice;
- liaising with external professionals and coordinating therapy input;
- leading annual reviews and submitting documentation to the local authority;
- supporting admission and transition planning; and
- contributing to whole-school improvement, including curriculum design and inclusion evidence.

#### Designated Safeguarding Lead (DSL)

The DSL ensures that safeguarding practice meets KCSIE expectations and is SEND-informed. Responsibilities include:

- monitoring safeguarding risks for pupils with SEND;
- ensuring accessible reporting routes and protective supervision;
- liaising with multi-agency partners; and
- ensuring staff understand and fulfil their safeguarding responsibilities.

#### Teachers

Teachers are responsible for:

- delivering high-quality teaching adapted to pupils' needs;
- knowing pupils well, including starting points, EHCP outcomes and effective strategies;
- planning and assessing learning, recording progress and responding to gaps;
- working collaboratively with TAs and specialists; and
- maintaining strong communication with families.

#### Teaching assistants and support staff

Support staff are responsible for:

- enabling access to learning and promoting independence;
- delivering interventions and programmes with fidelity;
- supporting communication and regulation proactively; and
- recording information accurately and sharing concerns promptly.

#### Therapists and external professionals

External professionals contribute through:

- assessment and advice;
- staff training and programme design;
- review of impact; and
- participation in EHCP processes.

#### Parents and carers

Parents and carers are partners. They are encouraged to:

- share information about their child's needs and strengths;

- engage in reviews and co-production;
- work with IW to support attendance and wellbeing; and
- raise concerns promptly so they can be addressed.

#### Pupils

Pupil voice is central. Pupils are supported to:

- share their views in accessible ways;
- take increasing ownership of goals and strategies; and
- develop self-advocacy and independence over time.

## 14. Working with parents/carers and pupil voice

IW is committed to meaningful partnerships with families. We recognise that parents and carers are experts in their child and that trust is essential for progress and wellbeing.

Communication with families includes:

- structured meetings (IEP reviews, EHCP reviews, transition meetings);
- regular updates on progress and wellbeing;
- planned communication systems appropriate to the family's needs (email, phone, home-school books, platforms);
- collaborative problem-solving when barriers arise (for example, attendance or behaviour);
- signposting to support services and SENDIASS where appropriate; and
- clear explanations of strategies so consistency can be built between home and school.

#### Co-production

Co-production means families are involved in:

- setting outcomes and priorities;
- agreeing strategies and adjustments;
- reviewing impact and changing course where needed; and
- decisions about pathway and provision.

#### Pupil voice

IW ensures pupil voice is accessible. Methods include:

- choice boards and symbol-supported questionnaires;
- structured pupil conferencing with visuals;
- photographs and learning journals;
- supported communication with trusted adults; and
- observation of preference, engagement and distress cues for pupils with complex communication needs.

Pupil voice is used to shape:

- individual plans and goals;
- regulation strategies and safe spaces;
- enrichment choices and interests-based learning; and

- improvements to school culture and routines.

## 15. Multi-agency working and external support

Many pupils require coordinated support across education, health and care. IW works proactively with partners, including:

- educational psychology;
- speech and language therapy;
- occupational therapy and physiotherapy;
- CAMHS and other mental health services;
- paediatrics and specialist medical services;
- social care (CIN/CP, early help, contextual safeguarding); and
- the local authority SEND team and commissioning.

### Referral and engagement

Referrals are made with parental consent where appropriate, except where safeguarding duties require information sharing. IW ensures:

- clear rationale for referrals linked to evidence and outcomes;
- timely sharing of relevant information;
- attendance at multi-agency meetings and strategy discussions;
- implementation of professional recommendations; and
- review of impact and next steps.

IW expects all professionals to work in a coordinated way. The SENCO provides oversight to ensure that advice is not siloed and that staff can implement strategies consistently.

### Local area partnership

IW is committed to contributing positively to the local area partnership strategy for SEND. We engage in local networks where possible, share best practice and work collaboratively to improve experiences and outcomes for pupils with SEND.

## Transition arrangements

Transitions are pivotal for pupils with SEND. IW plans transitions carefully to reduce anxiety and prevent setbacks.

### Transition into IW

A transition plan may include:

- phased entry and gradual increase of time on site;
- assigned key adult and predictable arrival routine;
- transition booklets, photo maps and social stories;
- sensory planning for transport and entry points;
- clear communication with parents to align routines; and
- early review points to adjust support quickly.

## Transition within IW

When pupils move class, pathway or key staff, IW:

- plans change in advance with pupil voice;
- uses structured handover meetings and updated profiles;
- provides bridging activities and familiar routines; and
- monitors wellbeing closely during the change.

## Transition to secondary

IW begins early planning and coordinates with receiving settings to ensure continuity. Where needed, IW supports:

- additional visits at quieter times;
- introduction to key staff;
- planning for travel and routines;
- communication of successful strategies and triggers; and
- joint planning meetings with the local authority and parents/carers.

Transition planning is recorded and reviewed, recognising that successful transition is a key outcome for many pupils.

## Funding and resourcing of SEND provision

IW works with local authorities and parents to ensure provision is appropriately resourced. Funding considerations may include:

- banded funding and any top-up arrangements linked to EHCP provision;
- staffing levels and specialist roles (including SENCO and therapy input);
- training and supervision requirements;
- specialist equipment and assistive technology;
- environmental adaptations; and
- transport and transition support where relevant.

IW uses funding to build capacity and to ensure provision is delivered as commissioned. Leaders monitor resource deployment to ensure value for money and impact, and they provide transparent evidence for commissioners when requested.

## 16. Monitoring, evaluation, quality assurance and accountability

IW's inclusion and SEND provision is monitored rigorously. Leaders use both quantitative and qualitative evidence to evaluate impact and to improve provision.

### Monitoring cycles

Leaders and the SENCO use a planned cycle that may include:

- learning walks and classroom visits focusing on adaptive teaching and SEND access;
- scrutiny of plans, provision maps and intervention records;
- case sampling that triangulates pupil work, observations, plans and outcomes;

- pupil voice and parent feedback (including for protected groups);
- attendance, behaviour and wellbeing analysis for SEND cohorts; and
- review of safeguarding records where SEND vulnerabilities are relevant.

#### Evidence of impact

IW evaluates impact by looking at whether pupils:

- know more, remember more, and can do more (as appropriate to the pathway);
- develop communication independence and functional skills;
- increase independence, stamina and self-regulation;
- improve participation and engagement in learning;
- make progress towards EHCP outcomes and personalised targets; and
- are prepared for the next steps.

Where published outcomes data is unavailable or inappropriate due to cohort size and need, IW uses:

- small-step progress frameworks;
- engagement measures;
- case studies;
- therapy progress measures; and
- triangulated evidence across time.

#### Governance and proprietorial oversight

The Proprietary Body receives regular reports on:

- SEND cohort profile and admissions;
- progress and achievement evidence;
- attendance and behaviour trends, including reasonable adjustments and restrictive intervention monitoring;
- safeguarding issues impacting SEND pupils;
- staff training and capacity; and
- risks and improvement actions.

#### Continuous improvement

IW uses evidence to refine curriculum sequencing, interventions, staff deployment and environmental adjustments. Leaders ensure that where barriers persist, action is swift and practical rather than delayed.

This section also supports inspection readiness by ensuring leaders have an accurate understanding of strengths and areas for development in SEND provision.

## 17. Staff training, induction and professional development

Staff expertise is critical to SEND outcomes. IW provides a planned programme of training and coaching, including:

- statutory safeguarding training (including SEND vulnerabilities and child-on-child abuse);
- SEND Code of Practice and graduated approach training;
- autism and communication training (including AAC);
- trauma-informed practice and de-escalation;

- sensory processing and regulation strategies;
- adaptive teaching and curriculum access;
- positive handling training (where role-appropriate);
- medical needs training (including epilepsy, asthma, allergies, diabetes and use of emergency medication where applicable);
- record keeping and information sharing; and
- supervision and reflective practice for staff in demanding roles.

#### Induction

All new staff receive induction on:

- IW ethos and SEND model;
- safeguarding and reporting;
- communication supports and routines;
- behaviour and regulation approaches; and
- key policies and procedures.

#### Coaching and capacity building

Leaders ensure training translates into practice through:

- coaching, modelling and feedback;
- team reflection and learning conversations;
- sharing of successful strategies and resources; and
- evaluation of training impact through observation and pupil outcomes.

## 18. Record keeping, confidentiality and information sharing

IW maintains accurate records to ensure continuity, accountability and safeguarding. Records may include:

- SEND register and pupil profiles;
- EHCP documentation and annual review files;
- IEPs/ISPs, IBPs and risk assessments;
- therapy plans and reports;
- assessment and progress evidence;
- attendance and wellbeing plans; and
- safeguarding records.

#### Confidentiality

Information is handled in line with data protection law. Staff access information on a need-to-know basis. However, safeguarding duties may require information sharing to protect children.

#### Information sharing

IW shares information appropriately with:

- parents/carers;
- local authorities and commissioning teams;

- health professionals and social care; and
- receiving settings during transition.

IW ensures that the information shared is:

- accurate and factual;
- proportionate and relevant;
- timely; and
- recorded appropriately.

## 19. Complaints, disagreement resolution and SEND support assurance

IW aims to resolve concerns quickly, transparently and respectfully.

Informal resolution

Parents/carers are encouraged to raise concerns early. Typical steps include:

- discussion with the class teacher or key adult;
- meeting with the SENCO to review provision and agree on actions;
- escalation to the Headteacher if concerns persist.

Formal complaints

If concerns remain unresolved, parents/carers may submit a formal complaint in line with IW's Complaints Policy. IW will:

- acknowledge the complaint promptly;
- investigate fairly and proportionately;
- provide a written response within published timescales; and
- offer opportunities for further escalation where appropriate.

Mediation and SENDIASS

Where disagreements relate to EHCP provision or decisions, IW will signpost families to appropriate support, including SENDIASS and local authority routes, and will cooperate with mediation where applicable.

Assurance

IW welcomes feedback and uses concerns as opportunities to improve. Leaders review patterns in concerns/complaints to identify systemic issues and to strengthen provision.

## 20. Policy review and links to other policies

This policy is reviewed at least annually and sooner if:

- there are changes to statutory guidance (for example, SEND Code of Practice updates or KCSIE revisions);
- inspection or regulatory requirements change;
- learning from safeguarding incidents indicates a need for change; or
- monitoring identifies significant areas for improvement.

Linked policies and documents include:

- Safeguarding and Child Protection Policy
- Behaviour Policy and Positive Handling Policy
- Attendance Policy
- Curriculum Policy and Subject/Pathway Curriculum Documentation (including EQUALS-informed frameworks)
- Accessibility Plan and Health & Safety documentation
- Equality, Diversity, Equity and Inclusion (EDEI) Policy
- Medical Needs Policy
- Complaints Policy
- Data Protection and Confidentiality Policy

By working coherently across these documents, IW ensures that SEND provision is consistent, safe and effective.

## **Appendix A: Summary checklist for leaders (inspection-ready inclusion)**

The following checklist helps leaders demonstrate strong inclusion. It is used within IW's self-evaluation and quality assurance cycles.

### Leadership and culture

- Leaders identify pupils' needs quickly and accurately, including emerging or changing needs.
- Leaders have high expectations for pupils with SEND and can articulate ambitious end points.
- The SENCO has sufficient authority within the leadership structure to influence practice.
- Staff are trained and supported to implement the graduated approach consistently.
- Leaders take responsibility for pupils placed in any off-site provision and can evidence safeguarding and quality assurance.

### Graduated approach and provision

- Assessments are purposeful, triangulated and lead to timely action.
- Plans include clear outcomes, strategies, provision and review points.
- Provision mapping shows what support is in place and the intended impact.
- Reviews evaluate impact and lead to adjustments where needed.
- EHCP provision is delivered as written, monitored and evidenced.

### Curriculum and teaching

- Curriculum pathways are appropriate and ambitious for each pupil.
- Teaching is adapted carefully to remove barriers without lowering ambition.
- Teachers and TAs are deployed effectively, with clear accountability.
- Communication, language and foundational skills are prioritised.
- Assessment evidence shows progress over time, including where published data is unavailable.

### Safeguarding and wellbeing

- Pupils are safe and feel safe; their voices are heard.
- Staff are vigilant and follow systems consistently.
- SEND vulnerabilities are understood and addressed (communication barriers, grooming risk, peer abuse).

- Allegations and concerns are handled promptly and in line with local procedures.
- Attendance, behaviour and safeguarding are tracked and analysed for patterns.

#### Partnerships

- Parents/carers are engaged in co-production and reviews.
- Multi-agency working is effective, and specialist advice is implemented.
- Transitions are planned early and supported robustly.

This checklist is reviewed termly as part of IW's quality assurance cycle and informs improvement priorities.

## Appendix B: Independent School Standards and inspection mapping

This appendix provides an at-a-glance mapping of this policy to key Independent School Standards (ISS) and inspection themes.

#### ISS Part 1: Quality of education provided

- Curriculum: IW provides a broad and balanced curriculum that is ambitious for pupils with SEND and appropriately sequenced across pathways. Curriculum documentation sets out clear end points and progression, informed by EQUALS where appropriate.
- Teaching: Staff use adaptive teaching and specialist-informed strategies so that pupils can access learning and make progress from their starting points. Leaders monitor teaching quality through learning walks, coaching and case sampling.
- Assessment: IW uses proportionate assessment to check understanding and inform next steps, including small-step and engagement measures where appropriate.

#### ISS Part 2: Spiritual, moral, social and cultural development

- Pupils are taught to respect difference, develop empathy and understand British values in age- and needs-appropriate ways.
- The curriculum supports belonging, identity, relationships, education and participation in the wider community.

#### ISS Part 3: Welfare, health and safety

- Safeguarding is embedded, with SEND-informed practice that recognises additional vulnerabilities.
- Behaviour, attendance and wellbeing are treated as core components of SEND provision, with robust plans and monitoring.
- Risk assessments, PEEPs and medical plans support safe participation.

#### ISS Part 4: Suitability of staff, supply staff and proprietors

- Staff receive clear guidance and training on working safely and appropriately with pupils with SEND, including safeguarding, supervision and professional boundaries.
- Recruitment and induction ensure staff understand the school's SEND model and safeguarding expectations.

#### ISS Part 5: Premises and accommodation

- Premises are organised and adapted to be safe and suitable for pupils with SEND, including accessibility, safe spaces for regulation, and appropriate hygiene and medical arrangements.

## ISS Part 6: Provision of information

- IW provides clear information to parents and commissioners about SEND provision, including admissions information, curriculum pathways, how needs are identified and met, and how concerns can be raised.

## ISS Part 7: Manner in which complaints are handled

- IW's complaints route is transparent and accessible. SEND concerns are addressed promptly through informal steps where possible and through formal routes where necessary.

Leaders use this mapping alongside the school's self-evaluation and improvement planning to ensure compliance and continuous improvement.

## Appendix C: IW templates and standard paperwork

IW maintains a suite of standard templates to ensure consistency and quality. Templates are reviewed annually.

Key templates include:

- Pre-admission information request checklist (EHCP, reports, safeguarding, health, attendance, transport)
- Baseline and pupil profile template (strengths, needs, communication, sensory, regulation, risk)
- IEP / Individual Support Plan template (SMART outcomes, strategies, provision, review)
- Provision map template (universal, targeted, specialist provision with frequency and impact measures)
- Therapy integration plan (SaLT/OT recommendations embedded into routines)
- Regulation plan and toolkit template (triggers, early signs, strategies, safe spaces, co-regulation)
- Individual Behaviour Plan template (function, skill-building goals, proactive strategies, response plan)
- Risk assessment template (learning, behaviour, off-site, medical, contextual safeguarding)
- Personal Evacuation Plan (PEEP) template (mobility, understanding, sensory needs, adult support)
- EHCP annual review paperwork checklist and report template
- Transition plan template (into IW, within IW, to secondary)
- Attendance and EBSA support plan template
- Parent meeting record template and agreed actions log
- Case sampling proforma for quality assurance (triangulation of plans, practice and impact)

Templates are used to ensure that practice is "water-tight": transparent, auditable, and consistent across staff and over time.

## Appendix D: Glossary of key terms

Key terminology

- SEND: Special Educational Needs and/or Disabilities.
- SENCO: Special Educational Needs Coordinator, responsible for coordinating SEND provision.
- EHCP: Education, Health and Care Plan.
- APDR: Assess, Plan, Do, Review cycle.
- IEP/ISP: Individual Education Plan / Individual Support Plan.
- IBP: Individual Behaviour Plan.
- AAC: Augmentative and Alternative Communication (e.g., symbols, communication books, VOCA).

- SEMH: Social, Emotional and Mental Health.
- EBSA: Emotionally Based School Avoidance.
- PEEP: Personal Emergency Evacuation Plan.
- Reasonable adjustments: changes made to ensure a disabled pupil is not placed at a substantial disadvantage.

IW uses terminology in a child-centred way. Labels are used to access understanding and support, not to limit ambition or identity.