

## Special Educational Needs and Disabilities Policy

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## Faringdon Learning Trust Arrangements

### Definition and Aims

#### Definition

High quality teaching that is differentiated and personalised will meet the individual needs of the majority of children. Some children need educational provision that is additional and different to this. This is special educational provision under Section 21 of the Children and Families Act 2014.

A child has special educational needs if he or she has a learning difficulty or disability which calls for special educational provision to be made for him or her.

A child of compulsory school age has a learning difficulty or disability if she or he:

- has a significantly greater difficulty in learning than the majority of others of the same age, or
- has a disability which prevents or hinders him or her from making use of educational facilities of a kind generally provided for others of the same age in mainstream schools

#### Aims

We at Faringdon Community College believe that each pupil has individual and unique needs. However, some pupils require more support than others. If these pupils are to achieve their full potential, we must recognise this and plan accordingly. We acknowledge that a significant proportion of pupils will have special educational needs at some time in their school career. Many of these pupils may require help throughout their time in School, whilst others may need a little extra support for a short period to help overcome more temporary needs. We aim to provide all pupils with strategies for dealing with their needs in a supportive environment, and to give them meaningful access to the curriculum. In particular, we aim:

- to enable every pupil to experience success
- to promote individual confidence and a positive attitude
- to ensure that all pupils, whatever their special educational needs, receive appropriate educational provision through a broad and balanced curriculum that is relevant and differentiated, and that demonstrates coherence and progression in learning
- to give pupils with SEND equal opportunities to take part in all aspects of the School's provision, as far as is appropriate
- to identify, assess, record, and regularly review pupils' progress and needs
- to involve parents/carers in planning and supporting at all stages of their child's development
- to work collaboratively with parents, other professionals and support services including the Educational Psychology Service
- to ensure that the responsibility held by all staff and local governors for SEND is implemented and maintained.

### Roles and Responsibilities

Provision for pupils with SEND is a matter for the School as a whole. It is each teacher's responsibility to provide for pupils with SEND in his/her class, and to be aware that these needs may be present in different learning situations. All staff are responsible for helping to meet an individual's special educational needs, and for following the School's procedures for identifying, assessing and making provision to meet these needs.

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The Trust Board, in co-operation with the Trusts' Head teachers, has a legal responsibility for determining the policy and provision for pupils with special educational needs. It will through Local Governing Bodies maintain a general overview of provision and Local Governing Bodies will be expected to appoint a representative (the SEND Governor) who takes particular interest in this aspect of the School.

Governors must ensure that:

- the necessary provision is made for any pupil with SEND
- all staff are aware of the need to identify and provide for pupils with SEND
- pupils with SEND join in School activities alongside other pupils, so far as is reasonably practical and compatible with their needs and the efficient education of other pupils. Reasonable adjustments must be made wherever possible.
- they have regard to the requirements of the Code of Practice for Special Educational Needs (2014)
- parents are notified if the School decides to make SEND provision for their child
- they set up appropriate staffing and funding arrangements, and oversee the School's work for pupils with SEND
- they receive the Annual SEND report
- the annual report is published on the school website

Governors play a major part in School self-review. In relation to SEND, members of the governing body will ensure that:

- they are involved in the implementation and monitoring of the Faringdon Learning Trust (FLT) SEND policy, and that the School as a whole will also be involved in its development
- SEND provision is an integral part of the School Development Plan
- the quality of SEND provision is regularly monitored
- FLT Quality of Education committee is informed about any emerging SEND issues

The Head teacher has responsibility for:

- the management of all aspects of the School's work, including provision for pupils with special educational needs
- keeping the governing body informed about SEND issues
- working closely with the special educational needs co-ordinator
- the deployment of all special educational needs personnel within the School
- S/he also has overall responsibility for monitoring and reporting to the governors about the implementation of FLT SEND policy and the effects of inclusion policies on the School as a whole, e.g. through Monitoring Quality review meetings Parts 1 and 2.

The Special Educational Needs and Disability Co-ordinator (SENDCo) is responsible for:

- overseeing the day to day operation of the School's SEND policy co-ordinating the provision for pupils with special educational needs
- ensuring that an agreed, consistent approach is adopted liaising with and advising other School staff
- helping staff to identify pupils with special educational needs
- carrying out detailed assessments and observations of pupils with specific learning problems
- liaising closely with parents of pupils with SEND, so that they are aware of the strategies that are being used and are involved as partners in the process
- liaising with outside agencies, arranging meetings, and providing a link between these agencies, class teachers and parents

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- maintaining the School's SEND register and SEND records
- assisting in the monitoring and evaluation of progress of pupils with SEND through the use of existing School assessment information
- contributing to the in-service training of staff
- managing TAs
- liaising with the SENDCOs in receiving Schools or Colleges and/or other primary and junior Schools to help provide a smooth transition from one school to the other.

Class Teachers / Form Tutors are responsible for:

- making themselves aware of the FLT SEND Policy and the School's procedures for identification, monitoring and supporting pupils with SEND
- including pupils with SEND in the classroom, and for providing an appropriately differentiated curriculum. They can draw on the SENDCO for advice on assessment and strategies to support inclusion.
- agreeing and reviewing outcomes for pupils on the SEN Register at SEN Support.
- giving feedback to parents of pupils with SEND
- Making reasonable adjustments to classroom practice and activities to meet the needs of SEND pupils

**Teaching Assistants** work as part of a team with the SENDCO and the teachers, supporting pupils' individual needs, and helping with inclusion of pupils with SEND within the class. They also work with pupils outside the classroom providing 1:1 or small group interventions when deemed appropriate. They play an important role in implementing support strategies and monitoring progress. They contribute to review meetings and help pupils with SEND to gain access to a broad and balanced curriculum. TA's are trained to deliver evidence based intervention programmes to support SEND. Pupils with SEND do not work exclusively with teaching assistants.

**Teaching Assistants should:**

- be fully aware of FLT SEND policy and the School's procedures for identifying, assessing and making provision for pupils with SEND
- liaise with class teachers and SENDCO about individual children
- Record the progress of the pupils as required by class teachers, SENDCO or other professionals

### Co-ordinating and Managing Provision

At FLT:

- sharing of expertise is welcomed and encouraged
- special educational needs is a part of the School development plan
- SEND is a regular item on staff meeting agendas or the main item of a meeting
- the SENDCO meets formally with key staff each term to review provision
- the SENDCO ensures that regular meetings are held to review targets and provision and that parents are invited
- there is daily informal contact between all staff to monitor individual pupils and to discuss concerns
- pupils are involved as far as practicable in discussions about their targets and provision

The SENDCO ensures that the following information is easily accessible to staff as appropriate:

- the FLT SEND policy and School procedures

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- the SEND register, including descriptions of pupils' needs
- an overview of SEND provision from the School prospectus
- the School's internal arrangements for SEND, including a clear description of the responsibilities of all staff

### Admission Arrangements

We strive to be a fully inclusive School. It acknowledges the range of issues to be taken account of in the process of development. All pupils are welcome, including those with SEND, in accordance with the FLT admissions policy. If a parent wishes to have mainstream provision for a child with a statement or EHCP the LA must provide a place unless this is incompatible with the efficient education of other pupils, or unable to meet the needs of the individual child and there are no reasonable steps that can be taken to prevent the incompatibility.

### Specialisms and Special Facilities

At this school:

- all teaching staff teach pupils with SEND. Additional training for teachers and TAs is made available when necessary and appropriate, particularly training to meet the specific needs of an individual pupil
- differentiated resources are used to ensure access to the curriculum
- all staff are kept well informed about the strategies needed to manage pupils' needs effectively, and we try to ensure that other pupils understand and respond with sensitivity
- pupil support aims to encourage as much independence as possible within a safe and caring environment
- we have access to the expertise of LA services and other agencies if it is required
- the School can provide access for:  
Wheelchairs – There are lifts in the Science Block and in the Wilson Building.  
There are disabled toilets in Reception and on every floor of the Wilson Building.

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## Identification and Assessment and Provision

### Allocation of Resources

All schools in Oxfordshire receive funding for pupils with SEND in three main ways:

- The base budget (element 1 funding) covers teaching and curriculum expenses as well as the cost of the SENDCo.
- The notional SEND budget (element 2 funding) covers the additional educational support required.
- Specific funds may be allocated to pupils with Education, Health and Care Plans (element 3 funding). In Secondary Schools, element 3 funding is delegated to school and is included in the notional SEND budget.

The Headteacher, SENDCo and the governors of the School regularly monitor the needs of pupils with SEND. Resources are allocated according to need. The resources available include ancillary help, teacher time and materials, and these are dependent on the School's SEND budget.

Any money allocated as a result of statutory assessment is spent according to the terms outlined in the resulting Education, Health and Care (EHC) plan. The School has a continuing commitment to purchase appropriate resources for pupils with SEND.

This schools follows the OCC SEND Guidance to ensure that all pupils' needs are appropriately met.

### Identification, Assessment and Review

The progress of pupils is assessed at regular intervals by staff as part of the school's tracking process. Where progress is slow, the first response is high quality targeted teaching. Slow progress and low attainment do not necessarily mean that a child has SEND. All those working with children are alert to emerging difficulties and respond early.

In deciding whether to make special educational provision, the SENDCo and/or designated staff consider all the information gathered from within the school about the pupil's progress, alongside national data and expectations of progress.

Where more specific assessment is deemed to be necessary, this will be organised by the SENDCo, who may then involve other professionals from outside the school. The information gathering will include an early discussion with the pupils and their parents. We recognise that parents know their children best and we ensure we listen to and understand when parents express concerns about their child's development. Consideration of whether special educational provision is required starts with the desired outcomes, including the expected progress and attainment and the views and wishes of their parents.

When a pupil is identified as needing SEND support, the School employs a graduated approach of Assess-Plan-Do-Review adopting the recommended model for Special Educational Needs as set out in the Code of Practice (DfE 2014). The LA SEND Guidance is used as a guide for the identification, assessment and provision for SEND, and the forms provided are used for record-keeping. A register of pupils with SEND is kept as a legal requirement and is available to all staff.

Criteria for identifying SEND may include:

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- A child's early history and/or parental concern
- Low entry profile
- A pupil's lack of progress despite receiving a differentiated curriculum
- Low achievement i.e. significantly below the suggested level for their age
- Requiring greater attention in class due to behavioural/learning difficulties
- Requiring specialist material/equipment or support for sensory/physical problems

The SENDCo and the class teachers, together with specialists, and involving the pupil and parents, consider a range of teaching approaches, appropriate equipment, strategies and interventions in order to support the pupil's progress. Outcomes are agreed and progress reviewed regularly.

Where, despite the school providing SEND support, a pupil has not made expected progress, school and parents may consider requesting an Education, Health and Care assessment by the local authority. The LA will expect to see evidence of the action taken by the school as part of SEND support.

Reviews of pupils with SEND support will be carried out at relevant times during the academic year. These will include meetings and written communication with parents and will provide an opportunity to reflect on current provisions and plan for the future. However, parents are welcome to make an appointment at any time during the school year to discuss the support their child is receiving.

### Provision

Provision for pupils with SEND is additional to or different from those provided as part of the School's usual differentiated curriculum and strategies. It is a graduated response to pupils' individual needs. Such provision is recorded on the SEND Pupil Profile.

### Categories of Special Educational Need

Pupils' needs and requirements fall into four broad areas, but individual pupils may well have needs which span two or more areas. For example, a pupil with general learning difficulties may also have communication difficulties or a sensory impairment.

- Communication and interaction: Speech, Language and Communication needs  
Autistic Spectrum Disorder including Aspergers and Autism
- Cognition and Learning: Learning difficulties  
Specific Learning Difficulties e.g. dyslexia, dyspraxia, dyscalculia
- Social, emotional and mental health difficulties: Behaviour reflecting underlying mental health difficulties (e.g. anxiety, depression). Attention deficit disorder, attention deficit hyperactive disorder, attachment disorder
- Sensory and/or physical: Hearing Impairment  
Visual impairment

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### Supporting pupils with medical conditions

Where children with SEND also have medical needs, their provision is planned and delivered in a co-ordinated way with the healthcare plan. School has regard for the statutory guidance supporting pupils at school with medical conditions (DfE, 2014).

### Curriculum Access and Inclusion

We strive to be an inclusive school, engendering a sense of community and belonging through its

- inclusive ethos
- broad and balanced curriculum for all pupils
- systems for early identification of barriers to learning and participation
- high expectations and suitable targets for all children

Pupils are grouped in classes according to age and/or ability. As there can be a wide range of ability in each class, all staff provide a differentiated curriculum suitable for all the pupils, to ensure access at all levels. Any pupils with particular needs are included as fully as possible into the normal classroom environment and, where appropriate, the curriculum is adjusted. Sometimes it may be appropriate to withdraw a pupil sensitively, to work individually with a TA or specialist teacher in order to acquire, reinforce or extend skills more effectively. For some pupils, withdrawal sessions may be used to improve motor skills or application or to give support in a particular area e.g. spelling.

Provision for pupils with SEND is intended to enable them to make the greatest possible progress in the context of the curriculum and in their personal development.

### Remote Learning

it is important to try and reduce disruption to SEND pupils who rely on structure, continuity, and social interaction. Therefore, SEND pupils, especially those with an EHCP will be given priority places in school. Where this is not possible SEND pupils will be provided with access to remote learning.

If a child with SEND is unable to attend school due to COVID -19 the following provision will be made:

- 
- Appropriate work will be provided for pupils whether in school or at home
- IT will be provided where possible to support remote learning
- Annual reviews will continue to be carried out remotely
- Termly SEND review meeting with parents will continue to be carried out remotely
- Regular contact will be made with families of SEND children to offer support
- EHCP provision will continue to be provided wherever reasonably possible
- A risk assessment will be carried out for every pupil with an EHCP

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The SENDCO will continue to work with all pupils and families to ensure that all children on the SEND register are monitored and are able to achieve whilst learning remotely. All children with an EHCP will have an up to date risk assessment in place whilst remote learning and regular contact will be made with these families to offer further wellbeing support. Outcomes should continue to be achievable for children working from home – adapting where necessary for remote learning.

Below are some examples of types of learning approaches that may be offered to SEND pupils:

- Providing packs of work that are differentiated and appropriately levelled for individual children.
- Live streaming lessons which children at home can join.
- Extra support virtual meetings with teacher or TA
- Pre-recorded lessons for children to access at home at an appropriate time
- Packs of resources to allow for kinesthetic and visual learning
- Interventions carried out remotely with a Teacher or TA for individuals or small groups
- Individualised support to engage pupils
- Remote video lessons of teachers reading stories to their pupils
- Pastoral virtual session with teacher and classmates
- Online communication platforms connecting children, teachers and parents through sharing photos, videos and messaging about their learning (e.g. use of Class Dojo).

Some SEND children may find the approach of online learning very difficult, therefore a blended approach to learning involving some virtual and some paper based activities may be best.

SEND pupils are likely to need additional support from parents/carers to complete school work/activities at home. Home circumstances will therefore dictate how successful home /blended learning can be for SEND pupils. Virtual lessons may present barriers for pupils with SEND, this can include levels of engagement, concentration spans, understanding of task and ability to access IT. These things must be taken into account when providing remote learning.

Wherever possible therapies and external provisions that are crucial for the successful development of SEND pupils will continue.

Many learners with SEND are finding the transitions in and out of school very challenging and extra communication with parents may be needed. Leaders should recognise that SENCOs may need additional release time and resources to provide the necessary support for students with SEND and students with emotional or social needs.

### Evaluating Success

Parents/guardians, staff and pupils meet regularly, both formally and informally, to plan outcomes, revise provision and celebrate success.

The success of the School's SEND Policy and provision is evaluated through:

- monitoring of classroom practice by SENDCo and subject leaders
- analysis of pupil tracking data and test results for individual pupils and cohorts
- value-added data for pupils on the SEND register
- monitoring of procedures and practice by the School's SEND governor three times a year
- school self-evaluation

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- monitoring the quality of Pupil Profiles and review meetings
- the School's annual SEND review, which evaluates the success of our policy and sets new targets for development
- the School Development Plan, which is used for monitoring provision in the School
- visits from LA personnel and OFSTED inspection arrangements, which also enable us to evaluate the success of our provision

### Arrangements for Complaints

If a parent or guardian is concerned about SEND provision for their child, initial contact should be made with the class teacher, subject teacher or form tutor. A meeting will be arranged, which may include the Head Teacher and/or SENDCo, to discuss the concern. Parents can request an appointment with the SENDCo or Head Teacher directly. The SENDIASS Service is available to support parents in meetings concerning their child's progress and welfare.

In the event of a formal complaint concerning SEND provision, parents/guardians are advised to contact the School's Head Teacher and follow FLT Complaints Procedure in the first instance.

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## Partnership Within and Beyond the School

### Partnership with Parents

We will continue to forge home/school links and encourage parents to be partners in the education process. Parents are involved from the outset and encouraged to discuss any concerns with class or subject teachers or form tutors as they arise. They are always encouraged to take part in the process of reviewing and monitoring provision and progress.

Parents will receive accurate information when they meet with teachers, so that they have a full picture of their child's skills and abilities, at whatever level, as well as their child's behaviour at School. They are consulted before outside agencies are involved and are included as far as possible in strategies instigated. Parents have the right to access any records of their child's progress and are encouraged to contribute to these records.

Parent consultation meetings are held at least once a year, but parents are welcome to visit the School or arrange meetings at other times to discuss any aspect of their child's progress with the class teacher, form tutor or SENDCo. We are happy to make arrangements, wherever possible, for interpreters to be present for parents with a first language other than English.

The SENDIASS Service provides a range of support for parents of pupils with SEND, including Independent Parental Supporters (IPS). IPS give advice and support to parents of pupils with SEND at any age or stage. SENDIASS also gives information about mediation services. They arrange meetings and produce leaflets and a telephone help line about many aspects of SEND. They can be contacted on 01865 810516.

### The Voice of the Child

All pupils should be involved in making decisions where possible right from the start of their education. The ways in which pupils are encouraged to participate should reflect the pupil's evolving maturity. Participation in education is a process that will necessitate all pupils being given the opportunity to make choices and to understand that their views matter. Confident young pupils, who know that their opinions will be valued and who can practice making choices, will be more secure and effective pupils during their time at the School.

We encourage pupils to participate in their learning by:

- contributing to reviews and targets (formally or informally)
- talking to TAs and teachers about their learning
- class and individual reward systems

### Links with Other Agencies, Organisations and Support Services

The School is able to call upon the expertise of a wide range of support services. This includes advisory teachers from the Communication and Interaction Service, Services for Pupils with Physical and Sensory Disabilities, Occupational Therapists, Physiotherapists, Speech and Language Therapists and others. It also includes the Educational Psychology Service and the Oxfordshire School Inclusion Team on a buy-back basis. We are committed to using the expertise and advice provided by other professionals.

These support services are consulted after discussion with the Headteacher or SENDCo, and with the full agreement of parents. For assessment and advice from most of these services a request form

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must be completed and additional information may be required e.g. the service's own checklist, and information about strategies already in use.

The SENDCo holds contact addresses and request forms for other agencies and support services.

### Links with Other Schools and Transfer Arrangements

Transfer and links with other schools and colleges for pupils identified with SEND

- SEND records are transferred following FLT guidance on data retention procedures
- Y6 pupils with SEND transferring to Faringdon Community College are given additional visits, if required, so that they will become more confident in the new situation
- where appropriate, meetings are held with colleagues to ensure a smooth transfer between the Infant and Junior school or from other primary schools for pupils identified with SEND
- In school with a high transient population and children may experience high levels of mobility such as children of service personnel, every effort is made to ensure a smooth transition between settings.
- where appropriate, meetings are held with colleagues to ensure a smooth transfer between primary/junior schools to FCC for Y6 pupils identified with SEND or those transferring from other Secondary settings
- for pupils with Education, Health and Care Plans, the child's annual review should take place by 31<sup>st</sup> October in the year of transfer to secondary school. Annual reviews in the year of transfer to post-16 provision must take place by 31<sup>st</sup> March. Annual reviews in the year of transfer from Infant to Junior setting should take place in a timely manner so that the necessary transfer arrangements re needs and provision can be made.
- For Pupils with EHCP looking to transfer to specialist provision settings for secondary placement, this request must be made at the annual review meeting before the end of year 5.
- the SENDCo or their representative, where possible, will attend the final annual review of Year 6 pupils with Education, Health and Care Plans who are transferring to the college
- for a Y11 pupil with an Educational, Health and Care Plan, the appropriate person from the next phase of their education will be invited to the annual review.

### Staff Development and Appraisal

We are committed to gaining further expertise in the area of Special Needs education. Current training includes school-based whole school INSET, training sessions for TAs, SENDCo and TA group meetings, attendance at County meetings and the reading and discussion of documents on SEND. Individual staff development is provided by various higher education institutions. Staff meetings are arranged to respond to the particular needs of the school.

Arrangements for the induction of NQTs and new staff into the School's policy and SEND procedures are detailed in the Staff Handbook.

### Monitoring and Review

#### Monitoring

The implementation of this policy will be monitored by the SEND Governor.

The Governing Body will annually review the impact of the policy.

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The Local Governing Body will receive an annual SEND report (see annex A) which will be forwarded to the FLT Quality of Education Committee Chair.

#### Review

This policy will be updated in line with new initiatives together with any streamlining of school processes.

Faringdon Learning Trust will review this policy every two years.

#### Linked Policies

Accessibility policy

Equality policy

School Behaviour Policy

FLT Supporting Pupils with medical conditions

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## ANNEX A

### Model structure for the Report to Governors on Special Education Needs and Disabilities

This is a *suggested* model report structure which can be used to meet statutory and Faringdon Learning Trust reporting requirements.

A SEND report must be completed annually and presented to the Local Governing Body to be signed off. Once signed this must be uploaded onto the school website, in addition a copy must be sent to the Faringdon Learning Trust Chair of the Quality of Education committee:

[academysecretary@faringdonlearningtrust.org](mailto:academysecretary@faringdonlearningtrust.org)

#### 1. Identifying pupils with SEND

This section could cover:

- How the school identifies children with SEND
- What happens once a pupil has been identified

#### 2. Progress made by pupils with SEND

This should be a general overview and pupils should not be named.

You could also look at the impact of the interventions that are being used to support pupils with SEND.

#### 3. SEND funding

This section should tell governors:

- How the school's SEND funding is allocated and spent
- Who is responsible for this
- Where pupils with SEND are also eligible for the pupil premium, how the pupil premium is being used to support these pupils

#### 4. Staff development

This section of the report could cover:

- The staff development that has been offered on SEND
- Any issues relating to time and resources to enable the SENDCO to carry out his or her duties

#### 5. Work with external agencies

The report could also include information about any external specialist support services that work with the school, the impact they have and any concerns there may be around this specialist support, especially if it is not enough to meet need.

|                         |                                 |                               |                                   |
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## Checklist

This checklist specifies the information that must be included in a school's special educational needs (SEND) information report.

All schools, except special schools established in hospitals, must publish an SEND information report on their website.

The checklist is based on the requirements set out in [schedule 1 of the SEND and Disabilities \(SEND\) Regulations 2014](#) and [paragraphs 6.79-6.81 of the SEND Code of Practice](#).

| Required information  | ✓ |
|---|---|
| The kinds of SEND that are provided for   |   |
| Policies for identifying pupils with SEND and assessing their needs, including the name and contact details of the special educational needs co-ordinator (SENDCO) ( <i>mainstream schools only</i> )     |   |
| Arrangements for consulting parents of children with SEND and involving them in their children's education  |   |
| Arrangements for consulting young people with SEND and involving them in their education  |   |
| Arrangements for assessing and reviewing pupils' progress towards outcomes<br>This should include the opportunities available to work with parents and young people as part of this assessment and review |   |
| Arrangements for supporting pupils moving between phases of education and preparing for adulthood   |   |
| The approach to teaching pupils with SEND   |   |
| How adaptations are made to the curriculum and the learning environment of pupils with SEND   |   |
| Additional support for learning that is available for pupils with SEND  |   |
| The expertise and training of staff to support pupils with SEND, including how specialist expertise will be secured   |   |

|                         |                                 |                               |                                   |
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| Required information   | ✓ |
|--|---|
| How equipment and facilities to support children and young people with SEND will be secured  |   |
| How the effectiveness of the provision made for pupils with SEND is evaluated  |   |
| How pupils with SEND are enabled to engage in activities available with those in the school who do not have SEND   |   |
| Support for improving emotional and social development.<br>This should include extra pastoral support arrangements for listening to the views of pupils with SEND and measures to prevent bullying             |   |
| How the school involves other bodies, including health and social care bodies, local authority (LA) support services and voluntary sector organisations, in meeting pupils' SEND and supporting their families |   |
| Arrangements for handling complaints from parents of children with SEND about the provision made at the school   |   |
| Contact details of support services for parents of pupils with SEND  |   |
| Named contacts within the school for when young people or parents have concerns  |   |
| The school's contribution to the local offer and where the LA's local offer is published   |   |

|                         |                                 |                               |                                   |
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