



English as an Additional Language (EAL) Policy

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1. Introduction, definition and aims

ReFocus is committed to providing equitable access to education for pupils who use or have been exposed to a language other than English in their home or community. Multilingualism is an asset. EAL status does not indicate ability, attainment, nationality, immigration status or length of residence in the United Kingdom.

Pupils with EAL form a diverse group. Some may be new to English; others may communicate fluently in everyday situations but still require support with subject-specific and academic language. ReFocus aims to develop English alongside curriculum progress, wellbeing, belonging and continued respect for each pupil's first or strongest language.

- Maintain high expectations and provide access to an ambitious, appropriate curriculum.
- Assess language strengths and needs accurately and review them over time.
- Integrate speaking, listening, reading, writing and vocabulary development across subjects.
- Distinguish language acquisition from SEND while recognising that both may coexist.
- Remove avoidable barriers to safeguarding, family communication, examinations and participation.

2. Legal and regulatory framework

This policy reflects the Equality Act 2010; the Education (Independent School Standards) Regulations 2014; Independent School Standards guidance, April 2026; Keeping Children Safe in Education 2026; the SEND Code of Practice where applicable; current JCQ requirements; and ReFocus's commissioning arrangements.

As an ordinary independent school, ReFocus is not generally subject to the Public Sector Equality Duty in the same way as a maintained school or academy. It remains subject to the applicable Equality Act provisions and will consider equality implications as proportionate good practice.

The proprietor must ensure that the curriculum takes account of pupils' ages, aptitudes and needs, provides linguistic education, develops speaking, listening and literacy, and enables pupils to make appropriate progress. Language support will therefore be reflected in curriculum plans, schemes of work and classroom practice rather than treated only as a separate intervention.

3. Roles and responsibilities

3.1 Proprietor, Headteacher and governing board

The proprietor/owners retain legal accountability for compliance with the Equality Act and Independent School Standards. The Headteacher manages implementation, staffing, resources and commissioning arrangements. The governing board provides support and oversight, including scrutiny of provision and outcomes without identifying individual pupils in general reports.

3.2 EAL Lead

The Headteacher will nominate a suitably knowledgeable EAL Lead. The EAL Lead coordinates initial assessment, pupil language profiles, advice, resources, interventions, staff development and monitoring across sites. This does not remove each teacher's responsibility for language development and curriculum access.

3.3 Other staff and partners

- Teachers identify language demands, plan appropriate scaffolds, check understanding and assess curriculum and language progress.
- The SENDCo supports the distinction between EAL and SEND and coordinates any SEND assessment or provision.
- The DSL ensures that language and interpreting needs do not prevent safeguarding action or a pupil's voice being heard.
- The Exams Officer and SENDCo/EAL Lead coordinate evidence and applications under current awarding-body rules.
- Commissioning schools and local authorities provide relevant records and fulfil the responsibilities set out in placement agreements.
- All staff, including temporary and supply staff, follow the pupil's agreed communication and support arrangements.

4. Placement information and initial assessment

Before or at the start of a commissioned placement, ReFocus will seek proportionate information from the pupil, family, commissioning school and relevant professionals, including:

- languages spoken, understood, read and written and the preferred language for family communication;
- previous education, curriculum, attainment, qualifications and literacy in the first or strongest language;
- English-language proficiency in speaking, listening, reading and writing;
- interrupted education, recent arrival, displacement or factors affecting access to learning;
- SEND, EHC-plan, medical, safeguarding, attendance and pastoral information;
- previous successful strategies, interpreting needs and examination or access-arrangement records; and
- responsibility for specialist assessment, examinations, family communication and review.

An initial language profile will draw on discussion, observation, curriculum tasks, existing records and assessment across speaking, listening, reading and writing. It will also consider academic vocabulary, confidence in different settings, prior learning and first-language literacy. A single test, accent, silence, behaviour or initial impression will not be used to infer ability.

The profile will record strengths, immediate priorities, teaching strategies, any targeted support and a review date. ReFocus may use recognised proficiency descriptors or clearly defined local descriptors, but will not present a non-statutory framework as a national requirement. Progress in conversational English will not be assumed to demonstrate secure academic language.

5. Curriculum access and language development

Pupils with EAL will normally learn through the same broad and balanced curriculum as other pupils. Support will enable access to age-appropriate learning and will not routinely substitute less ambitious work. Targeted withdrawal may be used where beneficial but will be proportionate and coordinated so that important curriculum learning is not repeatedly missed.

Teachers will identify both subject content and the language needed to engage with it. Strategies may include:

- visuals, modelling, demonstrations and worked examples;
- explicit teaching and revisiting of subject vocabulary, sentence structures and text organisation;
- pre-teaching and overlearning where appropriate;

- structured talk, paired rehearsal and collaborative activity;
- accessible texts, glossaries, dual-language resources and appropriate use of the pupil's first language;
- reading and writing scaffolds which are gradually withdrawn as independence develops;
- planned roles for additional adults and checks of understanding that do not place the pupil under unnecessary pressure; and
- opportunities to observe effective language and subject practice across ReFocus sites or elsewhere.

Translation technology may support routine learning, but staff must check its accuracy and appropriateness. Confidential, medical, safeguarding or legally significant information must not be entered into unapproved systems. Machine translation does not replace a competent interpreter for sensitive or high-stakes communication.

6. EAL and SEND

Difficulties arising solely because English is not a pupil's first language are not SEND. Equally, EAL must not delay identification or support where a pupil may also have SEND. ReFocus will avoid interpreting limited English, unfamiliarity with school routines or cultural difference as evidence of a learning difficulty.

Where concerns persist, teachers, the EAL Lead and SENDCo will consider:

- progress in English over time and, where possible, skills in the first or strongest language;
- previous education, development, attainment and attendance;
- response to high-quality teaching and targeted language support;
- whether difficulties occur across languages and contexts;
- communication, cognition, sensory, physical, social, emotional and mental-health factors; and
- the need for culturally and linguistically appropriate specialist assessment.

Parents/carers, the commissioning school and relevant professionals will be involved. Interpretation will be provided where necessary. Any reasonable adjustments arising from disability are separate from EAL support and will be recorded and implemented under the Equality and SEND arrangements.

7. Safeguarding, interpreting and family engagement

Language barriers can make it harder for a pupil to disclose harm, understand expectations or seek help. Staff will check understanding carefully, provide accessible information about safeguarding and trusted adults, and inform the DSL where language creates a safeguarding barrier. A pupil's language, nationality or immigration history will not be used to make assumptions about risk.

A competent interpreter will be used for sensitive safeguarding, medical, SEND, complaints or legally significant communication where needed. Another child will not be used as an interpreter. Relatives will not be relied upon where this could affect accuracy, confidentiality, independence or safety. Records will identify who interpreted, the method used and how understanding was checked.

ReFocus will identify the family's preferred spoken and written language and communication method. Important information about attendance, behaviour, safeguarding, SEND, health, examinations, complaints and placement changes will be communicated in an accessible form. Families will be encouraged to maintain and value the pupil's first or strongest language at home.

8. Attendance, behaviour and placement decisions

Staff will recognise that recent arrival, interrupted education, trauma, transport, placement uncertainty, unfamiliar systems, social isolation or racist bullying may affect attendance and engagement. Concerns will be investigated and shared promptly with the commissioning school and family under agreed arrangements rather than attributed automatically to language or culture.

Language difference must not be mistaken for defiance, lack of ability or disengagement. Before a significant sanction, suspension recommendation or placement-ending decision, ReFocus will consider whether expectations were understood, whether communication was accessible, and whether EAL, SEND, safeguarding, trauma or unmet support needs contributed. This does not prevent proportionate action to protect safety, learning and the rights of others.

9. Examinations and access arrangements

EAL does not automatically entitle a pupil to extra time, a reader or another SEND-related examination arrangement. ReFocus will follow the current JCQ and awarding-body rules and the pupil's normal way of working.

A bilingual translation dictionary may be permitted where the qualification allows it and it reflects the candidate's established normal way of working. Additional time with a bilingual dictionary is a rare arrangement and will be used only where all current criteria are met. Where another centre makes the entry, ReFocus will provide timely evidence and agree responsibility for applications, dictionaries, examination delivery and records.

10. Assessment, monitoring and staff development

Curriculum attainment and English-language development will be assessed together but recorded distinctly where useful. The EAL Lead will review profiles and support at planned intervals and after significant changes in placement or need. Monitoring may include curriculum progress, attendance, engagement, behaviour, safeguarding, wellbeing, qualifications, enrichment, careers access, SEND identification and placement stability.

Information will be interpreted cautiously because ReFocus has small cohorts and individual pupils must not be identifiable in general reports. Findings will inform teaching, intervention, commissioning reviews and staff development.

Staff development will include EAL-responsive teaching, academic language, EAL/SEND distinction, safeguarding through interpreters, cultural humility, safe translation technology, examination arrangements and ReFocus's multi-site commissioning procedures. Relevant information will be included in induction for new, temporary and supply staff.

11. Policy review

The Headteacher will review this policy annually and sooner if law, statutory guidance, awarding-body requirements or ReFocus's provision changes. The proprietor will approve the policy and the governing board will provide oversight.

Appendix A: Developing language and literacy

Learning through talk

- Make the purpose, audience and expected language of talk explicit.
- Model key vocabulary and sentence structures and allow paired rehearsal before whole-group responses.
- Use listening frames, information-gap activities, collaborative problem solving and structured discussion.
- Use first-language discussion or bilingual resources where they help pupils develop ideas before expressing them in English.
- Permit appropriate oral responses in classroom and formative assessment; regulated assessments must follow the applicable rules.

Learning from text

- Make the purpose of reading explicit and activate relevant prior knowledge.
- Teach how subject-specific texts, diagrams, indexes, glossaries and digital sources are organised.
- Model skimming, scanning, close reading, inference and deduction.
- Use visuals, dual-language resources, glossaries and graphic organisers where helpful.
- Check understanding through explanation, demonstration or retrieval rather than relying only on "Do you understand?"

Learning through writing

- Make sure pupils are clear about purpose, audience and level of formality.

- Provide model texts and explicitly teach how ideas are organised across sentences and paragraphs.
- Use planning frameworks, sentence starters, key connectives and graphic organisers as temporary scaffolds.
- Ask pupils to rehearse an answer orally before writing where helpful.
- Teach pupils to evaluate, correct, edit and redraft their work and gradually remove scaffolds as independence develops.