



Special educational needs and disabilities Policy (SEND)

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1. Aims and objectives

This policy explains how ReFocus identifies and supports pupils with special educational needs and disabilities (SEND), including pupils placed by a school or local authority and pupils with an education, health and care (EHC) plan.

ReFocus aims to:

- provide an ambitious, broad and balanced curriculum, adapted where needed so that pupils can participate and make progress;
- identify barriers and needs early, without requiring a diagnosis before appropriate support or reasonable adjustments are considered;
- use a graduated assess–plan–do–review approach, with clear outcomes and regular evaluation;
- work in partnership with pupils, parents or carers, commissioning schools, local authorities and relevant professionals;
- support successful transitions, preparation for adulthood and sustained education, employment or training; and
- ensure that staff understand their responsibilities and that the proprietor maintains effective oversight.

2. Vision and values

ReFocus is an independent secondary alternative-provision school. Many pupils arrive after disruption to education and may have overlapping SEND, safeguarding, attendance, medical, social or emotional needs. We maintain high expectations while responding to each pupil's strengths, communication needs and barriers to learning.

Inclusion means more than physical access. Pupils should feel safe, listened to and able to belong, participate and achieve. Support is based on identified need and evidence, not simply on a diagnostic label or the number of adult-support hours provided.

3. Legal framework and status of this policy

This policy is informed by the Children and Families Act 2014, the Special Educational Needs and Disability Regulations 2014, the SEND Code of Practice: 0 to 25 years, the Equality Act 2010, the Education (Independent School Standards) Regulations 2014, the Children Act 1989 and 2004, current safeguarding guidance and data-protection law.

Independent-school position

Some duties and Code provisions are written specifically for maintained schools and academies. They do not all apply to ReFocus in the same way. ReFocus nevertheless follows the graduated approach and other

relevant Code principles as good practice and complies with the duties that apply directly to independent schools, including the Independent School Standards and Equality Act 2010.

- The curriculum and teaching must take account of pupils' needs, including those identified in an EHC plan, and enable pupils to make progress according to their ability.
- ReFocus must not discriminate against disabled pupils and must make reasonable adjustments, including auxiliary aids and services where reasonable. It must maintain and implement an accessibility plan.
- The proprietor is responsible for ensuring that applicable legal and contractual requirements are met and that provision is properly governed.
- The statutory maintained-school notional SEND budget and statutory school SEND-information-report framework do not apply to ReFocus in the same form. ReFocus publishes clear SEND information voluntarily and reports to commissioners as required.
- The School Admissions Code does not govern ReFocus admissions. Admissions decisions remain subject to the Equality Act, contractual arrangements, safeguarding, suitability and the school's registered provision.

The Government's 2026 SEND reform proposals, including proposed Individual Support Plans and National Inclusion Standards, are not treated as current legal requirements. This policy will be reviewed when legislation, a revised SEND Code or commencement arrangements require change.

4. Inclusion and equal opportunities

ReFocus will anticipate and remove avoidable barriers to learning, participation and communication. Reasonable adjustments are considered individually and may include changes to teaching, communication, routines, the physical environment, equipment, timetabling, assessment arrangements or the way a policy is applied.

A pupil may be disabled without having SEN and may have SEN without being disabled. Support under this policy does not depend on a parent obtaining a private diagnosis. Decisions will take account of the pupil's voice, relevant professional evidence, safety and the effectiveness and practicality of proposed adjustments.

5. Definitions

5.1 Special educational needs

A child or young person has special educational needs if they have a learning difficulty or disability which calls for special educational provision. For a child of compulsory school age, this means a significantly greater difficulty in learning than most others of the same age, or a disability which prevents or hinders use of facilities generally provided for others of the same age in mainstream schools. Special educational provision is additional to or different from provision generally made for others of the same age.

5.2 Disability

A person is disabled under the Equality Act 2010 if they have a physical or mental impairment with a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. "Substantial" means more than minor or trivial; "long-term" normally means 12 months or more or likely to recur.

5.3 Broad areas of need

The four broad areas in the current SEND Code help schools plan provision but do not provide a diagnosis or fixed label. Needs often overlap and change over time:

- communication and interaction;
- cognition and learning;
- social, emotional and mental health; and
- sensory and/or physical needs.

Staff will consider the whole pupil. Difficulties may also reflect interrupted education, trauma, bullying, exploitation, bereavement, attendance, English as an additional language, medical needs or safeguarding concerns. These factors do not rule out SEND and must not be used to delay appropriate assessment or support.

6. Roles and responsibilities

6.1 Proprietor and governance

- ensure compliance with applicable legislation;
- maintain strategic oversight of SEND provision, pupil outcomes, staffing, training, complaints and accessibility;
- ensure that the Headteacher/SENDCO is appropriately supported and challenged, including where the same person holds both roles; and
- receive at least an annual SEND report and assure itself that required provision and reasonable adjustments are delivered.

6.2 Headteacher and SENDCO

Paula Tucker, Headteacher, is ReFocus's designated SENDCO and may be contacted at Paula@refocus.school. Although the maintained-school statutory SENDCO arrangements do not apply in identical form, ReFocus appoints a SENDCO to lead and coordinate effective practice.

- lead this policy and maintain an accurate overview of pupils' needs, plans, adjustments and outcomes;
- coordinate the graduated approach and advise staff on adaptive teaching, interventions and external advice;
- liaise with pupils, parents or carers, commissioners, local authorities, previous or next settings and professional agencies;
- identify gaps or delay in EHC-plan provision and escalate them promptly to the responsible body;
- support access arrangements and reasonable-adjustment decisions, retaining appropriate evidence;
- ensure records transfer securely and promptly when a pupil joins or leaves; and
- evaluate provision, staff-development needs, equality impact and preparation for adulthood.

6.3 Teachers and other staff

- remain responsible for the progress, safety and inclusion of every pupil they teach;
- use adaptive, high-quality teaching and implement agreed plans, EHC provision and reasonable adjustments;
- identify and record concerns, assess impact and contribute to reviews;
- work closely with support staff without transferring responsibility for learning; and
- consider whether behaviour, distress, absence or disengagement may communicate unmet need or require safeguarding action.

6.4 Parents, carers and pupils

Parents and carers are encouraged to share relevant information and changes in need. They will be involved in decisions and reviews, receive clear information about provision and be told how to raise concerns. Pupils will be supported to express their views in a form they can understand and use. Their views will influence outcomes, support and transition planning, taking account of age and capacity.

7. SEND information

ReFocus publishes accessible information about its SEND arrangements and updates it at least annually or sooner following material change. This is provided as transparent good practice and should be read alongside this policy, the accessibility plan, admissions policy and complaints procedure.

Information shared publicly will not identify individual pupils. Information shared with staff, commissioners or professionals will be relevant, proportionate, secure and limited to those who need it for education, safeguarding, health, legal or commissioning purposes.

8. Our approach to SEND support

8.1 Admission, transition and initial assessment

Before admission, ReFocus will seek sufficient information from the parent or carer, commissioning school, local authority and previous setting to determine whether the placement is suitable and what support,

adjustments, risk controls and professional input are required. Missing information will be pursued and will not be assumed to mean that there is no need.

For pupils who remain registered at another school, the placement agreement should identify responsibilities for attendance, safeguarding, curriculum, assessment, SEND support, funding, reviews, transport, communication with parents and reintegration or onward transition.

8.2 Identifying needs

Teachers assess progress, participation, communication, wellbeing and wider development from an appropriate baseline. Slow progress or low attainment does not automatically mean SEND; equally, attainment at age-related expectations does not rule it out. Staff consider the pupil's response to adaptive teaching, views of the pupil and family, previous records, attendance, health and relevant professional evidence.

Where concern remains, the teacher and SENDCO will discuss it with the pupil and parent or carer and decide whether special educational provision or reasonable adjustments are required. Parents will be informed when ReFocus decides that a pupil will receive SEND support.

8.3 Assess–plan–do–review

1. Assess: analyse strengths, barriers and needs using school evidence, pupil and parent views and professional advice where appropriate.
2. Plan: agree measurable outcomes, provision, adjustments, responsible staff and a review date. Record the plan in an accessible form and communicate it to relevant staff.
3. Do: teachers retain responsibility and deliver the plan, supported by the SENDCO, support staff and specialists as agreed.
4. Review: evaluate progress and the quality and impact of provision with the pupil and parent or carer. Continue, change, intensify or end support on evidence, recording the reasons.

Reviews will normally take place at least termly for pupils receiving school-based SEND support and more frequently where need or placement arrangements require. Support will not be withdrawn solely because a pupil has made progress if it remains necessary to sustain that progress.

8.4 EHC plans and statutory processes

An EHC plan is a statutory document maintained by a local authority. ReFocus will obtain and read the current plan, contribute to reviews, implement provision it is responsible or commissioned to deliver, and provide evidence of progress and need. The placement agreement must identify responsibility and funding for provision delivered by ReFocus or another service.

Independent schools are not subject to the same automatic naming and admission arrangements as maintained schools.

8.5 Attendance, behaviour and safeguarding

SEND, disability and unmet need will be considered when responding to absence, behaviour, suspension or exclusion. This does not prevent proportionate action to protect safety or maintain standards, but decisions must consider reasonable adjustments, relevant EHC provision, safeguarding, professional advice and whether additional or alternative support could reduce recurrence. Staff must follow safeguarding procedures whenever a concern may involve abuse, neglect, exploitation or risk of harm.

8.6 Preparation for adulthood and transition

From Year 9, and earlier where appropriate, planning will increasingly address further education, employment, independent living, community participation and health. ReFocus will support timely information transfer and collaborative planning with the pupil, family, commissioner and next provider.

8.7 Evaluating provision

- progress towards individual academic, communication, wellbeing, independence and destination outcomes;
- pupil and parent or carer views and participation;

- attendance, engagement, safeguarding and patterns in sanctions or suspension;
- delivery and impact of plans, interventions and reasonable adjustments; and
- successful transition, reintegration or sustained onward placement.

9. Expertise and training of staff

The Headteacher/SENDCO will maintain an overview of staff knowledge and arrange induction, updates, coaching or specialist training in response to the current cohort and individual plans. Staff must seek advice where they do not understand a pupil's needs or agreed provision. Training does not replace professional referral where specialist assessment or intervention is needed.

10. External professional agencies and commissioning partners

ReFocus will work, subject to consent or another lawful basis, with relevant services such as educational psychology, speech and language therapy, occupational therapy, physiotherapy, sensory services, health professionals, mental-health services, social care, careers services and local-authority SEND teams.

The school will clarify the purpose of involvement, responsibilities, timescales, funding and how advice will be implemented and reviewed. Where a pupil is placed by another school or local authority, ReFocus will provide proportionate progress and provision information under the placement agreement and promptly raise material concerns about suitability or unmet need.

11. Admission and accessibility arrangements

11.1 Admission arrangements

Admissions are governed by the ReFocus Admissions Policy, the school's registration and capacity, the suitability of the proposed placement, safeguarding and commissioning arrangements. ReFocus will not discriminate unlawfully because of disability or SEN and will consider reasonable adjustments before deciding that a placement cannot be offered or continued.

11.2 Accessibility arrangements

The Accessibility Plan explains how ReFocus increases access to the curriculum, physical environment and information for disabled pupils. It is reviewed at least every three years and implemented in accordance with Schedule 10 to the Equality Act 2010.

12. Concerns and complaints

A parent, carer or pupil should normally raise a concern promptly with the teacher, key worker or SENDCO so that it can be resolved. Formal complaints are considered under the ReFocus Complaints Policy. Where the complaint concerns the Headteacher/SENDCO, it will be directed to the proprietor or other person identified in the complaints policy to provide appropriate independence.

If the school's procedure is complete, a complainant may contact the Department for Education where they believe an independent school has failed to meet the Independent School Standards. A commissioning school or local authority may also have a relevant review or complaints route. The First-tier Tribunal hears defined appeals about local-authority EHC decisions and disability-discrimination claims; it is not a general appeal against all SEND provision. Mediation and disagreement-resolution services may be available for statutory SEND disputes.

Nothing in the complaints procedure prevents an immediate safeguarding referral, a request for an EHC needs assessment or review, or use of another statutory remedy where applicable.

13. Monitoring and evaluation

The Headteacher/SENDCO reviews implementation throughout the year. The proprietor receives at least an annual report addressing pupil outcomes, provision, EHC-plan delivery, reasonable adjustments, attendance and behaviour patterns, complaints, transitions, staff training, accessibility and any significant risks or resource gaps.

This policy will be reviewed annually and sooner if legislation, statutory guidance, inspection standards, commissioning arrangements or school practice change. For September 2026, proposed SEND reforms are monitored but are not presented as legal duties before they are enacted and commenced.

14. Related policies and documents

- SEND information published by ReFocus;
- Accessibility Plan and Accessibility Policy;
- Admissions Policy;
- Attendance Policy;
- Behaviour Policy and suspension/exclusion procedures;
- Child Protection and Safeguarding Policy;
- Complaints Policy;
- Data Protection and Records Retention arrangements;
- Equality information and objectives, where applicable;
- Supporting Pupils with Medical Conditions Policy and Allergy Safety Policy; and
- placement agreements, individual support plans and EHC plans, where applicable.

Key national documents

- SEND Code of Practice: 0 to 25 years (current published version);
- Equality Act 2010: advice for schools;
- Independent School Standards: guidance for independent schools; and
- Keeping Children Safe in Education 2026.