# Transform Trust
# Special Educational Needs and Disability (SEND) Policy

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| 211 | Director of Inclusion & SEND<br>Associate Headteacher | V5 September 2026 | Annually |

## Policy Statement

Transform Trust is committed to developing schools that are inclusive by design, where all children are welcomed, valued and enabled to achieve and thrive. We will ensure that all children receive their entitlement to a high- quality education, one that is appropriate to and meets their individual needs, promotes high standards and enables children to fulfil their potential. Each child's provision should enable them to achieve their best and become confident individuals living rewarding lives.

All Transform's children, including those with special educational needs and disabilities, are supported to make successful transitions between phases in preparation for adulthood and to enjoy and achieve throughout their time in our schools.

This Special Educational Needs and Disabilities (SEND) Policy aims to make clear our commitment to high quality education for all children, set out how our schools will support and make provision for children with special educational needs and disabilities, and explain staff roles and responsibilities in relation to SEND.

## Purpose of this policy

1. To ensure all staff understand their role and responsibilities in relation to SEND and inclusion.
2. To demonstrate our Trust's commitment to procedures relating to SEND and inclusion.
3. To facilitate our Trust's commitment to ensuring all children receive their entitlement to a high-quality education, appropriate to their individual needs, and are able to achieve their full potential.
4. The SEND policy covers all children who fall within the definition outlined by the Code of Practice 2015 (see next paragraph), whether or not they have been issued with an EHCP or placed on the SEN Register. Support will be provided for pupils in our schools without waiting for a diagnosis or statutory assessment.

Each school within our Trust will publish a SEND Information Report annually, that signposts and makes reference to their Local Authority's Local Offer, a school SEND policy and an Accessibility Plan. Every school will publish an Inclusion Strategy from December 31st 2026, identifying barriers to learning, inclusive provision, planned activity and intended outcomes. These documents work alongside this SEND Policy in order to ensure that each school's SEND provision is responsive, dynamic and flexible in relation to their current cohort of children's needs as well as compliant with their Local Authority's guidance and processes.

This policy also links to other Trust and school policies:

- Anti-Bullying
- Attendance
- Behaviour
- Exclusions
- Restrictive Physical Intervention guidance
- Reduced timetables
- Safeguarding
- Supporting children with medical needs.

## Legislation

This policy is based on the statutory Special Educational Needs and Disabilities (SEND) Code of Practice 2015 and the following legislation:

- Part 3 of the Children and Families Act 2014, which sets out schools' responsibilities for children with SEN and disabilities.
- The Special Educational Needs and Disability Regulations 2014, which set out schools' responsibilities for Education, Health and Care Plans (EHCPs), Special Educational Needs Co-ordinators (SENCOs) and the SEND Information Report.
- The Equality Act 2010, which sets out the laws against discrimination, harassment and victimisation of nine protected characteristics, including disability.

## Definition of SEND

The following definitions are taken from the SEND Code of Practice 2015.

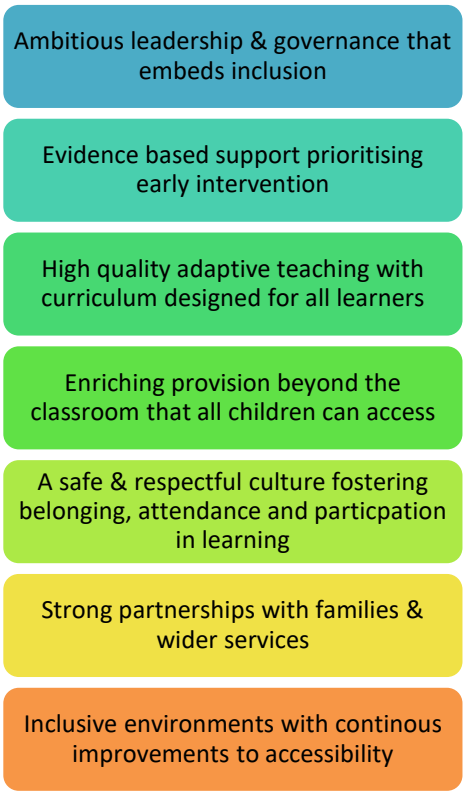
A child or young person has SEN if they have a learning difficulty or disability which calls for special educational provision to be made for him or her.

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

- 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 facilities of a kind generally provided for others of the same age in mainstream schools or mainstream post-16 institutions.

## The 7 Principles of Inclusion (DfE Guidance June 2026)

Schools will develop their provision based on the DfE's Seven Principles of Inclusion:



## Trust Commitment

Transform Trust recognises that, in order to meet its commitment to ensuring that all children receive their entitlement to a high-quality education, children with SEND need both whole school systems, universal provision and approaches that have inclusion built in from the outset and high quality, timely, and regularly reviewed individualised provision.

**Schools in our Trust will therefore:**

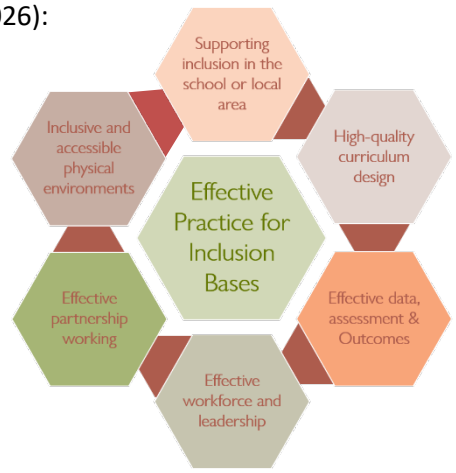
1. Establish and maintain a culture of equality, diversity and inclusiveness that allows children's needs to be met as part of the main offer of the school, wherever possible. Individual needs will be met whilst ensuring children maintain dignity and have a wealth of opportunity.
2. Create and build a strong universal offer ensuring that mainstream provision is inclusive for all pupils.
3. Ensure that needs are identified and responded to as early as possible and that support is not dependent on a diagnosis or an EHCP.
4. Establish and maintain an ethos where children, families and other agencies work collaboratively and cooperatively in order to ensure the best offer for each child.
5. Ensure that the curriculum and wider experience of children is inclusive by design for all pupils, including those with SEND.
6. Ensure that high-quality adaptive teaching forms the foundation of provision.
7. Ensure that the approach for managing behaviour is inclusive by design for all pupils, including those with SEND.
8. Ensure that all staff are aware of the different types of SEND need that are currently present in their school and the processes in place to support them.
9. Ensure that all staff understand that SEND is recognised as a potentially exacerbating vulnerability to forms of abuse in Keeping Children Safe in Education and that children with SEND could benefit from early help in relation to child protection and safeguarding before their non-SEND peers.

## Inclusion Bases (DfE Guidance June 2026)

Where Transform schools operate or develop an Inclusion Base, The Trust will ensure that:

- The purpose is to increase inclusion
- Pupils continue to maintain meaningful links with their mainstream classes.
- The use of the inclusion base is never punitive.
- The provision is led by appropriately qualified staff.
- Reintegration and inclusion outcomes are monitored.
- Families are actively involved in planning and reviewing provision.
- Curriculum entitlement remains broad, balanced and ambitious.
- The effectiveness of the Inclusion Base is reviewed regularly against pupil outcomes.

Transform Trust expect Inclusion Bases to reflect the following six principles of effective practice (DfE Inclusion Base Guidance June 2026):




Inclusion Bases within Transform Trust schools are not separate educational provisions operating in isolation from mainstream education. They form part of a continuum of inclusive provision designed to strengthen pupils' sense of belonging, participation and achievement within their school community. Placement within an inclusion base will be regularly reviewed, with clear intended outcomes, and pupils will continue to access mainstream opportunities wherever possible.

Schools will consider how any Inclusion Base supports the continuum of provision model outlined by the DfE (June 2026)

**Figure 1: Continuum model**

Source: adapted from Strogilos & Ward (2024)

## Procedures and Training

Each school will make explicit their arrangements for SEND and inclusion through their Inclusion Strategy (from 31st December 2026), SEND Information Report, school SEND Policy and Accessibility Plan, and all schools will be guided by these key principles:

1. Each school must ensure that there is a qualified teacher, employed by the school, designated as the SENCO.
2. The SENCO must achieve the mandatory SEND qualification within three years of starting the role. SENCOs who are already enrolled on the NASENCO accreditation (National Award in Special Educational Needs Co-ordination) must complete their qualification by August 2027. From September 2024, the NPQSEND qualification will replace the NASENCO accreditation and must be achieved for SENCOs new to role and within three years of appointment.

3. The SENCO provides professional guidance to colleagues and will work closely with staff, parents/carers and other agencies in order to ensure that children with SEND receive appropriate support, high quality teaching and adaptations.
4. The SENCO and class teacher, together with any specialists and involving the child and their parents/carers, should consider a range of evidence-based and effective teaching approaches, appropriate equipment, strategies and interventions in order to support the child's progress.
5. The identification of SEND should be built into the overall approach to monitoring the progress and development of all children.
6. Each school will meet its statutory duty to follow the graduated approach to meeting the needs of children with SEND as set out in the SEND Code of Practice 2015.
7. Each school should ensure that there is a named member of the Governing Body who has specific oversight of the schools' arrangements for SEND.
8. Each school's leadership team should regularly review how expertise and resources used to address SEND can be used to build the quality of whole-school provision as part of their overall commitment to school improvement.
9. The quality of teaching for children with SEND, and the progress made, should be a core part of the school's approach to professional development for all teaching and support staff.
10. Each school's leadership team, along with their SENCO, should identify any patterns in the identification of SEND, both within the school and, in comparison, with local and national data, and use this to reflect on and reinforce the quality of teaching.
11. Each school will meet its statutory duty to make arrangements to support children with medical conditions, usually through the implementation of an Individual Healthcare Plan specifying the type and level of support the child needs. This complies with the statutory guidance: Supporting Children at School with Medical Conditions, December 2015- please refer to the Trust's policy for more information.
12. In some cases, a child with SEND may also require a level of personal or intimate care to be provided in order for them to access their entitlement to a full and quality education. In these circumstances, an Intimate Care Plan (ICP) should be considered – please refer to the Trust Intimate Care Policy for more information.
13. In some cases, a child with SEND may require a level of physical support in order to fully access their entitlement to a quality education. In these circumstances, an Individual Handling Policy (IHP) should be considered – please refer to the Trust's Restrictive Physical Intervention Guidance.
14. In some cases, a child with SEND may require special consideration and support in order to be able to evacuate the building in an emergency such as a fire. In these circumstances, a Personal Emergency Evacuation Plan (PEEP) should be in place for them. This should include details of why the PEEP is required and how they will be supported, and should be written collaboratively between the SENCO, families, any involved healthcare professionals and, where possible, the child. These should be reviewed at least annually and following any change, incident or at the request of any stakeholder.
15. Whenever there is known risk associated with a child, including any arising from a special educational need or disability (for example, use of specialist equipment), an individualised risk assessment should be considered. Risk assessments should be written collaboratively between the most appropriate staff member (in the case of a child with SEND this is likely to be the SENCO and class teacher), families, any involved professionals and, where possible, the child. These should be reviewed at least annually and following any change, incident or at the request of any stakeholder.
16. Schools will implement the Routes 2 Inclusion (R2i) graduated approach to support the identification of need and to ensure provision is in place for individuals that require adaptation and personalisation.

17. All children will have access to a broad and balanced curriculum and a commitment from leadership teams, teachers and support staff that they will set high expectations for every child, regardless of their prior attainment.
18. Schools will work cooperatively and supportively with other agencies, for example children and adult mental health services (CAMHS) and Educational Psychology, in order to ensure that the needs of children with SEND are fully understood and met.
19. Schools will ensure the views, wishes and feelings of the child and their parents/carers, including supporting them to participate fully in decisions, are kept front and centre at all times.
20. Senior leaders will ensure that priority is given to ensuring that individual learning plans are well written, based on accurate assessment of individual needs, with SMART targets and are reviewed and updated in a timely manner. Quality assurance of these learning plans is embedded in the school's monitoring cycle.

## Roles and Responsibilities

**The Director of Inclusion will:**

- Provide Trust wide leadership in SEND and develop a shared vision and strategic plan for Trust Schools.
- Implement, monitor and review Transform Trust and school policies and practice with a clear focus on incorporating and embedding inclusive provision.
- Ensure the sustained raising of aspiration, achievement and attainment, is met through an inclusive, sustainable and innovative educational environment in which all pupils are able to achieve success from their starting points.
- Undertake quality assurance activities of SEND provision ensuring that schools remain complaint and offer a strong universal offer.
- In collaboration with the school and where appropriate, conduct SEND reviews and audits of provision.
- Support Headteachers to achieve their school improvement priorities relating to SEND.
- Identify and share best practice locally, nationally and internationally in order to further improve the inclusive practice of Transform Trust.
- Engage with the Trust Executive Team and Trustees through the work with Directors, reporting to Trustees and link Trustee meetings.

**The SEND Associate Headteacher will:**

- Identify and research best practice on SEND and facilitate transfer across Trust Schools.
- Develop and facilitate effective networks and partnerships across Trust schools, and wider, on SEND and promoting educational improvements and success.
- Support the different settings with SEND ensuring schools are implementing their best endeavours for children with SEND.
- Provide appropriate and research led CPD, deliver staff meetings and support schools with the delivery of INSET days.
- Support schools to carry out their statutory duties for SEND and where necessary add appropriate capacity when required.
- Support with quality assurance activities alongside the Director of Inclusion ensuring that schools remain compliant with a strong universal offer.
- Meet termly with the link Trustee for SEND.

**The Local Governing Body will:**

- Review the effectiveness of Inclusion Strategies.
- Monitor the use and impact of the Inclusive Mainstream Fund (IMF).
- Ensure inclusive practices are considered during estate development projects.
- Promote a culture of inclusion, belonging and participation for all pupils.
- Seek assurance that pupils experience a strong sense of belonging, participation and achievement.

**The SEND Governor will:**

- Help to raise awareness of SEND issues at Governing Body meetings.
- Monitor the quality and effectiveness of SEND provision within their school and update the Governing Body.
- Work with the leadership team and SENCO to determine the strategic development of SEND provision in their school.
- Attend the Trust's SEND Link Governor Training.

**The School Leadership Team will:**

- Create a culture of inclusion that promotes high expectations of children with SEND which is considered to be at the heart of school development and improvement.
- Create and build a strong universal offer ensuring that mainstream provision is inclusive for all pupils.
- Ensuring that all teaching is high quality and adaptive and is seen by all staff as central to successful inclusion.
- Identify pupil's needs quickly and accurately to ensure that the best possible provision can be implemented to meet need.
- Work with the SENCO and SEND Governor to determine the strategic development of SEND provision in their school.
- Have overall responsibility for the provision and progress of children with SEND.
- Ensure that the use of Alternative Provision (AP) is rigorously monitored ensuring that the provision chosen is safe, suitable and that any decisions made are in the best interest of the child.
- Engage proactively with families to help reduce the barriers to learning and wellbeing. Regularly gather and collate parent/carer, child and staff voice and take into account their views when decision making in relation to SEND.
- Routinely monitor the participation of pupils in wider school activities.
- Be committed too and understand their role in local area partnership's strategy and ensure this ha a positive impact on pupils.

**The SENCO will:**

- Work with the leadership team and SEND Governor to determine the strategic development of SEND provision in their school.
- Have day-to-day responsibility for the operational aspects of SEND and the co-ordination of specific provision made to support individual children with SEND, including those who have EHCPs.
- Provide professional guidance to colleagues and work with staff, parents/carers, and other agencies to ensure that children with SEND receive appropriate support and high-quality teaching.
- Advise on the graduated approach to providing SEND support.
- Advise on the deployment of their school's delegated budget, including the inclusive mainstream fund and other resources to meet children's needs effectively.

- Be the point of contact for external agencies, especially the Local Authority and its support services.
- Liaise with previous and potential next providers of education to ensure children and their parents/carers are informed about options and a smooth transition is planned.
- Work with the leadership team and SEND Governor to ensure that their school meets its responsibilities under the Equality Act 2010 with regard to reasonable adjustments and access arrangements.
- Ensure that their school keeps the records for all children with SEND up-to-date.
- Ensure that all individual learning plans are well written, include appropriate SMART targets based on need, up to date and co-produced and/or shared with parents in a timely manner.
- Have strategic oversight of the quality of the learning plans and whether they meet the needs of individuals through quality assurance activities.

**Class Teachers will be responsible for:**

- Ensuring that their teaching is consistently of high quality and is adaptive to meet the needs of the children in their class, particularly those with SEND.
- The progress and development of every child in their class.
- Ensuring common and predictable barriers to learning are addressed through ordinarily available provision.
- Ensuring that all children with SEND have an individual learning plan that is well written with appropriate SMART targets, based on need, reviewed regularly and co-produced and/or shared with parents in a timely manner.
- Implementing appropriate and tailored adaptations to support children's access to the curriculum and to meet their individual needs.
- Working closely with any Teaching Assistants or specialist staff to plan and assess the impact of support and interventions and how they can be linked to classroom teaching.
- Working with the SENCO to review each child's progress and development and decide on any changes to provision.

**Teaching Assistants and specialist staff employed by the school will be responsible for:**

- Working closely with the class teacher(s) to plan, deliver and assess the impact of support and interventions and how they can be linked to classroom teaching.
- Working with the SENDCO to ensure effective deployment in order to meet the needs of all children requiring support.
- Ensuring at all times that they are promoting the development, independence, and personal wellbeing of the child/children they are supporting.

## SEND Information Report

1. Each school will make explicit their provision for SEND and inclusion in the publication of their annual statutory SEND Information Report, in line with guidance set out in the SEND Code of Practice 2015 and the SEND Regulations 2014.
2. The SEND Information Report will be published on the school website and updated annually, with any changes made during the year to be updated as soon as possible.
3. The contents of the SEND Information Report are prescribed by law in the documents mentioned in this policy.
4. Each school will ensure that their SEND Information Report is easily accessible and set out in clear, straight forward language.

5. The SEND Information Report should include relevant named contacts who are available at the school.
6. The SEND Information Report must include information on the school's contribution to the Local Offer (see section below) and information on where the Local Offer is published.

## Inclusion Strategy (From 31st December 2026)

1. Each school will publish and annually review an Inclusion Strategy that outlines their inclusive practice, identified barriers to learning and participation, planned improvement activity and intended outcomes for pupils.
2. The Inclusion Strategy will be developed in line with the 7 Principles of Inclusion.
3. The Inclusion Strategy will demonstrate how the school embeds inclusion within their universal offer.
4. The delivery of early, effective, targeted support will be identified for those children who need it, without the need for a formal assessment or diagnosis.
5. There will be a focus on implementing fewer approaches well, to ensure inclusive practice is embedded with impact, consistency and quality.
6. The strategy will describe how resources, including the school's Notional SEND Budget and Inclusive Mainstream Fund allocation, are used to support inclusion.

## Inclusive Mainstream Fund (IMF)

The Trust recognises the Inclusive Mainstream Fund as an important mechanism for strengthening inclusive practice within our schools. They are expected to demonstrate the impact of the IMF funded activity through their Inclusion Strategy.

Schools will ensure that IMF funding is used strategically alongside delegated budgets and Notional SEND funding to:

- Improve inclusive universal provision.
- Support early intervention.
- Address barriers to learning and participation.
- Strengthen workforce knowledge and expertise.
- Improve environments and accessibility.
- Enhance attendance, participation and wellbeing.

## Local Offer

1. Each Local Authority has a statutory duty to produce a 'Local Offer' detailing information about provision they expect to be available across education, health and social care for children and young people who have SEN or are disabled, including those who do not have an EHCP, in their area.
2. As a 'partner body or agency', schools have a statutory duty to cooperate with the Local Authority in the development and review of the Local Offer.
3. Each school will comply with their Local Authorities guidance on how schools should contribute to the Local Offer in their area, including ensuring that it is published appropriately - within or alongside the SEND Information Report.

## Accessibility Plan

1. All schools have a statutory duty, under section 10 of the Equality Act 2010, to produce an Accessibility Plan detailing how they are going to increase the extent to which disabled children can participate in their curriculum, improve the physical environment of the school for the purpose of increasing the extent to which disabled children can take advantage of education and associated benefits, facilities

and services, and improving delivery to disabled children of information which is readily available to children who are not disabled.

2. The Accessibility Plan must be in writing, take the views of children and their parents/carers into account, and be regularly reviewed.
3. The school has responsibility for allocating adequate resources to ensure the furtherment of the Accessibility Plan.
4. Each school will comply with this statutory duty by publishing an Accessibility Plan in the form of a rolling development plan detailing strategies, timeframes, financial requirements and persons responsible over a three-year period.
5. The SENCO, along with the leadership team and SEND Governor, will take overall responsibility for producing and maintaining the Accessibility Plan, including at least annual review of progress made.

## Inclusive Education Estates

## (DfE Guidance June 2026-Supporting Inclusive Environments in Mainstream Settings)

Transform Trust recognises that the physical environment plays a significant role in participation, wellbeing and learning. School leaders should consider opportunities to improve accessibility and inclusion whenever estate improvements are undertaken.

Schools will seek to develop environments that are:

- Accessible
- Inclusive by design
- Sensory aware
- Safe and welcoming
- Flexible
- Calming

When developing, refurbishing or adapting school buildings, schools should consider the principles of inclusive design:

**Figure 1: Core elements of inclusive design**