

Special Educational Needs and Disabilities Policy



The Cottesloe School

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Reviewed by:	SENDCO (Ms A Hibbert) , SEND Governor (Mrs L Chidley)
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A SCHOOL ARRANGEMENTS

A1 DEFINITIONS AND AIMS

At the Cottesloe School, we are committed to offering an inclusive curriculum to ensure the best possible progress for all of our students whatever their needs or abilities. Not all students with disabilities have special educational needs and not all students with special educational needs meet the definition of disability.

We believe that each student has individual and unique needs. However, in the case of students with SEN and/or a disability (SEND), some of these students require more support than others. If these students are to “achieve their best”, we must identify these needs, inform parents, plan and set targets, implement appropriate strategies and interventions, review the appropriateness of these measures and amend/adjust accordingly. Some students will require additional support for only a short time whilst others may require additional support throughout the whole of their school career.

High quality teaching that is differentiated and personalised will meet the individual needs of the majority of children and young people. Some children and young people need educational provision that is additional to or different from this. This is special educational provision under Section 21 of the Children and Families Act 2014. Schools and colleges must use their best endeavours to ensure that such provision is made for those who need it. Special educational provision is underpinned by high quality teaching and is compromised by anything less.

Definition of SEN

Special Educational Needs are defined in S312 of the Education Act 1996 as arising when a child has a learning difficulty which requires special educational provision. The legal test of when a child or young person requires an Education Health Care Plan remains the same as that for a statement under the Education Act 1996. *The categories linked to this can be found in Section B2 of this policy.*

From September 2014 the new Children and Families Act 2014 became law. This replaced the former Statement of Special Educational Needs and Section 139a Learning Difficulty Assessment with the Education, Health and Care Plan (EHCP) running from birth to age 25 years for children with special educational needs. In line with the Buckinghamshire Council programme we have now converted all our students with statements on to EHCP.

- A child or young person has SEND 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;
 - 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.

Additionally, to ensure a graduated response, The Cottesloe School has two further levels of school based support in place.

School Support Level One attempts to address milder additional learning needs with students. The school has either been made aware of an additional need by a feeder school or by parents and as such is having to adapt provision to support the additional needs. Often at this level, students will benefit from quality first teaching or from a period of focussed additional support.

School Support Level Two targets those students who might have more complex needs and who may also be receiving support from outside agencies. They too will benefit from quality first teaching and additional support programmes within the school setting, but they also require some more specialist intervention in order to be successful.

The Special Educational Needs and Disabilities Co-ordinator (SENDCO) will keep up to date records of all these students and the support they receive through a Provision Map.

Schools and other educational establishments are expected to be able to help most children overcome their difficulties from resources and expertise within the mainstream school.

Aims and Objectives

The aim of the Governing Body of The Cottesloe School is to ensure that any registered student with special educational needs will be provided with the special educational provision that their learning difficulties call for so far as this is practicable and that it is compatible with:

- The student's special educational provision.
- The efficient education of other students with whom he/she will be educated.
- The efficient use of resources.

And where there is incompatibility that there are no steps that can reasonably be taken to prevent this.

The objectives of our SEND policy are as follows:

- To identify students with special educational needs/ disabilities and ensure that their needs are met.
- To ensure that students with special educational needs/disabilities are able to join in with all the activities of the school.
- To ensure that all learners make the best possible progress.
- To ensure parents are informed of their child's special needs and that there is effective communication between parents and school.
- To ensure that learners express their views and are fully involved in decisions which affect their education.
- To promote effective partnership with parents, professionals and outside agencies including other schools.

The success of the school's SEND policy will be reviewed annually against the criteria set out above and the governing body will report on this annually. The Headteacher and governors will set new success criteria. The Governing Body will ensure that it makes appropriate special educational provision for all students identified as in need of it. The governing body has a designated SEND governor who has a special interest in SEN and disability.

The SENDCO, Ms Anne-Marie Hibbert, is responsible for coordinating the day to day provision of education for students with SEND, in conjunction with a Senior Leadership Team Line Manager, Mrs Louise Baldwin.

The Cottesloe School aims to provide all students with strategies for dealing with their needs in a safe and supportive environment, and to give them full access to the National Curriculum (additionally see the school's Anti-Bullying and Health and Safety policies available to view on the school website).

The policy has regard for the relevant legislation and guidance including:

- SEND Code of Practice 0 – 25 January 2015
- Equality Act 2010; Advice for Schools DfE Feb 2013
- The Bucks LA Local Offer (www.bucksfamilyinfo.org/localoffer)
- Statutory Guidance on Supporting Pupils at School with Medical Conditions Sept 2014

- Schools SEN Information Report Regulations July 2014
- The National Curriculum in England July 2014
- Child Protection Policy
- Accessibility Plan
- Teachers Standards July 2011 (introduction updated June 2013)

A2 ROLES AND RESPONSIBILITIES

Provision for students with SEND is a matter for the school as a whole. It is each teacher's responsibility to provide for students 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. High quality teaching, differentiated for individual students, is the first step in responding to students who have or may have SEND.

The Governors

The Governing Body in co-operation with the Headteacher, has a legal responsibility for determining the policy and provision for students with special educational needs - it maintains a general overview and has appointed 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 student with SEND.
- All staff are aware of the need to identify and provide for students with SEND.
- Students with SEND join in school activities alongside other students, so far as is reasonably practical and compatible with their needs and the efficient education of other students.
- Information about SEND is regularly published in school newsletters and on the school website.
- They have regard to the requirements of the Code of Practice for Special Educational Needs (2015).
- Parents are notified if the school decides to make a form of SEND provision for their child.
- They are fully informed about SEND issues, so that they can play a major part in school self-review.
- They set up appropriate staffing and funding arrangements, and oversee the school's work for students with SEND.

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 development and monitoring of the school's SEND policy, and that the school as a whole will also be involved in its development.
- SEND provision has a yearly action plan and is an integral part of the School Development Plan.
- The quality of SEND provision is regularly monitored.

The Headteacher

The Headteacher has responsibility for:

- The management of all aspects of the school's work, including provision for students with special educational needs.
- Keeping the governing body informed about SEND issues.
- Working closely with the SENDCO.
- The deployment of all special educational needs personnel within the school.
- Overall responsibility for monitoring and reporting to the governors about the implementation of the schools' SEND policy and the effects of inclusion policies on the school as whole.

The SENDCO

The SENDCO is responsible for:

- Overseeing the day to day operation of the school's SEND policy.
- Co-ordinating the provision for students with special educational needs.
- Ensuring that an agreed, consistent approach is adopted.
- Liaising with and advising other school staff.
- Helping staff to identify students with special educational needs.
- Carrying out detailed assessments and observations of students with specific learning problems.
- Supporting and monitoring class teachers in devising strategies, drawing up support plans, setting targets appropriate to the needs of the students, and advising on appropriate resources and materials for use with students with special educational needs and on the effective use of materials and personnel in the classroom.
- Liaising closely with parents of students 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.

- Maintaining the school's SEND register and SEND records.
- Assisting in the monitoring and evaluation of progress of students with SEND through the use of existing school assessment information.
- Contributing to the in-service training of staff.
- Managing the Teaching Assistant team and evaluating performance.
- Liaising with the SENDCOs in receiving schools and other educational settings when students transfer out at any point after Year 7, and with feeder and other schools when students transfer in at any point from Year 7 onwards to help provide a smooth transition from one school to the other.
- Liaising with external agencies to ensure that additional support is utilised and allocated as required.

Class Teacher/Form Tutor

Class teachers/Form tutors are responsible for:

- Including students 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.
- Making themselves aware of the school's SEND Policy and procedures for identification, monitoring and supporting students with SEND.
- Giving feedback to parents of students with SEND.
- Giving feedback to the SENDCO to inform annual reviews.
- Reviewing Individual Provision Maps with students and parents so that the SENDCO can adjust support plans.

Teachers should:

- Be fully aware of the school's SEND policy and the procedures for identifying, assessing and making provision for students with SEND.
- Use the school's procedures for giving feedback to teachers about students' responses to tasks and strategies.

Teaching Assistants (TAs) are responsible for:

- Working as part of a team with the SENDCO and the teachers.
- Supporting students' individual needs.
- Helping with inclusion of students with SEND within the class.
- Monitoring progress.

- Contributing to review meetings.
- Helping students with SEND to gain access to a broad and balanced curriculum.
- Running bespoke interventions as necessary.

TAs should:

- Be fully aware of the school's SEND policy and the procedures for identifying, assessing and making provision for students with SEND.
- Use the school's procedures for giving feedback to teachers about students' responses to tasks and strategies.

A3 CO-ORDINATING AND MANAGING PROVISION

At The Cottesloe School:

- Sharing of expertise is welcomed and encouraged.
- Special educational needs is a part of the school development plan.
- SEND is an item on every department meeting agenda or the main item of a meeting.
- The SENDCO meets with TAs regularly to review progress.
- The SENDCO ensures that regular meetings are held, normally once a term, to review Individual Provision Map documents (IPMs) and provision, and that parents are invited to contribute to this process.
- There is daily informal contact between all staff to monitor individual students and to discuss concerns.
- Students 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:

- The school's SEND policy.
- The SEND register.
- 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.
- A Google Document giving the names of all students in the class with SEND and copies of the student's IPMs and other relevant information.

A4 ADMISSIONS ARRANGEMENTS

The Cottesloe School strives to be a fully inclusive school. It acknowledges the range of issues to be taken account of in the process of development. All students are welcome, including those with SEN, in accordance with the LA admissions policy (the school's admissions policies are available to view on the school and Buckinghamshire Council websites). If a parent wishes to have mainstream provision for a child with a Statement or an EHCP the LA must provide a place unless this is incompatible with the efficient education of other students, and there are no reasonable steps that can be taken to prevent the incompatibility.

A5 SPECIALISMS AND SPECIAL FACILITIES

At The Cottesloe School:

- All teaching staff are experienced teachers who are able to teach students with SEND.
- Additional training for teachers and TAs is made available when necessary and as appropriate, particularly training to meet the specific needs of an individual student.
- Teachers ensure differentiated resources are used to allow access to the curriculum.
- All staff are kept well informed about the strategies needed to manage students' needs effectively, and we try to ensure that other students understand and respond with sensitivity.
- Student 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 has been adapted to provide easy access for wheelchairs, or toilet and washing areas.

A6 SUPPORTING STUDENTS WITH MEDICAL CONDITIONS

- The school recognises that students with medical conditions should be properly supported so that they have full access to education, including school trips and physical activities. Some children may be disabled and where this is the case the school will comply with its duties under the Equality Act 2010.
- Some students may also have Special Educational Needs or a Statement or EHCP which brings together health and social care needs and the school will make reasonable adjustments to support students in relation to this and the latest legislation.
- The SENDCO will liaise with the school's Senior First Aider to ensure that students are supported effectively.
- A copy of the school's medical arrangements can be found on the school website.

B IDENTIFICATION AND ASSESSMENT AND PROVISION

B1 ALLOCATION OF RESOURCES

Schools receive funding for students with SEND via the National SEN Budget which covers:

- low cost, high incidence special educational needs which is based on prior attainment and
- provision for students with high needs including high cost, low incidence SEND.

The Headteacher, SENDCO and the Governors of the school regularly monitor the needs of students 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 SEN budget. Any money allocated as a result of statutory assessment is spent according to the terms outlined in the resulting statement of SEND. The school has a continuing commitment to purchase appropriate resources for students with SEND.

The Cottesloe School follows LA guidance, as given in the SEND Handbook, to ensure that all students' needs are appropriately met. Details of how resources are allocated are reported by the Headteacher to the Governing Body on a termly basis.

B2 IDENTIFICATION, ASSESSMENT AND REVIEW

The Code of Practice (2015) outlines a graduated response to students' needs, recognising that there is a continuum of need matched by a continuum of support. This response is seen as action that is additional to or different from the provision made as part of the school's usual differentiated curriculum and strategies.

What is not SEND

The Code of Practice (2015) outlines the "reasonable adjustments" duty for all schools. These alone do not constitute SEND. Nor does:

- Attendance and punctuality
- Health and welfare
- EAL
- Being in receipt of Pupil Premium grants
- Being a looked-after child
- Being a child of service personnel
- The identification of behavioural concerns will no longer be an acceptable criteria of describing SEND. Any concerns relating to a student's behaviour should be clearly described as a need which we will respond to via the pastoral team with focused and clearly directed interventions.

The Buckinghamshire SEND Handbook gives guidance on identification, assessment and review.

Categories of Special Educational Need

The SEND Code of Practice recognises four broad areas of need: Communication and Interaction; Cognition and Learning; Social, Emotional and Mental Health; and Sensory and/or Physical.

Code of Practice needs	Categories	Usual method of referral
Communication and Interaction	Language Autistic spectrum disorder (ASD)	Specialist teacher and Speech and Language link therapists CAMHS
Cognition and Learning	Learning Specific Learning difficulties e.g. Dyslexia	Specialist teaching service
Social, Emotional and Mental Health	SEMH	PRU Outreach
	ADHD	GP
Sensory and/or Physical	Hearing Visual Physical	GP

Please note that in some cases alternative methods of referral may be more appropriate according to individual student needs.

Levels of Provision

School Support Level One

If a student requires additional and different support and meets the criteria, then support at this level is put in place. Staff are made aware of the students' individual needs via an Individual Provision Plan and an 'Access to Learning' card may also be issued, according to need. These are formally reviewed twice a year or more often if necessary.

School Support Level Two

If a student has not made sufficient progress and meets the criteria, then the level of support may be increased to Level Two. At this level, outside agencies may be involved. This is often the school's link therapists or LA-based specialist teachers but may be one of a range of other LA or Health Services professionals. They may undertake more specialised assessment, begin to support the student and/or observe the student. Parental permission is always sought for a formal referral to any external service.

The SENDCO will write a SEND support plan and liaise with any outside agencies involved. The support plan should reflect any advice given by outside agencies.

Parents are encouraged to attend reviews and to play a full part throughout the process. Students at this level are reviewed twice a year.

Education Health and Care Plan (EHCP)

Only a very small proportion of students require an Education Health and Care Plan (EHCP). These students are likely to have severe or complex needs that require more specialist advice and support.

Review

Formal reviews of students at Level One or Two are normally carried out twice per year. The school will invite parents to meet with the SENDCo or Assistant SENDCo. Normally, TAs and teachers are invited to provide brief input prior to this review. Where a parent or carer is unable to attend the SEND team will contact them and provide feedback if needs and provision have changed. Parents/carers are sent a letter outlining any additional support in place. Parents/carers can request a copy of their child's Individual Provision Plan, Access to Learning card or SEND support plan. Furthermore, a parent can request a meeting with the SEND during the school day to discuss any concerns that they may have or to review provision. Students are fully involved. Firstly, as they are expected to attend any review meetings and secondly as they will review their personal targets in school, prior to formal reviews.

Annual Reviews

For students with EHCP an Annual Review Meeting has to be held in addition to the regular termly reviews. At this meeting, consideration is given to whether the EHCP should continue, and whether provision/strategies should be maintained or amended. It should set new long-term objectives for the following year. Annual Reviews are held during the school day. All relevant current professionals, including those, if applicable, who contributed to the original EHCP are invited to attend or submit a written report.

Exiting the SEND Register

Through regular review, assessment and the interventions in place students may overcome their barriers to learning. Where this is the case and the SENDCO identifies that a student is to be taken off the SEND register, parents will be contacted, usually via letter, to explain the reasons for this decision. Students will then be placed on the monitor list for an academic year to ensure that their rate of progress is sustained. This may then result in the final removal from the school SEND register or, if necessary, being returned to the SEND register. Parental views will always be considered and parents will be informed at each stage.

Accessibility

Schools are required to produce accessibility plans and to increase accessibility for students over time. The Cottesloe School's latest accessibility audit and plan is available to view on the school's website.

B3 CURRICULUM ACCESS AND INCLUSION

Students are grouped in classes according to age and/or ability. As there is a wide range of ability in each class, all staff provide a differentiated curriculum suitable for all the students, to ensure access at all levels.

Any students 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 student sensitively, to work individually with an Intervention Leader or TA in the Learning Support Centre in order to acquire, reinforce or extend skills more effectively. For some students, withdrawal sessions may be used to improve motor skills or application or to give support in a particular area e.g. spelling, literacy, numeracy, etc. Withdrawal programmes are normally time-limited and criteria for inclusion in such programmes are clearly specified.

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

B4 EVALUATING SUCCESS

The success of the school's SEN policy and provision is evaluated through:

- Monitoring of classroom practice by the SENDCO and subject co-ordinators.
- Analysis of student tracking data and test results for individual students or cohorts.
- Value-added data for students on the SEND register.
- Termly monitoring of procedures and practice by the SEND governor.
- School self-evaluation.
- The Headteacher's termly report to Governors, which contains the required information about the implementation and success of the SEND Policy.
- The school's annual SEND review, which evaluates the success of our policy and sets new targets for development.
- The School Improvement 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.
- Frequent meetings of parents and staff, both formal and informal, to plan IPMs and targets, revise provision and celebrate success.

B5 ARRANGEMENTS FOR COMPLAINTS

Should students or parents/carers be unhappy with any aspect of provision they should discuss the problem with a class/form teacher/Head of Year in the first instance. Anyone who feels unable to talk to the teacher, or is not satisfied with the teacher's comments, should ask to speak to the SENDCO. In the event that the SENDCO cannot resolve the issue then the SENDCO line manager can be consulted.

In the event of a formal complaint parents are advised to contact the Headteacher or a Governor, if they prefer. The Buckinghamshire Parent Partnership Service is available to offer advice (see C1 below).

B6 STORING AND MANAGING INFORMATION

The school manages and keeps information securely according to its policies (Data Protection Policy, E-Safety Policy, Records Management for Schools Guidelines and Code of Conduct for Teaching and Support Staff). The SENDCO keeps secure files on students which are updated as necessary according to the review schedules outlined. Some key information for teachers is kept on the school's internal networks and SIMS (Schools Information Management System). This information is confidential and is stored and used according to the relevant school policies.

C PARTNERSHIP WITHIN AND BEYOND THE SCHOOL

C1 PARTNERSHIP WITH PARENTS

The staff at The Cottesloe School 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 teachers 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 once a year and 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 or SENDCO. SEND information and leaflets/audio guides are available in a number of community languages through the school or Buckinghamshire Special Educational Needs and Disability Information, Advice and Support Service (SENDIAS).

Buckinghamshire SENDIAS provides a range of support for parents of students with SEN, including Independent Parental Supporters (IPS) and parent training about the Code of Practice. IPS give advice and support to parents of students with SEND at any age or stage. SENDIAS also gives information about mediation services. Buckinghamshire SENDIAS arranges meetings and produces leaflets and audio guides about many aspects of SEND. They can be contacted on 01296 383754. Some of their leaflets are available in school. Additionally, information can be found at <https://www.buckinghamshire.gov.uk/schools-and-learning/bucks-sendias-service/contact-sendias/>

C2 THE VOICE OF THE CHILD

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

C3 LINKS WITH OTHER AGENCIES, ORGANISATIONS AND SUPPORT SERVICES

The school has access to a wide range of education, health and social services professionals available in Buckinghamshire. This includes The Specialist Teaching Service which has services for Cognition and Learning needs (on a buy-back system for schools) and core funded services for Communication and Interaction, visual and hearing impaired and for students with Physical Disabilities. Health specialists such as Occupational Therapists, Physiotherapists, Speech and Language Therapists and others. It also includes the Educational Psychology Service. We are committed to using the expertise and advice

provided by other professionals and health, social services, and voluntary organisations can be contacted as required.

C4 LINKS WITH OTHER SCHOOLS AND TRANSFER ARRANGEMENTS

Year 6 transfer and casual admissions links with other schools

- SEND action records are transferred following LA procedures.
- There are opportunities for all students to visit their prospective Secondary School.
- Students with SEND are given additional visits, if required, so that they will become more confident in the new situation.
- Representatives from local secondary schools are available for consultation before the time for transfer.
- For students with an EHCP it is amended by 15th February of the year of transfer. It must be amended in the light of the recommendations of the annual review in Year 5, the parents' views and preferences and the response to consultation by the LA with the schools concerned.
- The SENDCO attends the annual review/final annual review of Year 5/Year 6 students with an EHCP for whom The Cottesloe School has been named.
- Representatives from The Cottesloe School visit feeder schools to meet students before transfer.
- Should a student on the SEND register transfer to The Cottesloe School as an in-year admission the SENDCO will contact the current school to receive an overview of the student, and request copies of all relevant support plans, academic information and grades prior to the student's enrolment.

Transfer within the school

- Teachers liaise closely when students transfer to another class within the school.
- Meetings are arranged wherever possible between the staff involved in monitoring the student's progress.

Transfer to another school

- Should a student on the SEND register transfer to another educational provider or establishment the school will make available to the new provider:
 - an overview of the student
 - copies of relevant plans and support programmes
 - internal and external reports
 - academic information and grades
 - the opportunity for the SENDCO, or other relevant professional, from the receiving school to meet with the SENDCO at The Cottesloe School to discuss the student. This could be via a meeting, or other forms of communication.

C5 STAFF DEVELOPMENT AND APPRAISAL

- The school is committed to gain expertise in the area of SEND.
- There are regular training sessions for TAs.
- TAs are involved in the appraisal system.
- The SENDCO attends the partnership SENDCO support group termly meeting
- whole staff in-service training sessions are arranged as appropriate, in response to particular needs within the school.
- Reading and discussion of documentation, and SENDCO/teacher meetings are considered to be part of staff development, as well as a time to share information.
- The SENDCO and other staff attend LA meetings and INSET when relevant.
- Newly appointed teaching and support staff meet the SENDCO to discuss SEND procedures in the school. There is an induction pack outlining the school's procedures and approach.
- All staff training needs are identified through progress data and via the appraisal system.
- All new staff to the school (including new teachers and support staff and those who are training to be teachers) have a training session with the SENDCO to explain the systems and structures to support learning and to discuss the needs of individual students. There is a staff handbook detailing the systems in place.

Review

This policy will be reviewed annually.