Special Educational Needs and Disabilities (SEND) and Inclusion Policy

Adopted September 2026

Approved by:	Academic Standards committee	Author:	Trust SEND & Inclusion Lead
Last Reviewed: N/A		Date of Adoption:	September 2026
Next review due by: September 2027			

Contents

1.	Introduction and Objectives	3
2.	Legislative Framework and Linked Trust policies	4
3.	Roles and Responsibilities	5
4.	SEND Information Reports	7
5.	Identification of SEND	7
6.	School SEND registers	9
7.	Record Keeping and Information Sharing	9
8.	SEND Support and the graduated approach of Assess, Plan, Do, Review	10
9.	Education, Health and Care Plans	10
10.	Evaluating the effectiveness of SEND Provision	11
11.	Safeguarding pupils with SEND	11
12.	SEND in Early Years Settings within the trust	11
13.	Working in collaboration with families	12
14.	Funding for SEND pupils	12
15.	School Admissions and accessibility arrangements for pupils with SEND	12
16.	Transition and Preparation for Adulthood	13
17.	Staff Continuous Professional Development and improving practice in relation to SEND and Inclusion	13
18.	Complaints	13
19.	Monitoring and review of policy	14

1. Introduction and Objectives

Learning Together, Inspiring All

This policy is rooted in our Lumero Educational Trust (LET/the trust) values:

Excellence
Holding the highest of standards: we have great aspirations for our children and young people, encouraging them to seek out and take hold of opportunities

Collaboration
Stronger together: we commit to sharing expertise to empower and inspire all individuals to thrive in a global world

Inclusion
Celebrating and respecting the diversity in our communities: we have a shared expectation in everyone to achieve in an ever-changing world

LET is committed to:

- Promoting equality and diversity in its policies, procedures, and guidelines
- Ensuring staff and students are protected from unlawful direct or indirect discrimination resulting from a protected characteristic (e.g., age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation).
- Delivering high-quality teaching and services that meet the diverse needs of its pupil population and its workforce, ensuring that no individual or group is disadvantaged.

Lumero Educational Trust believes that all pupils are entitled to an education which allows them to achieve their potential, feel valued, accepted and included within our community and which enables them to make a successful transition to other educational settings and to adulthood.

This policy aims to outline the framework, responsibilities, structures and endeavours which the trust will use in providing a high-quality education for pupils with Special Educational Needs and Disabilities (SEND).

Our key objectives include:

- Outlining the expectations for schools to fulfil their statutory duties towards pupils with SEND, aligned to the SEND Code of Practice
- Ensuring that all pupils in Lumero schools receive high-quality, inclusive teaching as part of ordinarily available provision.
- Supporting Lumero schools to promote inclusion
- Promoting inclusive teaching and support strategies, to ensure that SEND pupils receive the best possible education, by removing barriers to learning, participation and enjoyment
- Ensuring that support for SEND pupils includes making reasonable adjustments as required
- Promoting disability equality and equality of opportunity, to fulfil our duties under the Equality Act 2010.

- Supporting our staff to use their best endeavours to make sure that pupils with SEND get the support they need to access the curriculum.
- Ensuring early identification of possible SEND needs and early support for emerging needs, via the Graduated Approach of Assess, Plan, Do, Review
- Ensuring the involvement of parents, carers and students in decision making and outlining our commitment to and expectations of schools and families in working together to support pupils
- Collaborative working with colleagues in other agencies, including Local Authorities
- Ensuring that SEND pupils can fully participate in and enjoy all aspects of school life, including life beyond the classroom alongside pupils who do not have SEND.

For the purposes of this policy, **a pupil is defined as having SEND if they have**:

- A significantly greater difficulty in learning than most others of the same age
- A disability or health condition that prevents or hinders them from making use of educational facilities used by peers of the same age in mainstream settings
- Special educational provision that is additional to or different from that made generally for other children or young people of the same age by mainstream settings.

Under the Equality Act 2010, a **disability** is defined as 'a physical or mental impairment which has a long-term and substantial adverse effect on a person's ability to carry out normal day-to-day activities.'

'Long-term' is defined as 'a year or more' and 'substantial' is defined as 'more than minor or trivial'. This definition includes sensory impairments such as those affecting sight or hearing, and long-term health conditions such as asthma, diabetes, epilepsy, and cancer. Children and young people with such conditions do not necessarily have SEN, but there is a significant overlap between disabled children and young people and those with SEN. Where a disabled child or young person requires special educational provision, they will also be covered by the SEN definition.

All schools in our trust are expected make reasonable adjustments for pupils with disabilities, so that they are not at a substantial disadvantage compared with their peers.

2. Legislative Framework and Linked Trust Policies

This policy has due regard to the following legislation:

- The Children and Families Act (2014)
- The Special Educational Needs and Disability Code of Practice: 0 to 25 Years (2015)
- The Special Educational Needs and Disability (Amendment) Regulations (2024)
- The Equality Act (2010)
- Part 3 Duties on Schools – Special Educational Needs Co-ordinators;
- Special Educational Needs and Disability Regulations 2014 (Schedule 1)
- Keeping Children Safe in Education (2025)
- NHS Choice Framework (2024)
- The UK General Data Protection Regulation (GDPR)
- The School Admissions Code (DfE, September 2022)
- Bromley Local Offer or Croydon Local Offer
- Early Years Foundation Stage framework (2025)

This policy should be read in conjunction with the following Trust policies and documents:

- Lumero Safeguarding Child Protection policy
- LET Complaints Procedure
- LET Information Security Policy
- Individual school SEND Information Reports, SEND Policies and Accessibility Policies

3. Roles and Responsibilities

At Lumero, the responsibility for inclusion and special educational needs is shared across all levels, from the Trustee board and Trust Executive team to school leadership teams, classroom teachers and wider school staff. Our core value of Inclusion runs through all aspects of our ethos and actions, from Leadership to curriculum and teaching.

3.1 The Trustee Board will

- Help to raise awareness of SEND issues with the governance board
- Monitor the quality and effectiveness of SEND governance
- Scrutinise trust wide trends and strategies around SEND and Inclusion

3.2 The Governance Board will

- ensure that each school meets its legal duties under the Equality Act 2010 and Children and Families Act 2014. They should promote an inclusive culture, monitor SEND provision quality and hold leadership teams accountable for pupil outcomes and resource allocation.

3.3 The Trust Executive team will

- Monitor the effectiveness of the Trust-wide SEND policy, will review data on outcomes for pupils with SEND and will challenge leaders to ensure continuous improvement.
- Monitor school performance and quality of provision for SEND students using the Trust quality assurance model. This will be underpinned by the trust Standards and Support Framework. which sets out expectations of school performance and mechanisms to direct improvements for SEND school improvement.
- Monitor and support the work of the Trust SEND & Inclusion Lead
- Report to the Trustee Board on the progress of SEND pupils in public examinations and key assessment points.

3.4 The Trust SEND & Inclusion Lead will

- Provide guidance and support to Lumero school SENCos, ensuring they achieve and maintain the professional qualification and training necessary to deliver exceptional SEND provision.
- Implement a Trust-wide SEND Development plan, monitoring its progress across individual schools and at Trust level to ensure impact for SEND pupils, in line with the Trust strategic vision.
- Ensure that school staff have access to high-quality professional development and training opportunities, to enhance teaching and support for pupils.

- Support sharing of SEND skills and good practice across Lumero schools, via collaborative approaches.
- Conduct an annual SEND and Inclusion self-evaluation audit in each school, to drive continuous improvement and ensure high standards of provision.
- Monitor and advise Trust and school leaders on updates to regulatory systems, legislation, and DfE guidance, ensuring SEND provision remains compliant and aligned with national best practices
- Oversee the analysis of progress and outcomes for SEND pupils across the Trust, ensuring transparency and continuous improvement.
- Regularly review the views of parents and carers of SEND pupils across the trust, using this information to inform actions to improve and adjust how schools work with pupils and families

3.5 Headteachers of Lumero schools will

- Have overall responsibility for the provision and progress of pupils with SEND, fostering a whole-school culture and ethos of inclusion. This should include monitoring and action planning when SEND pupils are overrepresented in data of concern around attendance, attainment, behaviour, suspensions and exclusions.
- The headteacher should also monitor and promote the inclusion of SEND pupils in wider school life, ensuring that they can and do fully participate in and enjoy school life beyond the classroom.
- Ensure the school holds ambitious expectations for all pupils with SEND.
- Establish and sustain culture and practices that enable pupils with SEND to access the curriculum and learn effectively.
- Ensure that the school works effectively in partnership with parents, carers, and professionals, to identify the additional needs and SEND of pupils, providing support and adaptation where appropriate.

3.6 Each School SENCO will be responsible for

- Coordinating the day-to-day delivery of the trust/school SEND policy.
- Working in collaboration with the Headteacher, Trust SEND & Inclusion Lead and wider leadership team to agree on and progress strategic development priorities in relation to Inclusion and SEND.
- Maintaining an accurate SEND register and a monitoring list of pupils whose needs are being investigated in relation to lack of expected progress or other difficulty, including ensuring that the Management Information System (Arbor/SIMS) is updated at least termly.
- The coordination of specific provision made to support individual pupils with SEND, including advising colleagues on a graduated approach to providing SEND support.
- Ensuring records of support and outcomes are maintained for SEND pupils, to monitor progress towards targets and outcomes.

- Regular liaison and joined up working with other staff within the school who have responsibility for pupils within other vulnerable groups, such those responsible for Children Looked After, Pupil Premium, Attendance and Safeguarding.
- Being a key point of contact for external agencies, in particular, the Local Authority and their support services.
- Liaising with professionals from other agencies to ensure a joined-up approach for pupils and families, including working with other settings to support transition.
- Analysing impact of support provided to SEND pupils, to assure that pupils receive the best possible support for their needs within the capacity of the school.
- Liaising with the parents/carers of pupils with SEND wherever necessary and taking their views into account.
- Working with the Headteacher to ensure that the school meets its responsibilities under the Equality Act 2010, regarding reasonable adjustments and access arrangements.
- Being familiar with the provision in the Local Offer, to ensure an understanding of the services, support, and activities available locally area for children and young people with SEND.
- Ensuring that the school has a compliant and up to date SEND Information Report published on the school website as per the Special Educational Needs and Disability Regulations 2014 (Schedule 1)

3.7 Teachers are responsible for

- Teachers are both responsible and accountable for the progress and development of all pupils in their class, including those pupils with SEND and who access support from teaching assistants or specialist staff.
- Creating a safe, stimulating, and respectful environment where pupils with SEND feel included and supported.
- Making inclusive, high-quality teaching normally available to the whole class.
- Assessing the progress of pupils with SEND and setting appropriate targets for them.
- Contributing to assessments for pupils who may have SEND needs.
- Adapt teaching methods as needed and work with the SENCO to implement adjustments and interventions.
- Working closely with the SENCO, support staff, external specialists, and parents, keeping records of progress, including for SEND interventions and supports as required.
- Being an initial point of contact for parents/carers who have concerns about possible SEND needs or who wish to discuss their child's needs or progress.
- Engaging in training and development opportunities relating to SEND and Inclusion.
- Working in collaboration with support staff, to maximise their effectiveness in the classroom environment.

4. SEND Information Reports

In accordance with the requirements of the Special Educational Needs and Disability Code of Practice (2015), each Lumero school will produce a SEND Information Report, specific to their own setting. SEND Information Reports should be reviewed and updated annually and be published on the school

website. The content should include information as outlined in the Special Educational Needs and Disability Regulations 2014 (Regulation 51 and Schedule 1) and any updates.

5. Identification of SEND

5.1 There are four key areas of Special Educational Need outlined in the SEND Code of Practice:

i. **Cognition and Learning**, which may include types of learning difficulty, as well as specific learning difficulties (SpLD) such as dyslexia, dyspraxia and dyscalculia

ii. **Communication and Interaction**, which may include difficulties speaking, understanding or communicating, and autism.

iii. **Social, Emotional and Mental Health**, which may include a range of mental health difficulties such as anxiety, depression, eating disorders, as well as conditions such as, attention deficit hyperactivity disorder (ADHD) or attachment disorder

iv. **Sensory and Physical needs**, which may include physical disabilities, visual and hearing impairments, and sensory processing difficulties

Pupils can have needs across more than one SEND area, and their needs may change over time.

Interventions and support will be selected that are appropriate for the pupil's particular area(s) of need, at the relevant time.

5.2 The Trust recognises that Early identification of Special Educational Needs and Disabilities is crucial to improving long-term outcomes, reducing barriers to learning, and preventing escalation of difficulties. Individual schools will seek to identify and address needs early, in accordance with the steps outlined in their SEND Information report.

The trust recommends that parents and carers as well as children and young people should be consulted and included throughout this process, from an early stage.

5.3 Classroom teachers are expected to conduct regular assessments for all pupils and should identify any pupils who are making less than expected progress, given their age and individual circumstances. This includes progress which is:

- Significantly slower than that of their peers starting from the same baseline.
- Does not match or improve on the pupil's previous rate of progress.
- Fails to close the attainment gap between the pupil and their peers.
- Widens the attainment gap

5.4 SENCOs and other school staff may use a combination of observations, screeners and other assessments to gather information about a pupil's areas of strength and need. Where a specialist opinion is needed, schools will endeavour to seek the advice of specialists to inform the support required in order to meet a pupil's needs.

There may be occasions when this is delayed or limited by a lack of access to specialists that is outside of the school's control. Lack of a specialist opinion should not prevent a pupil from receiving support for their needs as far as the school is able to provide this.

5.5 SEND Assessments and 'Right to Choose'

Schools will have usual processes in place for requesting specialist SEND assessments for pupils, often linked to Local Authority processes. In addition to this, NHS Choice Framework allows parents/carers the 'Right to Choose' to select their healthcare provider for an initial specialist appointment, applying to both physical and mental health services, as long as the provider has an NHS contract. This is accessed through the child or young person's GP (general practitioner).

5.6 The trust recognises that some pupils may have underlying factors which place them at a greater likelihood of having SEND. These groups include, but are not restricted to, those with social care involvement, children in care (CLA), those who have high rates of absence and pupils from disadvantaged backgrounds. The trust expects that schools will monitor pupils from these groups with particular rigour in relation to checking for emerging SEND needs.

6. School SEND Registers

Schools must keep an up to date SEND register in accordance with the agreed Trust criteria for placing pupils on or removing them from the SEND register. Pupils on the SEND register must be recorded on the school Management Information System (MIS).

When a school places a pupil on the SEND register, or removes them from the SEND register, they must inform parents/carers in writing.

7. Record keeping and Information Sharing

7.1 All information about pupils will be kept in accordance with the Trust's Information Security Policy and Trust Privacy Notice.

Each school will:

- Record details of a pupil's additional or different provision made under SEND support, with accurate information to evidence the SEND support that has been provided over the pupil's time in the academy, as well as its impact. E.g. Via provision maps
- Record details of SEND needs, outcomes, action, agreed support, teaching strategies and the involvement of specialists, to monitor the progress, behaviour, and development of all pupils.
- Maintain an accurate and up-to-date register of the provision made for pupils with SEND and a list of pupils who are being monitored while information is being gathered about possible SEND needs.

Records will be kept securely so that unauthorised persons do not have access, so far as is reasonably practicable.

The Trust keeps data on the types of need within each school and whether pupils are at SEND Support or EHCP level and makes this available to the Local Authority and Ofsted.

7.2 Information sharing

Schools will share information in accordance with the Data Protection Act (2018), SEND Code of Practice (2015), Council for disabled children's guidance on information sharing and UK General Data Protection Regulation (GDPR). It is useful for necessary information about a pupil's SEND needs to be shared with relevant school staff, to ensure that appropriate support can be put in place. It is also useful for necessary SEND information to be shared in preparation for transition to a new school or setting, so that preparations can be made to ensure that the transition is prepared for appropriately.

Should a parent or carer request that specific information is not shared, this request will be considered by the school in line with the above guidance and trust policies.

8. SEND Support and the graduated approach of Assess, Plan, Do, Review

8.1 SEND Support

When a pupil is placed on the SEND register, they are described as receiving 'SEND Support'. This means that they are receiving additional support from the school in order to meet their SEND needs. The trust expects schools to have developmentally appropriate high expectations for all pupils.

8.2 Pupils receiving SEND support have support tailored to their needs using the graduated approach. As part of their overall monitoring of the progress and development of all pupils, schools in the trust are expected to follow a graduated approach to identify and support needs in a timely and proactive manner.

The SEND Code of practice outlines the graduated approach as a cycle of: Assess-Plan-Do-Review:

- Assess – Identify needs using assessment and consultation
- Plan – Agree outcomes, strategies and support
- Do – Implement planned support
- Review – Evaluate impact and adjust provision, based on any new assessments – the graduated approach cycle starts again.

Parents and carers as well as children and young people should be consulted and included throughout this process, so that their views contribute to decisions made.

8.3 The trust expects schools to ensure that all learners with SEND can access a broad and balanced curriculum through provision of reasonable adjustments, adaptations and additional support where needed to meet the needs of all pupils and bring about the best possible outcomes.

9. Education, Health and Care Plans

9.1 Some pupils have an Education, Health and Care Plan (EHCP). This is a legal document outlining the child's educational, health, and social care needs and sets out the specific provision they must receive. The purpose of an EHC plan is to make special educational provision to meet the SEND needs of the pupil, in order to secure the best possible outcomes for them across education, health and social care and prepare them for adulthood.

9.2 An EHCP is usually applied for by the school for pupils who need support over and above what is provided by what is ordinarily available at the school. If a parent/carer feels that their child may need an EHCP, they should first ask for a meeting with the school to discuss this and agree next steps. It is important that any request for an EHCP needs assessment contains information from the school, the family, and the views of the pupil.

It is expected that wherever possible, schools will respond to requests from the Local Authority for information.

9.3 Annual Reviews of Education, Health and Care plans

For pupils with an EHCP, the trust expects schools to conduct a formal review of the EHC plan every year, as per the Children & Families act, 2014.

10. Evaluating the effectiveness of SEND provision

Schools are expected to evaluate the effectiveness of provision for pupils with SEN by:

- Tracking pupils' progress, including by using and reviewing targets on provision maps
- Gathering the views of pupils and their families
- Monitoring by the SENCO and other staff
- Holding annual reviews for pupils with EHC plans
- Monitoring of the impact of SEND interventions
- Escalating any serious concerns about SEND provision to the trust.

11. Safeguarding pupils with SEND

11.1 The trust recognises that evidence shows pupils with SEND are at a greater risk of abuse and maltreatment, and expects staff to be aware that pupils with SEND:

- Have the potential to be disproportionately impacted by behaviours such as bullying or social isolation.
- May face additional risks online, e.g., from online bullying, grooming and radicalisation.
- Are at greater risk of abuse, including child-on-child abuse, neglect, and sexual violence, exploitation and harassment.

11.2 The trust expects staff to understand that additional barriers to identifying and reporting abuse may exist for SEND pupils and expect staff to be vigilant to this. This may occur where SEND pupils experience difficulties with communication or cognition, have safeguarding concerns masked by their SEND, or due to signs of abuse, such as changes in their mood or behaviour being attributed to their SEND needs (Keeping Children Safe in Education, September 2025).
It is important to remember that Students with Special Educational Needs and Disabilities are not a homogenous group and should be treated as per their individual needs and circumstances.

12. SEND in Early Years Settings within the trust

12.1 All early years providers are required to have arrangements in place to identify and support children with SEND and to promote equality of opportunity for children in their care. These requirements are set out in the Early Years Foundation Stage framework (2025).

12.2 The trust expects early years settings to be proactive in identifying emerging SEND needs and in monitoring the progress and development of all pupils. Early years settings in the trust will have a designated Special Educational Needs Coordinator (SENCO). The SENCO may also be the SENCO for the attached school. Early years settings can also access the support of Local Authority Early Years SEND services.

13. Working in collaboration with families

13.1 Trust schools are committed to working in partnership with all families, including children & young people, in the best interests of their child. Where a pupil is receiving SEND support or has an EHCP, the school will regularly liaise with parents/carers in setting outcomes and reviewing progress and support, as outlined in the SEND Code of Practice. The trust recognises that the pupil and family can provide valuable insight and information and should be integral to planning and reviewing support.

13.2 The trust expects that where possible SEND needs are being investigated, parents/carers will be involved in discussions and planning from an early stage, including consideration of their views around identification of and support for their child.

14. Funding for SEND pupils

Where additional pupil needs are identified, schools will use their delegated funding allowance to provide early intervention support. Where pupils at SEND support level have been receiving support but are still not making sufficient progress over a period of time, the school and family can together consider applying for high needs top-up funding from the Local Authority via an EHC needs assessment, to request additional specialist support if this is required.

14.1 EHCP Funding

The school often but not always receives additional funding for pupils with EHCPs, in accordance with what is agreed by the local authority when the plan is issued. Schools will keep records of how funding is spent.

14.2 Families can request a Personal Budget to meet specific learning, health, or social outcomes specified in the EHC plan, rather than funds being managed by the school. Requests can be made to the local authority when the plan is being issued or reviewed.

15. School Admissions and accessibility arrangements for pupils with SEND

15.1 Lumero schools accept admissions throughout the year dependent upon numbers on roll. SEND pupils who do not have EHC plans should apply to schools according to the school's designated admissions policy and the School Admissions Code (2022).

15.2 Children with an EHC plan are admitted to school under separate statutory procedures set out in the SEND Code of Practice (2024). These procedures are managed by the child's home Local Authority, and not under the school's admission arrangements. Parents of children with an EHC plan should liaise with their child's home Local Authority's SEND team regarding which school they wish to be named in their child's EHC plan.

15.3 Admission to Specialist settings in mainstream schools

Within the trust there are some schools which have additionally resourced specialist provisions for pupils with SEND. Pupils who attend these settings have EHCPs and are therefore admitted to the setting via Local Authority procedures as outlined in paragraph 15.2.

15.4 Accessibility arrangements

The trust is committed to ensuring that pupils with disabilities are not treated less favourably than other pupils. School Accessibility plans outline how each school aims to support disabled pupils by increasing access to the curriculum, improving the physical environment for participation and improving the availability of accessible information. The trues expects all schools to be proactive in their approach, to ensure that all pupils can participate in all aspects of school life, including school trips and extra-curricular activities.

16. Transition and Preparation for Adulthood

16.1 For all pupils with SEND needs, it is expected that schools will make timely arrangements to support successful transitions for pupils as they move to new phases of education, including, in particular, preparing before they start at the school or setting and in preparation for leaving school - known as ‘preparation for adulthood’. The trust recommends that schools consider that pupils with SEND may need earlier or more bespoke careers or further education advice.

16.2 The trust is aware of the importance of planning and preparing for the transitions between phases of education and preparation for adult life for SEND pupils. Where pupils have EHC plans, it is expected that schools will seek to ensure that these are reviewed and amended in sufficient time prior to a pupil moving between key phases of education, to allow for planning for and, where necessary, commissioning of support and provision at the new setting.

17. Staff Continuous Professional Development (CPD) and improving practice in relation to SEND and Inclusion

17.1 The trust is committed to the learning and development of all its staff members and training opportunities will be provided and delivered in line with the trust’s strategic vision. Furthermore, each school will review staff CPD needs during regular SEND and Inclusion self-evaluation reviews and will plan actions accordingly, to ensure that CPD provision allows staff to develop their awareness, skills, and practices in identifying, educating, and assessing pupils with SEND.

17.2 It is also expected that teaching and support staff will given individual, developmental feedback which is specific to SEND and inclusion via regular Developmental Drop-Ins by leadership teams. This

may also be linked to further opportunities to develop practice in order to ensure that pupils receive high-quality teaching.

18. Complaints

18.1 Lumero Educational Trust recognises that parents and carers may, from time to time, have concerns about the progress, achievement, behaviour or welfare of their child, including concerns relating to their SEND needs. Please refer to the Trust Complaints Procedure for further information.

Trust schools may seek advice from the Trust SEND & Inclusion Lead regarding complaints relating to SEND.

19. Monitoring and review of policy

The Trust SEND and Inclusion Lead will review this policy annually, ensuring that all procedures are up to date. Changes made to this policy will be communicated to all schools.