

## POLICY – English as an Additional Language (EAL)

### Education Universal

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| Policy Author         | Laura Dickie, Head of Policy<br>Tonia Lewis, Education and Quality Improvement Lead |
| Approval Date         | Feb 2026                                                                            |
| Policy Approver       | Jo Dunn, Compliance, Regulation and Quality Director                                |
| Next Review Date      | Feb 2029                                                                            |
| Version No.           | 001                                                                                 |
| Policy Level          | Education                                                                           |
| Staff groups affected | All Education                                                                       |

### Monitoring and Review

This policy will be monitored on an ongoing basis through the service's established governance and quality assurance systems. Responsibility for ensuring that the policy remains compliant with legislation and regulatory frameworks sits with the Proprietor Representative and Regional Lead.

A formal review of this policy will be undertaken no later than three years from the date of approval, or sooner if changes in legislation, regulatory guidance, or operational requirements necessitate it.

The Head of Policy will support this process by identifying relevant changes in legislation, regulation, national standards and emerging best practice. The Head of Policy will also incorporate learning from inspections, audits and practice developments into future revisions whilst overseeing all proposed amendments to the universal content to ensure accuracy, consistency and compliance.



Abigail Salisbury-Headteacher

## Terminology

Our aim is to use consistent terminology throughout this policy and all supporting documentation as follows:

| Term                             | Definition                                                                                                                                 |
|----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|
| <b>‘Establishment’ or ‘Site’</b> | A generic term referring to the school/college owned by CareTech.                                                                          |
| <b>Learner</b>                   | Any child or young person under the age of 18, or young adult over 18 who receives education.                                              |
| <b>Service Head</b>              | The senior person with overall responsibility for the school/college.                                                                      |
| <b>Tutor/Teacher</b>             | Members of staff who have teaching responsibility for learners at the school/college.                                                      |
| <b>Parent/Carer</b>              | Parent or person with parental responsibility.                                                                                             |
| <b>Regulatory Authority</b>      | The independent regulatory body responsible for inspecting and regulating services (e.g., Ofsted, Estyn, Education Scotland).              |
| <b>Social Worker</b>             | The worker allocated to the individual learner; if none is allocated, the Duty Social Worker or Team Manager is responsible.               |
| <b>Placing Authority</b>         | The local authority/agency responsible for placing the learner or commissioning the service.                                               |
| <b>Local Authority</b>           | The local authority for the establishment’s location.                                                                                      |
| <b>Staff</b>                     | All staff working at the location, including employed staff, students on placement, contractors, agency staff, volunteers and proprietors. |

## 1. Local School/College Profile

Devon School is an independent specialist provision for students aged 7 to 18 with Social, Emotional and Mental Health (SEMH) needs. We provide a nurturing and supportive environment where students can access learning that is tailored to their individual needs. Our approach focuses not only on academic progress, but also on helping every student develop confidence, self-esteem, resilience and positive relationships. At Devon School, we believe that every young person deserves the opportunity to succeed and to discover their strengths in a safe and compassionate learning community.

At Devon School, our vision is to collaborate with students and families to create a respectful and compassionate school community. We aim to foster a lifelong love of learning, empowering everyone to become the best versions of themselves.

Our school community is guided by five core values that shape everything we do:

- Respect
- Honesty
- Responsibility
- Resilience
- Kindness

These values help us create a positive environment where students feel safe, valued and supported to grow.

## 2. Purpose

This policy applies to **Devon School** and sets out how we identify, assess, support and evaluate provision for learners who use English as an Additional Language (EAL) so that they access, participate in and achieve across our curriculum and wider life of the site.

It provides a universal framework and outlines the expectations that apply to:

- **Staff** (all colleagues)
- **Senior leaders** (Headteacher and leadership team)
- **Learners**
- **Visitors and contractors** (where relevant)

This policy enables Devon School to meet statutory duties, uphold safeguarding responsibilities, comply with data protection requirements, and maintain high-quality provision.

### 3. Scope

This organisational policy applies across all education sites, services and functions. It establishes the universal standards and expectations that must be followed consistently throughout the organisation.

Each site implements these standards in accordance with the statutory and regulatory requirements of the nation in which it operates, as set out in **Appendices A–C**.

### 4. Local Adaptation Requirement

Some sections in this policy are marked **Adapt Locally**. These sections are completed by each site to reflect local operational procedures or national equivalents (e.g., safeguarding framework, inspection remit, curriculum/quality framework, data protection contacts).

All local additions are:

- Accurate
- Up to date
- Consistent with national legislation and regulator guidance
- Fully aligned with the universal standards in this policy

Where no local adaptation or local equivalent is required, the universal content remains fully applicable.

### 5. Legal and Regulatory Context (Universal)

**Devon School** is governed by the statutory duties, safeguarding requirements and inspection arrangements of the nation in which it operates. The universal standards in this policy are implemented in line with the correct national frameworks set out in **Appendices A–C**, which summarise the legal, regulatory and inspection requirements for specific sites.

### 6. Rationale

Our sites welcome multilingual learners and recognise bilingualism/multilingualism as an asset. This policy sets the universal standards that ensure every learner who uses English as an Additional Language (EAL) can access a high-quality curriculum, make strong progress, and feel a deep sense of belonging in our community. Research consistently shows that sustaining home languages benefits cognition, identity and long-term attainment; our approach builds on that evidence while remaining practical for classrooms and tutorials.

### 7. Policy Principles (What “Good” Looks Like)

We adopt a whole-site approach in which EAL is everybody's responsibility:

1. **Asset-based ethos** that values multilingualism and maintains home languages as a foundation for learning English and achieving academically.
2. **Early, holistic induction and assessment** to establish English proficiency, literacy in home language(s), prior schooling, and any additional needs.
3. **High-quality teaching and tutoring** with language-aware pedagogy (explicit vocabulary, modelling, visuals, talk for learning, scaffolds) integrated across subjects and programmes.
4. **Targeted support** proportional to need, coordinated through an EAL plan, and reviewed for impact; EAL **is not** a special educational need, but **can co-occur** with SEND
5. **Inclusive assessment and fair access to qualifications**, following awarding-body rules for arrangements such as bilingual dictionaries where permitted.
6. **Partnership with parents/carers and communities**, providing translation/interpreting where reasonable and encouraging the continued use of home languages.
7. **Continuous professional development (CPD)** for teachers/tutors and support staff, guided by credible frameworks and self-evaluation tools.
8. **Data-informed improvement** using proficiency and attainment data to track progress, close gaps, and evaluate provision.

## 8. Terminology and Definitions

- **English as an Additional Language (EAL)**: learners whose first language is not English; includes fully bilingual learners and those at different stages of English proficiency.
- **Home/first language**: the language(s) used at home or in the community. Maintaining these supports' identity, cognition and later attainment.
- **SEND** frameworks vary by nation; speaking EAL is not, in itself, an additional learning need, but needs may co-exist and must be identified accurately.

## 9. Roles and Responsibilities

- **Headteacher**: champions an asset-based culture; ensures resourcing, staffing, CPD and QA; approves local adaptations; monitors impact.
- **Senior Leadership Team**: embeds EAL within improvement planning, curriculum, assessment and professional learning; ensures compliance with awarding-body rules
- **EAL Lead / Education Team**: coordinates induction, assessment, planning, targeted interventions, staff guidance, family partnership, and data tracking.
- **Teachers/Tutors**: design language-aware teaching (subject vocabulary, modelling, structured talk, visuals, scaffolds), assess progress, and adapt materials.
- **Support Staff**: deliver targeted language support and enable access (pre-teaching vocabulary, visuals, glossaries).
- **Learners**: engage with support plans, use self-help strategies (glossaries, drafting tools), and celebrate multilingual identity.

- **Parents/Carers:** share linguistic background, support home language maintenance, and participate in reviews (with interpreting if needed).

## 10. Identification, Induction and Initial Assessment

### Standard process (all phases, under/over 18):

- **Pre-admission information:** collect languages, prior education, literacy levels; note safeguarding or trauma indicators for sensitive transition.
- **Welcome & orientation:** provide a clear induction with visuals and buddies; give families key info in accessible formats; avoid over-reliance on peers as interpreters for sensitive issues.
- **Initial English proficiency profiling:** complete a best-fit baseline across listening/speaking/reading/writing; record a starting point aligned to an internal framework and track over time.
- **Holistic needs analysis:** screen for potential co-existing SEND; plan any onward assessment without conflating EAL with SEN

## 11. Planning and Provision

Each learner identified for EAL support has an **EAL Support Plan** proportional to need:

- **Classroom/Workshop/Tutorial approaches:**  
Clear language objectives alongside subject objectives; pre-teach and revisit key vocabulary; dual-coded visuals; structured talk; modelling and sentence frames; scaffolded reading and writing; gradual release of responsibility.
- **Targeted support** (time-limited): small-group language for curriculum access; oracy development; reading fluency; academic writing; ESOL-style study skills for Post-16 where appropriate.
- **Home language as a resource:** permit bilingual note-making, dual-language texts, and family engagement to sustain biliteracy, which supports English development and outcomes.

## 12. Assessment, Tracking and Review

- **Formative assessment:** routine checks of vocabulary, comprehension, and academic language (not just conversational fluency).
- **Progress tracking:** maintain an EAL proficiency profile; review against curriculum outcomes; use whole-site self-evaluation tools to plan improvements.
- **Avoiding misidentification:** where progress is atypical despite quality EAL teaching over time, consider SEND assessment pathways.

## 13. Qualifications and Access to Assessment

**Principle:** assessment must fairly reflect what a learner knows/can do, without altering what is being assessed. Follow awarding-body regulations

### Examples (illustrative only; confirm locally):

**Bilingual dictionaries** may be permitted in some external assessments.

Good practice guidance is available on arranging support for learners who use EAL in high-stakes exams.

Inline with the guidelines from JCQ, a candidate with EAL might be eligible for a bilingual dictionary. **SENCo must determine the needs of the individual candidate.** Not all candidates for whom English is an additional language will need to use a bilingual translation dictionary. Very few bilingual translation dictionary users will need to have 25% extra time.

Using a bilingual dictionary is a rare and exceptional arrangement specifically for a candidate who entered the United Kingdom less than three years before the time of the examination(s), with no prior knowledge of the English Language. (Holiday periods are included in the three-year rule.). A standard bilingual translation dictionary without extra time is a centre-delegated arrangement (no online application or evidence needed), provided it is permitted in that specific subject.

Where a candidate for whom English is an additional language has arrived in the United Kingdom due to mitigating and challenging personal circumstances, the centre may select 'Other' using Instructions for conducting examinations Access arrangements online. This will result in an automatic rejection. The centre must then make an online referral to the relevant awarding body.

Adding 25% extra time alongside a bilingual dictionary requires a formal online application via Access Arrangements Online (AAO) by the SENCo - a full explanation can be found here [JCQ Access Arrangements booklet section 5.18](#)

## 14. Partnership with Parents/Carers and Communities

We communicate proactively, value home languages, and provide interpreting/translation where reasonable for key meetings and information. We share practical strategies for supporting learning at home and encourage reading, storytelling and cultural connections in the home language.

## 15. Staff Capability and Professional Learning

We invest in CPD so all colleagues can apply language-aware pedagogy and understand proficiency progression, including early years and Post-16 contexts. Sites can use whole-school self-evaluation and associated checklists to plan CPD, peer coaching and resource development.

**EAL Lead: Claire Benjafield**

**DSL: Claire Benjafield**

## 16. Safeguarding, Wellbeing and Inclusion

Our induction and ongoing support are trauma-informed and culturally responsive. Where relevant, we coordinate with multi-agency partners to ensure wrap-around support for learners and families (e.g., arrivals, refugees/asylum, care-experienced learners).

Refer to our 'Safeguarding and Child Protection' Policy for the full pathway.

**DSL: Claire Benjafield**

## 17. Data, Information Management and Privacy

We collect only what we need, store it securely, and use it to plan provision and monitor outcomes.

**Our Senior Information Risk Owner and Data Protection Officer is Russel Edge.**

## 18. Quality Assurance and Accountability

- **Internal assurance:** learning walks, book/portfolio reviews focusing on language access, and learner/parent voice.
- **Impact measures** may include: proficiency gains, attendance, participation, curriculum attainment/progression, and destination data (for Post-16).
- **Reporting:** EAL is included in site improvement reviews to the Headteacher/Principal and governance.

## 19. Complaints and Concerns

Concerns about EAL provision follow the site's standard concerns/complaints process.

## Equality Impact Statement

This policy has been developed to promote equality, safeguard individual's rights, and ensure fair and inclusive practice across all services. The potential impact of the policy on children, young people, young adults, families, and staff with protected characteristics has been considered in line with the Equality Act 2010.

No negative impacts have been identified. Staff must apply this policy with sensitivity to individual need and make reasonable adjustments to ensure equitable access, safety, wellbeing, and participation for every individual. Any emerging risks of differential impact should be reported and addressed through ongoing review and quality assurance

## Appendices

Appendix A – Legal and Regulatory Framework in England

Appendix B – Legal and Regulatory Framework in Wales

Appendix C – Legal and Regulatory Framework in Scotland

## Appendix A — England

Legislation, guidance and regulatory frameworks underpinning EAL in England.

### English as an Additional Language (EAL) — DfE guidance (Early Years to school entry)

- **Means:** Sets expectations for identifying multilingual learners, valuing home language, and creating fair entry/settling processes that do not disadvantage EAL learners at the point of admission.
- **Requires:** Admissions materials and entry conversations gather first language and early proficiency appropriately; sites model inclusive practice, provide accessible information and avoid using EAL status to gatekeep access. Inspectors test culture and implementation.
- **Our stance:** Admissions collects first language and initial needs sensitively; we provide clear pre-admission information and early EAL profiling without barriers.
- **Implementation example:** Admissions form captures “home/first language” and communication needs; welcome pack includes translated basics where reasonable.

**Links:** [English as an additional language \(EAL\) — DfE](#)

### Education Inspection Framework (EIF)

- **Means:** Sets how Ofsted inspects schools and FE; considers equality of access, statutory compliance and the impact of admissions information and onboarding on learners, including those using EAL.

- **Requires:** Sites evidence fair access, accurate public information, and early identification of learner needs; inspectors expect barriers for multilingual learners to be removed at entry.
- **Our stance:** We demonstrate fair criteria and transparent information across school and FE intakes; EAL profiling occurs at onboarding and informs initial support.
- **Implementation example:** Inspection pack: admissions policy, decisions log, onboarding checklist with EAL/first-language capture for all new learners.  
**Links:** [Education inspection framework \(EIF\)](#)

### Equality Act 2010 — DfE Advice (Schools) and Government Equality Guidance (FE covered in the Act)

- **Means:** The Equality Act applies to schools and FE; DfE schools advice sets out duties at admissions; government equality guidance confirms the Act's scope across education, including FE providers.
- **Requires:** Admissions must not directly/indirectly discriminate; sites evidence due regard and accessible communications for prospective multilingual learners.
- **Our stance:** Equality screening is built into admissions decisions for both school and FE cohorts; we provide interpreting/translation where reasonable.
- **Implementation example:** Offer/decline template includes an equality impact tick-box; website states availability of language support during application.  
**Links:** [Equality Act 2010: advice for schools \(applies alongside the Act to FE\)](#)

### Data protection in education — DfE (Admissions data, incl. EAL fields)

- **Means:** Guidance on lawful collection and use of learner data at admission (UK GDPR/DPA 2018), including language/identity data. Applies to schools and FE.
- **Requires:** Lawful basis, minimisation, privacy notice at point of collection, Records of Processing for admissions; secure handling of language/proficiency data.
- **Our stance:** We collect only what is necessary (e.g., first language) and publish a clear privacy notice linked from the application journey.
- **Implementation example:** Admissions MIS fields limited to required categories; RoPA lists EAL data with retention and sharing controls.
- **Links:** [Data protection in schools \(DfE\)](#)

## Appendix B — Wales

Legislation, guidance and regulatory frameworks underpinning EAL/WAL in Wales.

### EAL/WAL data capture — PLASC (first language and staging for returns)

- **Means:** Welsh Government guidance on collecting/recording first language and related fields for pupil census; used at the point of admission/on-roll updates.
- **Requires:** Sites accurately capture first language (and, where locally required, EAL/WAL staging) without using it to restrict access; maintain data quality for returns.
- **Our stance:** Admissions forms reflect PLASC categories; data are validated before submission and never used to gatekeep.
- **Implementation example:** MIS intake workflow includes first-language drop-downs aligned to PLASC and termly validation.
- **Links:** [PLASC: guidance and services](#)

### Independent Schools Registration & Operational Guidance — Welsh Government

- **Means:** Explains the operating obligations under the **Independent School Standards (Wales) 2024**, including accurate published information used by families at admission.
- **Requires:** Admissions information must be accurate, accessible and compliant; proprietors ensure standards are met and evidenced. (FE: use the same approach for colleges within organisational policy.)

- **Our stance:** We publish clear admissions criteria and EAL information; governance checks accuracy annually.
- **Implementation example:** Website admissions page reviewed each summer; changes logged to proprietor audit trail.
- **Links:** [Independent schools registration and operational guidance](#)

### Estyn — What/How we inspect

- **Means:** Handbooks set what/how Estyn inspects in independent schools and FE, including information for learners and equitable access at entry.
- **Requires:** Sites demonstrate fair, inclusive admissions; inspectors expect accessible information and early identification of language needs.
- **Our stance:** Inspection folder includes admissions policy, equality screening note, and EAL onboarding checklist.
- **Implementation example:** Estyn “virtual room” holds anonymised admissions decisions and language-support signposting given to applicants.
- **Links:** [Estyn: inspection guidance resources](#)

### Equality Act 2010

- **Means:** The Act applies to education providers, covering admissions decisions and information accessibility across school and FE contexts.
- **Requires:** No discrimination in admissions; due regard to equality of opportunity and good relations; accessible communications for multilingual families.
- **Our stance:** Admissions criteria and public information are equality-checked; interpreters/translation offered where reasonable.
- **Implementation example:** Equality impact note attached to annual admissions policy review; homepage lists language support routes.
- **Links:** [Equality Act 2010: advice for schools \(read with the Act for FE\)](#)

**Data protection in education — DfE Means:** Practical guidance to meet UK GDPR/DPA at admission; applicable principles across Schools and FE.

- **Requires:** Lawful basis, minimisation, privacy notice, retention, and secure handling of first-language/EAL data collected at entry.
- **Our stance:** Privacy notices are linked in online forms and available on request in Welsh/English (and other languages where reasonable).
- **Implementation example:** RoPA lists EAL data items with retention; privacy notice versioning logged annually. **Links:** [Data protection in schools \(DfE\)](#)

## Appendix C – Scotland

Legislation, guidance and regulatory frameworks underpinning EAL in Scotland.

### Learning in 2+ Languages — Education Scotland (EAL practice at entry)

- **Means:** National resource for supporting bilingual learners, including identification, assessment and classroom access relevant from admission onwards.
- **Requires:** Sites recognise home language as an asset, gather language information early, and ensure equitable access to learning from the start. Inspectors use this as good-practice context.
- **Our stance:** Admissions/onboarding capture language profile and plan early classroom access supports.
- **Implementation example:** Admissions checklist includes first-language capture and early classroom support prompts.
- **Links:** [Learning in 2+ Languages \(Education Scotland\)](#)

### How Good Is Our School? (HGIOS4) — Education Scotland/HMIE

- **Means:** Self-evaluation framework used by inspectors and sites; covers wellbeing, equality and inclusion applicable to fair admissions and transitions.
- **Requires:** Sites self-evaluate admissions against inclusion/equality and ensure accessible information and smooth transitions for multilingual learners.
- **Our stance:** Annual SE update includes an admissions equity check (QI 3.1).

- **Implementation example:** SE minute evidences review of admissions materials for language accessibility and fairness.
- **Links:** [HGIOS4](#)

### **GIRFEC — gov.scot (entry and transitions; rights and wellbeing)**

- **Means:** Scotland's national approach to coordinated support and wellbeing from first contact; sets expectations for early identification and multi-agency working at admission.
- **Requires:** Sites consider SHANARRI needs at entry, share information appropriately, and coordinate support where EAL intersects with wider needs.
- **Our stance:** Admissions triggers a GIRFEC-aligned wellbeing prompt and, where needed, a plan involving the education team/multi-agency partners.
- **Implementation example:** Admissions pro-forma includes Named Person notification where early language support is required.
- **Links:** [GIRFEC — gov.scot](#)

### **Equality Act 2010**

- **Means:** The Act applies to education providers, covering admissions decisions and terms; HMIE expect equitable access and non-discrimination.
- **Requires:** No direct/indirect discrimination in admissions; due regard to equality; accessible communications for multilingual applicants.
- **Our stance:** Admissions criteria and publications are equality-screened; translation/interpreting arrangements signposted.
- **Implementation example:** Equality screening note appended to policy; website lists how to request language support during application.
- **Links:** [Equality Act 2010: advice for schools](#)

### **EAL admissions data & information sharing — *Learning in 2+ Languages* (Education Scotland)**

- **Means:** Sets expectations for identifying bilingual/multilingual learners at entry, gathering first-language and early proficiency information, and sharing it appropriately to secure access to learning from day one.
- **Requires:** Sites capture home/first language at admission, profile early EAL needs, value use of the home language, and share information with the education team (and partners where appropriate) in line with local GIRFEC arrangements.
- **Our stance:** Admissions collects first-language and initial EAL profile; we record this in the learner file and notify the education team so classroom supports are in place at start.



- **Implementation example:** Admissions checklist includes first-language field, initial EAL profile (listening/speaking/reading/writing), and a hand-off note to class/tutor referencing early supports (visuals, vocabulary, talk routines).  
**Links:** [Learning in 2+ Languages — Education Scotland \[ico.org.uk\]](https://www.education.scot.nhs.uk/learning-in-2-languages/)