POLICY – Inclusion

Education Universal

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Policy Approver	Jo Dunn, Compliance, Regulation and Quality Director
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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.

Terminology

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

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

1. Local School/College Profile

Cambian Whinfell School offers up to 52-weeks residential placements and day places for local students.

The School offers **OUTSTANDING** care and education for boys and young men aged 7-19. Students often arrive after difficult education and domestic experiences and are potentially lacking of confidence. Whinfell School provides stability, consistency and a sense of belonging within a safe and nurturing environment, whilst supporting students academic, social and emotional development to prepare them for the future.

Our young people have often experienced significant disruption to their schooling in the past and may come to us from multiple placement breakdowns. They may also present a risk to themselves or others due to high levels of challenging behaviour or deficits in personal development. Typically they are very disengaged, isolated and have little self-belief. By prioritising these deficits we create the conditions for young people to re-engage in education and achieve their full potential.

We believe that it is not enough to just provide a safe and happy school experience. We prioritise **connections before corrections**, recognising that strong, trusting relationships form the foundation for genuine growth and learning. In a supportive way, we want to challenge all of our young people to grow as individuals and acquire the skills, confidence, knowledge and qualifications to be as successful and resilient as they possibly can be when they eventually move on to further education or independence.

2. Purpose

This policy applies to **Whinfell School** and sets out our commitment to an inclusive, aspirational learning environment, describing how we identify and respond to need, remove barriers to learning and ensure that every Learner can thrive academically, socially and emotionally.
It provides a universal framework and outlines the expectations that apply to:

- Staff
- Senior leaders
- Learners
- Visitors and contractors (where relevant)

This policy enables us 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 **Appendix 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).

Where England-specific statutory references appear in the universal policy, sites in Wales and Scotland insert their own national equivalents into the marked *Adapt Locally sections.*

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)

Whinfell 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 England, Wales and Scotland.

6. Policy Aims

Our aims guide all aspects of our inclusive practice and shape the decisions we make as a site. While our approach is relational and responsive, it is underpinned by high standards, national expectations and evidence-informed practice.
We aim to:

- Provide a broad, balanced and ambitious curriculum that remains accessible to all Learners.
- Identify needs at the earliest point and respond with timely, evidence-based interventions.
- Promote emotional regulation, resilience and positive relationships through trauma-informed practice.
- Ensure that Learners with SEND (England) make strong progress.
- Work closely with families, carers and external partners including social care, health and therapeutic agencies.
- Champion equality, diversity and anti-discriminatory practice throughout the site.

- Meet all statutory responsibilities set out in national legislation, statutory guidance and the regulatory requirements applicable to our site ensuring full compliance and continual readiness for inspection. See Appendix A-C.

7. Roles and Responsibilities

The effective delivery of inclusive practice relies on clear accountability and collaborative working.

The Principal

- Holds overall strategic accountability for inclusion and SEND
- Ensures adequate resources, staffing and oversight are in place.
- Promotes a culture in which inclusion is central to site improvement.

The SENCO:

- Leads the coordination of SEND provision.
- Oversees the implementation of EHCP processes.
- Supports teachers/tutors and the wider education team in understanding and meeting Learners' needs.

Regional Lead / Proprietor Representative:

- Oversees strategic compliance and the impact of provision.
- Approves and monitors the implementation of this policy.
- Ensures provision is appropriately planned and resourced.

8. Identification of Need

We identify needs using a graduated assess–plan–do–review model. This ensures early recognition of emerging needs and a structured, evidence-based response.

Identification draws on:

Baseline assessments on entry.

- Teacher/tutor observations and daily formative assessment.
- Behaviour, wellbeing and communication screening tools.
- Speech, language and communication assessments.
- Information from previous schools/colleges, social care and health.
- Learner and family voice.
- Specialist assessment (EP, SALT/SLT, OT, CAMHS).

We recognise a broad range of needs, including:

- **SEMH:** emotional regulation, attachment, trauma and anxiety.
- **ASC:** differences in sensory processing, communication and social understanding.
- **Cognition & Learning:** mild learning difficulties.
- **Communication & Interaction:** expressive/receptive differences.
- **Contextual Safeguarding:** vulnerabilities linked to exploitation or risk.

9. Teaching, Learning & Curriculum Adaptations

We deliver adaptive teaching rooted in high expectations. Teachers plan proactively for diverse learning needs and make responsive adjustments to remove barriers.

Adaptations may include:

- Scaffolding, modelling and task chunking.
- Pre-teaching, overlearning and structured repetition.
- Visual timetables, graphic organisers and social stories.
- Sensory strategies, movement breaks and co-regulation approaches.
- Adjustments to cognitive load and ways of recording.
- Targeted literacy and numeracy interventions.
- Assistive technology to support communication and independence.
- Consistent routines, predictable transitions and structured environments.
- Integration of therapeutic strategies into lessons.

Support staff are deployed to:

- Reinforce learning within the classroom.
- Support regulation and relational safety.
- Facilitate communication needs.
- Promote independence and reduce over-reliance.
- Deliver structured interventions.

10. Curriculum Phases & Qualifications

KS1–KS5 (Adapt Locally) and qualification pathways (e.g., GCSE, Functional Skills) must reflect local national frameworks.

11. Curriculum Access

All Learners have the right to access the full curriculum. Where a personalised pathway is required due to an EHCP specialist advice, this is planned collaboratively, reviewed regularly and designed to ensure progression and ambition remain central.

12. Behaviour, Relationships & Communication

Our approach to behaviour is relational, reflective and trauma-informed. We understand that behaviour communicates emotional and unmet needs, and we respond in ways that prioritise safety and connection.

Our behavioural approach includes:

- Emotion coaching and modelling of self-regulation strategies.
- Restorative conversations and reflective practice.
- De-escalation and co-regulation strategies.
- Sensory-based regulation opportunities.
- Personalised behaviour support plans.
- Reasonable adjustments for **SEND**
- Consistent routines, boundaries and expectations.
- Strengths-based communication and positive reinforcement.

Communication approaches include:

- Simplified, accessible language.
- Visual supports and AAC where needed.
- Strategies tailored to ASC profiles.
- Staff trained to use communication tools confidently.

13. Working with Families & External Agencies

We work in strong partnership with families and carers, valuing the insights they bring. We are committed to regular communication, collaborative decision-making and transparent review processes.

We work with external partners — including social care, therapy services, youth justice and health agencies — to ensure provision is holistic and coordinated. Information is shared in line with **ISS Part 6**.

14. Safeguarding Framework & Local Procedures

See Safeguarding Policy

15. Data Protection & Information Governance

See Data Protection and information governance policy

16. EHCP - SEND Provision & Outcomes

Learners with **EHCPs** are supported through high-quality classroom practice and targeted provision driven by the outcomes in their statutory plans.

Our approach ensures that:

- Plan outcomes directly shape teaching strategies.
- Provision maps meet statutory expectations.
- Therapeutic interventions (SALT/SLT, OT, counselling, trauma therapy) are integrated.
- Progress towards outcomes is reviewed each term.
- Annual reviews are timely, collaborative and evidence-based.
- Learners' voices contribute meaningfully to decisions.

17. Monitoring Outcomes

We use a range of indicators to evaluate the effectiveness of inclusion.

Monitoring includes:

- Academic progress across subjects.
- Emotional regulation and wellbeing.
- Social communication and interaction skills.
- Independence, resilience and self-advocacy.

- Attendance, engagement and participation.
- Safeguarding and contextual risk indicators.

18. Assessment & Multi-Agency Pathways

See safeguarding, assessment and mutli agency policies

19. Staff Training & Professional Development

We invest in ongoing CPD to ensure our staff team feel confident and skilled.
Training includes:

- Trauma-informed practice.
- ASC and SEMH strategies.
- Safeguarding including contextual safeguarding (CSE).
- De-escalation and behaviour regulation.
- Communication and interaction strategies.
- National frameworks for SEND and the SEND Code of Practice
- Therapeutic approaches relevant to our Learners.
- A comprehensive induction programme for all new staff.

20. Monitoring, Evaluation & Governance

Leaders evaluate the quality of inclusion using both qualitative and quantitative evidence.

Monitoring includes:

- Learning walks and observation.
- Review of work, plans and provision.
- Data analysis (progress, behaviour, safeguarding).
- Learner, staff and family voice.
- Staff supervision and reflective practice.
- Governance/proprietor oversight (Adapt Locally).
- Findings feed directly into site improvement planning.

Inspection & Regulatory Context

Inclusion is evaluated as part of the site's national inspection and regulatory framework. All local requirements (inspectorate, framework, visit model and applicable quality indicators) are provided in the Regulatory & Legislative Appendix A-C.

21. Environment & Accessibility

We work intentionally to ensure our learning environment supports all Learners.

This includes:

- Reasonable adjustments to physical spaces.
- Sensory-friendly environments.
- Safe rooms and therapeutic spaces.

- Individualised risk assessments where needed.

22. Complaints

Complaints relating to **SEND** follow the site's complaints procedure and any statutory mediation or appeal routes.

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

Legislation, guidance and regulatory frameworks underpinning Inclusion in England.

Working Together to Safeguard Children 2023

- **Means:** Statutory multi-agency guidance for how agencies work together to help, support and protect children; applies to education providers including FE educating under-18s.
- **Requires:** Align site safeguarding to local partnership procedures and national child protection standards, evidencing effective information sharing and joint working.
- **Our stance:** We follow local safeguarding partnership procedures and evidence leadership oversight.
- **Implementation example:** DSL maintains live referral and strategy-discussion logs aligned to local thresholds, reviewed termly.
- **Links:** GOV.UK – Working together to safeguard children

Keeping Children Safe in Education (KCSIE) 2025

- **Means:** Statutory guidance for schools and colleges on safeguarding and safer recruitment, including FE colleges that educate under-18s.
- **Requires:** All staff read Part 1; DSL role, safer recruitment checks, managing allegations, online safety and a single central record with auditable compliance.
- **Our stance:** We embed KCSIE in induction, supervision and internal audits.
- **Implementation example:** Termly SCR audit, Part-1 completion logs and current DSL training records available for inspection.
- **Links:** GOV.UK – Keeping children safe in education

Education Inspection Framework (EIF)

- **Means:** Ofsted evaluates inclusion through Quality of Education, Behaviour & Attitudes, Personal Development, and Leadership & Management, with safeguarding as a baseline across remits including FE & skills.
- Requires: Evidence of an ambitious, accessible curriculum and adaptive teaching for all Learners (incl. SEND), fair behaviour/attendance, equitable personal development, and leadership oversight securing compliance and impact.
- **Our stance:** We triangulate curriculum access, assessment-led adaptation, participation and outcomes by group, and leadership actions to prove impact.
- **Implementation example:** Compact inspection pack with curriculum maps (SEND access), work/lesson samples (adaptation), attendance/enrichment dashboards by group, and a leadership impact summary.
- **Links:** GOV.UK – Education inspection framework

SEND Code of Practice: 0 to 25 years (statutory guidance)

- **Means:** Statutory guidance for the SEND system aged 0–25; duties on schools and FE educating under-25s.
- **Requires:** Graduated approach; learner/family participation; SEN Support and EHC plans where required; coordinated work with health and social care.
- **Our stance:** We map plan outcomes to classroom/tutorial practice and review impact termly.
- **Implementation example:** Provision map evidences assess–plan–do–review cycles with learner voice and measured outcomes.
- **Links:** https://www.gov.uk/government/publications/send-code-of-practice-0-to-25

Equality Act 2010

- **Means:** DfE guidance on legal duties under the Equality Act 2010, including the public sector Equality Duty, for education providers.
- **Requires:** Eliminate discrimination/harassment, advance equality of opportunity and foster good relations; apply reasonable adjustments; publish equality information/objectives.
- **Our stance:** We set measurable equality objectives and audit reasonable adjustments across curriculum, support and premises.
- **Implementation example:** Annual equality report analyses outcomes by protected characteristic and informs the site improvement plan.
- **Links:** **https://www.gov.uk/government/publications/equality-act-2010-advice-for-schools**

The Education (Independent School Standards) Regulations 2014 — Part 3 *(if independent)*

- **Means:** Legal standards all independent schools must meet; Part 3 covers welfare, health and safety (including safeguarding). *(Not applicable to FE colleges.)*
- **Requires:** Effective safeguarding arrangements, risk assessment and welfare policies, with proprietor oversight and evidence of implementation.
- **Our stance:** Where applicable, we maintain a proprietor compliance log mapped to Part 3 and review termly.
- **Implementation example:** Proprietor receives a safeguarding compliance report summarising audits, incidents and corrective actions.
- **Links:** **https://www.legislation.gov.uk/uksi/2014/3283**

Appendix B

Legislation, guidance and regulatory frameworks underpinning Inclusion in Wales.

Keeping Learners Safe 2022

- **Means:** Welsh Government statutory guidance for safeguarding in education; sets roles, procedures and expectations for schools and FE sites providing for under 18s
- **Requires:** DSP arrangements, staff training, reporting/escalation and alignment with local safeguarding board procedures.
- **Our stance:** We align policy, training and escalation to this guidance and local authority procedures.
- **Implementation example:** DSP maintains a training matrix, referral log and an annual safeguarding report to the Headteacher/Principal and proprietor.
- **Links:** https://www.gov.wales/keeping-learners-safe

Estyn — Inclusion across inspection areas

- **Means:** Estyn's '*How we inspect/What we inspect*' sets expectations for teaching & learning, wellbeing/care/support/guidance, and leadership/improvement, with safeguarding embedded across sectors including FE.
- **Requires:** Evidence of inclusive curriculum/teaching, learner wellbeing and equitable participation, effective support/guidance (incl. ALN), and leadership self-evaluation and improvement that raise outcomes for all Learners.
- **Our stance:** We link inclusive practice and outcomes to Estyn criteria, showing how leaders monitor, evaluate and improve provision across groups.
- **Implementation example:** One-page cross-reference of self-evaluation to Estyn criteria with case-tracked examples (ALN progress, participation, destinations).
- **Links:** https://estyn.gov.wales/inspection-guidance-resources

Additional Learning Needs (ALN) Code for Wales 2021 (statutory guidance)

- **Means:** Mandatory Code under the ALN & Education Tribunal (Wales) Act 2018; applies to schools and FE institutions supporting 0–25s.
- **Requires:** Person-centred practice; timely identification; IDPs for learners with ALN; coordinated multi-agency planning and review.
- **Our stance:** We implement IDPs that translate into classroom/tutorial strategies with clear outcomes and review dates.
- **Implementation example:** IDP review schedule tracked termly; action logs show adjustments, agency input and learner/carer voice.
- **Links:** https://www.gov.wales/additional-learning-needs-code

Equality Act 2010 — education duties

- **Means:** UK-wide equality law applying in Wales; duties on education providers to prevent discrimination and meet the public sector Equality Duty. [gov.wales]
- **Requires:** Publish equality information/objectives; ensure reasonable adjustments and fair access across curriculum, support and facilities. [gov.wales]
- **Our stance:** We set site equality objectives aligned to inclusion priorities and monitor progress via self-evaluation and Estyn criteria.
- **Implementation example:** Annual equality dashboard with protected-characteristic analysis informs actions and governor reports.
- **Links:** https://www.gov.uk/guidance/equality-act-2010-guidance

Independent School Standards (Wales) Regulations 2024 — welfare/health/safety *(if independent)*

- **Means:** Welsh standards for **independent schools**, strengthening safeguarding (e.g., training, DBS re-checks, proprietor accountability, transparency). *(Not applicable to FE colleges.)*
- **Requires:** Proprietor ensures safeguarding arrangements meet the standards and information duties to stakeholders are fulfilled.
- **Our stance:** Where applicable, we maintain proprietor oversight and a compliance log mapped to the standards.
- **Implementation example:** Annual proprietor statement evidences safeguarding standards, training currency and publication of required information.
- **Links:** **https://www.legislation.gov.uk/wsi/2024/27/made**

Appendix C

Legislation, guidance and regulatory frameworks underpinning Inclusion in Scotland.

National Guidance for Child Protection in Scotland (2021, updated 2023)

- **Means:** National guidance setting out responsibilities and expectations for everyone involved in protecting children; safeguarding is a core pillar of an inclusive school culture.
- **Requires:** Align site procedures to local child protection arrangements; evidence robust information-sharing, inter-agency working and consistent practice that keeps Learners safe.
- **Our stance:** We follow local Child Protection Committee procedures; leaders quality-assure referrals, risk planning and reviews as part of inclusion effectiveness.
- **Implementation example:** Termly safeguarding assurance meeting samples case files, supervision notes and actions, with findings feeding into the site improvement plan.
- **Links:** gov.scot – National Guidance for Child Protection in Scotland

Getting it right for every child (GIRFEC)

- **Means:** Scotland's national approach to wellbeing and coordinated support (National Practice Model; roles such as named/lead professional) underpinning inclusive planning and intervention.
- **Requires:** Embed GIRFEC values; use the National Practice Model (assessment, planning, review) and appropriate information-sharing to coordinate multi agency support proportionate to need.
- **Our stance:** We plan, record and review support using SHANARRI, with clear actions, ownership and timescales monitored by the education team.
- **Implementation example:** Child's Plan and chronology reviewed at scheduled multi agency meetings; outcomes tracked to SHANARRI indicators with next steps agreed.
- **Links:** gov.scot – GIRFEC policy

How Good Is Our School? (HGIOS4) — self-evaluation for inclusion

- **Means:** Education Scotland/HMIE self-evaluation framework driving school improvement; scrutinises leadership, wellbeing, equality and safeguarding culture as part of inclusion.
- **Requires:** Evidence-based self-evaluation and improvement planning that demonstrates impact on Learners' participation, progress and safety, including those with additional needs.
- **Our stance:** We use relevant QIs to test how curriculum, pedagogy and support remove barriers; actions and impact are recorded in the site improvement plan.
- **Implementation example:** Annual self-evaluation maps evidence and actions to targeted QIs (e.g., leadership of change, wellbeing/equality/inclusion), with measurable success criteria.

- **Links:** HM Inspectors of Education – HGIOS4

Supporting Children's Learning: Code of Practice (ASL) (statutory guidance)

- **Means:** Statutory guidance to the Education (Additional Support for Learning) (Scotland) Act 2004; sets duties to identify and support additional support needs as a foundation of inclusion in school education.
- **Requires:** Early identification; coordinated planning with partners; use of Co-ordinated Support Plans (CSPs) where criteria are met; uphold children's and parents' rights in decisions.
- **Our stance:** We operate staged intervention, coordinate multi-agency input and escalate to CSP where required; Teachers/tutors implement and review strategies in class.
- **Implementation example:** ASN audit trail evidences assessment → planning → review cycles; CSP decisions recorded with timescales met and outcomes monitored.
- **Links:** gov.scot – Additional support for learning: statutory guidance

Equality Act 2010 — education duties

- **Means:** UK-wide equality law applying in Scotland; requires schools to prevent discrimination and meet the public sector Equality Duty as part of inclusive provision and participation.
- **Requires:** Reasonable adjustments; actions to eliminate discrimination/harassment, advance equality of opportunity and foster good relations; publish/evidence equality work.
- **Our stance:** We integrate Equality Duty evidence into HGIOS4 self-evaluation; objectives and impact measures are monitored by the Headteacher/Principal and governance.
- **Implementation example:** Equality statement and objectives reviewed annually; progress (participation, attainment, exclusions, complaints) reported to governance with actions.
- **Links:** GOV.UK – Equality Act 2010: guidance