ALMA EDUCATION

SEND Policy

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Statement of Intent

Every learner is entitled to provision that enables them to achieve their best, build confidence and make progress towards a fulfilling and independent life. This policy sets out the framework Alma uses to meet its duties and principal equality values in providing appropriate, high-quality support for learners with special educational needs and disabilities (SEND).

Most learners in Alma's provision have identified or suspected SEND. For many, unmet need is a central reason they are unable to access mainstream education. Through the successful implementation of this policy, Alma aims to eliminate discrimination and promote equal opportunities for every learner with SEND.

Alma works with each commissioning body to ensure that the following principles underpin this policy: the involvement of learners and their families in decision-making; the early identification of learners' needs and early intervention to support them; a focus on inclusive practice and removing barriers to learning; collaboration between education, health and social care services; high-quality provision to meet the needs of learners with SEND; and successful preparation for adulthood.

Under the Equality Act 2010, a disability is 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. For the purposes of this policy, a learner is defined as having SEND if they have a significantly greater difficulty in learning than most others of the same age, or a disability or health condition that prevents or hinders them from making use of facilities used by peers of the same age, and this calls for special educational provision.

Legislation and Statutory Guidance
Children Act 1989
Education Act 1996
Mental Capacity Act 2005
Equality Act 2010
The Equality Act 2010 (Disability) Regulations 2010
Children and Families Act 2014
The Special Educational Needs (Personal Budgets) Regulations 2014
The Special Educational Needs and Disability (Amendment) Regulations 2015
UK GDPR and Data Protection Act 2018
Children's Wellbeing and Schools Act 2026
SEND Code of Practice 0 to 25 Years (Jan 2015)
Supporting Pupils at School with Medical Conditions (Aug 2017)

Keeping Children Safe in Education (2026)
Working Together to Safeguard Children (2026)
Every Child Achieving and Thriving (White Paper, Apr 2026)
The Equality Act 2010 and Schools: Departmental Advice (DfE, 2018)
Non-School AP Voluntary National Standards (Aug 2025)

1. Legal Framework and Related Policies

This policy has due regard to all relevant legislation and statutory guidance, including, but not limited to, the legislation and guidance listed in the table above.

This policy operates in conjunction with the following Alma policies:

- Admissions Policy
- Behaviour Policy
- Social, Emotional and Mental Health Policy
- Health and Safety Policy
- Child Protection and Safeguarding Policy
- Complaints Policy
- Data Protection and Privacy Policy

2. Objectives

Through the implementation of this policy, Alma will:

- Use its best endeavours to make sure that learners with SEND get the support they need to access their learning programme.
- Ensure that learners with SEND are included fully in Alma's sessions alongside learners who do not have SEND.
- Ensure there is high-quality provision to meet the needs of learners with SEND, with a specific focus on inclusive practice and removing barriers to learning.
- Promote disability equality and equality of opportunity, fulfilling its duties under the Equality Act 2010 towards individual learners with SEND.
- Make reasonable adjustments, including the provision of auxiliary aids and services, to ensure that disabled learners are not at a substantial disadvantage compared with their peers.
- Inform families when Alma is making adapted provision for their child.

3. Definitions

Under the Children and Families Act 2014 and the SEND Code of Practice, a child or young person has SEND if they have a learning difficulty or disability that calls for special educational provision to be made for them.

A learner has a learning difficulty or disability if they have:

- A significantly greater difficulty in learning than the majority of others of the same age, or
- A disability which prevents or hinders them from making use of educational facilities of a kind generally provided for others of the same age in mainstream settings

A learner is disabled under the Equality Act 2010 if they have a physical or mental impairment that has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. Not all disabled learners have SEND, and not all learners with SEND are disabled, though there is significant overlap.

A learner's social, emotional and mental health difficulties fall within the definition of SEND where they call for special educational provision. Many learners in Alma's provision have primary needs in this area, alongside or in combination with other identified needs.

4. Areas of Special Educational Need

The SEND Code of Practice identifies four broad areas of need. These are not rigid categories: many learners have needs across more than one area. Alma is experienced in supporting learners across all four areas.

Communication and interaction

Learners with speech, language and communication needs (SLCN) have difficulty communicating with others. This may include difficulty saying what they want to say, understanding what is being said, or understanding and using the social rules of communication. Autism spectrum condition (ASC) often includes communication and interaction needs alongside other characteristics, including differences in sensory processing and the need for predictability and structure.

Cognition and learning

Learners with cognition and learning needs learn at a different pace to their peers, even with appropriate support. This includes moderate learning difficulties, severe learning difficulties, specific learning difficulties such as dyslexia, dyscalculia and developmental coordination disorder, and ADHD where it significantly affects learning.

Social, emotional and mental health

Social, emotional and mental health (SEMH) difficulties present in a wide range of ways, including withdrawal, disruptive behaviour, anxiety, depression, self-harm, attachment difficulties, and the impact of trauma and adverse childhood experiences. This is the most common primary need category in Alma's provision, and frequently co-occurs with other areas of SEND and with trauma histories. Alma's Social, Emotional and Mental Health Policy sets out Alma's approach in full.

Sensory and/or physical

Learners with sensory or physical needs include those with vision impairment, hearing impairment, multi-sensory impairment, physical disabilities, and conditions such as epilepsy, diabetes and cerebral palsy. Some learners with ASC have significant sensory processing needs that fall within or alongside this category.

5. SEND in Alma's Context

Alma is not a school. It is a non-school alternative provider, delivering commissioned 1:1 and small group sessions to learners who cannot access mainstream education, part-time and alongside the learner's placement with their commissioning body. This context shapes everything about how SEND is understood and addressed at Alma.

The learners placed with Alma have, by definition, not been able to access mainstream provision, and for many, unmet SEND is a significant part of the reason. Alma's role is to deliver its commissioned sessions in a way that is genuinely responsive to each learner's needs. Assessing or diagnosing SEND, providing specialist SEND provision, and delivering what the commissioning body is required to provide under an EHC plan remain the commissioning body's responsibility.

In practice, this means:

- Every session is planned with the learner's identified SEND needs in mind.
- Learning mentors adapt their approach, pacing, communication and materials based on each learner's profile.
- Alma maintains a working knowledge of each learner's SEND, updated as new information is received from the commissioning body or the family.
- Alma contributes to EHC plan reviews and multi-agency meetings as a commissioned provider, sharing its observations and the evidence from its sessions.
- Alma does not carry out formal statutory SEND assessments and does not issue EHC plans; these remain the commissioning body's responsibility.

The absence of a whole-class environment means that many of the barriers learners with SEND experience in mainstream settings are simply not present in Alma's sessions. Alma builds on this deliberately: its entire model of 1:1 and small group provision is individual by design.

6. Roles and Responsibilities

The Advisory Board

The Advisory Board, in its advisory role, will:

- Seeking assurance, annually, that Alma's approach to SEND is effective, well-resourced and consistent with its obligations under the Children and Families Act 2014 and the Equality Act 2010.

- Receiving a summary SEND report from the Director of Education as part of the annual governance review, covering the proportion of learners in provision with identified SEND, any themes in SEND needs, CPD completed, and any significant SEND-related concerns.
- Seeking assurance that Alma meets its duties in relation to supporting learners with SEND.

The Director of Education

The Director of Education, acting as Alma's SENCO, is responsible for:

- Holding overall responsibility for SEND provision across all of Alma's placements.
- Reviewing and updating SEND information for each learner before and during a placement.
- Ensuring that learning mentors are briefed on each learner's SEND needs, learning strategies and any relevant adjustments before the first session.
- Maintaining SEND records for each learner in the placement file.
- Attending or contributing to EHC plan reviews and multi-agency meetings as Alma's representative.
- Identifying and arranging CPD for learning mentors, so they can respond effectively to the SEND needs of the learners in their sessions.
- Ensuring that concerns about unidentified or unmet SEND are communicated to the commissioning body promptly.
- Reporting on SEND themes across Alma's provision to the Advisory Board annually.
- Ensuring the day-to-day operation of this policy, holding ambitious expectations for every learner with SEND, and establishing a culture and practice that enables learners with SEND to engage effectively.
- Working effectively in partnership with families, carers and professionals to identify learners' additional needs and SEND, providing support and adaptation where appropriate.
- Ensuring that Alma's day-to-day practices do not directly or indirectly discriminate against learners with SEND.

Learning mentors

Every learning mentor is responsible for:

- Planning sessions taking full account of the learner's identified SEND needs, adapting approach, materials, pacing and communication accordingly.
- Recording any observations about the learner's learning and access needs in session notes and sharing these with the Director of Education.
- Raising any concern about unidentified SEND, or about SEND needs that are not being met, with the Director of Education without delay.
- Not attempting to diagnose SEND, but noting observable behaviours or difficulties that warrant further investigation.

- Working in a way that is asset-based and strengths-focused, identifying what the learner can do, not only what they find difficult.
- Setting high expectations for every learner and planning to remove barriers to their achieving.
- Being accountable for the progress and development of the learners they work with.

7. Identifying and Understanding SEND

For most learners placed with Alma, SEND has already been identified before provision begins. The commissioning body shares relevant information, including the EHC plan where one exists, the learner's school or learning profile, and any known diagnoses or assessments.

Before the first session, the Director of Education reviews all available information and prepares a briefing for the learning mentor. This briefing sets out the learner's SEND needs, the strategies known to be effective, any sensory or environmental considerations, and the agreed approach for the first session.

Where a learner is placed with Alma without a formal SEND identification, but the learning mentor observes behaviours or learning difficulties that suggest an unmet need, the learning mentor records their observations in session notes and raises them with the Director of Education.

Raise unmet needs the same day
Any concern about unidentified or unmet SEND is raised with the Director of Education the same day it is noticed. Record it in the session note and tell the Director of Education directly, do not wait for the next scheduled review.

The Director of Education discusses these observations with the commissioning body, who holds responsibility for further investigation and, where appropriate, statutory assessment. Alma does not diagnose SEND and does not refer learners directly to specialist services or for statutory assessment; any such referral is made by and through the commissioning body.

Identification of a learner's SEND is continuous throughout their placement with Alma. Staff remain alert to events that can lead to learning difficulties, such as bereavement or bullying.

Alma is aware that some learners for whom English is not their first language may also have SEND. Where a learner with English as an additional language makes slower progress than expected, Alma will not assume that their language status is the only reason, and will consider the full context of the learner's home, culture and community.

8. Safeguarding

Alma recognises that evidence shows learners with SEND are at a greater risk of abuse and maltreatment, and ensures staff are aware that learners with SEND:

- Have the potential to be disproportionately affected by behaviours such as bullying.
- May face additional risks online, for example from online bullying, grooming and radicalisation.
- Are at greater risk of abuse, including child-on-child abuse, neglect, and sexual violence and harassment.

Alma recognises that there are additional barriers to recognising abuse and neglect in this group of learners, including, but not limited to:

- Assuming that indicators of possible abuse, such as behaviour, mood or injury, relate to the learner's condition without further exploration.
- These learners being more prone to isolation or bullying, including prejudice-based bullying, than other learners.
- The potential for learners with SEND or certain medical conditions being disproportionately affected by bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges.
- A different cognitive understanding, and difficulty distinguishing fact from fiction in online content.

Never assume it's "just SEND"
Never assume a change in behaviour, mood or communication is explained by a learner's SEND without also considering whether it could indicate abuse or harm. If in doubt, raise it with the DSL.

The Director of Education ensures that the Child Protection and Safeguarding Policy reflects the fact that these additional barriers can exist when identifying abuse. Care is taken by all staff, particularly learning mentors who work closely with learners with SEND, to notice any changes in behaviour or mood, or any injuries, and these are investigated by the DSL.

Staff are particularly alert to the potential need for early help for learners with SEND and additional needs, and ensure that learners with SEND are taught about how to keep themselves and others safe, including online, in a way that is tailored to their specific needs and vulnerabilities.

Any reports of abuse involving a learner with SEND are handled by the DSL, who works closely with the Director of Education throughout.

9. Individual Learning and Support

Alma's entire model of provision is individual by design. Every session is planned for one learner, in response to their specific needs and current circumstances, so Alma's approach to SEND support is not an add-on: it is intrinsic to how every session is planned and delivered.

Where formal support planning is required, for example as part of an EHC plan review or in support of a statutory assessment, Alma contributes its session observations and evidence to the process.

Alma follows the same four-part cycle described in the SEND Code of Practice, assess, plan, do, review, adapted to Alma's model:

Assess

Before and throughout the placement, the Director of Education and the learning mentor gather and review information about the learner's SEND needs, strengths and current circumstances. This includes information from the commissioning body, the family, the learner themselves, and observations from sessions. This assessment is ongoing, not a one-off event.

Plan

The Director of Education and the learning mentor plan each session and each placement period in light of the current assessment, taking into account the approaches, strategies and adjustments known to be effective for the individual learner. Plans are shared with the commissioning body and the family at placement reviews.

Do

The learning mentor delivers sessions in line with the plan, using their professional judgement to adapt in the moment based on the learner's presentation on any given day. Session notes record what was done, how the learner responded, and any observations relevant to future planning.

Review

The Director of Education reviews the effectiveness of the current approach at regular intervals, using session notes, learning mentor feedback, and information from the commissioning body and family. Reviews are built into every formal placement review meeting. Where an approach is not working, it is changed. Where new information about the learner's needs is received, the plan is updated.

10. Education, Health and Care Plans

Many learners placed with Alma have, or are in the process of obtaining, an Education, Health and Care (EHC) plan. An EHC plan is a legal document that describes the learner's SEND, their needs, the outcomes they are working towards, and the provision that must be made to meet those needs.

Where a learner has an EHC plan, the commissioning school or local authority retains legal responsibility for ensuring the provision described in it is delivered. Alma contributes to that provision as a commissioned provider. The Director of Education reads the EHC plan before the first session and plans sessions to be consistent with it.

Where Alma is delivering provision that forms part of an EHC plan, it contributes evidence and observations to annual EHC plan reviews, either by attending the review meeting or by providing a written report. The Director of Education ensures that any contribution made is honest, accurate and based on direct observation of the learner in sessions. Where possible for looked-after children, Alma's contribution is aligned with the relevant elements of their personal education plan.

Where the Director of Education forms the view that a learner's EHC plan may need reviewing because their needs have changed significantly, this is communicated to the commissioning body in writing without delay.

Where a learner does not yet have an EHC plan but the Director of Education believes one may be warranted based on Alma's observations, this is communicated to the commissioning body, who holds responsibility for deciding whether to request a statutory assessment.

Alma admits any learner referred with an EHC plan naming Alma's provision as part of the arrangements made by the commissioning body, subject to Alma's capacity as set out in the Admissions Policy, and ensures that all those working with a learner named in an EHC plan are aware of the learner's needs and that arrangements are in place to meet them.

11. Involving Learners and Families in Decision-Making

The SEND Code of Practice places co-production with learners and families at the heart of SEND practice. Alma shares this commitment. Learners and their families are not passive recipients of Alma's provision, they are active partners in planning it.

In practice, this means:

- The learner's views, interests and preferences are sought before provision begins and are a central part of session planning.
- Families are kept informed of how sessions are going, what is working, and where adjustments are being made.
- The learner and their family are included in placement reviews and in any significant decisions about how the provision is being delivered.
- The learner is supported to develop their self-awareness, including an understanding of their own strengths and the strategies that help them.
- Families are signposted to relevant support and information, including the relevant local authority's Local Offer and parent carer forums, where this would be helpful.

Planning is focused on the learner as an individual, not allowing their SEND to become a label; is easy for learners and families to understand, using clear, ordinary language rather than professional jargon; highlights the learner's strengths and capabilities; and tailors support to the needs of the individual.

Communications are made accessible to the learner and family. Where a family member or the learner themselves has communication needs, Alma adjusts how it engages with them, and will facilitate support from an advocate where necessary to ensure the learner's or family's views are heard and acknowledged.

12. Transition

Alma is aware of the importance of planning and preparing for transitions, both into an Alma placement and out of one, and for the learner's preparation for adult life.

Where a learner has an EHC plan, Alma contributes any relevant information in good time before the learner moves between key phases of education, or between providers, to allow for planning and, where necessary, commissioning of support and provision at the new setting.

Where a learner's placement with Alma is ending, whether through a return to mainstream provision, a move to a new setting, or a transition towards further education or employment, Alma works with the commissioning body to share relevant information and support a smooth transition, recognising that being supported towards greater independence can be transformative for learners with SEND.

13. Managing Complaints

Alma's Complaints Policy is published on Alma's website.

Following a family's serious complaint or disagreement about the SEND provision being made for their child, Alma contacts the commissioning body promptly, regardless of whether an EHC plan is in place, since the commissioning body holds the statutory responsibility for the learner's SEND provision.

Where a family raises a formal disagreement relating to a statutory EHC process, Alma supports the commissioning body in responding to requests for information as part of disagreement resolution, mediation or SEND Tribunal procedures, but these formal routes remain the commissioning body's responsibility, not Alma's.

14. Staff Training and Development

Every learning mentor receives induction training that includes an introduction to the most common SEND needs of learners in Alma's provision, effective strategies for each area of need, and the link between SEND and safeguarding. This continues through ongoing supervision and case discussion, not just at induction.

The Director of Education identifies specific CPD needs for learning mentors based on the current profile of learners in provision. Where a learning mentor is working with a learner whose SEND is new to them, for example a rare condition or a complex co-occurring profile, the Director of Education provides specific guidance and, where needed, identifies external training or advice.

CPD in SEND is recorded on each learning mentor's file and forms part of Alma's training records.

15. Use of Data, Records and Confidentiality

The Director of Education maintains a SEND record for each learner in provision. This includes all information received from the commissioning body about the learner's SEND, session notes that include observations relevant to SEND, any assessment information shared with Alma, and records of contributions made to EHC plan reviews or other planning meetings.

SEND information is handled in accordance with the Data Protection and Privacy Policy. Health and SEND information is special category data under UK GDPR, and is processed lawfully, transparently and with appropriate security measures in place.

Alma doesn't diagnose or assess
Learning mentors record observations, never a diagnosis. Do not tell a family their child has a specific SEND condition, that assessment sits with the commissioning body and appropriate professionals.

SEND records are not disclosed to any third party without the consent of the learner's parent or carer, except where required for safeguarding, legal or regulatory purposes. Information shared with commissioning bodies and professionals involved in the learner's provision is shared on a need-to-know basis only.

Where a learner has an EHC plan, the plan itself is shared with the learning mentor as necessary for session delivery, and is not shared more widely within Alma's operations without specific justification.

16. Joint Working and the Local Offer

Alma works closely with local education, health and social care services to ensure learners get the right support, and assists commissioning bodies and local authorities in carrying out their statutory duties under the Children and Families Act 2014, by ensuring that services work together where this promotes learners' wellbeing or improves the quality of special educational provision.

Where relevant and appropriate, Alma collaborates with local authorities in developing and reviewing their Local Offer, by providing information about Alma's existing SEND provision and

capabilities to support learners with SEND, and by helping to ensure that the Local Offer is accessible, comprehensive and up to date.

17. Monitoring and Review

This policy is reviewed annually by the Director of Education and the Advisory Board, or sooner if required by changes in legislation or statutory guidance. Any necessary amendments will be communicated to all staff. This policy was approved by Melanie Steel, Director of Education, in August 2026 and is due for review in August 2027.