



DISCOVERY
EDUCATIONAL TRUST

Special Educational Needs and Disability (SEND) Policy

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1 Aims

- 1.1 This is the Special Educational Needs and Disability (SEND) Policy of Discovery Educational Trust (DET) and its Schools.
- 1.2 The aims of this Policy are as follows:
 - 1.2.1 to afford opportunity to and actively promote the wellbeing of pupils who are disabled and/or who have special educational needs (SEN);
 - 1.2.2 to promote good practice in the detection and management of SEN;
 - 1.2.3 to explain the support that the Trust Schools can provide for children who have SEN and the cooperation needed from parents;
 - 1.2.4 to maintain and drive a positive culture towards the inclusion of disabled people and those with SEN in all the activities of each Trust School;
 - 1.2.5 to ensure compliance with equality legislation and to have regard to relevant guidance and advice;
 - 1.2.6 to explain the proactive duty to make reasonable adjustments which requires the Trust Schools to take such steps as it is reasonable to have to take to avoid the substantial disadvantage to a disabled person caused by a provision, criterion or practice applied by or on behalf of a School, or by the absence of an auxiliary aid or service;
 - 1.2.7 to create a whole school culture of openness, safety, equality and protection; and
 - 1.2.8 to actively promote and safeguard the welfare of children, staff and others who come into contact with the Trust and its Schools.

2 Scope and Application

- 2.1 This Policy applies to the whole of each Trust School, including, where relevant, the Early Years Foundation Stage (EYFS) and the Sixth Form.

3 Regulatory Framework

- 3.1 This Policy has been prepared to meet the Trust's and its Schools' responsibilities under:
 - 3.1.1 The Education (Independent School Standards) Regulations 2014;
 - 3.1.2 The Special Educational Needs and Disability Regulations 2014;
 - 3.1.3 Statutory framework for the Early Years Foundation Stage (DfE, September 2023);
 - 3.1.4 Education and Skills Act 2008;
 - 3.1.5 Children Act 1989;
 - 3.1.6 Childcare Act 2006;
 - 3.1.7 Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR);
 - 3.1.8 Equality Act 2010;

- 3.1.9 Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017/353; and
- 3.1.10 Children and Families Act 2014.
- 3.2 This Policy has regard to the following guidance and advice:
 - 3.2.1 [What equality law means for you as an education provider: schools](#) (Equality and Human Rights Commission, April 2014);
 - 3.2.2 [Technical guidance for schools in England](#) (Equality and Human Rights Commission, July 2014);
 - 3.2.3 [The Equality Act 2010 and schools](#) (DfE, May 2014);
 - 3.2.4 Reasonable adjustments for disabled pupils (Equality and Human Rights Commission, April 2015);
 - 3.2.5 [Public Sector Equality Duty: Guidance for schools in England](#) (Equality and Human Rights Commission, updated November 2022);
 - 3.2.6 [Tips for tackling discriminatory bullying](#) (Equality and Human Rights Commission);
 - 3.2.7 [Supporting pupils with medical conditions at school](#) (DfE, September 2014, updated August 2017);
 - 3.2.8 [Mental health and behaviour in schools](#) (DfE, November 2018);
 - 3.2.9 [Special educational needs and disability code of practice: 0 to 25 years](#) (DfE and Department for Health, June 2014, updated April 2020) (SEND Code of Practice);
 - 3.2.10 [Keeping children safe in education](#) (DfE, September 2023) (**KCSIE**); and
 - 3.2.11 [Working together to safeguard children](#) (DfE, March 2015, updated February 2024).
- 3.3 The following Trust and School policies, procedures and resource materials are relevant to this Policy:
 - 3.3.1 DET Equality Policy;
 - 3.3.2 DET Safeguarding and Child Protection Policy;
 - 3.3.3 School Anti-Bullying Policy;
 - 3.3.4 School Admission Arrangements;
 - 3.3.5 School Attendance Policy;
 - 3.3.6 DET Behaviour Policy;
 - 3.3.7 DET Harmful Sexual Behaviour/Child-on-Child Abuse Policy;
 - 3.3.8 School Accessibility Plan;
 - 3.3.9 School SEN Information Report;
 - 3.3.10 DET Supporting Pupils with Medical Conditions Policy;
 - 3.3.11 DET Risk Assessment Policy for Pupil Welfare;

3.3.12 School Relationships and Sex Education (RSE) Policy.

4 Publication and Availability

- 4.1 This Policy is published on the Trust website, and is available via each Trust School's website.
- 4.2 This Policy is available in hard copy on request.
- 4.3 A copy of the Policy is available for inspection from the School Office/Reception during the school day.
- 4.4 This Policy can be made available in large print or other accessible format if required.

5 Definitions

5.1 Where the following words or phrases are used in this Policy:

- 5.1.1 References to the Trust are references to Discovery Educational Trust (DET).
- 5.1.2 References to parent or parents mean the natural or adoptive parents of the pupil (irrespective of whether they are or have ever been married, with whom the pupil lives, or whether they have contact with the pupil) as well as any person who is not the natural or adoptive parent of the pupil, but who has care of, or parental responsibility for, the pupil (e.g. foster carer/legal guardian).
- 5.1.3 References to school days mean Monday to Friday, when the Trust Schools are open during term time. The dates of terms are published on each School's website.

5.2 "Special Educational Needs" and "Learning Difficulty"

- 5.2.1 Children have SEN if they have a learning difficulty or disability which calls for special educational provision to be made for them.
- 5.2.2 Children have a learning difficulty if they:
 - (a) have a significantly greater difficulty in learning than the majority of others of the same age; or
 - (b) have a disability which prevents or hinders the child from making use of educational facilities of a kind generally provided for children of the same age in mainstream schools or mainstream post 16 institutions;
 - (c) are under compulsory school age and fall within the definition at (a) or (b) above or are likely to do so do when of compulsory School age if special educational provision is not made for the child.
- 5.2.3 For children aged two or more, special educational provision is educational or training provision that is additional to or different from that made generally for other children or young people of the same age in a mainstream school or early years provider. For a child under the age of two, special educational provision means educational provision of any kind.
- 5.2.4 A child must not be regarded as having a learning difficulty solely because the language or form of language in which they are or will be taught is different from a language or form of language which is or has been spoken at home. However,

children for whom English is an additional language will be provided with appropriate support.

- 5.2.5 A child, who finds a particular subject difficult, does not necessarily have a "learning difficulty" in the legal sense of that expression; there will often be disparities in the speed with which children learn, in their skill at solving problems and in aptitude generally.
- 5.2.6 The expression "learning difficulty" covers a wide variety of conditions and may include those known as dyslexia, dyscalculia, dyspraxia (developmental coordination disorder (DCD)), attention deficit (hyperactivity) disorder, semantic processing difficulty and learning problems which result from social, emotional or mental health difficulties. The expression may also include those who have problems with their eyesight or hearing or who have an autistic spectrum disorder.
- 5.2.7 Learning difficulties may affect children who have a high IQ and academic ability as well as those of lower IQ and ability, although a lower IQ does not automatically assume SEN – children, who are lower achievers may not have SEN.
- 5.3 References to an Individual Support Plan (ISP) (CHS only) or One Plans (OPs) (all Essex Trust Schools) are references to a plan or programme designed for children with SEN to help them to get the most out of their education. These tools are part of the graduated approach/response to children with SEND. An ISP/OP builds on the curriculum that a child with learning difficulties or disabilities is following and sets out the strategies being used to meet that child's specific needs. Both tools may also be referred to as]
- 5.4 References to **provision mapping** are references to provision maps used by all Trust Schools as an efficient way of showing all the provisions that the Schools make, which are additional to and different from that which is offered through the School curriculum. The use of provision maps can help the Special Educational Needs and Disabilities Coordinators (**SENDCo**) maintain an overview of the programmes and interventions used with different groups of pupils and provide a basis for monitoring the levels of intervention.
- 5.5 References to **disability** mean a physical or mental impairment which has a substantial and long-term adverse effect on a person's ability to carry out normal day-to-day activities. As part of this definition, 'substantial' is defined as more than minor or trivial in its effect on a person. 'Long-term' means that the impairment is likely to last or recur for twelve months or more. For pupils, 'normal day-to-day activities' in a school context are those activities that a pupil would normally be able to carry out having reached the expected stage of development and education for their chronological age There is no requirement for a formal diagnosis of a disability to meet this definition, but there are some diagnosed conditions that will automatically meet the definition under the Equality Act 2010 (for example cancer, HIV or multiple sclerosis).
- 5.6 References to **a reasonable adjustment** are references to the anticipatory duty to take such steps as it is reasonable to have to take to avoid the substantial disadvantage to a disabled person caused by a provision, criterion or practice, or applied by or on behalf of the School, or by the absence of an auxiliary aid or service. Further information on the statutory duty to make reasonable adjustments is found on the [Equality and Human Rights Commission's website](#).

6 Responsibility Statement and Allocation of Tasks

- 6.1 The Trust has overall responsibility for all matters which are the subject of this Policy.

6.2 The Trust is aware of its duties under the Equality Act 2010 and the requirement under s.149 of the Equality Act 2010 to meet the Public Sector Equality Duty. This means in carrying out its functions, the Trust is required to have due regard to the need to:

- 6.2.1 eliminate discrimination and other conduct that is prohibited by the Act;
- 6.2.2 advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
- 6.2.3 foster good relations across all characteristics - between people who share a protected characteristic and people who do not share it.

6.3 To ensure the efficient discharge of its responsibilities under this Policy, the Trust has allocated the following tasks:

Task	Allocated to	When / frequency of review
Keeping the Policy up to date and compliant with the law and best practice	Trust Director of Operations	As a minimum annually, ideally termly, and as required
Day-to-day responsibility for carrying out individual pupil risk assessments under the Policy	Each School's Special Educational Needs and Disability Coordinator (SENDCo)	As required, and at least termly
Monitoring the implementation of the Policy, relevant risk assessments and any action taken in response and evaluating effectiveness	Headteachers (HTs)	As a minimum annually, ideally termly, and as required
Seeking input from interested groups (such as pupils, staff, parents) to consider improvements to the School's processes under the Policy	HTs	As a minimum annually, ideally termly, and as required
Formal annual review	DET	As a minimum annually, ideally termly, and as required
Overall responsibility for content and implementation	DET	As a minimum annually

6.4 In accordance with the SEND Code of Practice, each Trust School's SENDCo has responsibility for:

- 6.4.1 overseeing, advising and coordinating the day-to-day operation of the School's SEN provision through this Policy;
- 6.4.2 ensuring liaison with School staff, parents, other professionals, external agencies and next providers of education in respect of a child's SEN;

- 6.4.3 advising and supporting other staff in the School to provide support to pupils;
- 6.4.4 ensuring that appropriate ISP/OP/provision mapping is in place and effectively implemented;
- 6.4.5 ensuring that relevant background information about individual children with SEN is collected, recorded and updated;
- 6.4.6 working with the HT and the Trust to ensure that the School meets its responsibilities under the Act in respect of reasonable adjustments and access arrangements;
- 6.4.7 undertaking any other appropriate duties as set out in the SEND Code of Practice.

7 Procedures

- 7.1 Each Trust School's approach to the detection and management of SEN and learning difficulties will be guided by the SEND Code of Practice.
- 7.2 As part of the Assess-Plan-Do-Review Model and to ensure collaborative working, each Trust School works closely with pupils and parents of children who have or may have SEN and learning difficulties to assess and review a pupil's needs and support. Each Trust School will work together with parents and pupils concerning assessment, planning, provision and review of the pupil's education.
- 7.3 **Identification, assessment, implementation and review of pupils with a SEN or learning difficulty**
 - 7.3.1 Pupil progress and engagement is monitored, at least, termly and if the outcome of a test or any other circumstance(s) give(s) reason to think that a pupil may have a SEN or learning difficulty, each Trust School will carry out a clear analysis of the pupil's needs, using a variety of assessment measures and in accordance with the SEND Code of Practice. This may be following concerns raised by teachers or a parent. During this time, each Trust School will consider what extra teaching, interventions or support may be required to help the pupil progress. The pupil's response to this support may assist to identify their particular needs.
 - 7.3.2 Each Trust School will report and consult with the pupil's parents as necessary throughout this process and the class teacher and SENDCo in consultation with the parent, pupil, and where relevant outside professionals, agree the adjustments, interventions and support to be put in place.
 - 7.3.3 The recommended interventions, strategies and support will be implemented and each Trust School will ensure that all relevant teachers and staff working with that pupil are aware of the interventions, strategies and support, as well as the outcomes that are sought for the pupil.
 - 7.3.4 Each Trust School will seek parental involvement at all stages to reinforce or contribute to progress at home.
 - 7.3.5 The class or subject teacher and SENDCo will review and revise the interventions, strategies and support in place, in light of progress and development. Any changes will be made in consultation with the parent and pupil. Parents will be provided with clear information about the impact of interventions, strategies and support to enable them to be involved in the next steps.

7.4 Examinations

- 7.4.1 Pupils, who have been identified as having a SEN, learning difficulty or disability may be eligible for extra time and/or other "access arrangements" to complete internal examinations and public examinations.
- 7.4.2 The Trust School, as the Examination Centre, will make appropriate access arrangements or apply for the appropriate access arrangements to be made for pupils with SEN or a learning difficulty, who may require them. Note that access arrangements can only be made if the arrangement is part of/evidenced as a pupil's normal way of working. Parents will be asked to liaise with their child's SENDCo and the School's Examinations Officer in good time with respect to this, as necessary.
- 7.4.3 Refer also to the DET Access Arrangements Policy (Examinations).

7.5 Information Sharing and Parent Involvement

- 7.5.1 Once a place has been accepted for a prospective pupil, the Trust School will ask all parents to complete an enrolment form. This will include questions to gather key information in relation to a prospective pupil's SEN or a learning difficulty at their child's previous school or elsewhere. Confidential information of this kind will only be shared within the Trust School on a "need to know" basis to ensure that teachers are given any necessary information about a child's SEN and learning difficulties, and that teaching practices are appropriate.
- 7.5.2 Parents should notify the School immediately if their child's progress or behaviour causes concern so that the School can devise and agree a strategy with the parents.
- 7.5.3 At all stages, the Trust Schools and the SENDCos will work in consultation with the parent and pupil to seek to ensure that all support and outcomes are appropriate to the pupil's needs.

7.6 Individual Support Plan/One Plan/Provision Mapping

- 7.6.1 The SENDCo will ensure that an appropriate ISP/OP/provision map is in place, where required.
- 7.6.2 The ISP/OP/provision map will be prepared in consultation with the parents and, if appropriate, the pupil and will include:
- (a) the adjustments, interventions and support required to meet the outcomes identified for the pupil;
 - (b) the expected impact on the pupil's progress, development or behaviour, as appropriate; and
 - (c) clear dates for review.
- 7.6.3 In carrying out the review, the SENDCo will consider:
- (a) the effectiveness of the support and interventions and their impact on the pupil's progress;
 - (b) the views of relevant teaching staff, the parents and the pupil; and

- (c) any changes that are required to the support and outcomes set out for the pupil.

8 **Disability and Discrimination**

8.1 Conditions, which may amount to disability, will include both physical and mental impairments, such as:

- 8.1.1 severe disfigurements, scarring conditions and birthmarks (but not including tattoos or piercings);
- 8.1.2 progressive physical conditions or mental impairments which will result in a substantial long-term adverse effect on day-to-day activity;
- 8.1.3 a controlled impairment, i.e. a person with a prosthesis, or a person with drug-controlled epilepsy or diabetes;
- 8.1.4 a history of impairment, for example, a person who used to be disabled and has recovered, or a person with a previous mental illness; and
- 8.1.5 a physical or mental impairment that will automatically meet the definition of disability under the Equality Act 2010 such as cancer, HIV or multiple sclerosis.

8.2 Disability does not include:

- 8.2.1 hay fever sufferers;
- 8.2.2 a person with anti-social tendencies, such as paedophilia;
- 8.2.3 a person who has a behavioural difficulty, for a reason other than a disability, for example, arising from social or domestic circumstances, and it is considered that those circumstances have not given rise to a physical or mental impairment; and
- 8.2.4 a person who is addicted to nicotine, alcohol and other non-prescribed substances unless the addiction was originally the result of administration of medically prescribed drugs or other medical treatment.

8.3 Discrimination arising from disability occurs when a disabled person is treated unfavourably because of something connected with their disability and the treatment cannot be shown to be a proportionate means of achieving a legitimate aim.

8.4 The Trust and its Schools will not knowingly discriminate against a disabled person:

- 8.4.1 in the Schools' Admission Arrangements;
- 8.4.2 by refusing or deliberately omitting to accept an application for admission;
- 8.4.3 in the provision of education and associated services;
- 8.4.4 in the way the Trust Schools afford access to any benefit, service or facility offered or provided by the Schools;
- 8.4.5 by excluding a person on the grounds of their disability;
- 8.4.6 by harassing a person with a disability;
- 8.4.7 by victimising a person with a disability;

- 8.4.8 by treating a person with a disability unfavourably because of something connected with their disability; or
 - 8.4.9 by failing to take reasonable steps to ensure that disabled persons are not placed at a substantial disadvantage in comparison with non-disabled persons.
- 8.5 The Trust and its Schools have regard to the Equality and Human Rights Commission's **Technical Guidance for Schools in England** to decide whether someone has the protected characteristic of disability.

9 Education and Associated Services

- 9.1 The Trust and its Schools have an ongoing duty to make reasonable adjustments in respect of the education and associated services provided by the Schools, including:
- 9.1.1 the curriculum;
 - 9.1.2 classroom organisation and timetabling;
 - 9.1.3 access to School facilities;
 - 9.1.4 School sports;
 - 9.1.5 Trust and School policies;
 - 9.1.6 breaks and lunchtimes;
 - 9.1.7 the serving of school meals;
 - 9.1.8 assessment and examination arrangements;
 - 9.1.9 School discipline and sanctions;
 - 9.1.10 exclusion procedures;
 - 9.1.11 School clubs, educational visits and other activities; and
 - 9.1.12 preparation of pupils for the next phase of education.
- 9.2 The above is not an exhaustive list, and the Trust and its Schools will consider each case on its own circumstances.

10 Reasonable Adjustments for Pupils

- 10.1 When providing educational services to a pupil, the School is legally required to make reasonable adjustments in order to cater for a pupil's disability.
- 10.2 The Schools shall inform the pupil and parents of the reasonable adjustments that they are able to make for that pupil. This will include adjustments to the School's provisions, criteria and practices which may, typically, include:
- 10.2.1 allowing extra time for a dyslexic child to complete a test or public examination;
 - 10.2.2 providing examination papers in larger print for a pupil with a visual impairment;
 - 10.2.3 rearranging (but not reducing) the timetable to allow a pupil to attend a class in an accessible part of the building; or

10.2.4 arranging a variety of accessible sports activities.

10.3 The Trust Schools are not legally required to make adjustments, which include physical alterations such as the provision of a stairlift or new ground floor facilities, such as a new library.

10.4 The Equality Act 2010 requires all schools to provide auxiliary aids and services for disabled pupils as part of the duty to make "reasonable adjustments". The Trust Schools will carefully consider any proposals and will not unreasonably refuse to provide such aids and services.

11 Reasonable Adjustments for the Public

11.1 The Trust Schools may provide services to the public, for example at:

11.1.1 open days;

11.1.2 parents' evenings;

11.1.3 facilitating meetings with parents, for example, as part of the Trust's complaints procedures or as part of the statutory exclusions process;

11.1.4 concerts and plays;

11.1.5 use of sports facilities.

11.2 Where a physical feature (for example, steps, entrances, exits, toilet facilities) makes it impossible or unreasonably difficult for a disabled person to access the service, schools are required to take reasonable steps to:

11.2.1 remove the feature; or

11.2.2 alter it so that it no longer has that effect; or

11.2.3 provide reasonable means of avoiding the feature; or

11.2.4 provide a reasonable alternative method of making the service available.

11.3 Where an auxiliary aid or service would enable a disabled person to make use of a service, schools are required to take reasonable steps to provide it. An auxiliary aid or service could be something as simple as extra assistance from a member of staff or a large print sign, or it might be a temporary ramp where steps are preventing wheelchair access.

12 Accessibility Plans

12.1 Each Trust School has prepared an Accessibility Plan which is available, on request, to all parents and staff.

12.2 The accessibility plan includes consideration of how the Schools propose to:

12.2.1 increase the extent to which disabled pupils can participate in the School's curriculum;

12.2.2 improve the physical environment of the School for the purpose of increasing the extent to which disabled pupils are able to take advantage of education and benefits, facilities or services provided or offered by the School; and

12.2.3 improve the delivery to disabled pupils of information which is readily accessible to pupils who are not disabled.

- 12.3 The plan will be reviewed on a regular basis, and, as a minimum, every three years, to ensure that it is up-to-date and covers all aspects of School life.

13 Education Health and Care Plans (EHCP)

- 13.1 Parents and the Trust Schools have the right, under section 36(1) of the Children and Families Act 2014, to ask the Local Authority (LA) to make an assessment with a view to drawing up an EHCP. The Trust Schools will always consult with parents before exercising this right. If the LA refuses to make an assessment, the parents (but not the School) have a right of appeal to the First-tier Tribunal (Special Educational Needs and Disability).
- 13.2 Where a prospective pupil has an EHCP and it is proposed that the School is named in section I of the EHCP, the LA will consult the School, in line with the statutory procedures.
- 13.3 Where the School is named in an EHCP, the School will work together with the LA, the pupil and the parents to implement the provision, as set out in the EHCP.

14 Additional Welfare Needs

- 14.1 The Trust Schools recognise that pupils with SEN, learning difficulties or a disability may be at risk of being bullied. Each Trust School's Anti-Bullying Policy makes it clear that bullying behaviour of any kind is not acceptable and will be taken very seriously.
- 14.2 The Trust Schools will tackle inappropriate attitudes and practices through staff leading by example, through the personal, social, health and economic (PSHE) programmes, through the supportive School culture and through the Trust's and Schools' policies; in particular through each School's RSE Policy and programme.
- 14.3 When teaching pupils about safeguarding, the Trust Schools recognise that a one size fits all approach may not be appropriate for all pupils and will consider whether they should adopt a more contextualised approach for some pupils with SEN, learning difficulties or a disability.
- 14.4 If parents are concerned about their child's welfare, they can approach the pupil's tutor/class teacher, SENDCo or any member of the Senior Leadership Team (SLT) to discuss their concerns in private at any time.
- 14.5 Additional barriers can exist when detecting the abuse or neglect of pupils with SEN, disability or certain medical or physical health conditions that can create additional safeguarding challenges both online and offline for those involved in safeguarding and promoting the welfare of this group of children. The Trust Schools are mindful that, in particular, these may include:
- 14.5.1 assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the pupil's condition without further exploration;
 - 14.5.2 pupils with a SEN, disability or certain health conditions may be more prone to peer group isolation and can be disproportionately impacted by bullying (including prejudice-based and discriminatory bullying) without outwardly showing any signs;
 - 14.5.3 some pupils may be unable to understand the difference between fact and fiction in online content and can repeat the content/behaviour in school without understanding the consequences; and
 - 14.5.4 there may be communication barriers which are difficult to overcome to identify whether action under this Policy is required.

- 14.6 The Trust Schools should consider providing extra pastoral support and attention for these pupils, along with ensuring that any appropriate support for communication is in place.
- 14.7 Any reports of abuse involving children with SEND will require close liaison with the Designated Safeguarding Lead (DSL) (or Deputy DSL) and the SENDCo.
- 14.8 Any safeguarding concerns will be dealt with in accordance the Trust’s Safeguarding and Child Protection Policy and with local School procedures for safeguarding and child protection.

15 **Training**

- 15.1 Each Trust School ensures that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff and volunteers understand what is expected of them by this Policy and have the necessary knowledge and skills to carry out their roles.
- 15.2 The level and frequency of training depends on role of the individual member of staff.
- 15.3 The Trust and its Schools maintain records of all staff training.
- 15.4 Staff will be trained to understand the types of disabilities and how to deal with pupils who are disabled. Staff will not be expected, unless medically qualified or trained, to administer medication.

16 **Risk Assessment**

- 16.1 Where a concern about a pupil's welfare is identified, the risks to that pupil's welfare will be assessed and appropriate action will be taken to reduce the risks identified.
- 16.2 The format of risk assessment may vary and may be included as part of the School’s overall response to a welfare issue, including the use of individual pupil welfare plans (such as behaviour, healthcare and education plans, as appropriate). Regardless of the form used, the Schools’ approach to promoting pupil welfare will be systematic and pupil-focused. Please refer to Section 6.3 above for details of the individuals with responsibility for carrying out, monitoring, implementing and reviewing the effectiveness of risk assessments under this Policy.

17 **Record Keeping**

- 17.1 All records created in accordance with this Policy are managed in accordance with the Trust’s policies that apply to the retention and destruction of records.
- 17.2 The information created in connection with this Policy may contain personal data. The School’s use of this personal data will be in accordance with Data Protection law. The Trust has published on its website privacy notices which explain how the Trust and its Schools will use personal data.