



NOTTING HILL & EALING  
HIGH SCHOOL

GDST  
GIRLS' DAY SCHOOL TRUST

Senior School

# **SEND, ALN, EAL & Access Arrangements Policy**

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2022-2023

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# Definitions of key terms

**Special Educational Needs** are defined in the Children and Families Act 2014:

20.1 A child or young person has special educational needs if he or she has a learning difficulty or disability which calls for special educational provision to be made for him or her.

20.2 A child of compulsory school age or young person has a learning difficulty or disability if he or she:

(a) has a significantly greater difficulty in learning than the majority of others of the same age, or

(b) has a disability which prevents or hinders him or her from making use of facilities of a kind generally provided for others of the same age in mainstream schools or mainstream post-16 institutions

**Disability** is defined under the Equality Act 2010. A person has a disability if s/he “has a physical or mental impairment that has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities.”

## Abbreviations

- SEND: Special Educational Needs and Disabilities
- ALN: Additional Learning Needs. A distinction is made between students who have a formal diagnosis of a SEND and those who are recognised through a need for additional support. The latter group come under the category ALN.
- SENDCo: Special Educational Needs and Disabilities Coordinator.
- EAL: English as an Additional Language.
- EALCo: English as an Additional Language Coordinator.
- SEMH: Social, Emotional and Mental Health.
- SpLD: Specific Learning Difficulty.
- ASD: Autism Spectrum Disorder.
- ADHD: Attention Deficit Hyperactivity Disorder.
- HOY: Head of Year
- HOD: Head of Department

# Legal framework

This policy operates within a wider national and local policy framework, which includes:

- The Education Act 1996
- The Equality Act 2010
- The Children and Families Act 2014, SEND Regulations 2014 and SEND Code of Practice 2015
- GDST Inclusion Policy
- GDST Equal Opportunities (Education) Policy
- GDST Accessibility Strategy
- GDST and the School's Admissions Policies
- GDST Exclusion Policy
- The School's Safeguarding and Child Protection Policy
- The School's Behaviour Policy
- The School's Anti-Bullying Policy

# Key colleagues

- Deputy Head (Academic)
- Deputy Head (Pastoral)
- SENDCo
- SEND-specialist teachers
- Teaching assistants



## Identification of SEND/ALN (Assess)

The school recognises the importance of early identification of any SEND or ALN in order to ensure that each individual's learning needs are met as well as to avoid the risk of other possible consequences such as loss of self-esteem and frustration in learning. Early identification is a whole school responsibility.

The school uses a number of approaches to identify SEND and ALN:

- Identification at admission: through communication with prospective parents, any previous school, and use of the admission information which prospective parents should complete fully.
- Identification at transition - Junior to Senior school: Junior and Senior schools liaise closely on pupil transfer to the Senior school; the SENDCo meets with students in year 6 during the Summer term, Pupil Profiles, academic concerns and pastoral issues are shared during a transitions meeting attended by Y6 teachers, Year 7 HOY and the SENDCo. The SENDCo completes learning walks during the first half of the Autumn term, looking at students' work and observing them in class to identify any students who may require additional support or assessment.
- Identification on progression through the Senior School:
  - Identification by HOY or Tutor Team: HOYs monitor pupils' progress at each transition point as students move up through the Senior School, meeting once each term with the SENDCo to discuss any students who are causing concern. Internal examinations are carefully scrutinised by all teachers to identify potential SEND or ALN. SEMH difficulties are likely to be identified and addressed through the school's pastoral system – tutors, Heads of Year, school nurse and counsellor. All staff should be alert to changes in attitude and behaviour which may indicate such difficulties, and involve pastoral staff, who may then make a referral to the SENDCo.
  - Identification by Subject Teacher: Subject Teachers make regular assessments of progress for their pupils, sharing any concerns with their HOD and the HOY, using the referral system detailed below. This may then trigger a referral to the SENDCo.
  - Identification through pupil/parent concern: The school recognises that parents and the pupils themselves have a unique perspective on their learning. These concerns feed into the referral system detailed below.

### Referral System and assessment

A concern is raised by contacting the student's HOY. The HOY will decide if further investigation is appropriate and may ask the student's Tutor to gather feedback from teachers and other staff. This may trigger a referral to the SENDCo, who will coordinate a graduated response to assess the level of need. This may involve some or all of the following:

- Monitor the student's progress, looking at samples of their work.
- Discuss difficulties with the student's teachers.
- Observe the student in class.
- Arrange to meet with the student to discuss their difficulties.
- Discuss these difficulties with parents.

These actions may allow the SENDCo to establish the pattern of support that will meet the student's needs. In some cases, the SENDCo may recommend further assessment, either:

- Academic Profiling - combining observations and a short assessment to provide insight into areas of strength and weakness.
- Diagnostic Assessment - Where a student and their parents agree that a diagnosis of a SPLD would be beneficial, the SENDCo may recommend that a student is formally assessed. The school's Specialist Assessor can undertake this assessment, or the assessment may be provided by a suitably qualified professional external to the school.



- Further Diagnostic Assessment - Where a student is seen to be experiencing a more complex difficulty, perhaps indicating an underlying Neurological difference such as ADHD or ASD, or SEMH difficulties, the SENDCo will support the family in this lengthier assessment process with the necessary external professionals.

## Patterns of Support (Plan & Do)

Having established the learning needs of the student, the SENDCo works with them, their teachers, Tutor team and parents to decide on a package of support to meet those needs.

### In class:

The SENDCo and Specialist SEND Teacher work in collaboration with class teachers to establish a pattern of in-class support. This may include:

- Adapted resources or templates.
- Additional materials and approaches to using them, e.g. highlighters.
- Particular approaches to working supported by the subject teacher.

If a higher level of support in-class is required, a member of the SEND team may work collaboratively with the subject teacher in their lesson.

### Supported Individual Study Sessions:

Students may be invited to attend a regular pattern of individual sessions with either the SENDCo or the Specialist SEND Teacher.

- These sessions are planned and guided by a Pupil Profile. These documents are created with the student using data gathered through observations, teacher feedback and any assessments that have taken place.
- The sessions will be as frequent as best suits the individual needs of each student, varying from one per term to weekly sessions.
- These sessions take place during the timetabled day. Students never miss a core subject in order to attend, and the sessions rotate around their other subjects to ensure that they do not fall behind in any subject area.

## Record Keeping (Review)

### Pupil Profiles

Students who attend regular Supported Individual Study Sessions have Pupil Profiles. These documents provide a formal summary of the students' individual needs, guidance for teachers on how best to support them in class and a detailed plan of provision that is updated each term and acts as a clear reference for all staff. Pupil profiles can be shared with the student's parents on request, and discussed in individual parent meetings with the SENDCo.

### SIMS

As well as holding links to any SEND documents (including the pupil profile) that are stored on Google Drive for each student, SIMS records details of any SEND or ALN, allowing staff ease of access to this information.

### Tracking and Monitoring

The SENDCo maintains a detailed list of students with ALN and SEND and the support that they receive, along with details of any students where a Concern has been raised. This list is reviewed at least termly and updated as students make progress, and informs the SENDCo's termly meetings with HOYs and HODs.

The SEND department maintains a monitoring log of every Individual Supported Study Session.

Detailed analysis takes place following each annual examination period, showing the progress of each student in relation to their projected level of achievement.



# Students with an EHCP

Students with an EHCP follow the same pattern of assess, plan, do and review as all other students with SEND or ALN, informed by the same record keeping and assessments. In addition to this, students with an EHCP also have a more detailed EHCP form that records their particular needs and outlines the annual aims for each academic year.

These EHCP forms are updated and reviewed each year during the Summer term by the SENDCo, in a formal meeting with the student, their parents and sometimes HOY and representatives from their Local Education Authority.

## Admissions arrangements

The SENDCo assists the Admissions team in reviewing any applications from students with an identified SEND, ensuring that the school can make reasonable adjustments to support their needs and ensuring that each student has the Access Arrangements they need to complete the entrance exam and interview.

## Examination Access Arrangements

Access Arrangements are examination arrangements for pupils with special educational needs, disabilities or temporary injuries. The intention behind an access arrangement is to meet the particular needs of an individual candidate without affecting the integrity of the assessment. Access arrangements are the principal way in which awarding bodies comply with the duty under the Equality Act 2010 to make 'reasonable adjustments'.

'Reasonable adjustments' are made where a candidate, who is disabled within the meaning of the Act, would be at a substantial disadvantage in comparison to someone who is not disabled. Schools and examination boards are required to take reasonable steps to overcome that disadvantage. An example might be providing an enlarged paper for a visually impaired pupil. Whether an adjustment will be considered reasonable will depend on a number of factors, which will include:

- the individual needs of the pupil;
- the effectiveness of the adjustment;
- the cost of the adjustment and
- the likely impact of the adjustment upon the candidate and other candidates.

An adjustment will not be approved if it:

- involves unreasonable costs
- involves unreasonable timeframes or
- affects the security and integrity of the assessment.

This is because the adjustment is not "reasonable".

### *Types of Access Arrangement*

A number of access arrangements are available. Their use depends upon the pupil's needs, her normal way of working, the type of examination and the current JCQ regulations. This means that different arrangements might be allowed in different examinations, and SENDCos are required to consider the need for access arrangements on a subject-by-subject basis.

**The access arrangements most commonly used at the school include:**

- Supervised rest breaks;
- Use of a word processor (with spelling and grammar check disabled);
- 25% extra time;
- Bilingual translation dictionary.

Other types of access arrangement are available and may be considered depending on the exact nature of a pupil's needs. Details of such possible arrangements can be found in the JCQ regulations.



## **Supervised Rest Breaks**

Supervised rest breaks (SRB) must always be considered before making an application for extra time. The SENDCo is allowed to provide a supervised rest break if it is the candidate's normal way of working. The SENDCO must be satisfied that there is a genuine need for the arrangement due to a candidate's disability.

Supervised rest breaks may be given to girls to take account of:

- cognition and learning needs;
- communication and interaction needs;
- a medical condition;
- sensory and physical needs;
- social, emotional and mental health needs.

At the start of the SRB, the timing of the examination will be paused and then restarted when the candidate is ready to continue. The student will not have access to the examination for the duration of the SRB.

## **25% Extra time**

25% extra time may be granted to candidates with learning difficulties, or for other difficulties such as sensory, physical or mental health and emotional needs. The documentation supporting an application for 25% extra time must make a compelling case and present a clear and detailed picture of current need (see section on evidence of need below).

When a candidate progresses from GCSE to A-level qualifications, whilst an assessment conducted no earlier than the start of Year 9 recommending 25% extra time for GCSE examinations will be valid for A-level examinations, an application for extra time must be re-submitted in relation to A-level examinations, and the school must have available detailed evidence that 25% extra time is still needed and continues to be the candidate's normal way of working.

## **Bilingual Translation Dictionaries**

Bilingual translation dictionaries may be used by candidates whose first language is not English, Irish or Welsh as long as this reflects their normal way of working in the centre. There are certain examinations in which the dictionary may not be used, e.g. English Language examinations or Modern Foreign Language examinations testing one of the languages of the dictionary. The dictionary may be paper or electronic but must be a standard dictionary, i.e. not contain supplementary information such as pictures or explanations of words. Dictionaries to be used in examinations must be held in the centre and checked thoroughly before use.

In addition, 10% extra time may be awarded to a candidate for use of the dictionary where the candidate entered the UK within 3 years of the examination with no prior knowledge of the English Language. In such cases the SENDCo or EALCo must compile evidence to demonstrate the candidate's eligibility for this arrangement.

## **Laptop Policy and Provision**

All students at NHEHS use Laptop computers to support their learning. Word processors are approved for some students to use in examinations, where it is their usual way of working to use a laptop for all longer writing. A word processor cannot simply be granted to a pupil because she now wants to type rather than handwrite in examinations, or because she uses a laptop at home. The use of a word processor must reflect the candidate's normal way of working within the centre and the school must hold evidence demonstrating the reasons why the use of a word processor has been awarded. Although not an exhaustive list, students are permitted to use their laptop for all longer writing tasks where one or more of the following apply:

- They have a learning difficulty or disability which has a substantial and long term adverse effect on their ability to write legibly
- They have a medical condition that impacts on their ability to write by hand accurately or at speed
- They have a physical disability that impacts on their ability to write by hand accurately or at speed
- They have a sensory impairment that impacts on their ability to write by hand accurately or at speed



- They have difficulties with planning and organisation when writing by hand
- They have very poor handwriting
- They have very poor spelling
- Slow handwriting speed
- Traits of ASD or ADHD where the pupils is able to concentrate much better with the use of a screen

If a pupil uses a word processor, she must do so with the spelling and grammar check facility/predictive text disabled (switched off) and this must be the pupil's normal way of working within school.

Teachers provide evidence that a student is working effectively using their laptop for all longer writing, before this is approved as an arrangement for examinations. It is permissible for a pupil using a word processor in an examination to type certain questions, i.e. those requiring extended writing, and handwrite shorter answers. Examinations that have a significant amount of writing, as well as those that place a greater demand on the need to organise thought and plan extended answers, are those where pupils will frequently need to type. Some students use a laptop for examinations where medium length writing is a component, if this is their usual way of working. Examinations that require more simplistic answers are often easier to handwrite within the answer booklet, so that the pupil avoids the difficulty of visually tracking between the question paper and screen.

Internal Examinations: Once a student is using a laptop in a particular subject as their usual way of working, they will also use a laptop for the internal tests or examinations in that subject.

External Examinations: Where using a laptop in class and in internal examinations has become the usual way of working for a student, they will be eligible to use a laptop in their external examinations. It is recommended that any student who is thinking about using a laptop for an external GCSE, IGCSE or GCE examination should have used a laptop for at least one end of year or 'mock' examination before then so that they are practised in how the exam laptops function. In exceptional circumstances a student may be allowed to sit an external examination using a laptop for any subject if they have not already completed at least one internal examination using a laptop. For example, injury to the wrist or hands or another condition physically affecting the student's ability to write by hand.

Parents are informed when the decision is made to allow their daughter to use a laptop in examinations.

A list of which students will use a laptop and for which subjects is maintained in a document showing EAA for all students.

## *Internal Exams, Assessments and Tests*

For those pupils requiring access arrangements, the following steps will be followed in relation to internal examinations and assessments:

- Departments will be informed of which pupils are eligible for access arrangements, and individual departments will then coordinate this with guidance from the SENDCO as necessary.
- Access arrangements must be put in place for relevant pupils for formal internal school tests, examinations and mock examinations. For less formal assessments, teaching staff will use their discretion as to how to allow for a pupil's needs in the classroom – either by allowing some form of access arrangement or accounting for the conditions of the test when marking.
- For formal internal assessments, pupils with extra time are to write in their normal way and to participate within normal exam conditions. However, they should change pen colour when their 25% becomes available. Pupils use the coloured pen until the 25% extra time is finished, or when they have finished – this contributes to providing essential evidence of need.
- Teachers may, under guidance from the SENDCO, mark exam scripts or other assessments with and without the 25% extra time and comment on the qualitative differences with 25% extra time, e.g. Has a pupil's work moved into an A grade from a B grade or vice versa?
- Teachers should supply the SENDCO with copies of exams scripts where 25% extra time has been used; scripts should be accompanied by teachers' comments, i.e.: the qualitative differences AND comment on how extra time affected exam performance.
- Pupils may use a laptop for internal assessments if this has been their normal way of working. If a laptop is used, this will be used with the internet, spelling and grammar check disabled.





## *Public Examinations and Access Arrangements*

For all public examinations, the school follows the Joint Council for Qualifications (JCQ) Access Arrangement and Reasonable Adjustments regulations<sup>1</sup>. These are accessible via the following link: <https://www.jcq.org.uk/exams-office/access-arrangements-and-special-consideration>. Failure to comply with these regulations may constitute malpractice, which could in turn affect a candidate's result(s).

Decisions to apply for access arrangements will always be made by the school acting for and on behalf of the awarding bodies. The school will be guided by a thorough understanding of a pupil's learning needs over time and in a range of circumstances, assessments by the SENDCO conducted from Year 9, recommendations from external reports (where the private assessor has consulted with the school prior to the assessment taking place), and the school teachers' own knowledge of the pupil's needs and her normal way of working both in school and at home. A portfolio of 'evidence of need' will be put together by the SENDCO to support any application for access arrangements; this will include teacher feedback and evidence of a pupil's work.

Pupils on the school's SEN register in Year 9 will automatically be considered for assessment for access arrangements by the SENDCO, who will have established a picture of need and normal way of working in Years 7-9. Otherwise a pupil may self-refer or be referred by a parent or teacher. In normal circumstances, the application will be made at the start of a GCSE or A level course. In all cases, the following steps will be followed to ensure that the required evidence is collated and the correct application procedure followed:

- In the autumn term, the SENDCO identifies any students in year 10 who may qualify for EAA.
- The parents of these students will be contacted for permission to assess them where relevant, and to make an application to the JCQ on their behalf if they are found to be eligible for EAA.
- The SENDCO collects data and feedback from all teachers. Using this feedback along with details of the support that the student needs at school, the SENDCO then completes Section 1 of the JCQ form 8.
- The school's specialist assessor completes an assessment with the student, and uses this data to complete Section 2 of the form 8.
- All eligible students complete a Data Permissions form.
- The SENDCO completes Section 3 of the form 8, and the application is submitted to the JCQ via Access Arrangements Online. Applications must be processed and approved no later than the JCQ published deadline. Late applications are only permitted in very specific circumstances and may be subject to scrutiny.
- The SENDCO will inform the student and their parents of the outcome, updating SIMS and the shared list of students with EAA for staff.
- Evidence will be kept on file for inspection by the JCQ inspector, including the original copy of Form 8, the signed Data Protection Notice, confirmation of approval of the access arrangement and the portfolio of evidence of need/normal way of working.

## *Use of externally commissioned reports*

Parents have the right to seek further diagnostic assessments for their children. However, the organisation or individual performing the assessment must have prior contact with the school to gather background information on the pupil before going ahead with the assessment. A privately commissioned assessment carried out without prior consultation with the centre cannot be used to award access arrangements, and external assessors must have a thorough and up to date understanding of the JCQ regulations. In order for the report to be used for an application for access arrangements, it must evidence the pupil's disability as being 'limitations going beyond the normal differences in ability which may exist among people'. The report must state that the pupil's disability must be 'substantial' and 'long term'.

It is always at the discretion of the SENDCO as to whether the recommendations contained within the report are followed. The decision will be made based on whether the recommendations fit with the picture of need already established within the centre and the pupil's normal way of working. NHEHS does not recommend parents use externally commissioned reports, and instead contact the SENDCO.

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<sup>1</sup> A small number of external examinations are not subject to JCQ regulations – for example International Baccalaureate and Cambridge Pre-U examinations. In these cases, NHEHS follows the JCQ principles but ensure that the separate procedures specific to the examination board are followed.



## *Temporary Access Arrangements*

Temporary Access Arrangements and applications for special consideration can also be made in certain situations. These arrangements can be processed as the need arises. An example could be, a Year 11 pupil has fallen off her bike and broken the wrist of her writing hand. In such a case, the school would look at the most appropriate and reasonable adjustment to make to ensure that the pupil can access the exam but is not given an unfair advantage. As with all applications, the school is required to ensure that the appropriate documentation is held on file to support any arrangement made.

## *Roles and Responsibilities for Examination Access Arrangements*

**The Head Teacher** as Head of Centre is responsible for ensuring that all public examinations held at the school are administered according to the JCQ regulations, and must therefore be familiar with the JCQ Access Arrangements and Reasonable Adjustments document. The Head is also responsible for the appointment of assessors, and ensuring that they have the required level of competence and training.

**The SENDCO** is responsible for leading on the access arrangements process within the centre. This includes:

- Liaising with parents and external assessors (in cases where assessment is not carried out in school). If an assessor is used, the SENDCO must provide background information on the pupil before the assessment takes place, and work with the assessor to ensure a joined up and consistent process.
- Managing the application procedure, ensuring that full supporting evidence is available before starting the application
- Maintaining a portfolio of all the required documentation, including evidence of need, updating this as required (e.g. transfer into the sixth form). This evidence must be available for JCQ inspection
- Keeping evidence of the qualifications of any assessor used by the centre: this must be available for JCQ inspection. Assessors not directly employed within the centre must also be entered on Access Arrangements Online to confirm their status
- Liaising with the Examinations Officer to ensure access arrangements are applied correctly for all relevant examinations
- Liaising with Heads of Department and teaching staff to ensure that they know which pupils are entitled to access arrangements, that these should correspond to the pupil's normal way of working, and that access arrangements should also be made for internal school texts, examinations and mock examinations.

**The examinations officer** is responsible for the practical application of access arrangements in public examinations. This will involve:

- Being aware of which pupils are eligible for access arrangements, and any particular conditions (e.g. arrangements being appropriate in some examinations and not others)
- Putting access arrangements in place according to the regulations
- Making practical arrangements, e.g. for extra rooms, extra invigilation etc.

**HODs and teaching staff** support the SENDCO in determining and implementing appropriate access arrangements. This involves:

- Being aware of which pupils are eligible for access arrangements
- Ensuring that access arrangements are made for these pupils in internal tests, examinations and mock examinations
- Collaborating with the SENDCO to provide evidence of pupils' normal way of working.

**Parents** of pupils from Year 9 who feel that their daughter should be assessed for access arrangements due to learning difficulties, should contact the school SENDCO as early as possible, bearing in mind that access arrangements are only made for pupils who have difficulties which amount to a substantial impairment. NHEHS does not advise parents to commission a private assessment without prior consultation, as these cannot be used to award access arrangements.

## *English as an Additional Language (EAL)*

EAL students speak English as an additional language, so the first words they spoke as a child will have been in a different language. EAL students are identified during the admissions process or during their first half-term at



NHEHS, when information is gathered about pupils' linguistic background and their competence in other languages. Most pupils do not have difficulties arising from their linguistic backgrounds. All speak English to a high standard, enabling them to pass the rigorous entry test.

A very small number struggle to progress with the development of grammatical competence and with the fluency of their written expression, which can cause the quality and depth of their English skills to 'plateau', preventing them from reaching their full academic potential.

#### **EAL provision aims to:**

- Identify girls with EAL at the earliest possible opportunity
- Enable girls with EAL to achieve their full potential, through interventions in the classroom, and additional EAL support where appropriate
- Liaise with parents of girls with EAL in decision-making
- Celebrate the cultural and linguistic diversity in the school and create an environment where this is valued in its richest sense

The needs of EAL students are usually met within the classroom environment. A selection of useful texts is available, including dictionaries, grammars, textbooks and reference books for EAL students and for staff guidance. However, where there is a concern that more support may be needed, this will be flagged by a teacher, or on admission to the school through school intake surveys. The EALCo will then arrange for the student's level of English to be assessed as follows:

#### **In KS3 and KS4:**

Students are assessed using the [Bell Framework](#).

- If they fall at or below 'D' in the framework, they will be offered EAL Support.

#### **In KS5:**

Students are assessed using the [IELTS Levels](#).

- If they have a score below 7.5, they will be offered EAL Support.

It is unusual for a student to pursue A Level studies at the school if they are:

- below a 5.5 IELTS for non-essay subjects, or
- below a 6.5 for essay subjects.

Where additional support is required in the senior school this is arranged, in discussion with parents, by the EALCo, and the student's needs are reviewed regularly.

If a student is below the required level in any Key Stage, the 'EAL Support' code will be used in SIMs.

Most EAL pupils who need support with English do not have specific learning disabilities. However, should a specific learning disability be identified during assessment, EAL pupils will have equal access to school Learning Support provision, in line with equal opportunities for all pupils.

#### **Links to other policies**

- [Curriculum Policy](#)

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Next Review July 2023

