

BLACK COUNTRY FEDERATION

SPECIAL EDUCATIONAL NEEDS AND DISABILITIES (SEND) POLICY

Brockmoor Primary School • Brierley Hill Primary School

POLICY OWNER	Senior Leadership Team
SEND LEADERSHIP	SENCO / Executive Leadership
APPROVED BY	Governing Body
APPROVAL DATE	September 2026
REVIEW DATE	September 2027, or earlier if guidance changes
REVIEW CYCLE	Annual

Aspiration and opportunity for every child

Policy status and framework

This is the Black Country Federation policy for special educational needs and disabilities (SEND). It applies to Brockmoor Primary School (BRK) and Brierley Hill Primary School (BH). It sets the federation-wide principles and responsibilities for identifying need, removing barriers, securing appropriate provision and evaluating impact. School-specific arrangements are described in each school's current SEN Information Report.

Important distinction

This policy sets the federation's approach to SEND. Each school must also publish and keep up to date its own SEN Information Report, explaining how the policy is implemented in that school and providing the current SENCO contact details, provision and accessibility information.

Key legislation and guidance

- Children and Families Act 2014, including the duty to use best endeavours to secure special educational provision and the duties relating to SENCOs and SEN information.
- Special Educational Needs and Disability Regulations 2014, as amended, including SENCO requirements and the SEN Information Report.
- Special educational needs and disability code of practice: 0 to 25 years (statutory guidance; current version).
- Equality Act 2010, including duties not to discriminate against disabled pupils and to make reasonable adjustments, including auxiliary aids and services where reasonable.
- Equality Act 2010: Code of Practice for services, public functions and associations (2026), where relevant to the federation's public functions.
- National Curriculum in England: framework and statutory inclusion statement.
- Keeping Children Safe in Education 2026 and Working Together to Safeguard Children, where SEND and safeguarding intersect.
- Supporting pupils at school with medical conditions (statutory guidance).
- Working Together to Improve School Attendance (statutory guidance), where attendance barriers intersect with SEND.
- Dudley Local Offer and Dudley's graduated approach to SEN support.

The government published SEND reform proposals in 2026. At the date of approval, these do not replace the existing statutory framework. BCF will update this policy if legislation or statutory guidance changes.

Related BCF documents

SEN Information Reports (BRK and BH); Graduated Response; Curriculum Entitlement Pathway; Accessibility Plans; Equality information and objectives; Relational Behaviour Policy; Attendance Policy; Supporting Pupils with Medical Conditions Policy; Safeguarding and Child Protection Policies; Complaints Policy; Admissions information and Dudley Local Offer.

1. Vision and principles

Across BCF, pupils with SEND are entitled to the same ambition as their peers: a rich, coherent curriculum, excellent teaching, meaningful participation in school life and preparation for increasing independence. SEND provision is not a separate system running alongside the curriculum. It begins with knowing the pupil well, understanding the barrier, teaching the right knowledge and evaluating whether provision is making a difference.

Our test

What does the pupil need to know, remember or do better? What is getting in the way? What will adults change? How will we know whether it worked?

- High expectations and inclusion: additional need does not mean lower ambition.
- Belonging and participation: pupils with SEND should learn with peers and participate in the wider life of school wherever this is appropriate and beneficial.
- Needs, not labels: support is based on identified barriers and provision required; a diagnosis is not required before appropriate support begins.

- Teacher responsibility: the class teacher remains responsible and accountable for the progress and development of every pupil in their class, including where support is delivered by others.
- Adaptive teaching and reasonable adjustments: teaching, resources, routines and the environment are adjusted where needed without unnecessarily narrowing the intended curriculum.
- Independence: adult support should enable learning and participation, not create avoidable dependence.
- Co-production: pupils and parents/carers are listened to and involved in decisions about outcomes, provision and review.
- Impact over activity: interventions, plans and additional adults are only valuable if they improve access, learning, participation, independence or wellbeing.

2. Definition of SEND and disability

A child or young person has SEN if they have a learning difficulty or disability which calls for special educational provision to be made for them. For compulsory school age pupils, this includes having 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 facilities generally provided for others of the same age in mainstream schools.

Special educational provision is educational or training provision that is additional to or different from that made generally for other pupils of the same age. SEND and disability overlap but are not identical. A pupil may be disabled under the Equality Act 2010 without having SEN, and a pupil with SEN may not meet the Equality Act definition of disability.

The four broad areas of need

Communication and interaction	including speech, language and communication needs and needs associated with autism.
Cognition and learning	including moderate, severe or profound learning difficulties and specific learning difficulties such as dyslexia, dyscalculia and dyspraxia.
Social, emotional and mental health	including needs which may present through anxiety, withdrawal, dysregulation, attention difficulties or other barriers to learning and participation.
Sensory and/or physical	including vision, hearing, multisensory and physical needs requiring adaptations, specialist support or equipment.

The four areas are a starting point for understanding need, not categories into which pupils must neatly fit. Needs can overlap and change over time. BCF considers the whole pupil and the interaction between curriculum, communication, cognition, sensory/physical factors, social and emotional development, health, attendance and context.

3. Identifying need early and accurately

Early identification is a shared responsibility. Teachers use day-to-day assessment, observation, pupil work, curriculum response, attendance and behaviour information, discussion with pupils and families, and relevant specialist evidence to identify emerging barriers. The SENCO supports teachers to distinguish between a pupil who needs better or more precisely adapted teaching and a pupil who may require special educational provision.

- A pupil's attainment being below age-related expectations does not, by itself, mean that the pupil has SEN.
- Slow progress does not automatically mean SEN and should not lead to a lower curriculum ceiling.
- Difficulties related solely to learning English as an additional language are not SEN.
- Persistent behaviour, attendance or emotional regulation concerns should prompt leaders to investigate underlying barriers, including possible SEND, but should not automatically be labelled as SEND.
- Where a pupil has a disability, reasonable adjustments must be considered whether or not the pupil is on the SEN register.

Initial response

Where concern emerges, the teacher should first sharpen the teaching response: identify the specific knowledge, skill or access barrier; check prerequisite knowledge; adapt explanations, modelling, scaffolds, practice, resources or environment; and assess the pupil's response. The teacher should discuss persistent concerns with the SENCO and parents/carers. Pupil views should be gathered in a way that is accessible and meaningful.

Do not wait for a diagnosis

BCF will not delay appropriate teaching, reasonable adjustments or SEN support while a pupil is awaiting assessment or diagnosis where the need for support is already evident.

4. The graduated approach: Assess, Plan, Do, Review

Where a pupil is identified as having SEN, BCF follows the graduated approach. This is a continuous cycle in which understanding of need becomes more precise and provision is adjusted in response to evidence. Dudley's graduated approach informs local practice.

Assess

Build a clear picture of strengths, needs, starting points, barriers and previous response to teaching. Draw on teacher assessment, pupil and parent voice, work, relevant screening or standardised assessment where useful, and specialist advice where needed.

Plan

Agree a small number of important outcomes, the provision and reasonable adjustments required, who will do what, what successful impact will look like and when it will be reviewed. Parents/carers and pupils are involved.

Do

The class teacher remains responsible for the pupil's learning. Additional adults and interventions support the agreed plan, but do not replace high-quality classroom teaching or disconnect pupils unnecessarily from the curriculum.

Review

Evaluate impact against the agreed outcomes and the pupil's learning, participation and independence. Decide what should stop, continue, change or escalate. Provision should not continue simply because it has always been in place.

BCF normally reviews SEN support at least termly, with earlier review where need or risk requires it. The frequency and form of review should be proportionate to the pupil's needs.

5. Provision: universal, targeted and specialist

BCF organises provision through a graduated continuum. The level of support may change as needs change. Placement on the SEN register is not determined by a fixed number of interventions or by a particular programme.

Level	Purpose	BCF expectation
Universal offer	Remove common barriers before they become entrenched.	Ambitious curriculum; explicit teaching; appropriate adaptation; accessible routines and resources; responsive assessment; reasonable adjustments; purposeful use of adults.
Targeted SEN support	Address identified needs that require provision additional to or different from the universal offer.	Assess-Plan-Do-Review; clear outcomes; time-limited or precisely targeted support where appropriate; connection back to classroom learning; impact review.
Specialist / highly personalised	Respond to complex, persistent or significant needs requiring specialist advice or a substantially personalised pathway.	Specialist assessment/advice; coordinated provision; EHCP processes where appropriate; carefully designed curriculum access or bespoke provision while maintaining ambition, belonging and meaningful participation.

Curriculum Entitlement Pathway and Pathways provision

Where pupils have substantial gaps in prerequisite knowledge or require a more personalised route into learning, BCF may use its Curriculum Entitlement Pathway and Pathways provision. These are not low-expectation alternatives to the curriculum. They are deliberate routes for securing the knowledge, communication, independence and learning behaviours pupils need to make stronger progress and access increasing amounts of the universal curriculum alongside peers where appropriate.

Leaders evaluate Pathways by what pupils learn and can do more independently, not by attendance at the provision. Planning and assessment should identify half-term endpoints, reconnect prerequisite knowledge and inform what pupils learn next.

Specialist provision

Some pupils may access specialist or highly personalised provision, including SETT at Brockmoor where appropriate. Such provision must be based on assessed need, have clear intended outcomes, maintain safeguarding and curriculum entitlement, and be reviewed for impact. Placement is not permanent by default; leaders consider whether the provision remains the best route for the pupil.

6. Teaching pupils with SEND

High-quality teaching is the first response to pupils who have or may have SEND. Teachers plan from the intended curriculum and make adaptations that enable pupils to access the important knowledge without unnecessarily changing what is being learned.

- Identify the precise barrier before selecting a strategy or intervention.
- Reconnect prerequisite knowledge where gaps prevent access to new learning.
- Use explicit instruction, modelling, worked examples, guided practice and sufficient independent practice where these meet the pupil's needs.
- Adapt language, chunking, visuals, resources, recording methods, sensory environment, pace or task structure where appropriate.
- Pre-teach or revisit essential vocabulary and concepts when this improves access.
- Use additional adults to scaffold thinking and participation, then reduce support as pupils become secure.
- Check understanding frequently and use assessment to adapt teaching, rather than relying on task completion.
- Ensure pupils with SEND participate in subject-specific thinking and are not routinely given generic or disconnected work.
- Plan for communication, physical, sensory and regulation needs so that access is proactive rather than reactive.

Adaptation without dilution

The question is not "How can we make this easier?" but "What barrier is preventing this pupil from accessing the intended learning, and what reasonable adaptation will remove or reduce it?"

7. Assessment, outcomes and impact

Assessment for pupils with SEND should be useful to teaching. BCF does not reduce progress to a single score or expect every pupil to follow the same trajectory. Leaders and teachers consider progress from the pupil's starting points across curriculum learning, communication, independence, participation and relevant individual outcomes.

- Are identified gaps in knowledge becoming more secure?
- Can the pupil apply learning with less prompting or adult support?
- Is the pupil accessing more of the intended curriculum?
- Are agreed reasonable adjustments removing the identified disadvantage?
- Is an intervention transferring into classroom learning?
- Is attendance, engagement or participation improving where this was a barrier?
- What evidence shows the provision is working, and what should change if it is not?

Standardised or diagnostic assessments may contribute to the evidence base where appropriate, but they do not replace professional assessment of what pupils know, remember and can do within the curriculum.

8. SEN Support Plans and pupil records

Where a pupil receives SEN support, agreed provision and outcomes are recorded in the school's current SEND system. Plans should be concise enough to be used by staff and specific enough to improve teaching. They should capture the pupil's strengths and voice, priority needs, outcomes, key provision and reasonable adjustments, responsibilities, and review information.

Records are factual, current, proportionate and transferred securely when pupils move school or phase. SEND information is handled in accordance with data protection requirements and the federation's privacy arrangements.

9. Education, Health and Care Plans (EHCPs)

Where, despite relevant and purposeful action to identify, assess and meet SEN, a pupil has not made expected progress or requires provision that may exceed what can reasonably be provided through SEN support, the school and/or parents may consider requesting an EHC needs assessment from the local authority. The legal test and decision rest with the local authority.

Where a pupil has an EHCP, BCF will use its best endeavours to secure the special educational provision specified in the plan and will work with the local authority and relevant partners. EHCPs are reviewed at least annually. Reviews focus on progress towards outcomes, whether provision remains appropriate and any changes required. The pupil and parents/carers are central to the process.

10. Pupil voice and parent/carer partnership

BCF works in partnership with families and pupils. Parents/carers know their child in a way school cannot, and pupils should be supported to express what helps, what creates barriers and what matters to them. Co-production does not mean every request will automatically be agreed; it means decisions are transparent, evidence-informed and made with families rather than done to them.

- Parents/carers are informed when the school is considering whether a pupil may have SEN and when special educational provision is made.
- Pupils and families are involved in setting and reviewing outcomes and provision.
- Information is communicated accessibly and without unnecessary jargon.
- Where views differ, leaders explain the evidence, the school's duties, what has been tried and the next available route.
- Families are signposted to Dudley's Local Offer and SENDIASS for independent information, advice and support.

11. Equality, reasonable adjustments and accessibility

BCF will not discriminate against disabled pupils and will make reasonable adjustments where a provision, criterion or practice would otherwise place a disabled pupil at a substantial disadvantage. The duty is anticipatory: leaders should consider likely barriers in advance as well as respond to individual circumstances. Reasonable adjustments may include changes to routines, teaching approaches, communication, assessment, resources or the provision of auxiliary aids and services where reasonable.

Each school maintains an Accessibility Plan addressing participation in the curriculum, the physical environment and access to information. SEND provision is also considered through the federation's Public Sector Equality Duty responsibilities.

12. Behaviour, attendance, safeguarding and medical needs

SEND must be considered alongside, not instead of, safeguarding, behaviour, attendance and medical responsibilities. A pupil's behaviour or absence may communicate an unmet need, but this does not remove the need for clear boundaries, safety or appropriate action. Staff consider whether SEND or disability is contributing to a pattern and whether teaching, support or reasonable adjustments should change.

Safeguarding concerns are recorded and acted on through the federation's safeguarding procedures. Medical needs are managed under the Supporting Pupils with Medical Conditions Policy. Attendance barriers are addressed through the Attendance Policy and current statutory guidance. No pupil should be placed on the SEN register solely because of poor attendance or behaviour without evidence of SEN.

13. Transition

Transition is planned according to need rather than as a one-size-fits-all event. This includes entry to pre-school or Reception, movement between classes and phases, mid-year admission, movement between BRK and BH provision where relevant, and transfer to secondary school or another setting.

- Relevant SEND information and records are shared securely and promptly.
- Pupils and parents/carers contribute to transition planning.
- Additional visits, visual information, transition books, phased familiarisation or professional meetings are arranged where they will reduce barriers.
- For pupils with EHCPs, statutory transition and annual review requirements are followed.
- Planning increasingly considers preparation for adulthood, independence, participation and future aspirations as pupils get older.

14. Working with external professionals

BCF works with Dudley services and health, social care and voluntary-sector professionals where specialist expertise is needed. This may include educational psychology, speech and language therapy, occupational therapy, physiotherapy, sensory/physical impairment services, autism and learning support services, CAMHS, school nursing and other appropriate services. The exact services available may change and are therefore detailed in each school's current SEN Information Report and Dudley Local Offer.

External advice should sharpen assessment and provision. It does not transfer responsibility away from the school or class teacher. Leaders check whether recommendations are feasible, implemented and having the intended impact.

15. Roles and responsibilities

Role	Key responsibilities
Governing Body	Ensure statutory duties are met; determine and monitor the SENCO role; have read the SEND Code; use best endeavours to secure provision; oversee the effectiveness of SEND provision; ensure required information is published and accessibility/equality requirements are met.
Executive Directors / Headteachers	Set an ambitious inclusive culture; ensure SEND is integral to curriculum, teaching, assessment, staffing, CPD and QA; secure appropriate resources; hold leaders to account for pupil impact; ensure safeguarding and statutory compliance.
SENCO	Coordinate SEND provision; support identification and assessment; advise and support staff; liaise with pupils, families and professionals; oversee the graduated approach; manage EHCP processes; monitor effectiveness; contribute to CPD; maintain appropriate records; support transition; prepare/review required SEND information.
Phase / subject leaders	Know how pupils with SEND access and achieve within their areas; support teachers to maintain curriculum ambition; identify patterns in barriers and teaching; contribute to curriculum and improvement action.
Class teachers	Remain responsible and accountable for the progress and development of pupils in their class; know needs and agreed adjustments; assess barriers; adapt teaching; direct additional adults; implement and review SEN support; involve pupils and families.
Teaching assistants / support staff	Work under teacher direction; know intended learning and agreed strategies; promote participation and independence; provide precise feedback to teachers; avoid unnecessary dependence.
Pupils	Contribute views about strengths, barriers, support and aspirations in ways appropriate to age and communication needs.
Parents/carers	Share relevant information; contribute to assessment, planning and review; work with school on agreed provision and outcomes; raise concerns promptly where support is not working.

16. SENCO requirements and leadership

Each mainstream school must have a SENCO who is a qualified teacher (or the headteacher) working at the school. Where the statutory qualification requirement applies, the SENCO must complete the mandatory SENCO NPQ within the permitted three-year period. BCF will ensure the SENCO has sufficient authority, time, support and access to leadership to fulfil the role effectively.

The federation may organise SEND leadership collaboratively across BRK and BH, but this does not remove the statutory requirement for each mainstream school to have an appropriately appointed SENCO and for parents to be able to identify and contact that person through the school's published SEN Information Report.

17. Staff expertise and professional development

SEND CPD is driven by identified pupil and staff need. It may include adaptive teaching, communication, literacy, mathematics, autism, sensory/physical needs, regulation, specific learning difficulties, medical needs, positive handling or other relevant areas. Training is not treated as impact in itself. Leaders follow up whether staff practice changed and whether pupils benefited.

Where specialist knowledge is required, BCF seeks appropriate external advice or training. Staff induction includes the core SEND expectations, safeguarding interfaces, reasonable adjustments and the practical information needed to support pupils safely and effectively.

18. Evaluating effectiveness and quality assurance

SEND quality assurance is part of normal school improvement, not a separate compliance exercise. Leaders triangulate evidence from classroom practice, pupils, work, assessment, attendance/behaviour where relevant, plans and professional dialogue.

The executive question

So what has changed for pupils with SEND because of the provision? If leaders cannot answer that with evidence, the provision needs reviewing.

- Are pupils learning the intended curriculum and securing identified prerequisite knowledge?
- Are adaptations enabling access without unnecessarily lowering ambition?
- Are pupils becoming more independent?
- Are additional adults and interventions improving learning rather than simply increasing support?
- Are pupils with SEND participating in the wider life of school?
- Are there patterns of absence, behaviour, suspension or reduced access that require action?
- Do pupils and families understand the support and feel meaningfully involved?
- Do leaders know where provision is inconsistent, why, and what they are doing about it?

Leaders use this evidence to determine CPD, deployment, curriculum adaptation, provision and improvement priorities. The federation does not judge SEND provision by the volume of paperwork, interventions or adult hours.

19. Funding and resources

The federation uses its delegated resources, notional SEN funding and any additional funding to meet identified needs and statutory duties. Funding decisions are made according to need, provision and impact rather than entitlement to a particular number of adult hours. Resources may include staffing, specialist advice, training, equipment, technology, environmental adaptations and targeted provision.

Where additional local authority funding is sought, BCF follows Dudley processes and provides evidence of assessed need, provision already made and intended outcomes.

20. Complaints

Concerns about SEND provision should usually be raised first with the class teacher and/or SENCO so that they can be addressed promptly. If a concern is not resolved, parents/carers may use the federation's Complaints Policy. Complaints relating to statutory EHC processes, disability discrimination or local authority decisions may have separate routes; families will be signposted appropriately, including to Dudley SENDIASS and the relevant local authority or tribunal information.

21. Publication, monitoring and review

This policy is reviewed at least annually and earlier where legislation, statutory guidance or federation practice changes materially. The Governing Body oversees the policy and leaders monitor its implementation through the federation's quality assurance and school improvement arrangements.

Each school's SEN Information Report is reviewed and updated at least annually and changes during the year are updated as soon as practicable. The report includes the current SENCO name and contact details and the information required by the SEND Regulations and Children and Families Act, including arrangements for disabled pupils and links to the school's Accessibility Plan.

Appendix A - Staff quick guide: from concern to impact

1. Notice

Identify the precise learning, communication, sensory, physical, regulation or participation barrier. Avoid vague labels.

2. Teach

Sharpen universal teaching and make reasonable adjustments. Reconnect prerequisite knowledge where needed.

3. Assess

Use evidence to understand the pupil's strengths, starting points, response to teaching and likely need.

4. Discuss

Involve the pupil, parent/carer and SENCO where concerns persist.

5. Plan

Agree outcomes, provision, responsibilities and how impact will be known.

6. Do

Teach the pupil. Use additional adults and interventions to support, not replace, classroom learning.

7. Review

Ask what changed. Continue, adapt, stop or escalate provision based on evidence.

8. Escalate where needed

Seek specialist advice or consider EHC needs assessment where purposeful action has not been sufficient and needs indicate this may be appropriate.

Appendix B - SEND review prompts

- What does this pupil know, remember or do better than at the previous review?
- Which identified barrier has reduced? Which remains?
- What evidence shows that the provision caused or contributed to improvement?
- What can the pupil now do with less adult support?
- Is the pupil accessing more of the intended curriculum and wider school life?
- Which adjustment or intervention should stop because it is no longer needed or has not worked?
- What is the smallest, highest-leverage change needed next?
- Who owns the next action, by when, and when will impact be checked?

Appendix C - Principal external references at approval

Reference	Relevance
SEND Code of Practice: 0 to 25 years	Department for Education and Department of Health and Social Care; statutory guidance; current GOV.UK version.
Children and Families Act 2014	Part 3: children and young people in England with special educational needs or disabilities.
Special Educational Needs and Disability Regulations 2014	Including SENCO duties and SEN Information Report requirements, as amended.
Equality Act 2010	Disability discrimination, reasonable adjustments and accessibility planning.
Mandatory qualification for SENCOs	DfE guidance confirming the SENCO NPQ requirement from 1 September 2024 and the three-year completion window where applicable.
What maintained schools must or should publish online	DfE guidance, including SEND information and accessibility requirements.
Dudley Local Offer and Graduated Approach	Local information, services and Assess-Plan-Do-Review expectations.

Where a reference is superseded, BCF will follow the current legislation or statutory guidance and update this policy at the earliest appropriate review point.