



Special Educational Needs and Disability (SEND) Policy

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| Approved by | The Governing Body Date: |
| Policy Owner / Originator: | Headteacher |
| Governor Responsible | Chair of Governors |
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Vita et Pax Preparatory School
SEND Policy – July 2025

Key Terms or Acronyms

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| SEN | Special Educational Needs – Learning difficulties or disabilities that require special educational provision. |
| SEND | Special Educational Needs and Disabilities – A broader term that includes both learning difficulties and physical/mental health conditions. |
| SENco | Special Educational Needs Coordinator – The staff member responsible for overseeing SEND provision in the school. |
| EHCP | Education, Health and Care Plan – A legally binding document issued by the local authority outlining a child’s needs and the support required. |
| Graduated Approach | A four-part cycle of Assess–Plan–Do–Review used to identify and support pupils with SEN. |
| Section 41 | A section of the Children and Families Act 2014 under which some independent special schools are approved to be named in EHCPs. Vita et Pax Preparatory School is not a Section 41-approved school. |
| Local Authority | The local government body responsible for education, health, and care provision, including EHCP assessments and funding. |
| Reasonable Adjustments | The term ‘reasonable adjustments’ as required under the Equality Act 2010, refers to changes that do not impose a disproportionate financial or operational burden on the School—taking into account its small size, limited infrastructure, and independent funding model—and can be made without compromising the safety, welfare, or educational experience of other pupils. |

1. Definition of Special Educational Needs (SEN)

1.1. A child is considered to have special educational needs (SEN) if they have a learning difficulty or disability that requires special educational provision to be made for them.

1.2. A learning difficulty or disability may arise in one or more of the following areas:

- Communication and interaction
- Cognition and learning
- Social, emotional and mental health (SEMH)
- Sensory and/or physical needs

- 1.3. These categories reflect the broad areas of need identified in the SEND Code of Practice; however, they are not exhaustive. Children may experience complex or overlapping needs that do not fall neatly into a single category, and the school recognises that each child's needs must be assessed and addressed individually.

2. Introduction and Policy Aim

- 2.1. This policy must be read in conjunction with the School's Admissions Policy, which outlines the criteria and processes applied at the point of entry. Together, the SEND and Admissions policies provide a comprehensive framework for understanding how the School identifies, supports, and manages special educational needs throughout a pupil's educational journey.
- 2.2. Vita et Pax Preparatory School ("the School") is an independent, co-educational day school for pupils aged 2 to 11.
- 2.3. Vita et Pax Preparatory School is an independent educational institution and is not approved under Section 41 of the Children and Families Act 2014.
- 2.4. As such, the school is not listed on the Secretary of State's approved list of independent special schools.
- 2.5. Local Authorities do not have the legal power to name the school in an Education, Health and Care Plan (EHCP) under Section 38(3) of the Act.
- 2.6. The school is not under a statutory duty to admit a child solely on the basis that it is named in an EHCP.
- 2.7. The school retains the right to consider requests for admission in accordance with its own admissions policy and its ability to meet the child's needs.
- 2.8. Nonetheless, Vita et Pax Preparatory School is committed to supporting children with special educational needs and disabilities wherever reasonably practicable and in line with the resources, expertise, and capacity available at the school.

3. Policy Aim

- 3.1. Ensure all pupils with SEN are identified and supported early.
- 3.2. Provide a learning environment where every pupil can reach their full potential.
- 3.3. Promote inclusive practices while recognising the school's ethos, operational capacity, and financial structure.

- 3.4. Support will be offered in partnership with parents and the local authority and may depend on the availability of appropriate external funding (agreement) and resources.

4. Legislation and Framework

- 4.1. This policy complies with:
- Relevant parts of Children and Families Act 2014
 - Equality Act 2010
 - Independent School Standards (DfE)
- 4.2. Although independent schools are not legally required to follow the Special Educational Needs and Disability (SEND) Code of Practice: 0 to 25 years (2015), Vita et Pax Preparatory School adopts the Code as a framework of best practice in its approach to supporting pupils with special educational needs and disabilities (SEND).
- 4.3. The principles set out in the Code — including early identification, graduated support, and meaningful collaboration with parents and professionals — are applied wherever possible, while recognising the school’s status as an independent institution.
- 4.4. All SEND provision at the school is delivered within the context of the resources, staffing, expertise, and financial capacity available to the school at any given time. While the school is committed to doing its best to meet the needs of individual pupils, its ability to provide specific support or make particular adjustments may be limited by the absence of external funding or statutory obligations applicable to maintained schools.
- 4.5. Parents are encouraged to work closely with the school to understand what support is available and how it can be tailored to their child’s needs, and the school will remain transparent about what can reasonably be provided within its operational constraints.

5. SEND Funding Expectations and the Independent School Context

- 5.1. The SEND Code of Practice: 0 to 25 years (2015), issued under Section 77 of the Children and Families Act 2014, states that maintained schools and academies are expected to provide up to £6,000 of additional support per year per pupil with special educational needs from within their delegated budgets, before seeking additional “top-up” funding from the local authority. This is commonly known as the £6,000 threshold (see paragraphs 6.99–6.100 of the Code).
- 5.2. As a small, fee-funded independent school, Vita et Pax Preparatory School does not receive any delegated or notional SEND funding from the local authority. We are

therefore **not** in a financial position to absorb or deliver support equivalent to the £6,000 threshold per pupil without external assistance.

5.3. While we remain committed to providing reasonable support in line with the Equality Act 2010 and our ethos of inclusive education, specialist or high-cost provision can only be offered where appropriate funding is secured in advance, either:

- Through an Education, Health and Care Plan (EHCP),
- By agreement with the local authority,
- Or via direct parental funding.

5.4. In all cases, the school will assess what level of provision can reasonably be offered, taking into account its existing resources, staffing, and obligations to all pupils. Provision remains discretionary and subject to feasibility.

5.5. The school works collaboratively with parents and local authorities to identify support needs early and explore appropriate routes for funding. This approach ensures that any provision made is sustainable and does not compromise the education of the pupil concerned or the broader school community.

5.6. For clarity, this policy section does not create a contractual or financial obligation on the part of the school to meet the notional £6,000 threshold, and no such provision shall be presumed without prior agreement and funding being confirmed.

6. Roles and Responsibilities

6.1.1. SENCo: Coordinates day-to-day SEND provision, maintains the SEN register, advises staff, liaises with parents and external professionals, and monitors the impact of interventions.

6.1.2. Headteacher: Ensures compliance with legal obligations, sets the strategic direction for inclusive education, allocates appropriate resources, and supports the SENCo and staff.

6.1.3. Class Teachers: Deliver high-quality, differentiated teaching; identify pupils who may need additional support; implement agreed strategies; and monitor progress.

6.2. Support Staff: Provide targeted support and interventions under the guidance of the SENCo and teachers, promote pupil independence, and share observations to inform planning.

6.3. Governing Body: Provides strategic oversight and monitoring of SEND provision, ensures compliance with statutory duties, and holds school leadership accountable for effective support.

7. Identification and Assessment of Special Educational Needs

7.1. Parental Disclosure at the Admission Stage

7.1.1. Parents and guardians are expected to proactively disclose, at the time of application, any existing or suspected special educational needs or disabilities (SEND) affecting their child. This includes:

7.1.2. Any previous or ongoing concerns;

7.1.3. Any relevant supporting documentation, such as reports from educational psychologists, speech and language therapists, medical professionals, or other specialists.

7.1.4. Where important information about a child's SEND needs is not disclosed at the time of application or during the child's time at the School, the School may not be in a position to make appropriate educational or pastoral provision. This may result in missed opportunities to support the child effectively, and in some cases, may lead to the School being unable to continue offering a place where it is no longer reasonably able to meet the child's needs in a safe and effective manner.

7.1.5. Where the School determines that there has been a deliberate withholding, misrepresentation, or omission of material information concerning a child's SEND needs, this will be treated as a serious breach of trust. In such cases, the School reserves the right to withdraw the offer of a place or terminate the child's enrolment with immediate effect. The School may also, where legally required or appropriate, make disclosures to the local authority, Ofsted, or other relevant safeguarding or regulatory bodies in accordance with its statutory duties.

7.2. The purpose of this disclosure is to enable the school to:

7.2.1. Assess whether it can reasonably meet the child's needs within its available resources.

7.2.2. Determine whether any reasonable adjustments or support measures may be required.

7.2.3. Ensure that the school can make an informed decision about the offer of a place.

7.3. Cost Responsibility for External Assessments

- 7.3.1. Where external specialist assessments or reports are required or recommended—either before admission or during the course of the child’s education—any costs associated with obtaining such assessments shall be the sole responsibility of the parents or guardians.
- 7.3.2. The school may assist, to the best of its ability, in signposting appropriate professionals or agencies but shall not be liable for the commissioning, funding, or delivery of such external services.

8. Ongoing Monitoring

8.1. SEND may also be identified after a child has joined the school, through one or more of the following:

- External professional reports;
- Teacher observations and classroom performance;
- Concerns raised by parents or carers;
- Standardised assessments, screening tools, or tracking of progress over time.

8.2. Where potential SEND is identified:

- 8.2.1. The SENCo will coordinate further internal assessments, gather relevant evidence, and consult with parents and staff.
- 8.2.2. If further specialist input is deemed necessary, parents will be advised to obtain external assessments at their own expense.
- 8.2.3. Any decision regarding placement on the school’s SEN Register or provision of support will be made in light of the school’s expertise, capacity, and resources.
- 8.2.4. The school will take reasonable steps to support pupils with identified SEND needs, within the context of its available staffing, financial resources, and facilities. However, parents remain financially responsible for any additional provision or support required beyond what the school can reasonably offer as part of its general educational provision.

9. Graduated Approach to SEN Support

- 9.1. Vita et Pax Preparatory School adopts a graduated approach to supporting pupils with special educational needs (SEN), based on the Assess–Plan–Do–Review cycle, in line with best practice guidance.
- 9.2. Assess: The school identifies barriers to learning through classroom observation, academic data, staff insight, parental input, and where available, external reports. Assessment is ongoing and informed by professional judgment.
- 9.3. Plan: Where support is considered appropriate, the school may prepare a support plan outlining intended outcomes, strategies, and review timelines. Plans are developed at the school’s discretion and in consultation with parents, where appropriate.
- 9.4. Do: Support strategies are implemented within the classroom or, where feasible, through additional interventions. The class teacher retains overall responsibility, with input from support staff or specialists where applicable.
- 9.5. Review: The school monitors progress against agreed outcomes and may revise or withdraw support in line with the child’s needs and available school resources.
- 9.6. The implementation and continuation of any SEN support remains at the sole discretion of the school, taking into account available staffing, expertise, and financial and operational constraints. Nothing in this policy constitutes a guarantee of provision beyond what the school reasonably determines it can offer.

10. Support and Intervention

- 10.1. Support for pupils with special educational needs and disabilities (SEND) at Vita et Pax Preparatory School is provided on a discretionary basis and is always subject to the school’s operational, staffing, and financial capacity. The school will determine, on a case-by-case basis, whether it is reasonably able to offer or continue any form of additional support or intervention.
- 10.2. Provision is further dependent on the joint ability of the parents, the school, and, where applicable, the local authority to secure appropriate funding or resources specifically for the child’s individual needs. If such funding cannot be secured, or if necessary external services are unavailable, the school may be unable to initiate, deliver, or maintain the support proposed.
- 10.3. Where a child requires external assessments, therapeutic input, or other specialist interventions beyond what the school can reasonably offer as part of its core provision,

parents may be required to arrange and fully fund such services independently. The school may assist in making referrals or coordinating with external professionals (subject to parental consent), but it accepts no financial responsibility or legal liability for any external provision.

10.4. Vita et Pax Preparatory School is an independent institution not approved under Section 41 of the Children and Families Act 2014. Accordingly, the school is not under a statutory duty to admit or provide support solely on the basis of an EHCP and retains discretion over all aspects of provision and placement.

10.5. For the avoidance of doubt, nothing in this policy shall be interpreted as a binding commitment to provide any particular type or level of support, and the school retains full discretion to determine whether it can reasonably offer or continue any specific provision based on the child's needs and the school's overall capacity.

10.6. This policy is non-contractual and does not form part of the parent-school contract. It is subject to amendment or withdrawal at the sole discretion of the school.

11. Education, Health and Care (EHC) Plans

11.1. Where a pupil's special educational needs cannot be met through in-school SEN support and reasonable adjustments, the school will work collaboratively with parents and the local authority to consider whether an Education, Health and Care (EHC) needs assessment should be requested.

11.2. Vita et Pax Preparatory School is committed to engaging constructively in the EHCP process, including contributing to assessments, attending relevant meetings, and supporting planning discussions where appropriate.

11.3. However, as a fee-funded independent school, Vita et Pax does not receive public funding to deliver high-cost or extensive specialist provision. Accordingly, the school cannot guarantee the delivery of provision specified in an EHCP unless:

- Adequate funding and support are secured from the local authority or another agreed source, and
- The school is satisfied that it can meet the pupil's needs without compromising its resources, staff capacity, or the educational experience of other pupils.

11.4. Inability to Meet Needs After Reasonable Adjustments

11.4.1. The school retains the discretion to review a pupil's place if their needs evolve significantly and it is determined that the school is no longer able to meet those needs effectively, even with support.

11.4.2. Where, despite the School making reasonable adjustments in accordance with its duties under the Equality Act 2010, it is determined that the School cannot meet a pupil's needs within its available staffing, expertise, or financial resources—and where additional funding or specialist input from external sources (including the local authority) has not been secured—the School reserves the right to decline or withdraw an offer of a place.

11.4.3. This decision will only be made after appropriate consultation with the parents or guardians, and where relevant, with the local authority or external professionals involved in the child's care and education.

11.4.4. Except in cases involving immediate safeguarding or serious disruption to the education of others, any decision to withdraw an existing place shall be accompanied by a reasonable notice period, normally not less than half a term, to allow the family time to make suitable alternative arrangements.

11.5. For the avoidance of doubt, the naming of Vita et Pax Preparatory School in an EHCP does not create a statutory duty on the school to admit or provide support, as the school is not approved under Section 41 of the Children and Families Act 2014.

12. Ongoing Applicability of This Policy and Change of Circumstances

12.1. This SEND Policy applies not only during the admissions process but continues to apply throughout the entire duration of a pupil's enrolment at Vita et Pax Preparatory School.

12.2. The provisions of this policy are equally applicable where a pupil's special educational needs emerge or evolve after admission. The School recognises that needs may change over time and is committed to identifying and responding to such changes, wherever reasonably practicable.

12.3. The School will work collaboratively with parents, carers, and where appropriate, the local authority, to review and implement reasonable adjustments or additional support. However, the School can only continue to educate a pupil with SEND where the required provision can be delivered within its operational, staffing, and financial capacity.

- 12.4. Where the level or nature of need exceeds what the School can reasonably provide—and appropriate adjustments, funding, or specialist support cannot be secured—the School may determine, following careful review, that it is no longer able to meet the pupil’s needs.
- 12.5. In such cases, the School reserves the right to withdraw the offer of a place or discontinue the pupil’s enrolment. This decision will be taken only after thorough consultation with the parents and, where applicable, with the local authority.
- 12.6. This policy does not confer or imply any contractual entitlement to continued provision in circumstances where, in the professional judgment of the School, the pupil’s needs can no longer be met appropriately within the School’s resources.

13. Complaints

- 13.1. Parents or guardians who have concerns regarding special educational needs (SEN) provision should, in the first instance, raise the matter with the class teacher or the Special Educational Needs Coordinator (SENCo).
- 13.2. If the matter remains unresolved, parents may escalate their concern by approaching the Headteacher. If the issue is still not resolved to their satisfaction, they may subsequently refer the matter to the Governing Body, in accordance with the School’s formal Complaints Procedure.
- 13.3. The School’s Complaints Procedure is available to all current parents and outlines the steps and timescales for raising and resolving concerns in a structured and transparent manner.
- 13.4. Prospective parents who wish to raise concerns relating specifically to admissions or placement decisions should refer to the School’s Admissions Policy, which provides the appropriate framework for addressing such matters.
- 13.5. All complaints are handled fairly and in accordance with the School’s policies. However, the resolution of any complaint remains subject to the School’s independent status, non-Section 41 designation, and its operational and financial capacity to respond to the concerns raised.

14. Data Protection

- 14.1. All personal data collected during the admissions process is handled in accordance with UK GDPR and the School’s Privacy Policy.

14.2. Data is retained only as long as necessary for lawful processing.

15. Monitoring and Review

15.1. This policy is reviewed annually by the Governing Body.

15.2. Minor administrative amendments or corrections may be made by the School to ensure continued compliance and relevance.

This policy is reviewed annually and ratified by the Governing Body.

Families are encouraged to be familiar with this policy via the school website. Copies of this policy and its associated documents are available from the school office.