

Westminster Tutors



Special Educational Needs and Disability Policy

2026-2027

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1. Introduction

- 1.1 Westminster Tutors has a proud history of supporting students with a broad range of differences, whether neurological, learning-related, or due to physical or mental health issues. In many ways, the college is a unique place for students with more complex needs and atypicality to thrive. Predominantly one-to-one tuition, a friendly, relaxed, and mature atmosphere, tailored and bespoke timetables, individualised support and the expertise of experienced leaders and teachers all contribute to an environment that enables every student to thrive and reach their potential.
- 1.2 While this policy outlines the college's approach to Special Educational Needs & Disabilities (SEND), including how it meets its legal duties and responsibilities, it forms a holistic part of the broader offering. It should be seen in the light of the other policies. It should be read in conjunction with the Admissions, Curriculum, Equality, Safeguarding & Child Protection policies and those relating to Behaviour, including online safety.

2. The Definition of SEND

- 2.1 A young person has special educational needs (SEN) if they have a learning difficulty or disability that calls for special educational provision. Disability is defined separately by the Equality Act 2010: a physical or mental impairment with a substantial and long-term adverse effect on normal day-to-day activities. SEN and disability overlap, but a disabled student does not necessarily have SEN. This policy covers support for both.

3. Legislation and Regulation

- 3.1 This policy has regard to:
 - The Equality Act 2010.
 - The Children and Families Act 2014.
 - The Special Educational Needs and Disability Code of Practice: 0–25 years (2015), as relevant to the college's independent post-16 provision.
 - The UK General Data Protection Regulation and the Data Protection Act 2018, as amended, including by the Data (Use and Access) Act 2025.
 - The Health and Safety at Work etc. Act 1974.
 - The Counter-Terrorism and Security Act 2015 (Prevent Duty guidance).
 - Keeping Children Safe in Education (2026) and the current JCQ Access Arrangements and Reasonable Adjustments regulations and supplementary guidance.

4. Principles Underlying Practice

- 4.1 The SEND Code of Practice informs our work with young people who have SEND. Westminster Tutors is an independent sixth-form college, and applies statutory duties where they cover its provision and uses the Code's wider principles as good practice. The college aims to:
 - Meet its duties under the Equality Act 2010, including making reasonable adjustments and avoiding unlawful discrimination.

- Follow the SEND Code of Practice where applicable and use its graduated approach to inform coordinated support.
- Meet all other relevant legislative requirements and have regard to applicable guidance.
- Set out and coordinate support for admissions, examinations, timetabling, mentoring, safeguarding, social activities and tuition delivered by teachers.
- Adopt an inclusive approach that responds to individual needs and barriers.
- Adapt academic and pastoral provision to individual students' needs.
- Use improvements made for students facing the greatest barriers to strengthen provision for all.
- Prioritise students' views, wishes and participation in decisions about their support.
- Involve parents, carers, teachers and non-teaching staff appropriately, respecting the young person's rights, capacity and confidentiality.
- Where possible, adopt a holistic approach that recognises barriers in the environment rather than treating difference itself as a problem.
- Celebrate diversity and avoid assumptions that may disadvantage students with different needs.

4.2 The college takes a positive and professional whole-college approach to students with SEND.

4.3 Students with SEND are the shared responsibility of all staff. All staff are expected to understand and be aware of the impact of specific learning profiles on teaching and learning.

4.4 To ensure the needs of students with SEND are addressed, the Pastoral Support Team will:

- Identify and assess students with SEND, and where necessary, refer them for further assessment by other professionals such as Educational Psychologists, Specialist Teachers, and Therapists.
- Develop and monitor support measures where a need is identified.
- Maintain the SEND Register and share relevant support information with staff who need it for their role.
- Work closely with teachers to ensure confidential communication on students' learning needs and progress.
- Ensure that independent teachers adapt their tuition to students' specific needs, recognising individual strengths and learning needs, and support them through mentoring and pastoral coordination so they can achieve their academic potential.
- Communicate effectively with students and, where appropriate, parents or carers; maintain personalised learning plans for students on the SEND Register and share relevant information with their teachers.
- Collate evidence to support applications for additional funding and examination access arrangements.

5. Identifying Special Educational Needs

5.1 Early identification of students' needs is the key to unlocking the potential of students with special educational needs. Westminster Tutors coordinates a graduated approach to ensure that students who may not develop age-appropriate knowledge and skills, or who fall behind their peers, are identified as early as possible.

- 5.2 In seeking to understand and coordinate support for students' learning needs, Westminster Tutors uses the four broad areas of need in the SEND Code of Practice. These areas overlap and are a guide to identifying support, rather than labels that determine provision:

Communication and interaction need

- 5.3 Students who have trouble with speech, language, and communication.

Cognition and learning needs

- 5.4 Students who learn slower than their peers or have difficulties acquiring skills in a specific area, such as literacy. This includes students with moderate and severe learning difficulties, requiring support in all curriculum areas and participation in college life in general.

Social, emotional, and mental health needs

- 5.5 Students' needs may be manifested in different ways, such as becoming withdrawn or displaying challenging behaviour. These may include being disruptive or self-harming. Students with difficulty paying attention or forming attachments with adults also fall into this category.

Sensory and/or physical needs

- 5.6 Students who require special educational provisions because they have a disability that prevents them from accessing the educational facilities that are generally available.

6. Categorisation of Students

- 6.1 At Westminster Tutors, we use a simple categorisation of students, which helps provide a consistent and understood language:
- Wave One: Universal support.
 - Wave Two: Targeted support.
 - Wave Three: Specialist support.

Wave 1 Universal Support

- 6.2 We firmly believe students' needs are best met through their direct work with independent teachers, with Westminster Tutors coordinating appropriate support and oversight. At this universal level, Westminster Tutors provides guidance, resources, and optional training to ensure teachers can deliver high-quality tuition that is differentiated for individual students.

Wave 2 Targeted Support

- 6.3 Westminster Tutors coordinates targeted support where appropriate by arranging short-term special educational provisions designed to remove or reduce learning obstacles or help students catch up when termly data analysis shows they have fallen behind their peers. Independent teachers deliver such specific, targeted one-to-one or small group interventions directly. They may be scheduled outside the usual timetable for a limited period to minimise disruption to the regular curriculum.

Wave 3 Specialist Support

- 6.4 Westminster Tutors coordinates specialist support when it is necessary to seek advice and regular long-term assistance from an external professional, to plan for the best possible learning outcomes for students who do not make progress despite high-quality tuition and targeted intervention. This may include assessment and/or support from an Educational Psychologist, an Assistant Educational Psychologist, a Speech and Language Therapist, a Specialist Dyslexia Teacher, a Specialist Sensory Advisory Teacher (for students with hearing or visual impairments), an Occupational Therapist, a Physiotherapist, a Therapeutic Learning Mentor, an Arts Psychotherapist, a Psychotherapist, or a Counsellor. This is not an exhaustive list.

7. The Graduated Approach

- 7.1 Westminster Tutors' approach to identifying and coordinating support for SEND is informed by the SEND Code of Practice, which recommends a graduated response to students who may be underachieving, based on continuous assessment, planning, and review. Westminster Tutors will ensure reasonable adjustments are coordinated and supported, so that barriers to learning are removed or reduced and students can access all aspects of college life, including academic and social activities.
- 7.2 The first response to existing or possible SEND is high-quality tuition delivered by independent teachers, using differentiated strategies to target specific difficulties. Teachers use the coordinated data and any available information Westminster Tutors provides to understand progress and individual needs.
- 7.3 Support is based on the student's needs and barriers, not attainment alone. Known needs, reasonable adjustments and necessary specialist advice should be addressed promptly; students do not have to complete each wave of support or fall behind academically before receiving appropriate provision.
- 7.4 Sources of information, including the student's own views, might include:
- Baseline data (e.g., previous school reports, GCSE, and/or A level results).
 - Educational Psychologist (EP) or Specialist Teacher reports.
 - Information from previous colleges for new students.
 - Discussions with parents/guardians.
 - Observations in lessons.
 - In-class assessments.
 - Discussions with the pastoral support team.
- 7.5 Independent teachers will implement the agreed strategies. The Personalised Learning Plan will record the intended outcomes, agreed support, who is responsible for each action and an agreed review date. The SENCo coordinates review with the student and relevant teachers, involving parents or carers appropriately. Where students have not made progress despite this approach, the cycle will

begin again and may incorporate further specific measures coordinated by Westminster Tutors, such as:

- Additional assessment arranged by the SENCo.
- Targeted one-to-one or small group sessions delivered by independent teachers or mentors to support study skills, organisation, or subject-specific strategies.
- Mentoring sessions focusing on study skills and pastoral support.
- The SENCo may, with consent, observe lessons to advise on strategies, but does not direct the content or delivery of tuition.

7.6 The student's progress will be reviewed after these measures. If sufficient progress has not been made, the level of support may increase through coordination with outside agencies such as:

- Education or Clinical Psychologist or Psychiatric Assessment.
- Full Specialist Teacher assessment.
- CAMHS or AMHS involvement.
- A request to the local authority for an education, health and care needs assessment, where appropriate.
- GP review.

7.7 Using all the information gathered at this stage, the process of applying new strategies and reviewing progress will continue.

8. Responsibility for SEND

8.1 Teachers are responsible for the progress and development of the students they teach, including when external professionals or specialist staff are involved. Teachers engaged via Westminster Tutors must understand students' specific needs and adapt tuition in line with their Personalised Learning Plans. The SENCo coordinates reviews with students, involves parents or carers appropriately, and advises on the effectiveness of support. For a student with an Education, Health and Care Plan (EHCP), the college works with the local authority and relevant professionals on provision and review. From the end of compulsory school age, SEND decision-making rights normally rest with the young person, subject to the Mental Capacity Act 2005; parental involvement should reflect their wishes and the applicable legal framework.

9. Provision for Students with SEND

9.1 As per the Curriculum Policy and the introduction of this policy, the college adopts an inclusive approach for all students, and every student has a bespoke and tailored educational programme. The following briefly summarises how that programme is adapted to SEND students. It is important to note that the following list is not exhaustive and that the college will respond to each student's circumstances individually.

Senior Tutor

9.2 Every student has an academic tutor. SEND students will be assigned a Senior Tutor who is suitably qualified and experienced to support students with more complex needs. Senior tutors are the first

point of contact for parents/guardians and coordinate those working with the student, including teachers, external professionals, and mentors.

Mentoring

- 9.3 Mentoring is an essential aspect of Westminster Tutors' coordinated support structure for overseeing the needs of SEND students. While teachers adapt tuition to individual needs, students with SEND may also benefit from additional support focusing on study skills and related pastoral issues.
- 9.4 Mentors are not necessarily qualified to provide medical or psychological treatment. Thus, their role is limited to supporting study skills such as organisation, planning, and independent learning. They may also discuss, from an academic and pastoral perspective, matters such as lifestyle, diet, sleep, and exercise. Mentors provide a supportive point of contact but are not counsellors or therapists.
- 9.5 Where a student's mental health needs require clinical support beyond the college's educational and pastoral remit, appropriate external support should be discussed with the student and, where appropriate, their parent or carer. Any requirement for external support as part of an individual placement must be based on assessed need, relevant professional advice, safeguarding considerations and reasonable adjustments. A diagnosis alone does not determine suitability for enrolment. External clinical treatment is arranged by the student and, where appropriate, their family; Westminster Tutors does not provide clinical treatment.
- 9.6 Students and, where appropriate, their parents or carers may ask the Principal about separately arranged external counselling with the Pastoral Coordinator in her capacity as a psychotherapist. Any such arrangement is distinct from her college pastoral role; the service's scope, confidentiality and safeguarding arrangements are agreed before it begins. The college can also signpost students and families to external services.

Timetabling

- 9.7 Westminster Tutors coordinates bespoke timetables for each student, including adapting attendance to particular days or times of the week. Individual study sessions may be integrated into timetables, and social activities can be scaffolded so that students with social anxiety, for example, can gradually build their confidence and participation.
- 9.8 Students with SEND may be offered increased flexibility in their timetabled provision. For example, some or all lessons may initially be arranged remotely, to progress to in-person attendance where possible. Lessons may also be scheduled later in the day, or students may be excused from completing study sessions on-site, where this is agreed to be appropriate. Such flexibility is coordinated with the student, involving parents or carers appropriately and consulting teachers and external professionals as necessary, aiming to enable students to access the full range of college facilities and activities.

Academic Curriculum

- 9.9 There is no specific difference between the academic curriculum for students with or without SEND. Westminster Tutors' approach is that all students should aim to become independent and active learners, with educational excellence as a core ethos. To achieve this, SEND students may require

additional support from pastoral mentors, alongside coordination and guidance provided by the SENCo and senior leaders, to ensure that appropriate adjustments and resources are in place.

Risk Assessments

- 9.10 As set out in the Risk Assessment Policy, Westminster Tutors coordinates individual risk assessments where needed, including for participation and fire evacuation. Safeguarding risks are considered under the Safeguarding Policy. Staff must not assume that a change in behaviour or a possible sign of abuse is explained by a student's SEND. Relevant information is shared with those who need it to support the student safely, taking account of confidentiality and data protection.

Exam Access Arrangements (EAA)

- 9.11 The Examinations Officer may conduct assessments for examination access arrangements only where appointed by the head of centre and qualified to meet the current JCQ assessor requirements. Evidence of the assessor's qualifications must be held by the centre before assessment.
- 9.12 Where an external assessor is needed, Westminster Tutors coordinates an assessor who meets the current JCQ requirements and has an established working relationship with the centre. Membership of a professional organisation alone does not establish the required qualification.
- 9.13 Previous examination access arrangements do not transfer automatically. The SENCo checks that evidence is complete, valid and appropriate, and that the requested arrangements reflect the student's current needs and normal way of working at Westminster Tutors.
- 9.14 A compliant Form 8 and evidence of the original assessor's qualifications may be reused where JCQ permits. When progressing from GCSE or another Level 2 qualification to A level or another Level 3 qualification, Form 8RF is completed where required. Medical, sensory or communication needs are documented using the relevant current evidence requirements, including a new Form 9 where required.
- 9.15 The SENCo gathers current teacher evidence and completes the appropriate JCQ documentation. Where Form 8 assessment is required, Part 1 must be completed with the required centre evidence and provided to the assessor before assessment takes place. A centre letter is not a general substitute for required forms. The Examinations Officer processes a new Access Arrangements Online application where required and observes the published deadlines. Students are informed about the use of their information for this purpose.
- 9.16 If a new need is identified, Westminster Tutors coordinates assessment by its appointed qualified assessor or gathers appropriate medical or other professional evidence. A diagnosis or privately commissioned report alone does not guarantee a particular arrangement. Decisions follow the current JCQ Access Arrangements and Reasonable Adjustments rules and relevant awarding-body requirements. Guidance is available at <https://www.jcq.org.uk/exams-office/access-arrangements-and-reasonable-adjustments/>.

Pastoral and Extracurricular Activities

- 9.17 All SEND students are encouraged and supported to access pastoral and extracurricular activities and events. As Westminster Tutors' approach is individualised and bespoke, reasonable adjustments to

support participation will be coordinated according to each student's needs, including consideration of mental health or safeguarding concerns.

9.18 Therefore, the following is a summary of examples of how the college may approach the following:

RSHE and PSHCE

9.19 The RSHE lead will liaise with the SENCo on planned sessions and any specific concerns, risks, or reasonable adjustments required for SEND students. These may include ensuring that materials are age- and experience-appropriate and that students are informed of any particularly sensitive topics under discussion. The safeguarding risk assessment process will include access to RSHE and PSHCE.

9.20 Students with an EHCP, such as those with autism, may require certain RSHE and PSHCE sessions to be delivered individually or in small, carefully chosen groups. Where appropriate, this will be coordinated with the student and teachers, involving parents or carers appropriately.

Sports and Exercise, Activities and Outings

9.21 As with RSHE and PSHCE, individualised programmes for sports and exercise may be required. Risk assessments will be completed to ensure that students are safe and supported in these activities. SEND students will be encouraged, where appropriate, to participate in exercise such as weekly gym sessions, following consultation with the student and, where appropriate, their parents or carers. Healthy lifestyle considerations, such as activity, diet, and sleep, may also be discussed in mentoring sessions.

Careers Education, Information and Guidance (CEIAG) and UCAS

9.22 UCAS and careers advice are tailored to the individual and are typically provided one-to-one. Transition planning includes relevant onward support and, where applicable, local-authority involvement for a student with an EHCP. An EHCP does not continue into higher education; university support and any Disabled Students' Allowance application need to be arranged separately.

10. Management and Roles

10.1 Westminster Tutors, like all colleges, has duties under the Equality Act 2010, not only to ensure that reasonable adjustments are made for students already attending, but also to anticipate and plan for the needs of prospective students with a disability. The Senior Management Team, led by the Principal, will regularly review how expertise and resources used to support students with SEND can be applied to improve the quality of provision across the college. To ensure best practice, the SENCo role is fulfilled by an experienced, qualified teacher.

Class and Subject Teachers

10.2 Teachers engaged via Westminster Tutors are responsible for the progress of the students they teach, including those with SEND.

The SENCo

10.3 The SENCo is responsible for operating the SEND Policy and coordinating provisions made for students with SEND.

- 10.4 The SENCo provides professional guidance to colleagues to secure high-quality teaching for students with SEND and works closely with students, parents/guardians, and other professionals to ensure students with SEND receive appropriate support.
- 10.5 The SENCo plays an essential role with the Head and proprietor in determining the strategic development of the SEND Policy and provision within the college to raise the achievements of students with SEND.
- 10.6 Within the college's independent post-16 provision, the SENCo also coordinates the following responsibilities, with student involvement and appropriate information sharing:
- Discuss possible special educational needs with the student promptly and involve parents or carers appropriately.
 - Identifying the student's special educational needs and coordinating the making of special educational provision that meets those needs.
 - Monitoring the effectiveness of any special educational provision made.
 - Securing relevant services for the student where necessary.
 - Ensuring the records of the student's special educational needs and the special educational provision made is maintained and updated.
 - Keeping the student informed about their SEND support and providing relevant updates to parents or carers appropriately, in line with the student's rights, capacity, confidentiality and the college's safeguarding and information-sharing policies.
 - Ensuring that where the student transfers to another college or educational institution, the educational provision made is conveyed to the appropriate authority or the proprietor of that college or institution.
 - Promoting the student's inclusion in the college community and access to the college's curriculum, facilities, and social activities.
 - Advise on the support and training of any learning support assistants involved in the student's provision.
 - Advising teachers at the college about differentiated teaching methods appropriate for individual students with special educational needs.
 - Contributing to in-service training for teachers at the college to assist them in carrying out necessary tasks to meet the needs of students with special educational needs.
 - Keep published information about the college's SEND provision accurate and under review, meeting any publication requirements that apply.

The Principal

- 10.7 The Principal acts as the SENCo and is responsible for the strategic planning and day-to-day delivery of SEND provision.

11. Document Retention

- 11.1 SEND records are stored securely and kept in line with the college's Data Retention Policy, applicable law and relevant safeguarding requirements. Access is restricted to those who need the information for their role.

12. Complaints

- 12.1 All complaints should be dealt with via the college's agreed complaint procedure.

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