



Behaviour Policy

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Staff member responsible:	Will Most
Role:	Head of Learning Support
Revised On:	September 2026
Ratified by governing board:	
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Introduction

Frewen College is an independent, co-educational day and boarding College for pupils aged 7-19 specialising in dyslexia. The College is committed to the equal treatment of all pupils including those with special educational needs (SEN) and disabilities. This policy works towards eliminating disadvantages for pupils with SEN and disabilities by:

- using best endeavors to ensure that all pupils (including those with medical conditions) get the support needed in order to access the College's educational provision
- making reasonable adjustments so that pupils are not put at a substantial disadvantage in matters of admission and education
- ensuring that pupils with engage as fully as practicable in the activities of College life
- ensuring clear communication with pupils and their parents or carers and involve them in discussions and decisions about support and provision for the pupil

At Frewen College we strive to create an inclusive learning environment that offers all pupils, no matter their needs and abilities, a broad, balanced and challenging curriculum.

In drawing up this policy, the College has had regard to the following guidance and advice (in so far as they apply to the College):

- Special Educational Needs and Disability Code of Practice: 0 to 25 years (January 2015)
- Equality Act 2010
- Children and Families Act 2014
- EHRC guidance 'Reasonable adjustments for disabled pupils'

This policy should be read in conjunction with the College's Admissions Policy, , Accessibility Plan, Restorative Behaviour Policy and the latest version of KCSIE.

Definitions

A pupil has SEN if they have a learning difficulty or disability that requires special educational provision to be made for them. Frewen College is an independent school specialising in dyslexia; therefore, dyslexia must be the primary need.

They have a **learning difficulty or disability** if they have:

- o A significantly greater difficulty in learning than most others of the same age, or
- o A disability which prevents or hinders them from making use of facilities of a kind generally provided for others of the same age in mainstream Colleges

Special educational provision is educational or training provision that is additional to, or different from, that made generally for other children or young people of the same age by mainstream Colleges.

Pupils are considered to have a **disability** if they have a physical or mental impairment that has a substantial and long-term adverse effect on their ability to do normal daily activities.

The College will make reasonable adjustments for pupils with disabilities, so that they are not at a substantial disadvantage compared with their peers.

Areas of Need

The needs of pupils with SEND are grouped into 4 broad areas. Pupils can have needs that cut across more than 1 area, and their needs may change over time.

AREA OF NEED	
Communication and interaction	Pupils with needs in this area have difficulty communicating with others. They may have difficulty understanding what is being said to them, have trouble expressing themselves, or do not understand or use the social rules of communication. Pupils who are on the autism spectrum often have needs that fall in this category.
Cognition and learning	Pupils with learning difficulties usually learn at a slower pace than their peers. A wide range of needs are grouped in this area, including: • Specific learning difficulties, which impact 1 or more specific aspects of learning, such as: dyslexia, dyscalculia and dyspraxia • Moderate learning difficulties • Severe learning difficulties • Profound and multiple learning difficulties, which is where pupils are likely to have severe and complex learning difficulties as well as a physical disability or sensory impairment
Social, emotional and mental health	These needs may reflect a wide range of underlying difficulties or disorders. Pupils may have:

	• Mental health difficulties such as anxiety, depression or an eating disorder • Attention deficit disorder, attention deficit hyperactive disorder or attachment disorder • Suffered adverse childhood experiences These needs can manifest in many ways, for example as challenging, disruptive or disturbing behaviour, or by the pupil becoming withdrawn or isolated.
Sensory and/or physical	Pupils with these needs have a disability that hinders them from accessing the educational facilities generally provided. Pupils may have: • A sensory impairment such as vision impairment, hearing impairment or multi-sensory impairment • A physical impairment These pupils may need ongoing additional support and equipment to access all the opportunities available to their peers.

Governor and staff responsibilities

The governing body is responsible for determining College policy and provision for pupils with SEN and disabilities. The Head is responsible for overseeing all aspects of the College's SEN provision and keeping the governing body fully informed of the implementation of the College's policy in practice. The Head is directly supported in this by the Deputy Head and the Head of Learning support.

Together with the wider staff they work to:

- Determine the strategic development of the SEN and disability policy and provision in the College
- Coordinate specific provision for children with SEN and disabilities, including those who have EHC plans
- ensure all staff understand their responsibilities to children with SEN and the College's approach to identifying and meeting SEN

- ensure that teachers are given any necessary information relating to a child's learning support needs and/or disabilities (if known) so that teaching practices are appropriate
- ensure parental insights are considered by the College to support their child's SEN and/or disability
- liaise with form tutors, external professionals and agencies, as appropriate
- ensure that the College keeps records of all pupils with SEN up to date.

All teachers are responsible for helping to meet a pupil's needs (irrespective of any specialist qualifications or expertise). All staff are expected to understand this policy so that the College can identify, assess and make provision to meet those needs.

Identifying and supporting pupils with SEN and disabilities

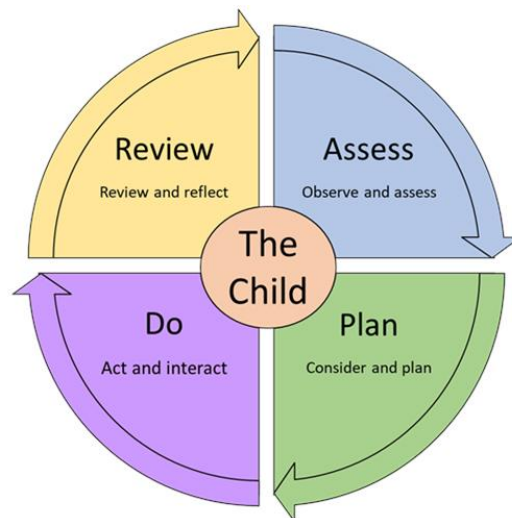
The College's curriculum, plan and schemes of work take proper account of the needs of all pupils, including those with SEN and disabilities. The College regularly reviews pupil progress to help monitor whether children are making expected progress. Our admissions procedures review the learning needs of pupils at the point of evaluation and placement, but we are mindful that learning profiles and the primary need of a pupil can change over time. Where the College reasonably considers that a pupil may have an additional educational need, for example where there are early indications that a pupil is not making expected progress, the College will do all that is reasonable to report and consult with parents/guardians and the pupil (as appropriate) to help determine the action required including whether any additional support is needed, and if the provision in place is appropriate.

The College may request parents/guardians to obtain a formal assessment of their child (such as by an educational psychologist or specialist teacher), the cost of which will usually be borne by the parents/guardians.

Where parents/guardians wish to request a formal assessment from outside of College, they should ensure the College is given copies of all advice and reports received. If there are significant emerging concerns, or identified SEN or disability, the College will take reasonable action to put appropriate special educational provision in place taking into account any advice from specialists where it is possible to do so within the remit of the Colleges designation and our core offer.

Parents/guardians should be consulted and kept informed of any action taken to help their child, and of the outcome of this action. Parents/guardians will be informed initially by email or a telephone call and meetings arranged as necessary. Due weight will also be given to a pupil's wishes (according to their age, maturity and capability).

All pupils at Frewen college have an identified Specific Learning Difficulty, and may also have additional co-occurring conditions . Frewen college follows a graduated asses, plan, do and review cycle to identify further support that may be needed for pupils both socially and academically.



Pupil Voice

Wherever practicable and appropriate pupils will given the opportunity to provide information and express their views about their SEND and the support provided. They will be invited to participate in discussions and decisions about this support. This might involve the pupil:

- Explaining what their strengths and difficulties are
- Contributing to setting targets or outcomes
- Attending review meetings
- Giving feedback on the effectiveness of interventions

The pupil's views will be taken into account in making decisions that affect them, whenever possible.

Reasonable adjustments

The College is committed to treating all pupils fairly. In light of the College's obligations under the Equality Act 2010, the College will seek to ensure that disabled pupils are not put at a substantial disadvantage, by comparison with pupils who are not disabled, by making reasonable adjustments:

1. to policies, criteria and practices (i.e. the way the College does things); and
2. by providing auxiliary aids and services (i.e. provision of additional support or assistance).

There is no standard definition of an auxiliary aid or service. Anything which helps, aids or renders assistance for disabled pupils or applicants is likely to be an auxiliary aid or service. Examples could include:

- use of equipment such as a laptop, remote microphone system, digital reader e.g. Livescribe pen; text-to-speech software
- provision of a safe place for taking rest breaks
- access arrangements in the classroom, tests and examinations.

The College is not required to remove or alter physical features to comply with the duty to make reasonable adjustments for disabled pupils or applicants. Similarly, the College is not required to provide auxiliary aids for personal purposes unconnected with its provision of education and services.

College staff seek to understand the needs of each and every pupil and to ensure that all pupils have the chance to make good progress according to their ability. In practice, making reasonable adjustments can be a daily, iterative process. Adjustments can often be made by staff at short notice or no notice, for example, taking steps to ensure that a child has understood instructions, or that they are seated where they are able to hear and concentrate. Once any required adjustments have been identified, the College will consider whether they are reasonable adjustments for the College to make by reference to the following factors:

- whether it would overcome the substantial disadvantage the disabled child is suffering
- the practicability of the adjustment
- the effect of the disability on the pupil
- the cost of the proposed adjustment
- the College's resources
- health and safety requirements
- the need to maintain academic, musical, sporting and other standards; and
- the interests of other pupils (and potential pupils).

The College will discuss the proposed adjustments with parents/guardians and, where appropriate, the pupil, Head of Learning Support or relevant member of College staff and (with the parents'/guardians' consent) any appropriate third party, which may include, for example, a medical practitioner or educational psychologist.

The College will communicate any decision regarding reasonable adjustments with parents/guardians and the child (where appropriate). Parents/guardians can assist the College in this process by ensuring that staff are informed of their child's needs, making available any relevant reports, assessments and information and working with the College if appropriate to implement any measures or reinforce any strategies put in place. Where, despite reasonable adjustments to assist a child's access to educational provision and the other benefits, facilities and services the College provides, a disabled pupil is evidently still at a substantial disadvantage, the College may draw this to the attention of the parents/guardians and make recommendations. This might include, for example, seeking further external professional advice, seeking a statutory assessment, additional support funded by the parents/guardians or other external sources. If the parents/guardians feel that there are further particular adjustments the College could make, parents/guardians may write to or speak with their child's class or form teacher, in the first instance, or the head of College. Parents/guardians are encouraged to provide copies of any medical or specialist's reports as evidence of the adjustments required.

Pupils with an Education Health Care Plan (EHCP)

The needs of the majority of pupils with SEND will be met effectively through the College's core offer. However, parents/guardians have the right to ask the Local Authority to make an assessment with a view to drawing up an EHC Plan for their child. Parents/guardians are asked to consult with the College before exercising this right. If the Local Authority refuses to make an assessment, parents/guardians have a right of appeal to the First-tier Tribunal (Special Educational Needs and Disability). The College does not have this right of appeal. Where a prospective pupil has an EHC Plan, or one is issued whilst the pupil is in attendance at Frewen College, the College will consult with the parents/guardians and the Local Authority (where appropriate) to ensure that the provision specified in the EHC Plan can be delivered by the College. Any additional services that are needed to meet the requirements of the EHC Plan will need to be charged to the Local Authority if the Local Authority is responsible for the fees and the College is named in the EHC Plan. In all other circumstances charges may be made directly to parents/guardians, unless the additional services can be considered to be a 'reasonable adjustment' where no charge will be made, in accordance with the provisions of the Equality Act (2010).

The College co-operates with the Local Authority to ensure that relevant annual reviews of EHC plans are carried out as required.

Further aspects relating to SEND provision

Admissions

The College does not unlawfully discriminate in any way regarding entry. The College welcomes pupils with disabilities and/or special educational needs, provided that their primary need aligns with our admissions criteria and we can offer them any support that they require and cater for any additional needs and that our site can accommodate them. We aim to ensure that all our pupils, including those with disabilities and/or special educational needs, are provided with a safe and inclusive environment in which to learn. Our admissions process reviews the identified learning, physical and social needs of the pupil. Where a prospective pupil is disabled, the College will discuss with parents/guardians (and their child's medical advisers, if appropriate) the adjustments that can reasonably be made for the child if they become a pupil at the College, to ensure that the prospective pupil is not put at a substantial disadvantage compared to a pupil who is not disadvantaged because of a disability. There may be circumstances in which we are not able to offer a place for reasons relating to a child's disability. For example, if, despite reasonable adjustments, we feel that a prospective pupil will not have a peer group, is not going to be able to access the education offered, or that their health and safety or those of other pupils or staff may be put at risk, we may not be able to offer a place at the College.

Withdrawal

We reserve the right, following consultation with parents/guardians, to request or require the withdrawal of a pupil from the College if, in our opinion after making all reasonable adjustments the College is unable to meet the child's needs. In these circumstances the College will, where appropriate, support the parent's/guardian's in finding an alternative placement which will meet the child's needs. Any decision to request withdrawal or require the removal of a pupil will be made as a last resort and in line with the terms of the parent contract. Fees in lieu of notice will not be chargeable in these circumstances.

Entitlements to Access Arrangements

Children who have been diagnosed as having a learning difficulty may be entitled to support, such as additional time and/or modified provision, to complete external

assessments. Exam access arrangements allow examination candidates with special educational needs and disabilities to access the assessment without changing the demands of the assessment. These are strictly regulated by the Joint Council for Qualifications (JCQ) on behalf of the examination boards, under the remit of Ofqual, and are administered and applied by the College in accordance with the published guidance and requirements. At Frewen College we assess all pupils to determine the access arrangements needed prior to the examination season as part of our core offer. External reports may provide useful supporting evidence but the final decision lies with the College and testing must be done by the College's approved assessor. Access arrangements must reflect the child's normal way of working and be supported by evidence from teachers before an application to JCQ is made. Access arrangements are intended to 'level the playing field' and should not provide an unfair advantage.

Bullying and Behavior issues

Frewen College operates a restorative behavior policy. All pupils are taught that any form of discrimination, bullying and harassment is prohibited and will not be tolerated.

Pupils are taught through the delivery of the curriculum, PSHE and assemblies the importance of respecting each other and behaving towards each other with kindness, courtesy and consideration.

The College's restorative behavior and anti-bullying policies make clear the seriousness of bullying and harassment and that appropriate sanctions will be applied to any pupil who displays inappropriate behavior. The College recognises that disabled pupils or those with SEN may be particularly vulnerable to being bullied. The College also recognises that bullying (or other matters such as bereavement) can impact learning, wellbeing and mental health. The College recognises that children with SEN and disabilities can face additional safeguarding challenges and additional barriers can therefore exist when recognising abuse and neglect in this group of children. The College's Child Protection and Safeguarding Policy will be followed if there are any safeguarding concerns relating to a child.

Three-year accessibility plan

In line with its duty under the Equality Act 2010 the College's three-year Accessibility Plan sets out how the College will:

- increase the extent to which disabled pupils can participate in the College's curriculum
- improve the physical environment of the College for the purpose of increasing the extent to which disabled pupils are able to take advantage of education and benefits, facilities or services provided or offered by the College; and
- improve the delivery to disabled pupils of information which is readily accessible to pupils who are not disabled.

A copy of the College's Accessibility Plan is available on request.

Parental Responsibility

To ensure that parents/guardians and pupils can be given the most appropriate advice and support, it is important that all relevant information and documentation about any possible special educational need and any history of learning support is shared with the College.

Parents/guardians must provide the college with copies of any reports or recommendations concerning the pupil's special educational needs or disability from previous Colleges or elsewhere. Parents/guardians agree to do this when completing the registration form and accepting the terms and conditions of the parent contract.

Concerns

The College will listen to any concerns expressed by parents/guardians about their child's development and any concerns raised by children themselves. In the first instance, parents/guardians must notify their child's class or form teacher or House Tutor if their child's progress or behavior gives cause for concern.

We hope that any difficulty or concern can be sensitively and efficiently handled and resolved informally before it reaches the formal complaints stage. That said, the College's Complaints Policy is on the website and sets out how parents/guardians can raise a formal complaint and how the College will handle it. We will also send parents/guardians a copy of the Complaints Policy on request

Review

This policy will be reviewed annually to ensure the College meets the needs of those pupils with SEN and/or disabilities, or at more frequent intervals if there are relevant legislative changes, and/or the evaluation of the policy highlights the need for a review

Links with other policies and documents

This policy links to the following documents

- Accessibility plan
- Restorative Behaviour policy
- Safeguarding / child protection policy
- Admissions Policy
- Complaints policy