

Inclusion Policy

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Owner: Sue Churches

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Putting Students First

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1. Introduction

This policy replaces the previous Equality, Diversity and Inclusion Policy and the SEND Policy and Procedures. It brings together the College's commitments and procedures for equality, SEND, additional learning support, reasonable adjustments and inclusive practice. Detailed operational forms, referral routes, contact details and system instructions are maintained separately so they can be updated without weakening the policy's statutory requirements.

Operational forms, referral routes, named contacts, email addresses, system instructions, funding arrangements and detailed timescales are maintained in controlled procedures and guidance linked to this policy. These documents must remain consistent with the statutory duties and expectations set out here.

2. Policy Statement

Inclusion is central to our mission. We are committed to removing barriers to participation and learning, ensuring that all students, regardless of background, identity or need, can thrive. This includes embedding inclusive practices across curriculum design, teaching, support services, leadership and governance.

3. Scope

This policy applies to:

- All students and apprentices
- Staff, governors, volunteers, contractors.
- Visitors and external partners.
- All college activities including teaching, assessment, enrichment and support services.

The College places the student or apprentice at the centre of SEND and inclusion decisions. Information is provided in a form they can understand, and communication support, advocacy, family or carer involvement is arranged where appropriate and with due regard to the young person's rights and wishes. Decisions focus on agreed outcomes and preparation for adulthood, including further education, employment, independent living, community participation and health where relevant.

4. Legal and Regulatory Framework

The policy is underpinned by the Equality Act 2010, including the Public Sector Equality Duty; the Children and Families Act 2014; the Special Educational Needs and Disability Regulations 2014; the SEND Code of Practice: 0 to 25 years; the Human Rights Act 1998; current safeguarding legislation and Keeping Children Safe in Education; and the current Ofsted further education and skills inspection framework, toolkit and operating guidance.

Related internal college policies, procedures and documents:

- Safeguarding Policy
- Student and Apprentices Behaviour Policy
- Student and Apprentices Attendance Policy
- Mental health and Wellbeing Strategy
- Teaching and Learning Policy
- Teaching Excellence Framework

- Recruitment Policy
- Admissions Policy
- Compliments and Complaints Policy and Procedure
- Data Protection Policy and records-retention guidance
- Medication Administration Policy
- Personal Care and Intimate Care Procedures
- Accessibility Plan and digital accessibility guidance
- Health and Safety Policy, including risk assessment and emergency evacuation arrangements
- Work Experience and Placement Policy
- Apprenticeship Policy
- Subcontracting and Franchise Quality Assurance Policy
- Careers Education, Information, Advice and Guidance Policy
- Student Support, Mental Health and Wellbeing Procedures
- Prevent Policy or Risk Assessment
- Staff Recruitment and Safer Recruitment Policy
- Whistleblowing Policy
- College Charter

5. Definitions (see Appendices A and C for more details)

- **Inclusion:** Creating a culture where every member of the college community—including students, staff, governors, volunteers and visitors—feels that they belong, are safe, respected, and supported to succeed. Inclusion means ensuring that everyone, regardless of background, identity, or need, is valued and empowered to participate fully in college life, contribute their perspectives, and reach their potential.
- **Protected characteristics:** As defined by the Equality Act 2010 (see also Appendix A)
- **Disadvantage:** Any factor that limits access to opportunity or achievement. This can include, but is not limited to, socio-economic status, disability, special educational needs, language barriers, care experience, family circumstances, discrimination, or lack of access to resources and support. Disadvantage may be temporary or long-term, visible or hidden, and can affect individuals or groups. Addressing disadvantage involves identifying and removing barriers so that everyone has an equitable chance to participate, progress, and succeed.
- **Special educational needs and disabilities (SEND):** A student or apprentice has special educational needs when they have a learning difficulty or disability that calls for special educational provision to be made for them. For a young person aged over 16, this includes having significantly greater difficulty in learning than most people of the same age, or a disability that prevents or hinders them from using facilities generally provided in post-16 education or training. Disability has the meaning given in the Equality Act 2010. English as an additional language is not, by itself, a special educational need.

6. Policy Objectives

- **Embed inclusive practices** across all areas of provision ensuring that curriculum, teaching, support services, leadership, and governance reflect the values of diversity, equity, and belonging.
- **Ensure early identification and support** for student and apprentice needs through information sharing, accessible disclosure routes, ongoing assessment and timely

intervention, so that each student receives appropriate support to participate, progress and achieve.

- **Promote equity in access, participation and outcomes** by removing barriers, addressing disadvantage, and monitoring progress to close achievement gaps between different groups of students.
- **Create a culture of belonging and respect** where every student and staff member feels valued, safe, and empowered to contribute to college life.
- **Ensure compliance with statutory duties** including the Equality Act 2010, SEND Code of Practice, Ofsted Framework, and safeguarding legislation.
- **Ensure active student and staff voice** in shaping inclusive policy and practice, using feedback to drive continuous improvement.
- **Monitor and evaluate** the impact of inclusion initiatives through data analysis, audits, and regular reporting to governors and stakeholders.
- **Ensure continuous professional development** for all staff to build confidence and competence in inclusive pedagogy and adaptive support.

7. Responsibilities

Students and Apprentices

- Treat others with respect and use respectful language.
- Contribute to a safe and inclusive environment.
- Report discrimination, bullying or exclusion.
- Participate in relevant inclusion activities and provide feedback through student voice arrangements.
- Follow College policies and the College Charter.

What students and apprentices can expect

- The College will listen to their views, wishes, strengths and aspirations and involve them in decisions.
- Support options will be explained in an accessible way, and barriers will be identified and addressed promptly.
- Agreed reasonable adjustments and support will be implemented and reviewed, while maintaining ambitious expectations.
- Confidential information will be protected and any changes to support will be explained.
- Preparation for adulthood, independence and employment will be supported.
- Accessible routes will be available to raise a concern, make a complaint or seek further advice.
- Support is not dependent on a formal diagnosis or EHCP.

Student voice

- Actively seek and respond to the views of students and apprentices, including those with SEND, disabilities and other identified barriers.
- Gather feedback through accessible surveys, forums, focus groups, course representation and the Student Executive Committee.
- Report themes, proposed actions and progress to senior leaders and governors.
- Inform students and apprentices about changes made in response to their feedback.

Senior Leadership Team (SLT)

- Set the strategic direction for inclusion and model inclusive leadership.
- Ensure compliance with statutory duties and allocate appropriate resources.
- Embed inclusion in quality assurance, curriculum and support services.
- Develop staff capability and respond to student, apprentice and staff voice.
- Monitor impact and improvement and provide governors with regular assurance about progress, risks and outcomes.

Governing Body

- Provide strategic oversight and constructive challenge to ensure inclusion is embedded across the College.
- Approve this policy and monitor compliance with statutory equality and SEND duties.
- Scrutinise the impact of inclusion on participation, retention, progress, achievement and student experience.
- Seek assurance that leaders allocate appropriate resources and act on identified inequalities or barriers.

Head of Student Experience

- Maintain operational accountability for SEND and inclusion and ensure a named operational lead for the Inclusion Team.
- Ensure statutory duties are understood and that referrals and assessments are timely.
- Ensure support is coordinated and reviewed, EHCP provision is delivered and specialist advice is obtained where required.
- Ensure staff receive appropriate guidance and training.
- Provide leaders and governors with accurate assurance about quality, impact, capacity and compliance.
- Publish current names and contact details through College information channels rather than fixing them in this policy.

Operational delivery and impact monitoring

- Manage the Inclusion Team and support services and coordinate College-wide inclusive practice.
- Ensure support plans, reasonable adjustments, EHCP provision and interventions are implemented consistently.
- Coordinate curriculum teams, support services and external partners.
- Develop staff confidence and monitor participation, retention, progress, achievement and student experience.
- Act on identified gaps and report assurance, risks and improvement actions to senior leaders and governors.

Responsibilities of Support and Business Services Staff, including the Inclusion Team, Student Support, Student Engagement Mentors, Admissions, Administration and other non-curriculum services

- Model inclusive behaviours and championing diversity, equity, and belonging at all levels.
- Provide accessible and respectful services, identify emerging barriers or support needs at the earliest opportunity, respond within the limits of the role, record relevant information on approved systems, and refer promptly to the Inclusion Team, safeguarding, pastoral, welfare or other appropriate service.

- Coordinate and follow up on referrals with parents/carers, Careers, Information, Advice and Guidance (CIAG), and external professionals (such as the virtual school and social services) to support students at risk of disengagement.
- Implement agreed support strategies, reasonable adjustments and interventions within the responsibilities of the role; communicate relevant information on a need-to-know basis; monitor the student's or apprentice's response; and alert the responsible team promptly where support is ineffective or needs change.

Responsibilities of Teaching and Curriculum Staff

- Model inclusive behaviours and championing diversity, equity, and belonging at all levels.
- Embed inclusive practices in day-to-day teaching, learning, and assessment to ensure all students can access and participate fully in the curriculum.
- Identify emerging barriers to learning, participation, attendance, progress or wellbeing at the earliest opportunity; discuss concerns sensitively with the student or apprentice; record relevant evidence; and make a prompt referral to the Inclusion Team or other appropriate service in accordance with College procedures.
- Implement agreed support strategies, reasonable adjustments and interventions consistently; review their impact on access, participation, progress and independence; record actions on approved College systems; and promptly raise concerns where support is not effective or needs have changed.
- Liaise with non-curriculum staff, parents/carers, and external agencies as needed to address barriers to learning and promote student retention.
- Plan and deliver ambitious, accessible teaching, learning and assessment by using inclusive and adaptive approaches, anticipating common barriers, applying agreed reasonable adjustments and support strategies, using accessible resources, and maintaining high expectations for every student and apprentice.

8. Procedures (see also Appendix B and D)

- The College identifies needs early, involves the student or apprentice, agrees and records support and reasonable adjustments, implements provision promptly, and reviews its effectiveness. Disabled students and apprentices are protected by the anticipatory reasonable-adjustment duty. Students and apprentices who have, or may have, SEND but do not have an EHCP are supported through an assess, plan, do and review cycle. EHCP consultation, delivery, review and escalation follow the procedure in Appendix D.
- Referrals are acknowledged promptly and triaged according to urgency. Immediate access, safety or participation needs are addressed without waiting for a full assessment. The College communicates the next steps, responsible team and expected timescale to the student or apprentice and reviews any interim arrangements until the assessment is complete.
- Where requested support or an adjustment cannot be provided, the College records the reasons, considers effective alternatives with the student or apprentice, explains the decision in an accessible way and identifies the review or escalation route. A decision must not be based solely on cost, diagnosis, staffing availability or a standard practice.
- Support and reasonable adjustments are considered for temporary, emerging, hidden or fluctuating needs as well as confirmed long-term needs. Students and apprentices may

request a review whenever their circumstances, health, placement, course demands or barriers change.

- Where an inclusion, SEND or support concern indicates possible abuse, neglect, exploitation, discrimination-related harm or immediate risk, staff must follow the College's safeguarding procedure without delay. Inclusion, assessment or support-planning processes must not delay a safeguarding referral or emergency action.
- Where a student or apprentice requires medical support, medication administration or personal care, arrangements are set out in an individual care plan or risk assessment developed with the person and relevant professionals. The plan identifies authorised and competent staff, consent and information-sharing arrangements, emergency action, dignity, privacy, risk management and review requirements. These arrangements operate alongside the College's safeguarding, medication and personal-care procedures.

9. Training and Awareness

- Mandatory Inclusion/EDI training and unconscious bias training for all staff.
- Student induction includes inclusion awareness.
- Regular refresher training for all staff to ensure up-to-date understanding of inclusion, equality, and safeguarding responsibilities.
- Specialist and role-specific training is provided for staff who support students with SEND, medical needs, personal care requirements, sensory or physical needs, mental health needs, or a risk of exclusion. Staff are given the guidance, resources and supervision needed for their responsibilities. Medication is administered only by authorised staff who have completed the required training and competency arrangements, including training for emergency medication such as buccal midazolam where this forms part of an individual's agreed healthcare plan.
- Workshops and training on topics such as cultural competence, anti-bullying, restorative practice, and trauma-informed approaches.
- Awareness campaigns and themed events (e.g., Diversity Week, Disability Awareness Month) to promote inclusion across the college community.
- Training for governors and volunteers to ensure everyone involved in college life understands their role in promoting inclusion.
- Accessible resources and guidance (e.g., toolkits, online modules, quick reference guides) to support staff in applying inclusive practices.
- Opportunities for staff and students to share lived experiences and best practice through forums, focus groups, and surveys.

10. Monitoring and Review

- The College monitors and quality-assures inclusion through data analysis, audits, learning walks, observations, record and support-plan sampling, EHCP provision checks, student and apprentice feedback, complaints themes, partner and workplace checks, and review of staff training and confidence. Leaders evaluate the impact on attendance, suspensions, retention, progress, achievement, destinations and student experience, assign improvement actions and timescales, and report significant findings and risks to governors.

11. Confidentiality/Record keeping

- The College records only information that is relevant and necessary to identify needs, make and review adjustments, deliver support, meet statutory duties and safeguard individuals. Information is accurate, kept securely, retained and disposed of in accordance with the College's retention schedule, and shared only with authorised people who need it for a lawful purpose. Students and apprentices are told how their information will be used and their information rights. Where consent is not the lawful basis for processing, staff do not imply that consent is required. Safeguarding or legal duties may require information to be shared without consent. Suspected data breaches are reported immediately through the College's data-protection procedure.

12. Communication

- The policy is published in accessible formats on the College website and intranet. Its principles and expectations are communicated through staff and student induction, handbooks, curriculum and support processes, staff development, internal communications and student and staff forums.

13. Review and Amendment History

October 2025	• Policy rewritten in line with inclusion framework
August 2026	• Combined the Equality, Diversity and Inclusion Policy with the SEND Policy and Procedures into one Inclusion Policy. • Updated the statutory framework, SEND definition, Ofsted assurance summary and anticipatory reasonable-adjustment duty. • Clarified governance, senior leadership, operational leadership, curriculum, support-staff, student and apprentice responsibilities. • Added clear expectations for students and apprentices, participation in decision-making, complaints, mediation and appeal signposting. • Strengthened early identification, referral, assess-plan-do-review arrangements, EHC needs-assessment requests, admissions and non-discrimination requirements. • Clarified EHCP consultation, provision, review, escalation, external-provider and placement responsibilities. • Strengthened confidentiality, record keeping, monitoring, quality assurance and reporting arrangements. • Separated changeable operational forms, contacts, systems, funding arrangements and timescales into controlled supporting guidance. • Streamlined the policy and appendices to remove duplication, including the protected-characteristics reference, inclusive curriculum checklist, essential definitions and ALS/EHCP procedure.

14. Approval

Susan Churches	Author	Head of Student Experience
Samantha Rooney	Reviewer	Assistant Principal
SLT	Approval	Chief Operating Officer and Deputy CEO
Governors	Final Sign off	Governing Body (C&Q)

Appendix A: Protected characteristics

The Equality Act 2010 protects people from discrimination because of the characteristics below. The College applies these protections across admissions, learning, assessment, support, employment and participation in College life.

Protected characteristic	What it covers	Inclusive practice in College
Age	A person's age or age group.	Decisions are fair, evidence-based and free from unjustified age-related assumptions.
Disability	A physical or mental impairment with a substantial and long-term adverse effect on normal day-to-day activities.	The College anticipates barriers and makes reasonable adjustments, including auxiliary aids and accessible arrangements.
Gender reassignment	A person proposing to start, starting or completing a process to reassign their sex.	People are treated with dignity, privacy and respect and are protected from discrimination, harassment and victimisation.
Marriage and civil partnership	Being married or in a civil partnership.	Staff employment decisions and treatment are not influenced by marital or civil-partnership status.
Pregnancy and maternity	Pregnancy, maternity and related absence or circumstances.	Reasonable, safe and supportive arrangements are made so that study, work and participation can continue wherever possible.
Race	Colour, nationality, and ethnic or national origins.	Racism and racial harassment are challenged, and curriculum, services and decision-making promote equitable participation and outcomes.
Religion or belief	Religious and philosophical beliefs, including having no religion or belief.	Beliefs are respected and reasonable arrangements are considered, while maintaining safety, learning requirements and the rights of others.
Sex	Being a woman or a man.	Sex discrimination, harassment and unequal treatment are addressed, and participation and outcomes are monitored.
Sexual orientation	Sexual orientation towards people of the same sex, the opposite sex or either sex.	People are treated with dignity and protected from discrimination, harassment, bullying and victimisation.

Appendix B: Inclusive curriculum checklist

Check	Expected inclusive practice	Evidence or review prompt
1. Know students and barriers	Use transition, assessment, support and student information to identify strengths, aspirations and potential barriers early, without lowering expectations.	What do staff know, how is it shared lawfully, and what action has followed?
2. Ambitious and coherent curriculum	Plan clear, challenging learning that builds knowledge, skills, English and maths where relevant, independence and progression for all students and apprentices.	Does sequencing enable students with different starting points to know more, do more and progress?
3. Inclusive mainstream practice	Anticipate common barriers through clear routines, accessible explanations, modelling, scaffolding, appropriate pace, checks for understanding and flexible participation.	Are inclusive approaches routine rather than added only after difficulty emerges?
4. Reasonable adjustments and support	Implement agreed adjustments, EHCP provision, assistive technology and support strategies consistently, while promoting dignity, choice and independence.	Can student-level records show what was agreed, delivered and reviewed?
5. Assessment for learning	Use assessment to identify misconceptions and emerging needs, adapt teaching promptly and arrange exam access arrangements in line with awarding-body requirements.	How does assessment change teaching, support or intervention?
6. Learner voice and co-production	Explain options accessibly and involve students and apprentices in setting outcomes, choosing strategies and reviewing the effect of support.	Do records reflect the student's views, experience and aspirations?
7. Participation, belonging and safety	Create a respectful learning environment, challenge discrimination and bullying, support attendance and participation, and escalate safeguarding concerns without delay.	Do students feel safe, valued, included and confident to seek help?
8. Preparation for adulthood and employment	Connect learning to progression, careers, employment, independent living, community participation and health, with effective transition planning.	Are destinations and next steps explicit, realistic and ambitious?
9. Partnership and accountability	Coordinate teaching, Inclusion, support, employers, families and external professionals so responsibilities are clear and provision is not fragmented.	Who is accountable, what has been agreed and how are gaps escalated?

Check	Expected inclusive practice	Evidence or review prompt
10. Review impact and improve	Evaluate access, attendance, participation, progress, achievement, independence, destinations and learner experience, including differences between groups.	What difference did provision make, and what will be continued, changed or stopped?
11. Staff capability	Ensure staff understand their inclusive teaching, SEND, safeguarding and reasonable-adjustment responsibilities and receive relevant guidance, training and coaching.	Can staff explain and demonstrate the strategies required for their learners?
12. Reform readiness	Strengthen early, evidence-informed and graduated support, shared accountability and inclusive mainstream practice, while awaiting final SEND reform decisions.	Which improvements are beneficial now, and which require confirmation before becoming policy requirements?

Appendix C: Essential definitions

Term	Essential definition
Inclusion	Removing barriers so that people feel safe, respected, valued and able to participate.
Equality	Preventing unlawful discrimination and ensuring fair access to opportunity.
Equity	Responding proportionately to different barriers, circumstances and needs so that people have a fair opportunity to participate and succeed.
Accessibility	Designing environments, information, communication, systems and services so that people can access and use them as independently as possible.
Protected characteristics	The nine characteristics protected by the Equality Act 2010, as listed in Appendix A.
Discrimination	Unfair or unlawful treatment because of a protected characteristic, including direct or indirect discrimination.
Harassment	Unwanted conduct related to a protected characteristic that violates dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.
Victimisation	Subjecting someone to disadvantage because they raised, supported or were involved in an equality concern or complaint.
Disadvantage	A barrier or circumstance that limits fair access, participation, progress, achievement or progression.
Special educational needs and disabilities (SEND)	A learning difficulty or disability that calls for special educational provision to be made, as defined in this policy and relevant legislation.
Disability	A physical or mental impairment with a substantial and long-term adverse effect on normal day-to-day activities, as defined by the Equality Act 2010.
Special educational provision	Education or training provision that is additional to, or different from, that generally made for others of the same age.
Additional Learning Support (ALS)	Targeted support, resources or specialist input that removes barriers and enables a student or apprentice to participate, progress and achieve.
Education, Health and Care Plan (EHCP)	A statutory plan issued and maintained by a Local Authority that records a young person's needs, outcomes and required education, health and care provision.
Reasonable adjustments	Reasonable steps taken to prevent a disabled person from experiencing substantial disadvantage.
Substantial disadvantage	A disadvantage that is more than minor or trivial when compared with a person who is not disabled.

Term	Essential definition
Auxiliary aid or service	Equipment, technology, communication support or assistance provided to reduce or remove a disability-related barrier.
Assistive technology	Technology or equipment that improves access, communication, learning, independence or participation.
Graduated approach	A continuing cycle of assess, plan, do and review used to understand need, provide support and evaluate its impact.
Adaptive teaching	Responsive teaching that maintains ambitious outcomes while adapting explanations, resources, activities or support to address identified barriers.
Co-production	Working in partnership with the student or apprentice, and others where appropriate, to make decisions and plan, deliver and review support.
Student voice	The views, wishes, experiences and aspirations of students and apprentices, used to inform decisions and improvement.
Preparation for adulthood	Planning for further education, employment, independent living, community participation and health as a young person moves into adulthood.
Public Sector Equality Duty	The duty to have due regard to eliminating unlawful discrimination, advancing equality of opportunity and fostering good relations.
Need-to-know basis	Sharing relevant information only with authorised people who require it for a lawful and specific purpose.

Appendix D:- Reasonable Adjustments and Additional Learning Support Procedure

Reasonable adjustments may address teaching, learning, assessment, communication, the physical or digital environment, participation and support services. Decisions are individual, evidence-informed, effective and proportionate, and are agreed and reviewed with the student or apprentice. The procedure table below sets out the referral, assessment, planning, implementation, review and escalation stages. Further information can be obtained from the <InclusionTeam@iwcollege.ac.uk>

Stage	Lead	Required action	Record or outcome
1. Identify or refer	Student, parent or carer, admissions, tutor, assessor or support staff	Share the identified barrier or support need, the student's or apprentice's views, relevant evidence, immediate access requirements and details of strategies already tried with the Inclusion Team through the approved referral route.	Referral acknowledged; immediate access needs considered.
2. Assess and involve	Inclusion Team with the student and relevant staff	Review available information, complete proportionate assessment and discuss the student's views, strengths and intended outcomes.	Support recommendations and any further evidence required.
3. Plan and agree	Inclusion Team, curriculum or apprenticeship team and student	Agree reasonable adjustments, support, responsibilities, communication and review arrangements.	Support plan or action plan recorded on approved systems.
4. Implement	Teaching, assessing and support staff	Put strategies and provision in place promptly, including assistive technology or specialist input where agreed.	Relevant staff informed on a need-to-know basis; delivery recorded.
5. Monitor and review	Curriculum or apprenticeship team with Inclusion Team	Review progress against the agreed outcomes, including access, attendance, participation, progress, achievement, independence and the student's or apprentice's experience of support. Record what will continue, change or stop and the reasons. For students with an EHCP, contribute evidence to the statutory review at least every 12 months.	Support continued, amended or reduced; EHCP review evidence submitted.
6. Escalate or transition	Curriculum leadership, Inclusion Team, Student Hub or careers and LA as appropriate	Escalate significant change, risk to retention or progression, unmet provision or transition concerns. Request an early EHCP review where necessary.	Revised support, multi-agency action or transition plan.