

SEND Policy

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SPECIAL EDUCATIONAL NEEDS AND DISABILITIES (SEND) POLICY

DEC 2025 Review Date: DEC 2026

Contents

Special Educational Needs and Disabilities (SEND) Policy

This document outlines the core principles and strategies employed by Nudge Education to support young people who have special educational needs and/or disabilities (SEND) during their time with us.

1. Introduction

Nudge Education offers a unique blend of personal and educational pathways designed to re-engage young people in learning and life. As a non-school provider of alternative provision, our role is to deliver interim, transition-focused interventions that respond to each young person's individual needs and circumstances.

Many of the young people we support have special educational needs and/or disabilities (SEND), which can create barriers to engagement and progress. We work in partnership with commissioners, schools, families, and multi-agency professionals to understand these needs, adapt our approaches, and ensure that every intervention promotes inclusion, belonging, and growth.

While we may draw inspiration from elements of academic frameworks such as the National Curriculum, we tailor all learning to the individual. Our ultimate goal is to end chronic disengagement and help every young person rediscover a sense of purpose and possibility, a life worth living.

2. Legislative and Guidance Framework

This policy is underpinned by current legislation and statutory guidance relevant to children and young people with special educational needs and disabilities (SEND). Nudge Education is a non-school alternative provision (AP) delivering interim, transition-focused interventions commissioned by LAs, schools and other partners. While Nudge does not meet the criteria to be a school or college, we follow and align with the following frameworks (where relevant), to ensure high-quality, person-centred provision:

- Children and Families Act 2014 (Part 3)
- SEND Code of Practice: 0–25 years (updated September 2024)
- Equality Act 2010
- Working Together to Safeguard Children (December 2023)
- Keeping Children Safe in Education (September 2026) – adopted as best practice
- School Attendance (Pupil Registration) (England) Regulations 2024
- DfE Voluntary Standards for Non-School Alternative Provision (2025)

3. Aims and Objectives

Our aim is to ensure that every young person we support experiences interventions that are inclusive, safe, and achieve a successful transition. To achieve this, we will:

- Champion equality for young people with SEND.
- Adhere to and be informed by relevant legislation, where applicable.
- Work collaboratively with commissioning SEND Leads to maintain coherent and aligned plans.
- Grant every young person access to our broad and holistic programmes.
- Promptly identify, assess, and cater to the needs of those with SEND and continuously review our approach.
- Deliver interventions that are personalised and transition-focused, and are aligned to the young person's Education, Health and Care Plan (EHCP) outcomes where applicable.
- Empower young people with SEND to realise their potential.
- Collaborate closely with parents/carers, encouraging their active participation in their young person's journey.
- Implement and evidence reasonable adjustments.

- Consider and integrate the perspectives of the young person in all decisions.

4. Equality, Diversity and Inclusion

We uphold the principles of equality and inclusion by meeting both our anticipatory and individual duties to make reasonable adjustments under the Equality Act 2010. Adjustments are discussed and agreed before our support commences during the Initial Assessment phase and are included in the young person's Pen Portrait and risk assessments. Practitioners have additional bespoke training to meet the needs of each individual young person they work with, so they can respond with care and expertise. For example, in trauma informed practice, Fetal Alcohol Spectrum Disorder (FASD), Pathological Demand Avoidance (PDA), Attention Deficit Hyperactivity Disorder (ADHD), and the administration of medication.

We acknowledge that every young person:

- Has unique needs and aspirations
- Learns in a way and at a pace that best supports their understanding
- Benefits from diverse teaching methodologies and experiences

Our team addresses these needs by:

- Offering tailored support, especially in communication, language, and literacy
- Using multisensory and experiential approaches
- Facilitating engagement in all learning and activities
- Equipping young people with tools to manage their emotions and responses, ensuring safe and effective participation

Where a young person has an EHCP, we deliver interventions in alignment with the outcomes specified in the plan. We contribute written feedback and progress evidence to reviews and notify the commissioning body if new or emerging needs are identified. Statutory assessment and provision duties remain with the local authority and the named education setting in Section I of the EHCP.

5. Support for Special Educational Needs and/or Disabilities

As a non-school provider, Nudge Education is not required to appoint a statutory Special Educational Needs Co-ordinator (SENCO). However, every intervention is led by a skilled and experienced practitioner workforce, and is overseen by an Education Intervention Coordinator (EIC), and an Assistant Regional Lead (ARL), each bringing extensive experience in supporting young people with SEND.

Overall accountability for SEND within Nudge Education sits with the Service Manager, who holds the National Award for SEN Coordination and has experience in the field. This structure ensures that SEND expertise and oversight are embedded across all levels of our service, with a shared responsibility for embedding consistent, inclusive practice, supported by ongoing training, reflective supervision, and quality assurance processes.

Provision is made for young people with SEND who require additional support. This includes holistic planning to address their individual needs, collaboration with colleagues and external professionals, and ensuring that the right resources and reasonable adjustments are in place to promote full participation and progress.

6. Allocation of Resources

Our leadership team manages resources carefully to ensure optimal support for every young person, whether they require general SEND provision or have an

EHCP. We work collaboratively with commissioning partners to ensure that support is well-coordinated, timely, and responsive to each young person's evolving needs.

7. Assessment

Early identification of needs is essential to providing the right support at the right time. While Nudge Education does not routinely carry out formal assessments or use standardised tools or frameworks, we do work closely with commissioners, schools, and families at the initial referral stage to gather all

available information about a young person's existing needs, levels, and any relevant plans or reports.

Many young people referred to Nudge already have identified or diagnosed SEND requirements. Our role is to understand these needs in depth and ensure our interventions align with them. Through practitioner observation, reflective practice, and regular communication with the wider team around the young person, we are able to notice and respond to emerging challenges or changes in presentation.

Where necessary, we work collaboratively with multi-agency partners including education, health, and social care professionals to share insights, coordinate support, and promote a joined-up approach that places the young person at the centre, helping to maintain an accurate, and up to date picture of need.

Where a change in need is identified, we liaise with the commissioning body to share observations and discuss any adjustments or next steps that may be required. This collaborative approach ensures that every young person's support remains responsive, appropriate, and aligned with their evolving circumstances.

8. Feedback and Concerns

At Nudge Education, we see feedback as a vital part of learning and growth, for us as much as for the young people we support. We actively welcome reflections, suggestions, and concerns from parents, carers, young people, and commissioners. Open and honest communication helps us to stay connected, keep improving, and ensure every young person receives the very best support we can offer.

If a commissioner or parent/carer has a concern, we ask that this is first discussed with the Education Intervention Coordinator (EIC), who will work collaboratively to explore and resolve the issue as early as possible. If the matter cannot be resolved at this stage, it can be escalated to the Regional Lead (RL) or a member of the Leadership Team for further consideration. Throughout this process, we are committed to maintaining a culture of transparency, respect, and partnership in every conversation.

Formal complaints should follow our Complaints Policy (below), which outlines the steps for resolution and response times. Where a concern relates to the

content or delivery of an EHCP, we will signpost families to the local authority's SEND disagreement resolution or mediation service, while continuing proactive communication with both families and commissioning partners to support the best possible outcomes for the young person.

All feedback, whether informal conversations or by formal process, is captured within our Quality Assurance and Service Improvement framework. Every piece of feedback helps us to reflect, learn, and strengthen our practice so that our provision continues to evolve in line with the needs of the young people and families we serve.

9. Associated Policies

We have written this policy in line with our suite of policies as a whole, although particularly relevant to this document are:

- Child Protection & Safeguarding Policy
- Equality, Diversity and Inclusion Policy
- Trauma-informed Practice Policy
- Admissions Policy
- Administration of Medication Policy
- Complaints Policy

All Policies can be found [here](#).

10. Policy Review

This policy will be reviewed annually or sooner if there are substantive changes to legislation, statutory guidance, or the DfE's standards for non-school alternative provision.

This policy has been signed off by the Nudge Education Directorate. Director of Partnerships & Services 5 Dec 2025

11. Glossary of terms

Alternative Education arranged outside of a mainstream or special Provision (AP) school for young people who cannot attend a regular setting. Nudge Education provides non-school, transition-focused AP.

SEND Special Educational Needs and/or Disabilities, when a young person has difficulties with learning or a disability that makes it harder for them to engage in education. These needs can be in the following four areas categorised by the Special Educational Needs and Disability Code of Practice: 0 to 25 years (2015, as updated September 2024) of cognition and learning, communication and interaction, sensory and physical, or social, emotional and mental health.

EHCP A legal document prepared by a local authority describing a (Education, child or young person’s special educational needs, the Health and Care support required, and the outcomes they are working Plan) towards.

Commissioner The local authority, school, or agency that commissions Nudge Education to provide support for a specific young person.

Reasonable Practical steps taken to ensure that young people with SEND Adjustments can fully access and participate in Nudge’s provision.

Multi-agency Professionals from education, health, and social care who Partners work together to support the young person holistically.

NEO Online Addendum

This addendum applies the canonical Nudge Education policy above to the online provision context of Nudge Education Online (NEO). It is sourced from NEO - SEND Policy v04.26.docx.

NEO BY NUDGE EDUCATION

SEND Policy Nudge Education Online

Policy Owner	SENCo, countersigned by Director, NEO & Head of School
Approved	April 2026
Review Date	April 2027
Version	04.26

Policy Owner	SENCo, countersigned by Director, NEO & Head of School
Operating Company	Nudge Education Ltd (Company Number 10192753)
Proprietor	Proprietor, Nudge Education Ltd
Accreditation Route	Online Education Accreditation Scheme (OEAS) — accreditation in progress

This policy applies to all learners, staff, practitioners, contractors, volunteers and visitors of Nudge Education Online (NEO). NEO is a fully online alternative provision for learners aged 11–18, operated by Nudge Education Ltd. NEO is not a DfE-registered independent school and is not subject to Independent Schools Inspectorate (ISI) inspection. NEO is pursuing OEAS accreditation only.

1. Policy Statement and Purpose

Nudge Education Online (NEO) is a trauma-informed, neurodivergent-affirming online alternative provision for learners aged 11–18 (Key Stage 3, 4, and 5). NEO is committed to inclusion and to ensuring that learners with Special Educational Needs and Disabilities (SEND) are supported to access education, make progress, and thrive in a learning environment that celebrates difference. Many learners join NEO after experiencing barriers in other settings, including emotionally based school non-attendance (EBSNA). Some arrive with established SEND profiles; others have unidentified needs that emerge over time. This policy outlines how NEO identifies, assesses, and meets SEND within its fully online provision, grounded in the six Cornerstones: Connection, Movement, Creativity, Reflection, Rest, and Nutrition. NEO's approach is strengths-based, not deficit-based. NEO asks not "what is wrong with this learner?" but "what does this learner need to feel safe, connected, and ready to learn?" NEO is not a DfE-registered independent school and is not subject to ISI inspection. NEO pursues OEAS accreditation only; this does not reduce NEO's obligations under the Equality Act 2010 or the SEND Code of Practice: 0 to 25 years (2015, as updated September 2024).

2. Legal Framework

Children and Families Act 2014 SEND Code of Practice: 0 to 25 years (2015, as updated September 2024) Equality Act 2010 Keeping Children Safe in Education 2026 (KCSIE) Mental Health and Wellbeing in Schools guidance (DfE) UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018 ICO Children's Code (Age Appropriate Design Code) OEAS accreditation criteria (inclusion and curriculum strands)

3. Scope

This policy applies to all learners enrolled at NEO, whether or not they have an Education, Health and Care Plan (EHCP). It covers all staff, practitioners, qualified subject-specialist teachers, contractors, and volunteers delivering or supporting NEO provision. It applies across all live lessons, asynchronous learning, pastoral support, and any off-site enrichment activities.

4. Definition of SEND

A learner has SEND if they have a learning difficulty or disability that requires educational provision that is different from or additional to that normally available to learners of the same age. NEO recognises the four broad areas of need as set out in the SEND Code of Practice: Communication and interaction — including speech, language, and communication needs, and autism spectrum conditions. Cognition and learning — including specific learning difficulties such as dyslexia and dyscalculia, as well as moderate and severe learning difficulties. Social, emotional, and mental health (SEMH) — including anxiety, depression, self-harm, attachment difficulties, ADHD, and EBSNA-related disengagement. Sensory and/or physical needs — including visual impairment, hearing impairment, and physical disabilities that affect access to learning. Many learners have needs that span more than one area. NEO takes a holistic view of each learner, recognising that SEND, trauma, and neurodivergence often intersect.

5. Roles and Responsibilities

Role	Responsibility
Proprietor	Named accountable person under OEAS; provides strategic oversight of SEND provision; ensures adequate resourcing; receives annual SENCo report.
Director, NEO & Head of School	Operational ownership of SEND implementation; co-signs this policy with the SENCo; ensures integration with safeguarding and curriculum.
SENCo	Strategic and operational leadership of SEND provision across NEO. Coordinates identification, assessment, and review of SEND; develops and maintains individualised support plans; advises and supports staff on differentiation, reasonable adjustments, and inclusive practice; liaises with local authorities on EHCP processes, annual reviews, and commissioning arrangements; maintains accurate SEND records in compliance with UK GDPR; reports to the Proprietor at least annually.
Designated Safeguarding Lead (DSL)	Ensures SEND provision aligns with safeguarding priorities; collaborates with SENCo on learners who are both SEND-identified and safeguarding-active.
Qualified subject-specialist teachers	Deliver high-quality, differentiated teaching as the first step in meeting SEND; follow guidance and support plans provided by the SENCo; identify and report emerging needs through observation and professional judgement; adapt online resources, lesson delivery, and assessment to meet individual needs.
Named practitioners	Single point of contact for learner and family; notice emerging need through pastoral conversation;

Role	Responsibility
(mentors)	coordinate with the SENCo; maintain continuity across a learner's SEND journey. Practitioners do not deliver live lessons.
Parents and carers	Valued as co-educators and partners in planning and reviewing support; encouraged to share relevant information about their child's needs, strengths, and preferences; participate in reviews and, where applicable, annual EHCP reviews.
Local authorities	Commission places for learners with EHCPs; collaborate with NEO on annual reviews, provision mapping, and transitions.

6. Identification and Assessment

NEO uses a range of methods to identify SEND: Information from previous schools, local authorities, and external professionals. Parent, carer, or learner disclosure during the admissions and induction process. Staff observation during live lessons, including engagement, communication, and emotional regulation. Baseline assessments conducted during the first half-term of enrolment. Ongoing formative and summative assessment. External professional reports, including from educational psychologists, speech and language therapists, and occupational therapists. Pastoral observation by the named practitioner. Where staff have concerns about a learner's progress or wellbeing, they raise these with the SENCo promptly. The SENCo will gather evidence, consult with the learner and family, and determine whether additional support or assessment is needed.

7. The Graduated Approach: Assess, Plan, Do, Review

NEO follows the graduated approach to SEND as set out in the SEND Code of Practice. This is a four-stage cycle that ensures provision is responsive,

evidence-based, and regularly reviewed:

Stage	What Happens	Led By
Assess	The SENCo gathers information about the learner's strengths, needs, and barriers. This includes input from the learner, family, staff, and external professionals where available.	SENCo with input from all parties.
Plan	An individualised support plan is co-produced, setting out desired outcomes, strategies, reasonable adjustments, and review dates. EHCP outcomes are incorporated where applicable.	SENCo with learner, family, and staff.
Do	Teachers and the named practitioner implement the agreed strategies and adjustments in their day-to-day practice. The SENCo provides ongoing advice and monitors fidelity of implementation.	Teachers and practitioners, supported by SENCo.
Review	Progress towards outcomes is reviewed at least termly. The plan is updated based on what is working and what needs to change. Learner and family voice is central.	SENCo with learner and family.

Where progress remains a concern despite sustained, high-quality support, the SENCo seeks additional advice from external professionals or requests a statutory assessment from the local authority.

8. Provision and Reasonable Adjustments

High-quality, differentiated teaching is the foundation of SEND provision at NEO. In addition, learners with SEND may receive: Individualised support plans with clearly defined outcomes and strategies. Flexible timetabling, including adjusted start times, reduced session lengths, or additional breaks. Adjusted screen use and rest periods to manage sensory and physical needs. Accessible digital tools, including text-to-speech, speech-to-text, screen readers, magnification, and visual supports. Specialist teaching or one-to-one sessions where identified as necessary. Modified assessment arrangements, including additional time, alternative formats, or oral assessment. Scaffolded resources with clear visual structure, simplified language, and multimodal presentation. Enhanced practitioner contact for learners experiencing EBSNA, with gradual re-engagement plans co-produced with the family. Learners with EHCPs have their provision reviewed annually in line with statutory requirements. The SENCo coordinates annual reviews and ensures that all parties contribute to the process.

9. SEND in an Online Learning Environment

As a fully online provision, NEO recognises that the digital environment presents both opportunities and challenges for learners with SEND.

9.1 Opportunities

Reduced sensory overwhelm compared to busy, noisy classroom environments. Flexible pacing that allows learners to work at their own speed. Ability to access recorded lessons for revision and reinforcement. Reduced social anxiety for learners who find peer interactions challenging in person. Easy integration of assistive technology and digital accessibility tools.

9.2 Challenges

Screen fatigue and difficulty sustaining attention over extended periods. Reduced opportunity for staff to observe non-verbal cues and body language. Risk of isolation or disengagement for learners who find online interaction difficult. Dependence on reliable internet and appropriate devices. Potential barriers for learners with visual or hearing impairments if platforms are not fully accessible. Staff are trained to recognise and mitigate these challenges through

differentiated lesson design, regular check-ins with the named practitioner, and close communication with families about the learner's experience at home.

10. Inclusion and Access

The NEO curriculum is accessible and flexible, tailored to learner strengths and interests. Learners with SEND are fully included in all aspects of NEO life, including live lessons, group learning, and enrichment activities. Barriers to participation are actively identified and addressed. NEO's approach to inclusion is informed by the social model of disability, recognising that barriers are created by environments, not by learners. NEO does not discriminate against learners on the basis of their SEND and makes reasonable adjustments in line with the Equality Act 2010.

11. Partnership with Families

Parents and carers are valued as co-educators and are central to the planning and review of SEND provision. Regular communication is maintained through the named practitioner, review meetings, Google Classroom updates, email, and wellbeing calls. Parent and carer voice is gathered through surveys, review meetings, and informal feedback. Families are signposted to external support services, parent forums, and information resources where helpful.

12. Partnership with External Agencies

NEO works collaboratively with local authorities, health professionals, educational psychologists, and social care. External specialists may be consulted to assess, advise on, and support learners with complex or persistent needs. Where NEO cannot meet a learner's needs within its provision, the SENCo works with the family and local authority to identify appropriate alternative provision. Information is shared lawfully and proportionately in line with UK GDPR, the ICO Children's Code, and the NEO Data Protection, Confidentiality and Privacy Policy.

13. Transitions

NEO recognises that transitions can be particularly challenging for learners with SEND. The SENCo coordinates transition planning for: Learners joining NEO

from another school or provision, ensuring that SEND information is transferred promptly and that support is in place from the first lesson. Learners moving between year groups or key stages within NEO. Learners moving on from NEO, whether to further education, employment, training, or another school. Transition plans are developed collaboratively with the learner, family, and receiving institution. Learners approaching adulthood (post-16 and post-18), with particular attention to preparation for independence, further study, and access to adult services.

14. Staff Training

All staff and practitioners receive training on SEND awareness and inclusive practice as part of their induction. Ongoing professional development includes: Understanding the four broad areas of SEND and how they present in online learning. Neurodivergent-affirming practice and strengths-based approaches. EBSNA awareness and re-engagement strategies. Differentiation and reasonable adjustments for online delivery. Working with individualised support plans and EHCP outcomes. Safeguarding considerations specific to learners with SEND. The SENCo provides additional training and guidance to individual staff as needed.

15. Monitoring and Review

The SENCo monitors learner progress and the quality of SEND provision termly. The Proprietor receives a SEND provision and outcomes report at least annually. This policy is reviewed annually, or sooner if statutory guidance or OEAS criteria change. Learner and family feedback directly inform updates to SEND provision and this policy.

16. Complaints

Concerns about SEND provision should be raised with the SENCo in the first instance. If the concern cannot be resolved informally, it should be escalated through the NEO Complaints Procedure. Parents and carers also have the right to request mediation from their local authority or to appeal to the First-tier Tribunal (SEND) in relation to EHCP decisions.

Related Policies

This policy should be read alongside: NEO Child Protection and Safeguarding Policy
 NEO Behaviour and Regulation Policy
 NEO Teaching and Learning Policy
 NEO Equal Opportunities, Equality and Diversity Policy
 NEO Online Safety and Acceptable Use Policy
 NEO Data Protection, Confidentiality and Privacy Policy
 NEO Complaints Procedure
 NEO Admissions Policy

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