



THE
PORTSMOUTH
GRAMMAR
SCHOOL

The PGS Additional Educational Needs and Learning Difficulties Policy

Contents

1.	Aims	3
2.	Scope and application	3
3.	Regulatory framework	3
4.	Publication and availability	5
5.	Definitions	5
6.	Responsibility statement and allocation of tasks	7
7.	Procedures	8
8.	Education health and care plans (EHC plan)	13
9.	Additional welfare needs	13
10.	Alternative arrangements	14
11.	Training	15
12.	Risk assessment	15
13.	Record keeping	15
	Appendix 1: Inclusive provision and additional charges	17
	Appendix 2: Allocation of Tasks and Version Control	18

The PGS Additional Educational Needs and Learning Difficulties Policy

1. Aims

- 1.1. The Portsmouth Grammar School (**School**) values all pupils equally and aims to provide a supportive environment for all pupils in accordance with the terms of this and related policies such as the Equal Opportunities Policy and other policies which reference the School's Diversity and Inclusion provision and practice.
- 1.2. This is the policy on special educational needs and learning difficulties of the School. These are collectively known within the School as 'Additional Educational Needs' (frequently internally abbreviated to **AEN**).
- 1.3. In this policy below:
 - 1.3.1 the term 'additional educational needs' will stand in place of references in external documentation to 'special educational needs'; and
 - 1.3.2 references will be made to 'learning difficulties' even though this term is often replaced in the School's day to day terminology by general reference to additional educational needs.
- 1.4. The aims of this policy are as follows:
 - 1.4.1 to promote good practice in the detection and management of additional educational needs;
 - 1.4.2 to explain the support the School can provide for children who have learning difficulties and the co-operation needed from parents;
 - 1.4.3 to actively promote the well-being of pupils;
 - 1.4.4 to create a culture of safety, equality, equity (where possible) and protection.

2. Scope and application

- 2.1. This policy applies to the whole School including the Early Years Foundation Stage (**EYFS**).

3. Regulatory framework

- 3.1. This policy has been prepared to meet the School's responsibilities under:

- 3.1.1 Education (Independent School Standards) Regulations 2014;
- 3.1.2 Statutory framework for the Early Years Foundation Stage (DfE, November 2025);
- 3.1.3 Education and Skills Act 2008;
- 3.1.4 Children Act 1989;
- 3.1.5 Childcare Act 2006;
- 3.1.6 Data Protection Act 2018 and UK General Data Protection Regulation (**UK GDPR**);
- 3.1.7 Equality Act 2010;
- 3.1.8 Children and Families Act 2014; and
- 3.1.9 Joint Council for Qualifications Access Arrangements and Reasonable Adjustments for Candidates with Disabilities and Learning Difficulties September 2025 to August 2026
- 3.1.10 **Keeping Children Safe in Education (KCSIE) (2024)** or the most recent version thereof

3.2. This policy has regard to the following guidance and advice:

- 3.2.1 **Special educational needs and disability code of practice: 0 to 25 years (DfE and Department for Health, January 2015, Updated April 2020) (Code of Practice)¹.**

3.3. The following School policies, procedures and resource materials are relevant to this policy:

- 3.3.1 The PGS Equal Opportunities Policy and The PGS Equal Opportunities and Dignity at Work Policy for Staff;
- 3.3.2 The PGS Disability Policy;
- 3.3.3 The PGS Safeguarding and Child Protection Policy and Procedure;
- 3.3.4 The PGS Risk Assessment Policy;

¹ <https://www.gov.uk/government/publications/send-code-of-practice-0-to-25>

- 3.3.5 The PGS Anti-Bullying Policy;
- 3.3.6 The PGS Behaviour Management Policy;
- 3.3.7 The PGS English as an Additional Language Policy;
- 3.3.8 The PGS Admissions Policy;
- 3.3.9 The PGS Relationships and Sex Education Policy;
- 3.3.10 The PGS Accessibility Plan;
- 3.3.11 The PGS More Able Gifted and Talented Policy;
- 3.3.12 The PGS Access Arrangements FAQ; and
- 3.3.13 The PGS Word Processing Policy for Access Arrangements

4. Publication and availability

- 4.1. This policy is published on the School website.
- 4.2. This policy is available in hard copy on request.
- 4.3. A copy of the policy is available for inspection from the School Office during the School day.
- 4.4. This policy can be made available in large print or other accessible format if required.

5. Definitions

- 5.1. Where the following words or phrases are used in this policy:
 - 5.1.1 References to **working days** mean Monday to Friday, when the School is open during term time. The dates of terms are published on the School's website.
 - 5.1.2 An Individual Education Plan (known at PGS as a Pupil Passport is a reference to programme of targeted support plans for children with AEN to help them to get the most out of their education. A PGS Pupil Passport builds on the curriculum that a

child with learning difficulties or disabilities is following and sets out the strategies being used to meet that child's specific needs. See Section 7.11.

- 5.1.3 References to **provision mapping** are references to provision maps used by the School as an efficient way of showing all the provision that the School makes which is additional to and different from that which is offered through the School's curriculum. The use of provision maps helps the Learning Support Department to maintain an overview of the programmes and interventions used with different groups of pupils and provide a basis for monitoring the levels of intervention.

5.2. Definitions of 'additional educational needs' and 'learning difficulty':

- 5.2.1 Children have additional educational needs if they have a learning difficulty or disability which calls for special educational provision to be made for them.

- 5.2.2 Children have a learning difficulty or disability if they:

- (a) have a significantly greater difficulty in learning than the majority of others of the same age; or
 - (b) have a disability which prevents or hinders the child from making use of educational facilities of a kind generally provided for children of the same age in mainstream schools or mainstream post 16 institutions (please also see the School's Disability Policy for Pupils and the Public);
 - (c) are under five and fall within the definition at (a) or (b) above or are likely to do so do when of compulsory school age if special educational provision is not made for the child.
 - (d) A child must not be regarded as having a learning difficulty solely because the language or form of language in which he or she is or will be taught is different from a language or form of language which is or has been spoken at home. However, children for whom English is an additional language will be provided with appropriate support. Please see the School's English as an Additional Language Policy.
- 5.2.3 A child who finds a particular subject difficult does not necessarily have a 'learning difficulty' in the legal sense of that expression; there will often be disparities in the speed with which children learn, in their skill at solving problems and in aptitude generally.
- 5.2.4 The expression 'learning difficulty' covers a wide variety of conditions and may include those known as dyslexia, dyscalculia, dyspraxia, attention deficit (hyperactivity) disorder, semantic processing difficulty and learning problems which result from social, emotional or mental health difficulties. The expression may also

include those who have problems with their eyesight or hearing or who have an autistic spectrum disorder.

5.2.5 Learning difficulties are not commensurate or comparable with academic ability or achievement. They may affect children who have a high IQ and academic ability as well as those of lower IQ and ability. Each child's learning difficulty is likely to become apparent for the first time at different stages of education; for some children, this will be in the junior age range but for others it might be later in secondary school as educational pressures increase.

5.2.6 Regarding 'disability', see paragraph 9.6 below and the School's Disability Policy for Pupils and the Public.

6. Responsibility statement and allocation of tasks

6.1. The Governing Body has overall responsibility for all matters which are the subject of this policy.

6.2. To ensure the efficient discharge of its responsibilities under this policy, the Governing Body has allocated the tasks according to the table in the Appendix.

6.3. The School's Head of Learning Support has responsibility for:

6.3.1 ensuring liaison with parents and other professionals in respect of a child's additional educational needs;

6.3.2 advising and supporting other staff in the School with regards to appropriate teaching and learning strategies for all pupils with additional educational needs;

6.3.3 ensuring that appropriate Pupil Passports are in place and effectively implemented;

6.3.4 ensuring that appropriate support is put in place for pupils identified with additional educational needs;

6.3.5 ensuring that relevant background information about individual children with special education needs is collected, recorded on the School's Additional Educational Needs Register and made available to staff through the School's Management Information System and updated;

6.3.6 undertaking any other appropriate duties in accordance with the SEND Code of Practice.

7. Procedures

- 7.1. The School's approach to the detection and management of additional educational needs will be guided by the Code of Practice.
- 7.2. As part of the '**Assess-Plan-Do-Review**' Model² and to ensure collaborative working, the School works closely with parents of children who have or may have additional educational needs to assess and review a pupil's needs and support. Parents are kept informed concerning assessment, planning, provision and review of their child's education
- 7.3. From September 2025, small group and one-to-one interventions will incur an additional charge. Core learning support services will continue to be provided as part of the standard school fees, ensuring all pupils have access to foundational support where needed. However, more targeted or intensive interventions will be chargeable. A detailed breakdown of chargeable provision, along with associated costs, is provided in Appendix 1.

7.4. Identification of pupils with a learning difficulty

- 7.4.1 Pupil progress and engagement is monitored and if the outcome of a screening test or any other circumstance(s) give(s) us reason to think that a pupil may have a learning difficulty, the Learning Support Department will report and consult with the pupil's parents as necessary and make recommendations about further assessment and support.
- 7.4.2 Any pupil who is not listed on the Additional Educational Needs Register can be referred to the Head of Learning Support by form teachers/tutors or subject teachers via a formal online referral system. Emerging concerns that do not yet have sufficient evidence to constitute a full referral can also be highlighted to the Head of Learning Support via a similar online referral system, as can specific concerns regarding legibility and speed of handwriting which has its own separate online referral system. Regular reviews of pupil progress, and close liaison between Tutors, Heads of Year, the Assistant Head (Pupil Progress), the Assistant Head (Pastoral) and the Senior Deputy Head are also used to identify pupils in need of support in the Senior School, who must then also be referred via the formal established process. Likewise, in the Junior School, pupil progress is regularly reviewed and discussed in year and subject teams. The Deputy Head (Academic), Pupil Progress Coordinator and Deputy Head (Pastoral) use assessment data to identify pupils who may be in need of further support.

7.5. Classroom Teaching

²

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/398815/SEND_Code_of_Practice_January_2015.pdf (pp100 onwards)

- 7.5.1 As per the DfE SEND Code of Practice (January 2015)³, the first response to any concerns about the progress or learning of a pupil should be high quality teaching strategies targeted at their areas of weakness. Where progress continues to be less than expected, a referral can be made to the Head of Learning Support (alongside evidence of both concerns and strategies already implemented) via the formal process outlined in 7.3.2. Staff are asked to review their pupils' progress and performance against a list of common potential indicators of potential AEN and, in addition to the formal referral process, there is the opportunity for all staff to record low-level concerns with the Learning Support department that can be used to create 'early warning' of emerging issues.
- 7.5.2 Members of the Learning Support department, the Senior School Assistant Head (Pupil Progress) and Deputy Head (Teaching and Learning), and Junior School Deputy Head Academic and Teaching & Learning Coordinator, are available to advise teachers on particular strategies to implement when they do have concerns. SEND-focused professional development is a recurring annual part of the school's internal training programme.

7.6. Formal assessment

- 7.6.1 If there are indications that a pupil may have a learning difficulty, the pupil's parents will be advised to arrange for the pupil to be formally assessed by an educational psychologist or appropriate professional where appropriate.
- 7.6.2 The parents must consult an educational psychologist recommended by the School with whom the School has a working relationship. Contact details are available from the Learning Support department. A privately commissioned report, or an assessment from an external professional, who is not recommended by the school, cannot be used to award access arrangements.
- 7.6.3 The carrying out of formal assessments falls under the chargeable aspect of the Learning Support Department's provision. SENCos and assessors working within the School, will always carefully consider the picture of need relating to a child. This includes information gathered at School from the child, teachers and the tutor, as well as external information from the child's family and other professionals.
- 7.6.4 The School will endeavour to follow any recommendations from that assessment whilst ensuring compliance with the JCQ Access Arrangements and Reasonable Adjustments 24/25 (or the latest version thereof). Extra support may incur additional fees.

7.7. Learning support

- 7.7.1 As part of a graduated approach, pupils who are identified as struggling with aspects of their learning will be classified using a waves system and assigned to a wave between Wave 1 and Wave 3. All pupils start at Wave 1 upon initial referral.
- 7.7.2 If there are indications that a pupil may have a learning difficulty but the circumstances are not such as to indicate an immediate formal assessment or a course of additional specialist teaching is required, the School may suggest that the pupil attends a small learning support group for a fixed number of sessions which will concentrate on developing skills targeted to their need. This is known as Wave 2 support and will incur an additional charge.
- 7.7.3 The pupil's progress and needs will be monitored and, if necessary, the School will recommend a formal assessment if the learning support does not appear to be meeting the pupil's needs or where it is required for the purposes of applying for exam access arrangements (see 7.9 below)

7.8. External teaching

- 7.8.1 Parents may opt for additional specialist teaching outside the School, provided that the Senior Deputy Head or Head of Junior School is satisfied with the child's safety and travel arrangements and also that the additional specialist teaching is at times which fit in with the remainder of the curriculum, timetable and community life of the School.

7.9. Examinations

- 7.9.1 Pupils who have been diagnosed as having a learning difficulty may be eligible for extra time and / or other "access arrangements" to complete internal examinations and public examinations.
- 7.9.2 In line with the School's commitments under JCQ regulations, and noting the evidence gathering mandated by the same, communications and liaison between the School (usually via the Head of Learning Support) and the parents must occur in good time and well in advance of the end of GCSE and A Level courses. This would typically be in advance of the reviews carried out following internal summer examinations in Year 10 for (I)GCSE examinations at the end of Year 11, and internal summer examinations in Year 12 for A Level examinations at the end of Year 13.
- 7.9.3 The full guidance regarding the awarding of access arrangements can be found in The PGS Access Arrangements FAQ and The PGS Word Processing Policy for Access Arrangements. Both of these documents are available to view on the school website.

- 7.9.4 The external policy governing the awarding of access arrangements is the JCQ Access Arrangements and Reasonable Adjustments document covering September 2024 to August 2025.⁴

7.10. Information sharing and parent involvement

- 7.10.1 New parents, as part of the admissions process, are asked to declare any additional educational needs and provide copies of any report or recommendations which have been made in relation to these needs. Confidential information of this kind will only be shared within the School on a "need to know" basis. See also the School's Admissions Policy.
- 7.10.2 Internal procedures are put in place to ensure close cooperation and a smooth transition between Year 6 and Year 7 for those pupils transferring from the Junior School to Senior School within PGS.
- 7.10.3 The School will do all that is reasonable to report and consult with parents about their child's learning difficulties and to ensure that teachers are given any necessary information about a child's learning difficulties and that teaching practices are appropriate.
- 7.10.4 Parents should notify the School immediately if their child's progress or behaviour causes concern so that the School can devise and agree a strategy with the parents.
- 7.10.5 A parent who would prefer to have a formal assessment instead of learning support should make arrangements accordingly with the School or outside, as appropriate. In these circumstances parents must ensure that the School and the Head of Learning Support are given copies of all advice and reports received. It should be noted that assessments commissioned without endorsement from the school cannot be used to apply for access arrangements.

7.11. Individual Education Plan ('IEP') / Pupil Profile

- 7.11.1 The Head of Learning Support will ensure that an appropriate IEP (known at PGS as a 'Pupil Passport') is in place where required.
- 7.11.2 The Pupil Passport will be prepared in consultation with the parents and, if appropriate, the pupil and will include:
- (a) the adjustments, interventions and support required to meet the outcomes identified for the pupil; these will always start with strategies for all of a pupil's teachers to implement within their own subject to aid learning. Any further adjustments, interventions and support will proceed from that;

⁴ https://www.jcq.org.uk/wp-content/uploads/2024/08/JCQ-AARA-24-25_FINAL_2024.pdf

- (b) the expected impact on the pupil's progress, development or behaviour, as appropriate;
- (c) strategies the pupil and home can use to support their progress and develop independence;
- (d) clear dates for review, usually termly.

7.11.3 In carrying out the review, members of the Learning Support department will consider:

- (a) the effectiveness of the support and interventions and their impact on the pupil's progress;
- (b) the views of relevant teaching staff, the parents and the pupil; and any changes that are required to the support set out for the pupil.

7.12. Waves of Intervention

- 7.12.1 Pupils that require additional targeted support will be assigned to a Wave. Most pupils will start at Wave 1 with high quality teaching strategies to be deployed by classroom teachers. A nominated learning support teacher with oversight will be listed and their progress closely monitored with their tutor / form teacher.
- 7.12.2 If, with Wave 1 support, pupils are still struggling to make progress they will move to Wave 2 where small group interventions will be offered for a fixed period to address specific difficulties. Wave 2 interventions will incur an additional charge. High quality teaching strategies will remain in place.
- 7.12.3 After evaluating progress, pupils may need additional Wave 3 support. These pupils will be offered one to one support with a learning support specialist teacher, this will incur an additional charge. High quality teaching strategies will remain in place. Following Wave 3 support, if a pupil is still struggling, specialist assessment may be advised. Some pupils, who are not able to make progress across a full curriculum may be offered the opportunity to reduce their curriculum in favour of learning support sessions. This decision is taken in collaboration with parents, AH PP, DH T&L, reviewing external reports and pupil tracking data. Learning support sessions will primarily consist of support across English and Mathematics.
- 7.12.4 Where a pupil has made satisfactory progress with the interventions offered, they will move back to Wave 1 with a review and update of high-quality teaching strategies.

8. Education health and care plans (EHC plan)

- 8.1. Parents and the School have the right under section 36(1) of the Children and Families Act 2014 to ask the local authority to make an assessment with a view to drawing up an EHC plan. The School will always consult with parents before exercising this right. If the local authority refuses to make an assessment, the parents (but not the School) have a right of appeal to the First-tier Tribunal (Special Educational Needs and Disability).
- 8.2. Where a prospective pupil has an EHC plan, the School will consult the parents and, where appropriate, the local authority to ensure that the provision specified in the EHC plan can be delivered by the School. The School will co-operate with the local authority to ensure that relevant reviews of EHC plans are carried out as required.
- 8.3. Any additional services that are needed to meet the requirements of the EHC plan will be charged to the local authority if the authority is responsible for the fees and the School is named in Section I of the EHC plan. In all other circumstances the School will agree the charging arrangements with the parent(s) with regard to the provisions of the Equality Act 2010, where applicable.

9. Additional welfare needs

- 9.1. The School recognises that pupils with additional educational needs or learning difficulties may be at risk of being bullied. The School's Anti-bullying Policy and related policies makes it clear that bullying behaviour of any kind is not acceptable and will be taken very seriously.
- 9.2. The School will tackle any inappropriate attitudes and practices within the community through staff leading by example, through the personal, social, health and economic (PSHE), relationships education / relationships and sex education programmes, through the supportive School culture and through the School's policies. At PGS the core PSHE/RSE curriculum is known as the Pastoral Curriculum (PAC) in the Senior School.
- 9.3. If parents are concerned about their child's welfare they can approach the pupil's form teacher, tutor, Head of Year or Assistant Head (Pastoral) (SS) / Deputy Head (Pastoral) (JS) to discuss their concerns in private at any time.
- 9.4. Additional barriers can exist when detecting the abuse or neglect of pupils with a additional educational need or disability creating additional safeguarding challenges for those involved in safeguarding and promoting the welfare of this group of children. The School is mindful in particular that:
 - 9.4.1 assumptions might be made, without further exploration, that indicators of possible abuse such as behaviour, mood and injury relate to the pupil's additional educational need (which may be or include a disability);

- 9.4.2 pupils with an additional education need (which may be or include a disability) can be disproportionately impacted by bullying without outwardly showing any signs; and
- 9.4.3 there may be communication barriers which are difficult to overcome to identify whether action under this policy is required.
- 9.5. Any safeguarding concerns will be dealt with in accordance with the procedures set out in the School's Safeguarding and Child Protection Policy and Procedure.
- 9.6. **Disability**
 - 9.6.1 The School recognises that some pupils with additional educational needs/ learning difficulties may also have a disability. Pupils and parents are referred to the School's Disability Policy for Pupils and the Public, and the Equal Opportunities Policy.
 - 9.6.2 The School will make all reasonable adjustments in order to afford opportunity to disabled pupils. However if, despite such adjustments, the School is unable to provide adequately for the pupil's needs, the School may decline to offer a place to a pupil or request that parents withdraw their child from the School (see paragraph 10 below).
 - 9.6.3 In line with the School's Behaviour Management Policy and Disability Policy, expectations for pupil behaviour are the same for all pupils at The Portsmouth Grammar School although reasonable adjustments will be made for managing behaviour which is related to a pupil's disability or SEND requirement(s).

10. Alternative arrangements

- 10.1. The School reserves the right, following consultation with parents or guardians, to ask or require them to withdraw their child from the School if:
 - 10.1.1 their child is in need of a formal assessment, additional specialist teaching, learning support or medication to which they do not consent; and / or
 - 10.1.2 they have deliberately withheld from the School information which prevents it from effectively addressing their child's learning difficulties;
 - 10.1.3 their child's learning difficulties require a level of support or medication which, in the professional judgment of the Head, the School is unable to provide, manage or arrange;

10.1.4 their child has significant additional educational needs that make it unlikely he / she will be able to benefit sufficiently from the mainstream education and facilities which the School provides.

10.2. In any of these circumstances the School will do what is reasonable to help to find an alternative placement which will provide the child with the necessary level of teaching and support.

Withdrawal of a pupil in these circumstances will not incur a charge to fees in lieu of notice. The deposit paid in respect of the child will be credited to the parent's account.

11. Training

11.1. The School ensures that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff and volunteers understand what is expected of them by this policy and have the necessary knowledge and skills to carry out their roles.

11.2. The level and frequency of training depends on role of the individual member of staff, including all newly qualified teachers who will have ongoing training and professional observations during their first year.

11.3. The School maintains written records of all staff training.

12. Risk assessment

12.1. Where a concern about a pupil's welfare is identified, the risks to that pupil's welfare will be assessed and appropriate action will be taken to reduce the risks identified (including the risk assessment required in the case of any pupil disability).

12.2. The format of risk assessment may vary and may be included as part of the School's overall response to a welfare issue, including the use of individual pupil welfare plans (such as behaviour, healthcare and education plans, as appropriate). This also includes care plans which aim to draw together pupils' welfare, medical and learning support needs. Regardless of the form used, the School's approach to promoting pupil welfare will be systematic and pupil focused. Such risk assessments are ultimately overseen by the Senior Deputy Head. Please see clause 6.2 for details of the individuals with responsibility for carrying out, monitoring, implementing and reviewing the effectiveness of risk assessments under this policy.

13. Record keeping

- 13.1. All records created in accordance with this policy are managed in accordance with the School's policies that apply to the retention and destruction of records.
- 13.2. The information created in connection with this policy may contain personal data. The School's use of this personal data will be in accordance with data protection law. The School has published privacy notices on its website which explain how the School will use personal data.

Appendix 1

AEND Inclusive provision and additional charges (as at September 2025)

A summary of all available specialist services and costs, not included within school fees, is provided below:

Service	Termly Cost (inc. VAT)
1:1 Support (10 sessions)*	£550
Small Group Support (10 sessions)*	£350
Directed Online Self-Study Program IDL	£120
Handwriting Assessment	£30
Dyslexia Portfolio Screener	£100
Assessment for Access Arrangements	£250
Access Arrangements with Report	£500

* Any additional lessons above the ten per term that are delivered will be charged at an individual rate of £55 per additional lesson for 1:1 support and £35 per additional lesson for small group support.

We remain committed to supporting all pupils and continue to offer a wide range of support options, including drop-in sessions and general in-class assistance, as part of our inclusive provision. Updating of pupil AEN passports and neuro-diversity profiles is also part of the inclusive provision.

Appendix 2

Allocation of Tasks and Version Control

Allocation of Tasks

Task	Allocated to	When / frequency of review
Keeping the policy up to date and compliant with the law and best practice	Deputy Head (Teaching and Learning) / JS Deputy Head (Academic)	As required, and at least termly
Day to day responsibility for carrying out individual pupil risk assessments under the policy	Head of Learning Support	As required, and at least termly
Monitoring the implementation of the policy, relevant risk assessments and any action taken in response and evaluating effectiveness	Deputy Head (Teaching and Learning)/ JS Deputy Head (Academic)	As required, and at least termly
Seeking /receiving input from interested groups (such as pupils, staff, parents) to consider improvements to the School's processes under the policy	Head of Learning Support	As required, and at least annually
Formal annual review	Governing Body (Education Committee)	Annually

Version Control

Date Approved	Updated 27 th June 2025 (Governing Body) 11 th October 2024 (Education Committee)]
Date Reviewed	25 th September 2024 (SMT)
Next Review	Autumn 2025
Policy owner (SMT)	Deputy Head (Teaching and Learning)
Status	ISI document to be made available
Report	Academic and Educational Report

Ph4030725