



# SPECIAL EDUCATIONAL NEEDS AND DISABILITY POLICY

## Value Statement (who we are):

Coombe Hill Infants' School is an inclusive, community school with a strong tradition of mutual respect and tolerance within a nurturing family environment.  
We provide an outstanding education for all children.

## Vision Statement (what we strive for):

Our vision is to develop strong minds, bodies and spirit in preparation for life. We sow the seeds of curiosity, enthusiasm and resilience to ensure all children continue to delight in their lifelong love of learning.

Statutory: Updated Annually/ Approved 3 yearly

Responsibility: The headteacher and the Governing body

Written: Autumn 2020

Reviewed: Autumn 2023

Reviewed by: SLT and Governors

Next approval date: October 2026

Governor Committee: Curriculum & Standards

## "Safeguarding is everyone's responsibility"

Coombe Hill Infants' School complies with the relevant legal duties as set out in the Equality Act 2010 and the Human Rights Act 1998; we promote equality of opportunity and take positive steps to prevent any form of discrimination, either direct or indirect, against those with protected characteristics in all aspects of our work.

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## **Special Educational Needs and Disability Policy**

### **COOMBE HILL INFANTS' SCHOOL**

**Updated October 2023**

This policy complies with the statutory requirement laid out in the SEND code of Practice 0 -25 (Jan 2015) and has been written with reference to the following guidance and documents:

- Articles 7 and 24 of the United Nations Convention on the Rights of Persons with Disabilities
- The Equality Act 2010: advice for schools DfE feb 2013
- Part 3 of the Children and Families Act 2014
- SEN Code of Practice 0 – 25 (June 2014 – Updated Jan 2015)
- The Special Educational Needs and Disability Regulations 2014
- The Special Educational Needs (Personal Budgets and Direct Payments) Regulations, Section 49
- Statutory Guidance on supporting pupils at school with medical conditions – April 2014
- The National Curriculum in England Key Stage 1 framework document – September 2013
- The Order setting out transitional arrangements, Section 137
- Keeping Children Safe in Education, September 2023
- Statutory guidance on supporting pupils at school with medical conditions - April 2014

This policy should also be read in conjunction with the following Coombe Hill Infants' School documents – all of which can be found on our website:

Our School SEND Information Report

Accessibility plan and Disability equality policy

Equality Policy and action plan

Medical Conditions and administrations of medicines Policy

Safeguarding and child protection Policy

Allegations of abuse against staff - Low level concerns policy

Staff code of conduct

Child sexual exploitation policy

Relationships and Behaviour Policy

Positive handling policy

Assessment Policy

Equalities Policy

Complaints Policy

Health and Safety Policy

Teachers Standards  
Intimate care policy

This policy was developed taking into consideration the views of all stakeholders including the children, parents, senior leadership team, school staff, and representatives from the governing body. This will be updated annually to meet the requirements in the Special Educational Needs and Disability Regulations 2015. It will be reviewed by Governors every three years.

## **Section 1**

### **Information**

The Inclusion Manager (SENCO) at Coombe Hill Infants' School is Mrs Jacqueline Heard and can be contacted via the school office Tel: 0208 942 9481 or by emailing directly [jheard1@chi.rbksch.org](mailto:jheard1@chi.rbksch.org)

Coombe Hill Infants' School is a community school. It is currently a three-form entry with 270 pupils on roll. In October 2023 there are currently 270 pupils and 22 children are on the SEND Register (8% of the school roll). Of these, 21 children are on SEN Support (SENK). 1 of these children has a Social Communication (SCIP). The school is heavily oversubscribed, with a mixed catchment area. In October 2023, 33(12%) of our pupils qualified for PPG (Pupil Premium Grant); and 56% of our pupils have English as an Additional Language (EAL).

Coombe Hill Infants' is a fully inclusive school. Our whole school ethos is one of inclusion, and as a school we aim to provide a secure, nurturing environment with a broad and balanced curriculum for all of our children. We recognise, respect and value differences and understand that diversity is a strength. We endeavour to provide appropriate support to enable every child to make progress, fulfil their potential whatever their disability or need and ultimately move towards becoming an independent learner. We believe in early intervention and strive continually to work closely with parents to address each child's needs.

Every teacher is a teacher of every child, including those with SEN.

## **Section 2**

### **Definition of SEN**

The Special Educational Needs Code of Practice (2015) states that a child or young person has SEN if they have a learning difficulty or disability, which calls for special educational provision to be made for them. A child of compulsory school age or a young person has a learning difficulty 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 them from making use of educational facilities of a kind generally provided for others of the same age in mainstream schools or mainstream post-16 institutions.

There are four main categories of need in the SEN Code of Practice, they are:

- Communication and interaction (CI)
- Cognition and Learning (Cog)
- Social, Emotional and Mental Health (SEMH)
- Sensory and/or Physical (SP)

High quality teaching that is differentiated and personalised will meet the individual needs of the majority of children and young people. Some children and young people need educational provision that is additional to or different from this. This is a special educational provision under Section 21 of the Children and Families Act 2014.

Special educational provision is underpinned by high quality teaching.

All children and young people are entitled to an education that enables them to make progress so that they:

- achieve their best
- become confident individuals living fulfilling lives
- Make a successful transition into adulthood, whether into employment, further or higher education or training.

#### ***The aims of this policy are:***

- To reach high levels of achievement for all
- To create an environment where children can contribute to their own learning
- To create an environment where our children feel safe and listened to.
- To ensure that all of our children have access to a broad and balanced curriculum
- To create an environment that meets the special educational needs of each child

- To ensure that the special educational needs of children are identified, assessed and provided for, as early as possible in their school career
- To have a common vision and understanding with all stakeholders
- To identify the roles and responsibilities of all staff in providing for children's special educational needs
- To achieve and maintain a high level of staff expertise to meet our children's needs
- To enable all children to have full access to all elements of the school curriculum.

***The objectives of the policy are:***

- To identify and provide for pupils who have special educational needs and additional needs
- To work within the guidance provide in the SEND Code of Practice, 2015
- To operate a “whole pupil, whole school” approach to the management and provision of support for special educational needs
- To ensure there is a Special Educational Needs Co-ordinator (SENCO/ Inclusion Manager) who will implement the SEND Inclusion Policy
- To provide support and advice for all staff working with special educational needs pupils.

### **Section 3**

#### **Identification**

At Coombe Hill Infants' we identify the needs of our children by considering the needs of the whole child, not just their special educational needs.

The code of practice suggests that pupils are only identified as having SEND if they do not make adequate progress once they have had all the intervention/ adjustments and good quality personalised teaching - Section 6.37 onwards

In order to identify any special educational need and with collaboration and permission from parents, we may need to refer children to gain advice from external agencies and professionals. We will look at the four areas of need;

- Communication and interaction (CI)
- Cognition and Learning (Cog)
- Social, Emotional and Mental Health (SEMH)
- Sensory and/or Physical (SP)

This will help us to identify which intervention or referral is needed. External agencies include Speech and language therapists (SALT), Occupational therapists (OT), Educational psychologists (EP) etc.

The purpose of early identification is to work out what action the school needs to take, not to fit the child into any of the above categories.

As a school we are open to recommendations from our children, their parents and other professionals in order to help our children fulfil their potential.

We have adopted a whole school approach to our SEND policy and practice. All staff are committed to the principles and aims of this policy. Pupils identified as having SEND are fully integrated and every effort is made to ensure that they have full access to the Early Years Foundation Stage Curriculum and National Curriculum. They are included in all aspects of school life, without exception. This SEND policy reinforces the need for teaching that is fully inclusive.

All children are encouraged to participate fully in all activities including extra-curricular activities or trips.

'Reasonable adjustments' may need to be made in order for some children with SEND to access certain activities or trips. This will be achieved in discussion with parents and carers and will be risk assessed, (See Health and Safety Policy).



As part of our requirement to keep the appropriateness of our curriculum and learning environment under review, our school has an Accessibility Plan which is part of our Disability Equality Scheme and is on the School website.

As a school we also consider what is NOT SEN, but may impact on progress and attainment;

- Disability - The code of practice outlines the “reasonable adjustment” need to made - these alone do not constitute SEND
- Attendance and punctuality
- English as an additional language (EAL) - Children must not be regarded as having learning difficulties solely because of their language, or form of home language that is different from that in which they are taught.
- Health and Welfare
- Being in receipt of PPG
- Being a “looked after” child

## **Section 4**

### **A graduated approach to SEN support.**

***‘Special educational provision is underpinned by high quality teaching and is compromised by anything less’ (SEN CoP, 2014)***

Teachers are responsible and accountable for the progress and development of the pupils in their class, including where pupils access support from teaching assistants or specialist staff. High quality teaching, differentiated for individual children, by a teacher is the first step in responding to pupils who have or may have SEN.

We work to ensure that our approach to teaching and learning is of high quality and personalised to meet the individual needs of children. Some children need educational provision that is additional to or different from this. This is ‘special educational provision’.

In meeting the requirements the school employs some additional teaching approaches, as advised by internal and external assessments. More information can be found in the SEND Information Report available to read on the School website. This is updated annually.

Additional staff often deliver this additional teaching under the close direction of the child's class teachers. They are employed through the funding provided to the school. This is known as ‘notional SEN funding’. The class teacher will remain responsible for working with the pupil on a daily basis.

All levels of support consist of a four part process

- Assess
- Plan
- Do
- Review

This is an ongoing cycle to enable the provision to be refined and revised as the understanding of the child’s needs grows. The cycle enables us to identify those interventions which are most effective in supporting the child to achieve good levels of progress and outcomes.

### **Assess**

At Coombe Hill Infants’ School, class teachers, with the support of the senior leadership team, regularly and carefully track the progress of all children on a termly basis. This enables us to review each child’s progress and inform decisions around adapting the curriculum and learning environment for all children, including those at risk of underachieving.

We will review and where necessary, improve, teachers' understanding of strategies to identify and support our children and their knowledge of SEND most frequently encountered.

Children with special educational needs may have more frequent and specific assessments to inform targets and to measure small steps of progress.

If these assessments do not show adequate progress is being made, the support plan and planned outcomes will be reviewed and adjusted.

The Senior Leadership Team, alongside class teachers regularly observe the quality of teaching for all of our children, including children with SEND. All staff have access to training to help identify and support vulnerable pupils

Coombe Hill Infants; will decide to make special educational provision if a child has a significantly greater difficulty in learning than the majority of others of the same age; or they are diagnosed with a disability which prevents or hinders them from making use of educational facilities of a kind generally provided for others of the same age.

We will gather information within the school about the children's progress, alongside national data and expectations of progress, including high quality and accurate formative assessment. This process involves the child, the parent, the SENCO (inclusion Manager), the class teacher and any external agencies.

### **SEND Monitoring list**

There are times when a child may be identified as having additional needs which may impact on progress and attainment but the child is not considered as having a Special Educational Need. These children will be monitored and interventions will be put in place if needed.

The class teachers will take steps to further differentiate the learning to better support the pupil.

### **Plan**

The planning stage will include discussions between the teacher, SENCO and parents to agree to any adjustments, Interventions and support that are required.

For children who are falling outside of the range of 'expected' academic progress, they will be monitored and adjustments will be made by the class teachers. At times

it may be necessary to consult with external agencies to receive more specialised expertise. Parents' permission will be gained, before referrals are made.

The purpose of these more detailed assessments and reviews is to understand what additional resources and different approaches are required to enable our children to make better progress. These will be shared with parents during parent chats, put into a personalised learning plan (PLP's). They are reviewed termly, and refined / revised if necessary.

As the child requires significant additional and extra provision we will have identified that the pupil has a special educational need.

If the pupil makes good progress using this additional and different intervention (but would not be able to maintain this good progress without it) we will continue to identify the pupil as having a special educational need.

If the pupil is able to maintain good progress without the additional and different resources he or she will not be identified with special educational needs.

We will ensure that all teachers and support staff who work with the pupil are aware of the support to be provided and the teaching approaches to be used.

### **Do**

The class teacher remains responsible for working with the child on a day to day basis. They will retain responsibility even where the interventions may involve groups or one to one teaching away from the main class teacher. They will work closely with teaching assistants to plan and assess the impact of support and interventions and ensure links with classroom teaching. The SENCO (inclusion Manager) will support further assessments and coordinate meetings with outside agencies, when and if required.

### **Review**

Regular monitoring and reviews of a child's progress will be made regularly and will focus on the extent to which planned outcomes have been achieved.

The review process will evaluate the impact and quality of the support and interventions. The views of the pupil, parents and class teachers will be taken into account. The assessment information from teachers will show whether expected or less than expected progress is being made.

The class teacher, in conjunction with the SENCO (inclusion Manager), will revise the support outcomes and based upon the pupils progress and development make any necessary amendments going forward.

The SEN Code of Practice (2015) describes adequate progress as:

- Is similar to that of children of the same age who had the same starting point
- Matches or improves on the pupil's previous rate of progress
- That which allows the attainment gap to close between the pupil and children of the same age

For pupils with an Education, Health and Care Plan there will be an Annual Review (and termly meetings), which will enable an evaluation of the effectiveness of the special provision to be made.

Meetings are held with class teachers every term, where a child's personal learning plan (PLP) is shared and discussed. If longer is needed to discuss a child's needs, the SENCO (Inclusion Manager) will arrange another meeting at a different time during the term.

## **Section 5**

### **Managing SEND support**

At Coombe Hill Infants' we strongly believe that our children are at the very heart of our provision. It is vital that we listen to their views, whilst providing them with opportunities to participate in the development of their educational provision. We endeavour to include our children in discussions and decisions about their individual support. Their feelings and preferences will always be taken into account and responded to, when considering their educational provision and planning for future outcomes.

The SENCO (Inclusion Manager) ensures that the SEND register is regularly reviewed on a termly basis and kept up to date. The school uses provision mapping and personalised learning plans (PLPs) to monitor and review outcomes on a termly basis, so as to ensure that progress is being made. The PLPs set an agreed time frame and allocate responsibilities for achieving the outcomes.

PLP's are a collaborative document and any recommendations and suggestions from the child, their parents and other professionals are taken into consideration and added as targets.

The Head teacher and SENCO (Inclusion Manager) hold termly tracking meetings with the Senior Leadership team to review the progress of all children in each year group.

The SEND Governors play a vital role in ensuring that SEND stays on the governing body agenda and provides a link between the governing body, its committees and the staff with regard to Special Educational Needs.

If a pupil needs a sustained high level of support, which cannot be provided from the budget available to the school, the SENCO will apply for an Education, Health and Care Plan to the Local Authority. Pupils and parents will be informed of the process and progress through regular meetings.

A child may be removed at any time from the SEND register and consequent provision, if significant progress has been made and maintained.

At Coombe Hill Infants' School we understand that an important feature of the school is to enable all pupils to develop emotional resilience and social skills, both through direct teaching e.g. PSHE (Jigsaw), Circle Times, during assemblies and indirectly through conversations which adults have with pupils throughout the day.

“Every interaction is an intervention”

Some pupils may require extra support in this area, which is provided by trained Emotional Literacy Support Assistants (ELSA). For those with particular needs in this area we also get support from external agencies. (See School SEND Information Report).

We recognise that vulnerable pupils may be at risk of bullying, of being left out or isolated from peers. We do not tolerate bullying in any form. Please refer to our Relationship and Behaviour Policy where our school procedures are outlined.

## **Section 6**

### **Supporting children and their families**

Establishing meaningful relationships with children and their families is a critical part of our work here at Coombe Hill Infants'. We have an open door policy and communication is key.

Parents know their children best and are their child's main educator. We are working on the same team, collaborating to ensure our children's needs are met.

All parents of pupils at Coombe Hill Infants' School are invited to discuss the progress of their children in the autumn 1 and spring 1 with their class teacher. In the summer term each child has a full report on their progress in all areas. We are also happy to arrange meetings outside of these times.

If your child is receiving additional SEND support and you require a longer discussion time you will be invited to meet with the SENCO, at least three times a year where we will:

- Discuss the effectiveness of the support in place and PLP targets
- Review your child's progress towards the agreed outcomes
- Set new targets for your child to work towards.
- Discuss any concerns you have about the support in place.

Where appropriate your child will be invited to contribute to these meetings so that they are fully involved in agreeing the desired outcomes/targets.

We have a strong Parent/teacher association: CHIPTA. Every parent is a member and we strongly encourage all parents to get involved. Each class has Class Reps who coordinate support in class and also organise events.

We have a thriving diversity group, who meet regularly. This is a supportive and inclusive parent group and ensures that parents are supported and do not feel alone.

The AFC local offer website gives children with special educational needs or disabilities and their families information about what support services the local authority can provide. Here is the link to Kingston's local offer.

[https://kr.afcinfo.org.uk/local\\_offer](https://kr.afcinfo.org.uk/local_offer)

**The Richmond and Kingston SEN and Disability Information, Advice and Support Services (SENDIASS)** provides free, impartial, confidential advice, and



support around educational issues for parents/carers who have children with special educational needs or disabilities (0-25).

SENDIASS aims to ensure that parents and carers are empowered and can play an informed role in planning provision to meet their child's special educational needs.

They can be contacted by calling 0808 164 5527 or by emailing

[info@RKsendiass.co.uk](mailto:info@RKsendiass.co.uk)

**To find out more, please visit their website**

<https://www.rksendiass.co.uk/>

### **Admissions**

Decisions on the admission of pupils with an Education, Health and Care plan are made by the Local Authority.

The admission arrangements for pupils without an Education, Health and Care Plan do not discriminate against or disadvantage disabled children or those with special educational needs and will follow the usual school admissions procedures, in accordance with national legislation including the Equality act 2010.

### **Transfer to Coombe Hill Infants' School.**

Our Early Years Team work closely with the many educational settings used by the pupils before they transfer to us in order to ensure the transition is as seamless as possible and the children settle quickly and build confidence. Teachers arrange home visits and transitional activities before a child's start date.

If a child has been assessed as having SEND, there will be additional liaison opportunities and, where required, outside agencies will be consulted to make sure all needs are covered.

### **Transfer to other schools from CHI**

When a child transfers from CHI to another setting we provide information to the next setting. The majority of children from CHI transfer to Coombe Hill Junior School and we have developed close links with them and have an extensive and very successful transition programme. For children on the SEND Register or with an EHCP there is additional liaison and sharing of resources and expertise for example in Learning and Communication Passports.

## **Section 7**

### **Supporting children at school with medical conditions.**

Coombe Hill Infants' recognises that our children with medical conditions should be properly supported so that they have full access to education, including school trips and physical education. Some children with medical conditions may be disabled and where this is the case, we will comply with our duties under the Equality Act. Please refer to our Accessibility policy and personal evacuation policy for more details.

Specialist equipment will be considered on an individual basis. The SENCO will monitor its use and make sure those resources and facilities are fairly distributed.

Children with medical needs will have an Individual medical health care plan (IHCP). This will be devised in collaboration with the child, their parents and any medical personnel. Children with medical needs may not be on the SEND register, unless their medical needs impact their learning. We will ensure all class teachers are aware of the medical needs of the children in their class. Each class will be given a class overview highlighting each child's medical need. Detailed notes on the medical condition will be located in the office and updated at the start of every year or when new information is given. This will be collated and updated by office staff and the SENCO.

Some of our children may have a medical need and special educational needs and may have an EHCP (Education, health and care plan). In this case, a child's special educational provision and SEND code of practice, will be followed. Please refer to our medical needs policy for more information.

We will always ensure that the plans are developed with the child's best interests in mind and ensure that we assess and manage any risks to each child's education, health and social well being and minimise any disruption.

Individual healthcare plans help to ensure that we are effectively supporting children with medical conditions. They provide clarity about what needs to be done, when and by whom. They will often be essential, such as in cases where conditions fluctuate or where there is a high risk that emergency intervention will be needed, and are likely to be helpful in the majority of other cases, especially where medical conditions are long-term and complex. However, not all children will require one. The school, healthcare professional and parent should agree, based on evidence, when a healthcare plan would be inappropriate or disproportionate.

## **Section 8**

### **Monitoring and evaluation of SEN provision**

*‘All pupils should have access to a broad and balanced curriculum. The National Curriculum Inclusion Statement states that teachers should set high expectations for every pupil, whatever their prior attainment. Teachers should use appropriate assessment to set targets which are deliberately ambitious. Potential areas of difficulty should be identified and addressed at the outset. Lessons should be planned to address potential areas of difficulty and to remove barriers to pupil achievement. In many cases, such planning will mean that pupils with SEN and disabilities will be able to study the full national curriculum.’ (Code of Practice 6.11)*

At Coombe Hill Infants’ we regularly review and evaluate the provision for all of our children, as outlined above and in the SEND information report. Please also refer to our Assessment policy.

Our evaluation and monitoring arrangements promote an active process of continual review and improvement of provision for all children.

## Section 9

### **Training and resources**

***Funding:*** Coombe Hill Infants' School is allocated funding from the Local Authority which is to be specifically used to support the learning of children with SEND. The SENCO (inclusion Manager), through the use of a costed Provision Map will monitor the use of this funding to ensure that it is used for this support and to evaluate its use, with support from the Senior Leadership Team.

Where a child needs additional support over and above the core funding we will apply for additional funding to further meet their needs through an Education, Health and Care Plan

In order to maintain and develop the quality of teaching and the ability to respond to the strengths and needs of all pupils, all staff are encouraged to undertake training and development both in-school as part of INSET and outside school organised by the Local Authority or other external agencies.

All teachers and support staff joining Coombe Hill Infants' (including ECTs and trainee teachers) undertake induction and this includes a meeting with the SENCO to explain the systems and structures in place around the school's SEND provision and practice and to discuss the needs of individual pupils.

Our SENCO regularly attends the Local Authority and Cluster SENCO network meetings in order to keep up to date with local and national updates in SEND.

Where a training need is identified beyond this, we will find a provider who is able to deliver it. Training is ongoing in response to identified needs.

## **Section 10**

### **roles and responsibilities**

#### **SENCO (Inclusion manager) Mrs Jacqueline Heard**

Responsible for:

- Coordinating all the support for children with special educational needs or disabilities (SEND) and developing the school's SEND Policy and SEND information report to make sure all children get a consistent, high quality response to meeting their needs in school.
  - Ensuring that parents/carers are:
    - involved in supporting their child's learning
    - kept informed about the support their child is receiving
    - involved in reviewing how their child is progressing
  - Liaising with all the other professionals who may be coming into school to help support a child's learning e.g. Speech and Language Therapy, Educational Psychology, Occupational Therapy etc.
  - Updating the school's SEND register (a system for ensuring all the SEND needs of pupils in this school are known) and making sure that there are excellent records of the child's progress and needs.
  - Providing access to specialist support for teachers and support staff in the school so they can help children with SEND in the school achieve the best progress possible.
  
  - Designated teacher for LAC and previously looked after children
  
  - Designated staff, responsible for managing Pupil Premium
- 

#### **Class/subject teachers**

Responsible for:

- Checking on the progress of each child and identifying, planning and delivering any additional help a child may need (this could be things like targeted work, additional support).
  - Writing Personalised Learning Plans with individual outcomes, sharing and reviewing these with parents at least once each term and planning for the next term.
  - Ensuring that all staff working with a child are helped to deliver the planned work/programme, so they can achieve the best possible progress. This may involve the use of additional adults, outside specialist help and specially planned work and resources.
  - Ensuring that the school's SEND Policy is followed in their classroom and for all the pupils they teach with any SEND.
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**Head teacher - Mrs Janet Berry**

Responsible for:

- The day to day management of all aspects of the school, this includes the support for children with SEND.
  - She must make sure that the Governing Body is kept up to date about any issues in the school relating to SEND.
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**SEN Governor – Mrs Catherine Amulen and Mrs Jessica Birchall**

Responsible for:

- Making sure that the necessary support is made for any child who attends the school who has SEND.
- Keeping updated on SEND provision within the school through learning walks, liaison with SENCO and other staff
- Point of contact for parents of children with SEND at the school
- Monitoring and reporting to the governing body, regarding SEND.

## **Section 11**

### **Storing and managing information**

All named paper documents are stored in a locked cabinet and shared on a “need to know” basis.

If documents are shared via email, they are always shared in a secure way, using Egress, Cisco, USO FX etc

Please see our Data protection and GDPR policy for further information on storing and managing data.

## **Section 12**

### **Reviewing the policy**

This policy is updated annually and reviewed every three years by governors.

Annual changes will be monitored and shared with SLT.

We take any complaint from parents very seriously. We have an ‘open door’ policy and encourage parents to discuss their concerns initially with their child’s Class Teacher, the SENCO or Head teacher, so that every effort can be made to resolve the issue as soon as possible. However, if parents are not happy with this they can make a formal complaint to the Chair of the Governing Body. (See Complaints Policy on the website). The SEN Code of Practice 2015 outlines procedures for resolving disagreements in Chapter 11.