



JOSEPHIAN SCHOOLS

Education to Inspiring Achievement

Special Educational Needs & Disabilities (SEND) Policy Suite

Apex Policy and Operational Annexes 1–9

Issued under the authority of the Registered Trustees of Educate the Children (NGO Registration No. 9422), operating as Josephian Schools, Plot 1023, Raffia, Mbezi Beach, Dar es Salaam, United Republic of Tanzania.

VERSION 1.0 – FINAL FOR ADOPTION

Document Control

Item	Detail
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Policy title	Josephian Schools SEND Policy Suite (Apex Policy + Annexes 1–9)
Issuing entity	Registered Trustees of Educate the Children (NGO Reg. No. 9422), operating as Josephian Schools
Approving authority	Managing Director (policy adoption). Statutory learner-exit and site-access functions remain with the School Board / School Committee under the Education Act framework — see Apex §6.
SENDCo / Exams Access Lead	Atubariki Bahati Mfingwa (Lead Special Education Teacher & Head of ESRAC) — single accountable holder
Deputy SENDCo	Gotfried W. Kato (Head of Special Education) — continuity and conflict-of-interest cover
Data Protection Officer	Ms. Janeth Felix Mcharo — formally appointed and notified to the PDPC (July 2026)
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Related policies	Child Protection & Safeguarding Policy; Fees & Finance Policy v2.0; Attendance & Learner Continuity Policy (JS-ACA-ATT-01); Enrolment Cessation Guideline (JS-ACA-GDL-01); Vocational Transition-to-Work Policy (to be drafted)

Apex Policy: Inclusion and Special Educational Needs & Disabilities

1. Purpose and Vision

Josephian Schools is an inclusive school. Every learner enrolled at Josephian — in the preschool, primary, secondary academic, secondary vocational, or Special Education Unit — is a full member of one school community. This policy governs how we identify, assess, and provide for learners with special educational needs and disabilities (SEND) across the whole school. The Special Education Unit is one part of our provision; it is not the boundary of this policy.

Our vision is that every learner with SEND at Josephian receives an education that is individually planned, delivered with dignity, and directed toward the greatest achievable independence — in learning, in daily living, and, for our vocational learners, in work.

2. Principles

- **Whole-school inclusion.** SEND provision is the responsibility of every member of staff, not only the Special Education Unit or ESRAC.
- **Functional need, not diagnosis.** A learner has SEND where they require provision additional to or different from that generally made for learners of the same age. A diagnosis is evidence of need; it is neither a precondition for support nor, by itself, an entitlement to any particular support.
- **Dignity.** Learners and families are described and addressed in language that affirms capability and personhood. Deficit framing is prohibited in all school documents and communication.
- **Behaviour is communication.** Responses to behaviour are function-led and educational, never punitive by default (Annex 8).
- **The child's education is never a bargaining position.** No act or omission of a parent or carer is answered by reducing the learner's education, provision, or safeguarding protection. Any suspension, exclusion, or termination of enrolment occurs only on lawful learner-focused grounds, through the applicable statutory process, and never as retaliation or leverage in a dispute with a parent (the Conditionality Rule — §5).
- **Honesty about scope.** Josephian is a school with an integrated assessment and rehabilitation centre. It is not a hospital, not a clinic, and not a lifelong one-to-one care service. We state plainly what we provide and what we do not (Annex 2).
- **Partnership.** Families are partners in their child's education. Parent obligations exist for the child's benefit and to protect a safe working environment for staff — never as a ledger of what parents "owe" the school. Wherever a difficulty arises, dialogue comes first; formal process exists to protect rights, not to replace conversation.

3. Legal and Regulatory Basis

This suite is drafted to comply with, and should be read together with:

- The Persons with Disabilities Act, 2010 (Cap. 183 R.E. 2023) — in particular s. 27 (equal right of admission to public and private schools and disability-related support) and s. 28 (disability-based refusal, special admission terms, denial or limitation of benefits, and disability-based expulsion constitute discrimination).
- The Education Act (Cap. 353 R.E. 2023) and subsidiary legislation, including G.N. No. 294 of 2002 (Corporal Punishment), G.N. No. 295 of 2002 (Expulsion and Exclusion of Pupils from

Schools), G.N. No. 298 of 2002 (Control of School Premises and Entry of Persons), and G.N. No. 302 of 2002 (School Boards).

- The Law of the Child Act, 2009 (Cap. 13 R.E. 2023) — best interests of the child, protection from abuse, and reporting obligations (operationalised in the Child Protection & Safeguarding Policy).
- **National Strategy for Inclusive Education 2021/22–25/2026.** This is the most recently published national inclusive-education strategy located at the date of this policy. Its stated implementation period has ended. Josephian applies the principles of inclusive education consistently with current law and will update this reference promptly when the Ministry publishes or confirms a successor strategy.
- The Personal Data Protection Act, 2022 (Cap. 44), its 2023 Regulations, and the requirements of the Personal Data Protection Commission (PDPC). Children's data and health data are each "sensitive personal data"; IEP, ESRAC, and therapy records combine both and sit at the highest protection tier. Josephian is a registered data controller with an appointed DPO (Annex 6).
- ESRAC registration and compliance requirements attached to the school's ESRAC permit (December 2024) and SEN Unit permit (September 2022).
- NECTA rules on accommodations and assessment modifications for candidates with disabilities (Annexes 5 and 7).
- Cambridge International regulations on access arrangements, applicable to the planned Cambridge stream from the date the school holds centre approval (Annex 7).
- The UN Convention on the Rights of Persons with Disabilities (CRPD), ratified by Tanzania in 2009, in particular Article 24 (education).

4. Scope and Definitions

- **Scope.** This policy applies to every learner at Josephian Schools with an identified or suspected special educational need or disability, at every level of the school, and to all staff, volunteers, and contractors.
- **SEND (definition).** A learner has SEND where, on assessment, they require educational provision additional to or different from that generally made for learners of their age, whether or not a formal diagnosis exists. Assessment of functional need for school placement and support purposes is conducted by the school's ESRAC centre; competent external professional evidence is given appropriate weight and is integrated into the ESRAC file (Annexes 1 and 5). ESRAC assessment determines educational placement and support; it does not override or substitute for clinical diagnosis.
- **Adults at risk.** Some vocational learners are aged 18 or over. They are adults in law. Provisions in this suite drafted in child-safeguarding terms apply to them under an "adults at risk" frame: the same protections against abuse and the same data sensitivity, with respect for their adult status, their consent where they have capacity to give it, and their maximum achievable autonomy.
- **Parent.** Throughout this suite, "parent" includes a legal guardian or primary carer.

5. The Conditionality Rule

The distinction below governs the interpretation of every annex. Where any clause could be read two ways, it must be read consistently with this rule.

Never reduced or conditioned on parental conduct	May be conditioned (defined process only)
The learner's enrolment, daily attendance, classroom and curriculum access, and assessment access — subject only to lawful learner-focused statutory processes (Annex 1 §1.6)	The scope of the home-school partnership (communication channels, meeting formats)
Safeguarding protections	Discretionary services beyond the guaranteed offer (e.g., additional therapy hours, extracurricular access)
The minimum service standards in Annex 2	Continuation of specific communication privileges where conduct standards are breached (Annex 3) — applied to the adult, never the child

Plain statement: no parental act or omission — including fee arrears, a complaint, or misconduct — is ever answered by reducing the learner's education, provision, or protection. Where the law provides a suspension or exclusion process, only that process, before the proper statutory body, may be used, and only on learner-focused grounds.

6. Roles and Accountability

Role	Holder	Responsibility under this suite
Approving authority	Managing Director	Approves the suite and all amendments; chairs the review panel at complaint rung 3 (Annex 4); receives the Annual SEND Review Pack (Annex 9).
School Board / Committee	As constituted under G.N. No. 302 of 2002	Statutory authority for any involuntary learner exit (Annex 1 §1.6) and for longer-term site-access restrictions on an adult (Annex 3 §3.4).
SENDCo / Exams Access Lead	Atubariki Bahati Mfingwa (Lead SET & Head of ESRAC)	Single accountable holder: assessment and eligibility decisions; IEP quality assurance; examination-access evidence custody; annual accommodations calendar; coordination of Cambridge and NECTA applications (Annexes 5 and 7).
Deputy SENDCo	Gotfried W. Kato (Head of Special Education)	Acts for the SENDCo during absence and wherever the SENDCo has a conflict of interest; day-to-day Special Education Unit operations.
Principal	Hafsa Mataka	Ensures mainstream teaching staff deliver the inclusive-classroom obligations in this suite; complaint rung 2 (Annex 4).
Exams Officer	Sospeter N. Mzuma	Submission mechanics and examination-centre compliance for Cambridge and NECTA applications.

Role	Holder	Responsibility under this suite
Data Protection Officer	Janeth Felix Mcharo	PDPC liaison; cross-border transfer permits; breach coordination; data-flow and retention register (Annex 6).
All staff	Every employee, volunteer, contractor	Duty to implement IEPs and behaviour support plans as written; duty to report safeguarding concerns; bound by the data rules in Annex 6.

Human resources functions (contracts, discipline, payroll) sit with the employing entity under the applicable HR framework. Nothing in this suite creates an employment obligation beyond those already existing; staff conduct standards herein are implemented through employment documentation, which must cross-reference this suite (Schedule A).

7. Cross-Policy Hierarchy

- **Safeguarding first.** The Child Protection & Safeguarding Policy prevails over this suite on all safeguarding matters.
- **Fee arrears.** A learner with SEND is never suspended, excluded, or removed mid-term solely because of fee arrears. Fee enforcement against families of SEND learners uses the same commercial levers as for all families under Fees & Finance Policy v2.0 — the late administration charge and conditions on re-enrolment for the following quarter — never a reduction of the learner’s education or provision. Where Fees & Finance Policy v2.0 conflicts with this rule, this suite prevails pending harmonisation at the December 2026 fees-policy review (Schedule A).
- **Attendance.** Extended-absence situations are governed by the Attendance & Learner Continuity Policy (JS-ACA-ATT-01), read consistently with this suite’s SEN safeguards.

8. Approval, Review, and Interpretation

- This suite is approved by the Managing Director and reviewed at least annually, and additionally after any serious incident (including any protective physical intervention resulting in injury, any safeguarding referral arising from school conduct, or any complaint reaching rung 3 or 4).
- The English text is the authoritative legal version. A Swahili operative version of parent-facing documents (in particular Annexes 2, 3, 4, and the parent-facing summary of Annex 8) is commissioned after the amendment freeze, following the translation sequence in Schedule A; in any conflict, the English version prevails. Parents receive the version they can understand before signing.
- Headings are for convenience and do not affect interpretation. Nothing in this suite suspends, shortens, or replaces any statutory appeal, regulatory complaint, safeguarding report, or right to urgent legal relief.

Annex 1 – Admissions, Probation, and Placement

1.1 Principle

Admission to Josephian Schools for a learner with SEND is assessment-based. Our duty of honesty runs in both directions: we will not admit a learner whose needs we cannot safely and competently serve, and we will not refuse a learner, impose a less favourable admission condition, or remove a learner because of a diagnosis, label, or disability. Decisions are based on individual functional need, documented reasonable adjustments, and the school's objectively evidenced capacity.

1.2 Service-Capability Statement

The following statement is published to prospective families before assessment. It describes services the school does and does not provide; it is not a list of excluded diagnoses. Every applicant is assessed individually, including consideration of reasonable adjustments and external support options. The statement is confirmed annually against actual staffing, therapy capacity, and facilities in the Annual SEND Review Pack (Annex 9) before republication.

We are equipped to serve learners with: autism spectrum conditions (our largest cohort and core specialism); communication and language needs, including learners who are non-speaking and learners using or requiring AAC; intellectual and developmental disabilities, assessed individually on functional need; specific learning difficulties; sensory processing differences; and co-occurring behavioural needs manageable through Positive Behaviour Support (Annex 8).

Services we do not provide: continuous clinical nursing or medical care during the school day; residential care; 24-hour or continuous medical monitoring of unstable health conditions; and behavioural risk management beyond the resourced capacity of Positive Behaviour Support, meaning a sustained serious risk of harm to self or others despite a properly implemented Behaviour Support Plan.

Where, after individual assessment and consideration of reasonable adjustments, the school cannot serve a learner, we say so before enrolment, in writing, with reasons, recording which adjustments were considered, tried, unavailable, or disproportionate — and we endeavour to refer the family to a more suitable provider (§1.6(a)).

1.3 Admission Process

- **Step 1 — Enquiry and disclosure.** The family completes an admission enquiry, including full disclosure of known diagnoses, prior assessments, current therapies, and medical needs. Incomplete disclosure discovered later is addressed under Annex 3 §3.3 and may require reassessment; it never, by itself, terminates the child's enrolment.
- **Step 2 — ESRAC assessment.** Eligibility and needs assessment is conducted in-house by the ESRAC centre. Competent external professional reports are welcomed, given appropriate weight, and integrated into the ESRAC file; the ESRAC assessment determines school placement and support, not clinical diagnosis. Where ESRAC identifies a need outside its assessment competence, it refers out to an appropriate external professional before an admission decision is made (Annex 5 §5.1).
- **Step 3 — Honest statement of provision.** Following assessment, the school issues a written statement to the family setting out: the needs identified; the provision the school will make

(mapped to Annex 2); any needs the school cannot meet; and the proposed placement (class, unit, level of aide support as an initial allocation).

- **Step 4 — Partnership agreement.** Admission is completed by signature of the Home-School Partnership Agreement (Annex 3) and the consent instruments in Annex 6.

1.4 School-Wide Probationary First Year and the Initial Provision Review

Every new admission to Josephian Schools — at every level, with or without SEND — begins with a probationary first year. This is a school-wide rule applied on equal terms to all learners; it is mirrored in the school's general admissions documentation (Schedule A). For a learner with SEND, the probationary term concludes with an Initial Provision Review (IPR): a structured meeting that tests the school's honest statement of provision against reality. The IPR assesses the fit of our provision, not the worth of the child.

- During the probationary term the learner receives the full minimum service standards (Annex 2), including an IEP within six weeks of enrolment.
- A mid-term check-in with the family is held no later than week six; the IPR is held before the end of the term, attended by the family, the key contact, and the SENDCo.
- IPR outcomes: (a) provision confirmed; (b) provision confirmed with an amended statement (e.g., adjusted aide allocation); or (c) a finding that the learner's needs fall within §1.2's unavailable services despite the provision made and reasonable adjustments considered — in which case the exit pathways in §1.6 apply.

What probation does not do. The probationary term creates no free-standing right to end any learner's enrolment. Non-confirmation of a compulsory-age learner is a school-initiated exit and may proceed only as a voluntary supported transfer agreed with the family, or through the statutory process in §1.6(b). Outcome (c) must be evidenced against the term record (IEP data, behaviour records, therapy notes); it is a provision finding, not a disciplinary one.

1.5 Continuing Eligibility

After confirmation, a learner's placement is not re-opened at each IEP review. Placement is reconsidered only where assessed need changes so materially that it falls within §1.2's unavailable services, and only through the process in §1.6 — with the school's own provision first reviewed and strengthened where reasonably possible.

1.6 Exit Pathways

(a) Voluntary supported transfer. Where the family and the school agree that another placement better serves the learner, the school provides: a written transition plan of at least one term (except where the family requests a faster move); lawful records transfer with consent (Annex 6); introductions to receiving providers; and a named contact until the transfer completes. A voluntary supported transfer is never characterised as discipline or exclusion, and is never proposed as a sanction, a threat, or a lever in any dispute with a family.

(b) Involuntary exit — statutory route only. Any school-initiated suspension, exclusion, or termination of enrolment occurs only on lawful learner-focused grounds and through the applicable statutory procedure under the Education Act framework, including G.N. No. 295 of 2002: decision by the properly constituted School Board or School Committee, written reasons, the required notifications (including to the Regional Education Officer where applicable), and the statutory appeal route. The Managing Director may recommend and coordinate but is not the

decision-maker. Before any disability-related involuntary exit is initiated, the school records the reasonable adjustments considered, tried, unavailable, or disproportionate, and obtains case-specific legal advice.

- The learner remains enrolled and educated, with full provision, throughout either pathway. Fees remain payable on normal terms during a transition period.
- The family may contest any exit proposal through Annex 4 (entering at rung 3). Nothing in this annex limits any statutory right of review or appeal.

Annex 2 – Scope of Provision ("The Offer")

This annex states what Josephian provides to learners with SEND, in three plainly separated categories, so that no family enrolls on a misunderstanding.

2.1 Minimum Service Standards ("We will")

Commitment	Standard
Individualised Education Plan (IEP)	In place within 6 weeks of enrolment; reviewed at least once per term; goals set and rotated on a quarterly cycle (Annex 5).
ESRAC assessment	Access to in-house ESRAC assessment at admission and on referral thereafter; reassessment where need materially changes.
Named key contact	One named staff member per family as first point of contact; response within 2 working days via official channels (Annex 3).
SEND-inducted staff	Every staff member working with the learner has completed the school's SEND induction, including autism-specific modules and the learner's IEP/BSP briefing.
Reasonable adjustments	Adjustments to access the curriculum and assessment, including Cambridge access arrangements (Annex 7) and NECTA accommodations (Annex 5) where the evidence threshold is met.
Communication cadence	Termly written progress report; at least one IEP meeting per term; same-day notification of significant incidents (Annex 3), unless the safeguarding lead or a competent authority directs otherwise.

Standing of these commitments. The standards above are binding minimum service standards. Where a standard is missed, Josephian takes reasonable and timely corrective action; the family's route is prompt correction first, then Annex 4, then a proportionate fee or service adjustment only where appropriate — legal rights preserved throughout. Nothing in this policy guarantees a particular academic, developmental, or therapeutic outcome. Temporary variation caused by emergencies, regulatory directions, or events beyond the school's reasonable control does not excuse the school from taking reasonable substitute measures and communicating promptly with the family, and does not limit any right that cannot lawfully be excluded — including liability for fraud, wilful misconduct, safeguarding violations, unlawful discrimination, or personal injury caused by negligence. The same standards are incorporated into the enrollment and parent financial documentation. No standard may be added to this table without Managing Director approval and confirmation that it is resourced.

2.2 Best Efforts – Allocated by Assessed Need

- **Aide support.** Aide support is a standard feature of our model, allocated by assessed need in one of three forms: full-time 1:1, part-time 1:1, or shared aide. Deployment (which aide, which sessions, which form) is determined by the school on professional assessment and is reviewed at every IEP cycle. Allocation may move in either direction as the learner's independence develops — increased independence is a success, not a withdrawal of service.
- **Therapy.** In-house therapy hours (speech and language, occupational therapy, and other services as staffed) are allocated by assessed need and timetable capacity, recorded in the IEP.

- **AAC and assistive technology.** Assessment for, and provision of, augmentative and alternative communication and assistive technology, subject to availability and budget; where the school cannot provide a device, it will advise the family on procurement.

2.3 Explicitly Excluded

- Guaranteed developmental or academic outcomes. We guarantee process and provision; no school can honestly guarantee a rate of progress.
- "Normalisation" or cure. We do not offer, promise, or pursue the elimination of a learner's disability, and we decline to frame our work in those terms.
- A specific named staff member. Families may not contract for a particular teacher, aide, or therapist; staffing is the school's decision.
- Permanent full-time 1:1 support as of right. 1:1 support is an allocation by need (§2.2), not an entitlement attaching to the learner.
- Medical treatment. We administer agreed medication protocols and first aid; we do not provide medical or nursing treatment.
- Transport to and from school (available separately under the school's transport service).
- Fees charged by examination bodies for access arrangements or accommodations, where such fees arise.

Annex 3 – Home-School Partnership Agreement (Signable)

Preamble. This is a partnership for the benefit of one child. The commitments below exist so that the child receives a consistent, safe, well-informed education at school and at home. Nothing in this agreement makes the child's education conditional on parental conduct (Apex Policy §5). A signable bilingual version is issued as a standalone document; parents receive and sign the version they can understand.

3.1 The School Commits To

- A termly written progress report against the learner's IEP goals.
- At least one IEP meeting per term to which the parent is invited with reasonable notice.
- A named key contact who responds within 2 working days via official channels.
- Prompt notification — same working day wherever practicable — of significant incidents involving the learner, and immediate action on any safeguarding concern under the Child Protection & Safeguarding Policy. Where the safeguarding lead or a competent authority directs that notification be withheld or delayed (for example, where a parent is implicated in a safeguarding concern), that direction prevails.
- Reasonable access for the parent to view the learner's educational records, subject to the data protection rules in Annex 6.
- Handling of any complaint through the process in Annex 4, without prejudice to the learner.

3.2 The Parent Commits To

- Attending IEP meetings, or sending an authorised representative with decision-making authority.
- Full and timely disclosure of medical, diagnostic, and therapeutic information relevant to the learner's education and safety, at admission and as it arises.
- Following through, at home, on programmes agreed in the IEP (e.g., communication systems, behaviour strategies), and telling the school honestly when a programme is not workable at home so it can be revised.
- Meeting fee obligations on the agreed schedule.
- Communicating through official school channels during working hours, except in emergencies.
- Treating all staff with courtesy and respect (§3.4).

3.3 Incomplete Disclosure

Where material information is withheld at admission or thereafter, the school may require reassessment and may revise the statement of provision and the aide allocation to reflect the true position. The child continues to be educated throughout. Where withheld information means the learner's needs fall within Annex 1 §1.2's unavailable services, the exit pathways in Annex 1 §1.6 apply — as a provision finding, not a sanction.

3.4 Staff Protection

Our staff are entitled to a safe working environment. Abusive, threatening, harassing, or intimidating conduct toward any member of staff — in person, by telephone, in writing, or online — is prohibited.

Graduated response. Breaches are addressed in proportionate steps, and dialogue is attempted at every step: (1) a documented conversation with the Principal; (2) a written warning restating this clause; (3) restriction of communication to a single named channel and/or written-only communication; (4) site-access measures: for immediate safety the Principal may impose a short temporary access restriction, reported without delay to the School Board / Committee; any longer-term restriction is approved and periodically reviewed by the Board / Committee, consistent with G.N. No. 298 of 2002. Criminal conduct is reported to the police.

The child is never the sanction. Every measure above is applied to the adult concerned. At no step is the child's attendance, classroom access, provision under Annex 2, or safeguarding protection reduced, and no parent-conduct matter initiates or influences any learner-placement process. The school always preserves a safe alternative route for the parent to receive essential information and to participate in IEP and complaint processes — including remote meetings or an authorised representative. The child's other parent or carers retain normal communication rights.

3.5 Signatures

Party	Name	Signature	Date
Parent / Guardian 1			
Parent / Guardian 2 (if applicable)			
For Josephian Schools (Principal or delegate)			

Annex 4 – Complaints and Dispute Resolution

Complaints are welcome: they are data. No complaint, at any rung, may prejudice a learner's education or provision (Apex Policy §5). Timelines below are maximum working-day response times; the clock starts when the complaint is received at that rung. The ladder is designed for resolution through dialogue — in the spirit of *usuluhishi* — before formality; it never suspends, shortens, or replaces any statutory appeal, regulator complaint, safeguarding report, police report, or right to urgent court relief.

Rung	Route	Who handles it	Timeline
1 — Informal	Raised verbally or in writing with the class teacher or the SENDCo	Class teacher / SENDCo	Response within 5 working days
2 — Formal	Written complaint to the Principal	Principal (written response with reasons)	Response within 10 working days
3 — Review panel	Written request for review of the rung-2 decision	Panel: Managing Director + one uninvolved senior staff member + optional external SEND professional drawn from a pre-approved pool (at the school's or family's request), with a conflict-of-interest declaration before appointment	Panel convened and written decision within 15 working days
4 — External mediation (voluntary)	Either party may propose confidential external mediation	Mediator agreed by both parties, or appointed through a recognised Tanzanian ADR institution where the parties cannot agree; costs shared unless otherwise agreed, with a hardship fee-waiver mechanism so cost never makes the route illusory	Convened as soon as practicable; proceeds only by mutual agreement

- Mediation is voluntary. A refusal to mediate does not prejudice the learner and does not extinguish any legal right. Mediation does not suspend or replace any statutory appeal, regulatory complaint, safeguarding referral, limitation period, or right to urgent legal relief unless the applicable law expressly permits this and the parties agree in writing.
- A complaint alleging a safeguarding failure is not held to this ladder: it is referred immediately under the Child Protection & Safeguarding Policy, and to the relevant authorities where the law requires.
- An exit proposal (Annex 1 §1.6) is contested by entering at rung 3; for any statutory exclusion process, the statutory written-notice and appeal route applies in addition — the internal review is additional, never a substitute.
- The learner's own voice is facilitated in any rung-3 or rung-4 matter where age, communication, and capacity make this appropriate.
- The SENDCo maintains the complaints record within the Annual SEND Review Pack (Annex 9); it is reviewed at the annual policy review and after any rung-3 or rung-4 matter.

Annex 5 – Assessment and the IEP Cycle

5.1 The ESRAC Pathway

- All eligibility and needs assessment for school placement and support is conducted in-house by the ESRAC centre, under its permit conditions. Competent external diagnostic and professional reports are received as evidence, given appropriate weight, and incorporated into the ESRAC file; the ESRAC assessment determines educational placement and support decisions and does not override or substitute for clinical diagnosis.
- **Referral in:** any staff member or parent may refer a learner to ESRAC where a need is suspected. Referral requires parental consent under Annex 6 (except where safeguarding law requires otherwise).
- **Referral out:** where a need falls outside ESRAC's assessment competence (e.g., psychiatric assessment, audiology, neurology), ESRAC refers to an appropriate external professional, coordinates the referral with the family, and integrates the resulting report.

5.2 The IEP Cycle

- Every learner with SEND has an IEP in place within 6 weeks of enrolment (minimum service standard, Annex 2).
- IEP goals are SMART: specific, measurable, achievable, relevant, and time-bound. Every IEP includes at least one functional-independence goal alongside academic goals; vocational learners' IEPs include transition goals (cross-reference: Vocational Transition-to-Work Policy).
- Goals operate on a quarterly rotation: set, taught, measured, and rotated or extended each quarter, with data recorded against each goal.
- The IEP is formally reviewed at least once per term in a meeting to which the parent is invited (Annex 3). The SENDCo quality-assures every IEP annually.
- The IEP names the aide allocation form (Annex 2 §2.2), therapy allocation, AAC/assistive technology in use, and the Behaviour Support Plan where one exists (Annex 8).

5.3 One Master Evidence File, Two Compliance Checklists

Evidence of need is gathered once into a master SEND evidence file per candidate. Because Cambridge International and NECTA maintain separate evidential requirements and deadlines, the master file supports two separate regime-specific applications; the school does not assume that one evidential standard automatically satisfies both regimes.

- **Master file:** the ESRAC functional assessment; the IEP history; dated samples of everyday classwork and homework showing the support in normal use; internal test and mock records under the proposed arrangement; external professional reports; and prior accommodations.
- **Cambridge checklist:** current Cambridge Handbook evidence rules, normal-way-of-working evidence, approved arrangement, application status, and examination series.
- **NECTA checklist:** current NECTA / regional instructions, required forms and letters, disability evidence, centre submission, and confirmation.
- **Deadlines:** the SENDCo and Exams Officer maintain a live annual Exams Access Compliance Calendar within the Annual SEND Review Pack (Annex 9). No deadline is hard-coded in this policy.
- **Governing test:** the candidate's normal way of working — an arrangement is applied for only where it reflects how the learner routinely works in the classroom (Annex 7).

5.4 Regression After Breaks or Illness

Regression in skills or behaviour after school holidays, illness, or disruption is a normal and expected feature of learning for many learners with SEND, particularly autistic learners. It is not, by itself, evidence that a programme has failed, and it does not trigger a change of protocol, placement, or provision. Staff and parents are briefed in these terms; re-establishment of routine is the first response, and only sustained regression beyond re-establishment prompts an IEP review.

Annex 6 – Data Protection and Records (PDPA 2022)

Josephian Schools processes learners' personal data as a registered data controller under the Personal Data Protection Act, 2022 and its 2023 Regulations. Children's data and health data are each "sensitive personal data" under the Act; the school's IEP, ESRAC, and therapy records combine both and are treated at the highest protection tier. The school's formally appointed and PDPC-notified Data Protection Officer is Ms. Janeth Felix Mcharo. The DPO owns PDPC liaison, cross-border transfer permits, breach coordination, and the data-flow and retention register.

6.1 Layered Consent

Consent is collected at admission in five separate layers. Sensitive-data processing rests on prior written consent as required by PDPA s. 30, or on a documented statutory exception mapped by the DPO — "necessary for provision" is never treated as a substitute for the statutory rule. Each layer is explained, given separately in writing, and (except layer 1, without which enrolment cannot be administered) is revocable in writing at any time with prospective effect.

Layer	Covers	Basis / character
1. General enrolment data	Identity, contact, fee, and attendance data	Necessary for the contract of enrolment
2. Sensitive data	Disability, health, diagnostic, and assessment data	Separate explicit written consent (PDPA s. 30); processing limited to educational provision and safety
3. Per-purpose sharing	(a) In-house therapists: necessary-for-provision; (b) external partners / researchers: separate explicit consent per purpose, revocable at any time	Granular; research participation never overrides the child's data rights, and revocation carries no consequence for provision
4. Cross-border transfer	Any transfer of personal data outside Tanzania (e.g., Cambridge International systems, cloud services)	Governed by the DPO's data-flow register and the PDPC transfer-permit framework (Form No. 7 under the 2023 Regulations) where required, plus explicit consent naming destination and purpose. Consent alone is not sufficient.
5. Image and media	Photographs, video, publications, website, social media, funder reporting	Granular and revocable per channel; refusal carries no consequence for provision

6.2 Storage, Access, and Data-Subject Rights

- Sensitive records (IEP, ESRAC, therapy, behaviour/intervention registers) are stored under lock and key in hard copy and under access control in digital form; access is limited to staff with a direct educational need to know.
- Parents may request access to, and correction of, their child's records; parent access is the default. Withholding is exceptional: any decision to withhold or redact requires joint review by the DPO and the safeguarding lead, a documented legal basis, the minimum necessary redaction, recorded reasons, and notification of the complaint route (Annex 4).

- Learners aged 18+ are the data subjects and ordinarily exercise their own consent and access rights, with supported decision-making where appropriate. Parent access to an adult learner's records requires the adult's authority or another lawful basis.

6.3 Retention

ESRAC, therapy, and IEP records are retained for the period required by the ESRAC / SEN Unit permit conditions, the PDPA, and any applicable education or professional record-keeping requirements. The approved Records Retention Schedule is maintained by the DPO within the Annual SEND Review Pack and reviewed annually. Provisional working figures — enrolment and academic records, 7 years after leaving; ESRAC/therapy/IEP records, until the learner turns 25 or 7 years after leaving, whichever is longer; behaviour/intervention register, minimum 7 years and until the youngest child in any recorded incident reaches 25 — remain subject to verification against the permits (Schedule A). Safeguarding records follow the Child Protection & Safeguarding Policy.

Litigation hold. No record is destroyed while a complaint, claim, safeguarding matter, or investigation is open. This rule overrides every retention period above.

6.4 Breach Response

Any suspected personal-data breach is reported immediately to the DPO and the relevant operational lead. The DPO coordinates containment, risk assessment, documentation, notification to the PDPC without undue delay where required by PDPA s. 27(5), and notification to affected data subjects where required or appropriate, using the PDPC's published templates. The school's internal target is to complete the initial regulatory assessment within 72 hours of becoming aware of the breach; this target is a stricter management ceiling and never permits avoidable delay. Communication with affected parents is risk-assessed and policy-based, not discretionary.

Annex 7 – Cambridge International Access Arrangements Procedure

This annex is adopted now and becomes operative for Cambridge candidates once the school holds the required Cambridge centre / stream approvals and current Cambridge rules apply. The SENDCo / Exams Access Lead (Atubariki Bahati Mfingwa) is the single accountable holder; the Exams Officer (Sospeter N. Mzuma) owns submission mechanics and centre compliance.

- **1. Identification.** Candidates who may need access arrangements are identified at admission (ESRAC assessment), at IEP review, or by teacher referral — as early as possible in the course, never first at examination entry.
- **2. Normal way of working.** An arrangement (e.g., extra time, supervised rest breaks, a reader or scribe, assistive technology, modified papers) is pursued only where it reflects the candidate's established normal way of working in the classroom. The classroom practice comes first; the examination arrangement follows it.
- **3. Evidence trail.** For each candidate, the SENDCo maintains the master evidence file (Annex 5 §5.3). Evidence is stored securely (Annex 6) and is producible to Cambridge International on request.
- **4. Application.** Arrangements are applied for through the Exams Officer within the published deadlines for each examination series, tracked on the annual Exams Access Compliance Calendar (Annex 9). Arrangements are granted per series and must be re-applied for, with current evidence, for each subsequent series.
- **5. Communication.** The candidate and parents are informed in writing of the arrangement applied for, granted, or refused. An arrangement is never promised to a family before it is granted.
- **6. NECTA parallel.** For candidates sitting NECTA examinations, the master evidence file supports a separate NECTA accommodations application under the NECTA checklist (Annex 5 §5.3), submitted within NECTA's current timelines.

Annex 8 – Behaviour and Positive Handling Policy (Autism-Centred)

8.1 Philosophy

- Josephian practises Positive Behaviour Support (PBS). Behaviour is communication: our first question is always what a behaviour is communicating and what need it serves, never merely how to suppress it.
- Responses are function-led and educational. Punitive responses to behaviour arising from a learner's disability are prohibited.
- This annex applies to all learners. For learners aged 18+, it is read with the adults-at-risk frame (Apex Policy §4).

8.2 Proactive Tier

- Environmental and sensory adaptation: predictable physical environments, sensory audit of learning spaces, access to regulation spaces and sensory tools.
- Predictable routines, visual schedules, and structured transitions, with advance preparation for changes.
- Individual Behaviour Support Plans (BSPs) for learners whose behaviour presents recurring challenge: functional assessment, identified triggers, agreed proactive strategies, agreed de-escalation script, and agreed crisis response — written into and reviewed with the IEP, and shared with parents.

8.3 De-escalation

Every staff member working with SEND learners is trained in de-escalation: low-arousal approach, reduced language, increased space, removal of audience, offer of the learner's known regulation strategies, and change of adult face where helpful. De-escalation is always attempted before any physical intervention, except where immediate danger makes that impossible.

8.4 Corporal Punishment – Prohibited

The Education (Corporal Punishment) Regulations, G.N. No. 294 of 2002, permit corporal punishment in Tanzanian schools within defined limits; they do not require any school to use it. Josephian Schools prohibits corporal punishment absolutely, for every learner, in every part of the school. Rationale: corporal punishment is incompatible with Positive Behaviour Support; it teaches nothing about the function of behaviour; and many of our learners — in particular non-speaking learners — cannot report, contest, or contextualise a physical sanction, which makes any such sanction unsafe and unjust per se. Any use of corporal punishment by any staff member is a safeguarding matter and an HR disciplinary matter under the correct employing entity.

8.5 Emergency Protective Physical Intervention

An emergency protective physical intervention is never a punishment, a consequence, or a behaviour-management technique. It is an emergency safety measure only, anchored in immediate safety, necessity, and proportionality.

- **Lawful grounds** — intervention may be used only to prevent: (a) harm to the learner themselves; (b) harm to another person; or (c) serious damage to property creating danger.
- **Standard:** any intervention must be reasonable, proportionate to the risk, necessary (no lesser measure available), and a last resort after de-escalation, and must end the moment the danger has passed.
- **Techniques:** only techniques approved in the school's adopted certified training programme may be used; techniques are taught in certified training and an internal restricted SOP, never in this policy. Prone (face-down) intervention and any pain-based or pressure-point hold are prohibited absolutely.
- **Personnel:** only staff holding current certification in the adopted training programme may perform an intervention, except that any adult may act in a genuine emergency to prevent imminent serious harm where no trained member of staff can intervene in time; any such action is reported and reviewed identically.
- **Recording and review:** every incident is recorded the same day in the Behaviour and Intervention Register (who, what, why, duration, technique, injuries, witnesses); the parent is notified the same day unless the safeguarding lead directs otherwise; a post-incident review is held with the staff involved and the SENDCo, and the learner's BSP is reviewed. First-aid or medical review follows any injury or where clinically indicated. Repeated interventions for the same learner or trigger prompt a management review; the SENDCo runs a quarterly trend analysis within the Annual SEND Review Pack.
- **Safeguarding cross-reference:** intervention can shade into abuse. Any intervention that is unrecorded, repeated for the same trigger without BSP review, involves a prohibited technique, or causes injury is automatically referred under the Child Protection & Safeguarding Policy. The register is inspected at every annual policy review, and the school's insurer is notified where coverage terms require.

8.6 Supportive Withdrawal — Distinguished From Seclusion

- Supportive withdrawal: accompanying a learner, or offering the learner the choice to move, to a calmer space with a staff member present or immediately available, as part of an agreed BSP strategy. This is legitimate and often written into a BSP.
- Punitive or isolating seclusion — confining a learner alone, in a locked or blocked space, or as a consequence — is prohibited. A door is never locked on a learner alone. Time in a withdrawal space is logged where it exceeds a BSP-agreed norm, and patterns are reviewed.

8.7 Training

- All SEND-facing staff: PBS foundations, de-escalation, and this annex — at induction and refreshed annually.
- **Certified positive-handling cohort.** A designated cohort of staff, sized so that certified cover is reliably available whenever learners are on site, holds certified positive-handling training with a provider procured against objective criteria: education/SEND-focused, de-escalation-first, independently quality-assured, medically reviewed, auditable, insured, inclusive of safeguarding and post-incident review, with a defined recertification cycle, and able lawfully and practically to deliver in Tanzania. The selected provider is recorded in the training register within the Annual SEND Review Pack — not in this policy. Training records are held by the SENDCo and reported in the annual review.

Annex 9 – The Annual SEND Review Pack

To match the school's operating capacity, the registers and calendars required by this suite are consolidated into a single Annual SEND Review Pack, compiled by the SENDCo, verified by the DPO for data items, and signed off by the Managing Director, the Principal, the SENDCo, and the safeguarding lead at each annual review. The Pack contains:

- The service-capability confirmation (Annex 1 §1.2): current roster and coverage of special-education teachers, aides, therapists, behaviour specialists, and first-aid personnel; maximum safe caseloads; contracted vs employed services; and the republication decision for the capability statement.
- The Exams Access Compliance Calendar and the Cambridge and NECTA checklists (Annexes 5 and 7).
- The training register, including the current certified positive-handling provider, certification status, and refresher cycle (Annex 8 §8.7).
- The Behaviour and Intervention Register trend analysis (Annex 8 §8.5).
- The complaints record and outcomes of any rung-3 or rung-4 matter (Annex 4).
- The DPO's data-flow and retention register, including cross-border transfer status and any PDPC permits (Annex 6).
- IEP quality-assurance outcomes and IEP goal-attainment reporting against the school's KPI ($\geq$ 80% of goals met or progressed termly).