



Adult Skills and Education

Guildhall – EC2P 2EJ

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Adult Skills and Education Service

Inclusion Policy

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1. Purpose

The Adult Skills and Education Service (ASES) of the City of London Corporation (COLC) recognises that adult learners arrive with a diverse range of backgrounds, experiences, needs and barriers to learning. We are committed to ensuring that all learners – including those with special educational needs and/or disabilities (SEND) or temporary or situational barriers – are welcomed, supported, and enabled to thrive, succeed and move into meaningful next steps (employment, further learning, progression). This Inclusion Policy establishes our approach to identifying, removing and preventing barriers, promoting belonging, high expectations and equitable outcomes.

This policy is aligned with the Ofsted FE & Skills Inspection Toolkit, which emphasises that providers must effectively identify learners who face barriers to their learning and/or well-being, including those with SEND, high-needs, without level 2 English and maths, and those previously NEET, and ensure support and inclusive practices are embedded across the provider's work. ([GOV.UK](https://www.gov.uk))

2. Scope

This policy applies across all ASES programmes and learning provision, including adult education courses, apprenticeships, employability programmes, community learning, ESOL, functional skills, and any subcontracted partner-delivery arrangements. It covers all learners (including those aged 19 +, high-needs learners, learners with SEND, those with temporary barriers such as health, caring responsibilities, language/cultural barriers, employment change, digital disadvantage) and staff, tutors, support services, subcontractors and partner organisations.

3. Definitions

For the purposes of this policy:

- **Inclusion:** ensuring that every learner feels valued, can fully participate in learning, has high expectations set for them, receives the support they need to engage, develop and progress, and no one is excluded from opportunities by virtue of their background or barrier.



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- **Barrier to learning:** anything that may hinder a learner’s ability to attend, engage in, progress through or achieve in their programme. This may be long-term or temporary and may include (but is not limited to) SEND, health issues, language/cultural issues, caring responsibilities, digital access, financial hardship, employment change or mobility, low prior attainment.
- **SEND:** Special Educational Needs and/or Disabilities – learners who have learning or other disabilities which may require different or additional learning support or reasonable adjustments.
- **Initial Assessment:** the process through which the provider determines a learner’s prior learning, skills and knowledge, barriers, support needs, personal circumstances, and aspirations in order to tailor their learning journey, determine appropriate programme, identify necessary support, set realistic targets and monitor progress.
- **Reasonable adjustments/adaptations:** alterations to delivery, materials, environment or support to enable learners with identified barriers or needs to participate fully and equitably.
- **Equitable outcomes:** all learners achieving the best possible progress, attainment, and next steps appropriate to their starting point, including those who are disadvantaged, with SEND or temporary barriers, so that outcomes are not significantly determined by prior disadvantage or barrier.

4. Policy Statement

ASES commits to:

1. **High expectations for all** – we believe that every learner can progress, succeed and achieve, regardless of barriers. We set ambitious learning aims, target high aspirations, and expect staff to plan for the full participation of all learners.
2. **Early and accurate identification** – through rigorous initial assessment and ongoing review, we identify learners’ starting points (skills, knowledge, prior learning), barriers to participation or progress, support needs (including SEND,



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English, maths, digital, language), personal and contextual factors, and set plans accordingly.

3. **Tailored support and interventions** – we provide differentiated teaching, learning materials, adjustments and additional support (one-to-one, specialist input, mentoring, assistive technologies) to ensure learners can engage, progress and achieve. We do not lower expectations for any learner; instead, we provide the routes and support to meet them. Learners identified as having SEND or complex barriers are referred to the ASES SEND Specialist, who conducts a detailed diagnostic assessment to identify specific learning needs, reasonable adjustments, and strategies to help the learner overcome barriers. Following this, the SEND Specialist develops and oversees an individual support plan, which is reviewed regularly in collaboration with tutors and the learner.
4. **Inclusive curriculum and learning environment** – our programmes and learning environment are designed to promote belonging, remove barriers to participation, ensure accessibility (physical, digital, pedagogical, language), and encourage full participation. Adaptations are made thoughtfully so that all learners can access the curriculum and progress to the next stage.
5. **Promotion of equity and reduction of disparities** – we monitor and track outcomes for learners with barriers (including SEND, disadvantaged learners, those with low prior attainment, temporary barriers) and take action to address any gap in participation, progress or achievement. We aim for equitable outcomes and successful destinations.
6. **Learner voice and belonging** – we ensure that learners are engaged, their views listened to, their feedback acted upon, and they feel valued as members of our learning community. We foster an inclusive culture, free from discrimination or harassment.
7. **Partnership working** – we collaborate with specialist services, subcontracted partner providers, employers, support agencies, and families (where relevant) to provide holistic support that addresses both learning and non-learning barriers (e.g., health, welfare, digital access, caring responsibilities).



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8. **Continuous improvement and accountability** – we review and evaluate our inclusive practices, support mechanisms, and outcomes; we use data and qualitative evidence to identify strength and development needs; we embed inclusion into strategic planning, leadership, governance and operational delivery in line with inspection expectations.
 9. **Training and awareness** – all staff, tutors and support personnel will receive training in inclusive practice, identification of barriers, SEND awareness, initial assessment processes, differentiated teaching and reasonable adjustments, and in promoting a culture of belonging and high expectations.
 10. **Accessibility and reasonable adjustment policy** – ASES will maintain a separate *Special Educational Needs and Disability Policy* (Q0021) and *Reasonable Adjustments Policy* (Q0051) to ensure physical, digital and pedagogical accessibility and meeting of legal duties (e.g., under the Equality Act 2010 and the Special Educational Needs and Disability Regulations 2014). The policy will ensure that any learner who discloses additional needs (long-term or temporary) is supported proactively.
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5. Roles & Responsibilities

5.1 Leadership and Governance

- The ASES Senior Leadership Team (SLT) is responsible for ensuring inclusion is embedded in strategy, planning and resource allocation, and monitoring inclusive outcomes and progress.
- Governors / oversight bodies will hold leadership to account for inclusion, ensuring high expectations, equitable outcomes, and data on learners with barriers.
- Leaders will ensure that staff workloads are manageable and that resource decisions do not undermine inclusion.

5.2 Inclusion Lead / SENDCo or equivalent



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- The Service employs a SEND Specialist to whom learners with identified or potential special educational needs and/or disabilities are referred.
- The SEND Specialist:
 - ❖ Undertakes detailed diagnostic assessments for referred learners.
 - ❖ Works collaboratively with tutors and support staff to design and implement personalised support plans.
 - ❖ Provides guidance on teaching strategies, assistive technology and reasonable adjustments.
 - ❖ Monitors the effectiveness of interventions and learner progress.
 - ❖ Supports learners directly to develop confidence, resilience and strategies to overcome their individual barriers to learning.
 - ❖ The ASES delivery teams and the SEND Specialist work jointly to ensure that all learners with SEND or other complex barriers receive timely, specialist input that enables them to thrive and progress.

5.3 Tutors, Teaching & Support Staff

- Tutors and support staff are responsible for implementing inclusive practices in their teaching and support sessions: using differentiated materials, providing adjustments, monitoring engagement and progress, working collaboratively with the support staff, and referring learners when additional support is needed.
- They will contribute to the initial assessment, set high expectations for all learners, and maintain data on learner engagement and progress.
- They will foster a supportive, welcoming environment and address any barriers (attendance, participation, digital access, language, etc.) as they arise.

5.4 Learners

- Learners are encouraged to engage in the initial assessment, disclose barriers or support needs, work collaboratively with staff to access support, and provide feedback on accessibility and inclusion.



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- Learners are expected to participate fully, communicate if they experience barriers, and take up available support.

5.5 Partner Organisations

- Where ASES uses subcontractors or partners, those organisations must align with this Inclusion Policy, implement equivalent inclusive practices, participate in initial assessment and support processes, share data and outcomes related to learners with barriers, and attend quality assurance processes.
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6. Processes

6.1 Initial Assessment & Identification

- Upon enrolment (or as soon as feasible), each learner will undertake an initial assessment that covers: prior learning and attainment (including English, mathematics, digital), learning needs, barriers to learning and participation (e.g., SEND, health, language, caring responsibilities, employment / unemployment, digital access, mobility, financial exclusion), interests and aspirations, and support requirements.
- This information will feed into an individual learning plan (ILP) or support plan, jointly agreed with the learner, which identifies: starting point, key targets, adjustments or support required, monitoring arrangements, and next steps.
- Where initial assessment indicates that a learner may have additional or complex learning needs, the learner will be referred to the SEND Specialist for a detailed diagnostic assessment. This assessment explores specific learning profiles, preferred learning styles, and any required reasonable adjustments. Outcomes are shared (with the learner's consent) with tutors to inform planning and delivery.
- The assessment will also identify whether the learner might benefit from specialist SEND assessment/support, high-needs funding, assistive technologies, bespoke adjustments or interventions.



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- Tutors, management and the support team will review assessment outcomes and determine appropriate programme and classroom groupings, ensuring the learner is placed at the right level and receives appropriate support from day one.

6.2 Support Planning & Intervention

- For learners identified as having additional needs or barriers, a support plan will be developed which details: the nature of the barrier, the adjustment(s) / intervention(s) required, responsible staff, expected timescales, success indicators, review dates.
- The support might include: one-to-one mentoring, specialist tutor support, referral to the SEND Specialist, assistive technology, small group work, alternative delivery modes (e.g., blended, online, flexible timing), additional English/maths/digital provision, language support, counselling or welfare referral, employer liaison (for employability programmes) etc.
- For learners with SEND or significant learning barriers, the SEND Specialist will prepare a comprehensive Support Plan based on the diagnostic assessment. The plan will outline:
 - ❖ Key learning needs and recommended adjustments
 - ❖ Teaching strategies and assistive technology requirements
 - ❖ Specific targets and milestones
 - ❖ Review points and named responsible staff
 - ❖ Tutors and support staff will guide classroom practice and review progress regularly with the learner and liaise with the SEND Specialist so as to best support the learner's needs and progression.
- Tutors and the Inclusion Lead monitor engagement, attendance, progress and participation and adapt the support plan as necessary.
- Attendance and participation will be closely monitored and barriers to attendance (e.g., transport, caring responsibilities, work commitments) proactively addressed.



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6.3 Curriculum Access & Differentiation

- All programmes will be designed and delivered to ensure access by all learners. Teaching materials, assessment methods, delivery modes will be differentiated or adapted as needed, without lowering expectations of what learners can achieve.
- Tutors will plan lessons with inclusive strategies (e.g., scaffolding, multi-modal delivery, flexible grouping, peer support, use of assistive technologies) and monitor engagement and progress for all learners.
- Learners with temporary barriers (e.g., illness, digital access issue, work commitments) will be supported through flexible delivery modes, catch-up sessions, personalised arrangements.
- The physical and digital learning environment will be accessible (ramps, lifts, accessible toilets, large print/accessible digital formats, hearing loop, captioning as needed) and will promote belonging and safety.

6.4 Monitoring Progress, Achievement & Destinations

- ASES will monitor learner progress, achievement, retention, destination (employment, further learning) data disaggregated by learner group (e.g., SEND, high-needs, low prior attainment, those with temporary barriers, ESOL, disadvantaged).
- We will identify any gaps in participation, progress or outcomes and implement targeted action plans to address them.
- Regular reviews of individual learning and support plans will take place (e.g., termly or more frequent as needed) to ensure support remains effective and adapt if necessary. Feedback from learners will be gathered about their experience of support, belonging, progress and adjustments.
- Destination tracking will ensure that learners are well-prepared for their next steps and that outcomes are equitable across learner groups.

6.5 Quality Assurance & Continuous Improvement



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- Inclusion will form a standing agenda item in the ASES quality improvement cycle, with data on participation, retention, achievement, progress, review of support interventions, learner feedback and partner feedback.
- Leaders will review whether inclusive practice is embedded, sustained, effective and making a tangible difference to learners' learning and well-being (per the Ofsted toolkit's criteria for 'strong' or 'exemplary' inclusive provision). (GOV.UK)
- Staff training needs will be reviewed annually with inclusion updates, good practice sharing and professional development.
- Where subcontractors or partner providers are used, their inclusive practices and support for learners with barriers will be monitored and evaluated to ensure alignment with ASES standards.
- The policy, procedures and data will be reviewed at least annually by senior leadership, with findings reported to governors/oversight bodies and actions taken accordingly.

7. Legal & Regulatory Duties

ASES acknowledges its responsibilities under:

- The Equality Act 2010 (public sector equality duty) – eliminating discrimination, advancing equality of opportunity, fostering good relations.
- The Special Educational Needs & Disability (SEND) Regulations 2014 (where relevant) – identifying, assessing and making provision for learners with SEND.
- The Ofsted FE & Skills Inspection Toolkit (November 2025) – specifically the inclusion evaluation area, which applies to “whole-provider level” and requires providers to identify learners with additional needs or barriers and ensure effective support, with high expectations for all.
- The Data Protection Act and other legislation relevant to collecting, storing and using learner personal data.
- The City of London Corporation's broader equality, diversity and inclusion policies and obligations.



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8. Related Policies & Documents

- Reasonable Adjustments Policy (Q0051)
 - Learner Equality & Diversity Policy (Q0016)
 - Safeguarding and Prevent Policy (Q0032)
 - Quality Policy (Q0018)
 - Learner Initial Assessment Procedure
 - Learner Support Plan Template
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9. Implementation & Review

- This Inclusion Policy will take effect from 07 November 2025.
 - All staff will receive training on the policy.
 - Inclusion will be embedded into the induction of new staff, subcontractors and partners.
 - The policy will be reviewed annually (or sooner if legislative/inspection changes demand) and updated in light of data, learner feedback, inspection outcomes and best practice. Responsibility for review lies with the External Programmes Manager and the Senior Leadership Team.
 - Progress on implementation will be reported to the ASES senior leadership and governance steering group at least annually via the inclusion report, monitoring key performance indicators.
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10. Key Performance Indicators (KPIs)

To monitor the effectiveness of inclusion, ASES will track a set of KPIs including (but not limited to):



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- Percentage of learners with identified barriers (SEND, temporary, ESOL, low prior attainment) completing the initial assessment and having a support plan in place.
- Retention and attendance rates of learners with identified barriers compared to cohort average.
- Progress rates (e.g., improvement in English/maths/digital skills) for learners with barriers.
- Achievement rates (qualifications attained, units completed) for learners with barriers, compared to other learners and against expected starting-point trajectories.
- Destination outcomes (employment, further learning/training) for learners with barriers.
- Learner feedback/engagement scores on belonging, accessibility of support and sense of being valued.
- Number of staff trained in inclusive practice/differentiation and number of reasonable adjustments made.
- Analysis of gaps (if any) in outcomes by learner group (SEND, high-needs, disadvantaged, ESOL, temporary barrier) and action plans to close them.
- Audit of curriculum accessibility and inclusive design (physical, digital, pedagogical) across programmes.

11. Summary

In summary, ASES is committed to creating an inclusive learning environment where every adult learner – regardless of prior attainment, background, barrier or need – has the opportunity to access, engage, progress and succeed. We will embed high expectations, early and accurate assessment, tailored support, inclusive teaching and learning practices, and rigorous monitoring of outcomes. Inclusion is not an add-on; it is integral to everything we do and central to our mission of enabling adults to achieve, progress and transform their lives.