



مدرسة جيمس الدولية – شارع الخيل
GEMS International School
AL KHAIL

Inclusion Policy

2024 - 2025

Students of Determination

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1. Introduction

At GEMS International School (GIS), our core philosophy is built on respect, trust and ambition. This Inclusion Policy serves as a comprehensive framework to support and enhance the school's vision and objectives, ensuring that inclusion remains a priority within our three-year strategic plan. By fostering an environment where every student feels valued and empowered, we are committed to providing equitable opportunities for all members of our diverse school community.

2. Vision

2.1 - GIS Inclusive Vision

GIS aims to develop lifelong learners who engage in meaningful learning experiences that foster trust, respect and ambition, and an understanding of their role in the community. Aligned with our vision of providing exceptional quality education to meet the needs of an international community, we take pride in being an inclusive school. GIS aligns with *Goal 4 of the United Nations Sustainable Development Goals (2015)*, calling for equitable education that is inclusive and allows everyone the opportunity to learn. GIS adheres to:

- a. Following a rights-based model of support, as outlined by the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD).
- b. Fostering partnerships with students and families, aiming to inspire ambition for all by motivating and challenging every student to become successful and confident lifelong learners
- c. Seeking to create a culture of inclusion whereby all stakeholders collaborate together to

ensure proactive identification of, and support for, students in an environment that enables every student to be successful.

- d. Believing that all students should be respected and trusted as fully participating members of their community.
- e. Embracing students of all abilities, with learning differences and neurodiversity being a welcomed and expected aspect of the community.
- f. Understanding that each student is an individual, aiming to promote their unique strengths and actively support them through their individual challenges.
- g. Commitment to creating an inclusive environment that acknowledges and accommodates differences. Ensuring that students with additional needs can grow and thrive within our school, and cultivating a richer, more diverse learning community that benefits all students.

2.2 - Alignment of GIS Vision and the UAE Context

We firmly believe in the principles and vision of the KHDA *Inclusive Education Policy Framework* (2017), and subsequent KHDA inclusion directives and guidelines; *Implementing Inclusive Education: A Guide for Schools, Creating the Capacity for Change* (KHDA, 2019); *Rights of Students of Determination: A Handbook for Schools* (KHDA, 2019) and the *Directives and Guidelines for Inclusive Education: Ensuring Equitable Access to Education for Students of Determination* (KHDA, 2019). We recognize that when a school improves the provision for students who experience barriers to learning, they improve provision for all.

3. Principles

3.1 - Guiding Principles

At GIS inclusion is embedded as a priority and something about being a guiding principle:

- a. All students have the right to high quality education, incorporating appropriate instruction and support to enable successful learning.
- b. All students have the right to learn in an environment alongside their peers.
- c. All students benefit when the principles of inclusive teaching practice are embedded within a school.
- d. Every teacher is a teacher of every student; including Students of Determination (SD), English Language Learners (ELL) and those who are More and Exceptionally Able (MEA; previously Gifted & Talented).
- e. Inclusive teaching approaches can reduce the barriers that some students experience, but are of benefit to all.
- f. Some students require individualized and specialized provision, which is different and additional to that provided to most students.
- g. There can be varied pathways and approaches to ensure that a student is progressing successfully.

3.2 - Principle Aims

Aligning with our guided principles, at GIS we aim to ensure that:

- a. All students have access to high quality inclusive teaching and the necessary support to enable them to become successful learners.
- b. Early and accurate identification of additional needs should ensure that the correct support is in place for students experiencing barriers to learning.

- c. Students have access to high quality intervention programs if identified as requiring provision that is *additional to or different from* their peers.
- d. All students have the opportunity to learn in an environment alongside their peers.
- e. Systems are in place to enable all stakeholders to work in partnership and collaborate effectively.
- f. Teachers and paraprofessionals working with students receive ongoing professional development and support in order to develop the knowledge, skills and confidence required to meet the needs of all students.
- g. Students are provided with identified exam access accommodations, as applicable.
- h. Varied pathways are available throughout the school to ensure that students have opportunities for accessible education.

4. Provision

4.1 - Definition

A **Student of Determination (SD)** is identified as a student who is experiencing a physical, mental, intellectual or sensory impairment which, in interaction with various barriers, restricts the student's full and effective participation in education on an equal basis with peers of the same age.

4.2 - Identification of Need

- a. The Inclusion Support Team works collaboratively with teachers, families and external specialists (as required) to accurately categorize need and specific barriers to learning.
- b. The school uses a range of internal and external assessments to monitor and track progress of all students.

- c. Data is analyzed in coordination with teacher assessments to identify students who may be experiencing barriers to learning.
- d. Comprehensive Assessments of Need (AoNs) are conducted at admissions to ensure that appropriate provisions are identified and provided to students upon enrollment.
- e. GIS caters to a wide range of needs and endeavors to adapt provisions in accordance with requirements.
- f. Identified students will be included on the school's Inclusion Support Register as Students of Determination (SDs).
- g. The school fosters a rights based model of support, aligned with UNCRPD. Students do not require a formal diagnosis to be recorded on the register or receive support.
- h. GIS recognises that highly specialized medical provisions or infrastructure required for some multiple & profound needs are not available. Where this is the case, GIS endeavors to support families in sourcing alternative specialist provisions.

4.3 - Categories of Need

The school uses the KHDA's Categorization Framework for Students of Determination (2019- 2020) to inform planning for provision.

Common barriers to learning	Categories of disability (aligned with the UAE unified categorisation of disability)
Cognition and learning	1. Intellectual disability (¹ including Intellectual disability - unspecified) 2. Specific learning disorders 3. Multiple disabilities 4. Developmental delay (younger than five years of age)
Communication and interaction	5. Communication disorders 6. Autism spectrum disorders
Social, emotional and mental health	7. Attention Deficit Hyper Activity disorder 8. Psycho - emotional disorders.
Physical, sensory and medical	9. Sensory impairment 10. Deaf-blind disability 11. Physical disability 12. ² Chronic or acute medical conditions

* These categories are further differentiated according to the guidance provided by the framework.

4.4 - Levels of Support

There are three levels of support identified at GIS. They are defined by the KHDA indicators.

- a. **Level 3:** Students who require individualized and specialized provision, which is different and additional to that provided to most students. Most level 3 students will require the support of an additional adult.
- b. **Level 2:** Students who need additional, often longer term, support and intervention to address significant identified barriers to learning. This will include the support of the inclusion team and possibly external professionals. Level 2 support at GIS is divided into two levels; 2a and 2b.
- c. **Level 1 =** Students with an identified additional need who are able to access the curriculum independently with accommodations where needed.

4.5 Graduated Approach

- a. During the initial assessment a decision will be made as to the category of need and the level of provision required. This level is continuously monitored, revisited, refined and revised through the four part cycle.
- b. A graduated approach to support is utilized to develop a growing understanding of a student's needs and ensures that the type of provision in place is the most appropriate for securing progress.
- c. At GIS the aim is to support all students develop towards independence in learning.
- d. Provisions are continuously monitored and reviewed, with termly reviews for all Level 3 and Level 2b students.

- e. Students' response to intervention (RTI) is tracked and monitored by the Inclusion Support Team and levels of support amended accordingly.
- f. In some instances needs can be addressed through short term intervention strategies or modifications within the classroom.

4.6 - Support Provisions at GIS

The school adopts a graduated approach to identification and provision. Students identified as requiring additional support will be included on the School's Inclusion Register. All students on the Inclusion Register receive the following provisions:

- a. Access to an Inclusion Support Teacher (IST).
- b. A Student Profile, prepared in coordination with the student, parents and teachers. Student Profiles outline strengths, barriers to learning and strategies to support students effectively access learning.
- c. Exam Access Accommodations. Accommodations for exams and formal testing is assessed in accordance with identified needs. The ISTs will work in collaboration with students to trial the required accommodations. In Grade 11 formal Educational Psychologist Exam Access Arrangements reports are required for the school to formally apply for the IB World Exams.

Level	KHDA Indicator	Documentation	
Level 3	Students who require individualised and specialised provision, which is different and additional to, that provided to most students. Most level 3 students will require the support of an additional adult (LSA within the classroom)	ALL	- Case Overview - Profile - IEP - Weekly Inclusion Report (LSA) - Individualised Service Agreement (LSA) - Communication Log
		SOME	- ABC Chart - Risk Assessment - Safety Plan - Behaviour Plan
Level 2b	Students who need longer term support and intervention to address significant identified barriers to learning. This will include the support of the inclusion team and possibly external professionals. Students identified at level 2b are likely to need a team approach (TAC) to coordinate provision.	ALL	- Case Overview - Profile - IEP - Communication Log
		SOME	- ABC Chart - Risk Assessment - Safety Plan - Behaviour Plan
Level 2a	Students who are able to access the mainstream curriculum with accommodations and modifications. Students at Level 2 may need additional time-limited interventions or support in order to close the gap with typically developing peers.	ALL	- Case Overview - Profile - Communication Log
		SOME	- GLP - ILP - Risk Assessment - Behaviour Plan
Level 1	Students with an identified additional need who are able to access the curriculum independently with accommodations where needed.	ALL	- Case Overview - Profile - Communication Log
		SOME	- Risk Assessment
Monitoring	Students on monitoring are not part of the inclusion register but are under assessment/ referral for potential needs.		n/a

Level 3

- a.** All Level 3 students receive individualized targets outlined through an Individual Education Plan (IEP).
- b.** Most Level 3 students receive access to small group targeted intervention sessions. This may be delivered by an IST, HLTA or Inclusion TA.
- c.** Most Level 3 students require a Learning Support Assistant (LSA). This support will be provided in addition to the standard school service and incurs an additional charge
- d.** The full Level 3 LSA support service and associated costs are outlined in an Individualized Service Agreement (ISA) that is agreed upon with parents before admission or as identified.
- e.** For safeguarding purposes the school offers two options for students who require Level 3 inclusion provisions with an LSA; school employed or from a school approved center. For parents who opt for a center based LSA, the External LSA is expected to possess the expertise and qualifications necessary to provide Level 3 support provisions, as outlined on the individualized student support plans. For external LSAs, parents, school and the specialist will agree to a Memorandum of Understanding (MoU) outlining the terms and conditions.

Level 2

- a.** Level 2 support is provided in addition to the standard school service, with no additional charge.
- b.** Some Level 2 students receive access to small group targeted intervention sessions. This may be delivered by an IST, HLTA or Inclusion TA.
- c.** Some Level 2 students receive in class support from an Inclusion Teaching Assistant.
- d.** Some Level 2 students have access to morning or lunchtime support and/ or interventions.

- e. All Level 2b students receive individualized targets monitored through Individual Education Plan (IEP). Targets are highly personalized and dependent on need.
- f. Some Level 2a students receive individualized targets monitored through a Group Learning Plan (GLP) or Individual Learning Plan (ILP).

Level 1

- a. Level 1 support is provided within the standard school service, with no additional charge.
- b. Some Level 1 students have access to morning or lunchtime support and/or interventions.
- c. Some Level 1 students receive in class support from a HLTA and/or Inclusion Teaching Assistant.

4.7 - Student Support Plans

- a. GLPs include an overview of a time-limited intervention that will be provided by a member of the Inclusion Support Team.
- b. An ILP is designed by the class teacher, with guidance from an IST. ILPs outline strategies and time-limited targets that will be implemented within the classroom.
- c. An IEP is provided for students requiring longer term support. IEPs include an overview of each targeted area, a long term aim broken down into short term targets. Targets are formulated using Specific, Measurable, Achievable, Relevant, Time-Bound (SMART) strategies designed to support student progress towards their IEP long term target. IEP targets must aim to support a student's next steps in learning and/or moving towards independence.
- d. Progress towards targets are reviewed at least three times a year, or more often if needed.

5. Transitioning from the Inclusion Support Program

As part of the review cycle the current needs of the student will be regularly revisited and reviewed. Ongoing assessments and observations formulate a triangulated approach to data collection. Students may transition between levels, or away from the additional support programme.

- a. Levels of support are reviewed on a termly basis, or more regularly if required.
- b. The level of provision may be increased, decreased or maintained depending on the progress of the individual student. Communication regarding levels will be shared with families.
- c. Where a student has made significant progress and is able to access the curriculum independently, they may be moved to monitored for an agreed period of time, no less than one assessment cycle to ensure that progress is maintained.
- d. Where a student continues to face barriers in accessing the curriculum, despite the highest level of support being put into place, it may be necessary to consider whether the current setting is the most appropriate provision to meet the student's individual needs. In these circumstances, the school will support the student and family to find alternative provision that is better able to support the student's particular need.

6. Roles and Responsibilities

As an inclusive school all stakeholders, including the Governor for Inclusive Education and leaders at every level, are responsible for supporting the needs of all students. For SDs, GIS adopts a Team Around the Child (TAC) approach to ensure effective collaboration and coordination between all parties involved in the individual support programs.

6.1 - Students

Student voice is paramount. GIS seeks to fully involve SDs in identifying and seeking solutions to address barriers to learning.

- a. Students in the higher grades are expected to formally contribute to their Student Support Plans and take an active role in target setting, wherever possible.
- b. The development of self-advocacy skills are central to inclusive support. All parties have a responsibility to ensure that students develop an understanding of their own strengths and challenges, and develop confidence in advocating for themselves and their entitlements, as outlined in UNCRPD.

6.2 - Classroom Teachers

- a. Classroom teachers are responsible for the learning, progress and outcomes for all of the students in their classroom.
- b. In the PYP section, homeroom teachers are expected to take a lead role in the TAC approach.
- c. GIS adopts a collaborative approach to the development and review of support provisions.

6.3 - Learning Support Assistants

- a. Learning Support Assistants (LSAs) are expected to support students in developing the skills needed to access learning independently.
- b. LSAs are required to work in collaboration with classroom teachers to ensure Level 3 students are successfully included in the mainstream classroom, where applicable.
- c. LSAs are assigned a mentor and are regularly observed by the ISTs to ensure that high quality provisions are adhered to.

- d. An LSA should not be a barrier to learning or reduce a student's access to the classroom teacher.
- e. LSAs are employed through the school recruitment processes. In exceptional circumstances, where the needs of a child require more specialist provision, the school will consider the appointment of an external LSA who is employed and supervised by a licensed center or clinic.
- f. The school does not accept LSAs who have a dual role within the home.
- g. The employment of the LSA will be governed by a Individualised Service Agreement (ISA) between the parents and the school. Parents must ensure that all the documentation requested is provided to the school.

6.4 - Higher Level Teaching Assistants & Inclusion Teaching Assistants

- a. HLTAs & Inclusion TAs plan and deliver group interventions to help students reach the targets outlined in their Student Support Plans. This is completed collaboratively with the ISTs.
- b. HLTAs & Inclusion TAs work collaboratively with their assigned grade and/ or subject departments to promote inclusive practices and develop quality first teaching.
- c. HLTAs & Inclusion TAs are assigned a mentor and are regularly observed by the ISTs to ensure that high quality provisions are adhered to.
- d. HLTAs & Inclusion TAs work predominantly with Level 1 and 2 students to enable them to make progress across the curriculum.
- e. HLTAs & Inclusion TAs are expected to be skilled in inclusive teaching strategies and share these with subject teachers.

6.5 - Inclusion Support Teachers

- a.** ISTs are expected to have specialist knowledge of working with SDs.
- b.** ISTs are required to have a high level of skill and ability in applying inclusive approaches within their own teaching practice.
- c.** ISTs are expected to support the development of inclusive practice in others through continuous professional development and dissemination of current research based practices.
- d.** The core function of the IST is to support the development of inclusive teaching practices within the mainstream classroom and to serve as a coach, mentor and professional resource for classroom teachers.
- e.** ISTs may work with individual, or groups of, students to implement interventions to accelerate progress. This may take place within the classroom or a separate setting.

6.6 - Special Educational Needs Coordinators (SENCOs)

- a.** SENCOs coordinate the inclusive teaching and learning provisions throughout their assigned phase of the school (PYP or Secondary).
- b.** SENCOs are responsible for deploying the inclusion support staff to meet the needs of the students, coordinating services and external agencies, quality assurance of provisions and promoting an inclusive ethos throughout the school community.
- c.** The Primary SENCO works closely with Curriculum Coordinators, Section Leads and homeroom teachers to ensure that the needs of all students are met appropriately.

- d. The Secondary SENCo works closely with Curriculum Coordinators, Heads of Department, Grade Leaders and subject teachers to ensure that the needs of all students are met appropriately.

6.7 - Head of Inclusion (Inclusion Champion)

- a. The HoI is expected to be an Inclusion Champion and lead on promoting and establishing an inclusive ethos throughout the school.
- b. The HoI is expected to effectively communicate a clear vision of inclusion and work with all stakeholders to turn this vision into practice.
- c. The HoI is required to collaborate with the Executive Leadership Team, to coordinate school-wide reviews to identify areas of best practice, identify areas which require targeted improvement and implement comprehensive and strategic Inclusive Education Improvement Plan.
- d. The HoI should ensure that the Executive Leadership Team and Governor for Inclusive Education are informed and updated on changes to research based practice and developments within the UAE.

6.8 - Head of School

- a. The Principal is responsible for ensuring that the school achieves its vision for inclusion. This includes ensuring that an inclusive approach is embedded in all practices across the school
- b. The Principal is responsible for and developing and monitoring the implementation of the Inclusive Education Improvement Plan in coordination with the Inclusion Support Team.

6.9 - Governor for Inclusive Education

- a. The Governor for Inclusive Education is a nominated member of the Local Advisory Board (LAB) who is fully committed to, and proactive in, setting and prioritizing a clear vision of inclusion.
- b. The Governor for Inclusive Education is expected to promote inclusion and communicate regularly with the LAB.
- c. The Governor for Inclusive Education should hold the designated inclusion support team accountable for the development and implementation of an appropriate inclusive education improvement plan.

7. Inclusive Partnerships

7.1 - Parents as Partners

The school recognizes the importance of involving parents in all aspects of their children's educational journey. For students of determination the role of the parent is seen as especially important and the school will endeavor to ensure that they are fully involved in decision-making and provision. This will include establishing a shared vision and a clear focus on desired outcomes at each review point with increasing participation of the student as they become more able to self-advocate.

7.2 - External Agencies

We view effective partnerships with specialist service providers as essential to ensuring that our students of determination receive the support that they require. Hence, we try to ensure that our students have access to the specialist services that they need through building close collaborative

partnerships with trusted providers. These partnerships are governed by a Memorandums of Understanding (MOU) that clearly sets out this working relationship for the provider, the school and parents.

Appendices

Appendix A: Legislation and guidance

This policy is based on the UAE Disability Act, Federal Law (29) 2006 and 2009 which guarantees a Student of Determination access to equal opportunities of education. This policy is also based on the following guidance and legislation.

<u>The United Nations Convention on the Rights of Persons with Disabilities</u>
<u>Federal Law (29) 2006 and 2009</u> Guarantees a person of determination access to equal opportunities of education within all educational institutions
<u>Dubai Law 2014 (no. 2)</u> Concerning Protection of the rights of persons of determination in the Emirate of Dubai
<u>Executive Council Resolution No. (2) of 2017 - Regulating Private Schools in the Emirate of Dubai</u> Regulations for Private Schools in Dubai
Article 4 (14) establish the conditions, rules, and standards that are required to facilitate the enrolment and integration of Students with disabilities in Private Schools;
Article 13 (16) treat its Students equitably and not discriminate against them on grounds of nationality, race, gender, religion, social class, or special educational needs of Students with disabilities;
Article 13 (17) admit Students with disabilities in accordance with the terms of its Educational Permit, the rules adopted by the KHDA, and the relevant legislation in force;

Article 13 (19) provide all supplies required for conducting the Educational activity, including devices, equipment, furniture, and other supplies which the KHDA deems necessary, such as the supplies required by Students with disabilities;

Article 23 (4) provide a special needs friendly environment and academic programmes appropriate for Students with disabilities in accordance with the rules and conditions determined by the KHDA and the concerned Government Entities in this respect;

[The National Project for Inclusion for People of Determination \(2008\)](#)

[UAE School for All: General rules for the provision of special education programmes and services guidance \(2010\)](#)

[My Community: A City for Everyone Initiative \(2013\)](#)

Aims to turn Dubai into a fully inclusive and friendly city for People of Determination

[Quality Standards of Services for Persons with Disabilities in Governmental and Private Institutions \(2016\)](#)

[The National Policy for Empowering People of Determination \(2017\)](#)

Aims to provide quality inclusive education in the UAE

[Dubai Inclusive Education Policy Framework \(2017\)](#)

Dubai Inclusive Education Policy Framework has been developed to support the UAE's commitment to the United Nations Convention on the Rights of Persons with Disabilities as well as federal and local legislation that calls for the inclusion of all learners, regardless of ability, in the education sector.

[Directive & Guidelines for Inclusive Practice](#)

[Implementing Inclusive Education - A Guide for Schools](#)

[Advocating for Inclusive Education - A Guide for Parents](#)

This guide supports parents in understanding their rights and responsibilities when advocating for an inclusive education for their child.

[The Dubai Universal Design Code \(2017, Accessibility Code\)](#)

Aims for universal accessibility

[Abu Dhabi Education Council Special Education Policies and Procedures Handbook \(2012\)](#)

[The Ministry of Education Strategic Plan 2017-2021](#)

[The Dubai Plan 2021](#)

Aims for a tolerant and fully inclusive city by 2020 which is part of a wider strategic plan, incorporating education, health & rehabilitation, employment, universal accessibility and social protection

[UAE Centennial 2071 project](#)

United Nations (2015) The Sustainable Development Agenda. Available at:
<https://www.un.org/sustainabledevelopment/development-agenda/>

Review Log

Reviewed by	Review date	Amendments made (Y/N) and details
Hannah Kelly <i>Head of Inclusion</i>	September 2022	Yes - Updated information in line with KHDA directives and school development.
Academic Leadership, Head of Inclusion & SENCos	September 2023	Yes - Updated information regarding Student Support Plans. Amended the vision statement to include further KHDA directives and UN SGP.
Head of Inclusion & SENCos	June 2024	Yes - Structure and formatting changes. All sections reviewed and amended. Sections numbered and new headings added.
ELT	September 2024	Yes - amendments and adjustments made.