

مدرسة الإمارات الدولية - ميدوز
Emirates International School - Meadows



Inclusion Policy

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Introduction

Inclusion at Emirates International School Meadows

At Emirates International School Meadows (EISM), the participation of students of determination in inclusive settings is based on the philosophy of equality, sharing, participation and the dignity of individuals. We believe that all students can learn and reach their full potential given appropriate opportunities, effective teaching and appropriate resources.

Additionally, we believe that students of determination should be full participants in the life of the school. We know that the classroom is where inclusive education comes to life and that a community of students with a range of abilities enriches the quality of education for everyone, as well as developing a strong sense of acceptance of diversity.

Rationale

This policy reflects the statutory requirements of the UAE government set out in the Federal Law No. 29 of 2006, and the guidance of the 'Dubai inclusive education policy framework' (KHDA 2017), 'Implementing inclusive education: a guide for schools' (KHDA 2019) and 'A revised categorisation framework for students of determination' (KHDA 2019). In addition, the policy also reflects the statutory guidance regarding safeguarding and child protection in UAE schools, and the Emirates International School Admissions Policy. Finally, the policy also reflects examples of best practice from around the world, particularly the UK.

Statutory Compliance: The school complies with the definition of Special Educational Needs (SEN) set out in UAE Federal Law No. 29 of 2006 and the DSIB inspection framework. In line with KHDA's 2017 requirements, the school has appointed the following roles:

Whole School	Head of Inclusion	William Burnside
	Inclusion Champion	William Burnside
	School Counsellor	Sumatee Sahni
High School	Inclusion Coordinator	Teresa Dabbar
	Inclusion Teacher	Maricris Celones
	Inclusion Teacher	Jaseenthe Jacob
	Inclusion LSA	Kenneth Moncler
	MEA/ Gifted & Talented Coordinator	Teresa Dabbar
Primary School	Inclusion Coordinator	Pearl Demosthenous
	Inclusion Teacher (EY1-Y1)	Doaa Emaan
	Inclusion Teacher (Y2-Y3)	Juliet Kurien

	Inclusion Teacher (Y4-Y6)	Sharan Singh
	Inclusion LSA	Artemio Curve
	Inclusion LSA	Jane Nduti
	MEA/ Gifted & Talented Coordinator	Pearl Demosthenous

Definitions

Federal Law No. 29 of 2006 was the first law in the UAE to protect the rights of people of determination. Specifically, Article 12 of the law states that ‘the country guarantees people with special needs equal opportunities in education within all educational, vocational training, adult education and continuing education institutions in regular classes or special classes with the availability of curriculum in sign language or Braille and/or any other methods as appropriate.’ (<https://u.ae/en/information-and-services/education/education-for-people-with-special-needs>).

Persons with Determination are described as the ways in which ‘...the UAE has chosen to view the attributes of persons with disabilities; a reflection of their strength of character, their perseverance and their courage.’ In the context of the school, persons with determination are described as students of determination or pupils of determination. (Dubai inclusive education policy framework, KHDA 2017).

Students of Determination (SoD) in school are defined under the following broad headings or ‘areas of need’:

Areas of Need	Categories
Cognition and Learning	- Intellectual Disability (including unspecified Intellectual disability) - Specific Learning Disorders - Multiple Disabilities - Developmental Delay (younger than five years of age)
Communication and Interaction	- Communication Disorders - Autism Spectrum Disorders
Social, Emotional and Mental Health	- Attention Deficit Hyperactivity Disorder - Psycho-emotional Disorders
Physical, Sensory and Medical	- Sensory Impairment - Deaf-Blind Disability - Physical Disability - Chronic or Acute Medical Conditions

(A revised categorisation framework for students of determination, KHDA 2019)

More and Exceptionally Able – MEA (also referred to as Gifted and Talented)

As per the 2018-2019 DSIB Inspection Handbook, the term giftedness refers to ‘a student who is in possession of untrained and spontaneously-expressed exceptional natural ability in one or more domains of human ability.’

The term talented refers to ‘a student who has been able to transform their ‘giftedness’ into exceptional performance’.

At EISM, students who are more and exceptionally able are supported by the relevant MEA Lead in the Primary School or High School. The Head of Inclusion and MEA leads will establish a school-wide MEA criteria and identify students who qualify for MEA consideration based on a variety of data points such as CAT4, NGRT, Progress Tests (PT), school progress reports, and teacher observations.

The Head of Inclusion and MEA leads will provide middle leaders and teachers with guidance on cultivating enrichment opportunities for students who qualify for the MEA provision. Additionally, the MEA Leads, with oversight from the Head of Inclusion, will identify external opportunities and partnerships that can more fully enrich the education of students who qualify for the MEA provision.

Accountability

School Governance and Advisory Council (AC) will:

- Hold the School Principal to account and ensure that the school is compliant with the statutory regulations regarding inclusive education in the UAE and Dubai.
- Appoint one member of the AC to act as link governor for Inclusion.
- Ensure that the AC link meets with the designated Inclusion Champion and the Heads of Learning Support once per term to measure progress in improving the school's inclusive education practice in accordance with the Department Improvement Plan.

The School Principal will:

- Appoint a suitably qualified and experienced Inclusion Champion to lead the strategic development of inclusive practice across the school.
- Appoint suitably qualified and experienced Inclusion Leaders in the Primary and High Schools.
- Ensure that the school is compliant with current UAE and KHDA inclusive education legislation.
- Ensure that the School Admissions Policy is compliant with the latest UAE Government and KHDA legislation.
- Support the effective implementation of the school's inclusion policy.
- Facilitate appropriate training and development of the Learning Support teams and other academic staff in the Primary and High Schools.

The Inclusion Champion will:

- Carry out the strategic aims of the School Principal regarding inclusive practice.
- Support the Inclusion Leaders in achieving the aims of the Department Improvement Plan for Inclusion across both schools.
- Champion the merits of inclusive education practice amongst the teaching staff, and facilitate professional learning in accordance with the aims of the Department Improvement Plan.
- Liaise with the link governor to ensure accountability and provide regular updates on progress.

The Senior Leadership Teams (Primary and High School) will:

- Support the School Principal, Inclusion Champion and Inclusion Leaders in the promotion of inclusive education at the school.

The Inclusion Leaders (Primary and High School) will:

- Develop the knowledge and understanding of teaching staff regarding the specific needs of individual Students of Determination/MEA (G&T) through sharing the Inclusion Register and IEPs, and any other documentation deemed necessary to achieve this aim.
- Provide practical support strategies to teachers in order to promote the academic progress of Students of Determination/MEA (G&T), both in class and over time.
- Periodically track and monitor the progress of all Students of Determination/MEA (G&T) and facilitate timely and appropriate interventions to support good progress from start points.
- Liaise with parents and outside agencies to develop a holistic approach to removing barriers to learning for Students of Determination, and further enhancing the educational experience of MEA (G&T) students.
- Lead on appropriate assessments to determine the nature of barriers to learning and levels of need in order to assist students of determination to make good progress.

The Teachers will:

- Take responsibility for the development of the requisite knowledge and understanding of the definitions of need for Students of Determination/MEA (G&T) and the needs of all individual students, including students of determination, in class.
- As part of the universal level of the Multi-Tier Systems of Support (MTSS), provide sufficient provision for the support of all students at the classroom level.
- Use National Agenda testing data (CAT4, NGRT, GL Progress Tests, PASS survey, IBT (ACER) Arabic testing), prior attainment data and IEPs to inform planning for, and teaching of, Students of Determination/MEA (G&T) in order to secure good progress in class and over time.
- Adapt the curriculum appropriately so that Students of Determination/MEA (G&T) are appropriately stretched, challenged and supported to make good progress in class and over time.
- Consult with the Inclusion Team, and other stakeholders as appropriate, to maintain high expectations of Students of Determination/MEA (G&T) in the classroom.

The Inclusion Team will:

- Support the needs of Students of Determination through the adaptation of classroom activities in partnership with class teachers.
- Provide regular feedback to class teacher regarding the areas of strength and development for Students of Determination in order to further enhance their individualised learning experience across the school.
- Use appropriate strategies to stretch and challenge Students of Determination.
- Support the physical, mental and emotional needs of Students of Determination in order for them to experience success in class.

The Parents/Carers will:

- Communicate regularly with the Inclusion Leaders to provide updates on any developments regarding the removal of barriers to learning for Students of Determination.
- Support the school in their aim of creating an excellent learning experience for Students of Determination.
- Access appropriate external interventions as recommended by the Learning Support teams.

Support

The Inclusion action cycle or the Graduated Approach, recommended by the UK SEND Code of Practice: 0 to 25 years (2015) is an important tool to support Students of Determination and ensures that teaching and support strategies are reviewed, refined and strengthened in response to students' needs.

The Inclusion Team and SLT assist and monitor classroom teachers in the use of the inclusion action cycle. This will lead to the development of inclusive differentiated teaching as part of the required practices included within the standard school services.



Individual Education Plan (IEP)

The Individual Education Plan (IEP) is a collaborative document written with parents, teachers, the Inclusion Team and the students.

IEPs are created to show the students' profile, share strategies to teachers and LSAs for support in class, and share strategies to parents to support students at home. Specific targets for the students to achieve in support lessons are devised and strategies for the students to implement in mainstream classes are shared.

IEP targets are reviewed at the end of each term. Targets may be achieved, partially achieved or not achieved. Should targets be partially achieved or not achieved and performance requires improvement, the support continues for an additional period of 1 term.

Learning Profile

The Learning Profile (LP) is a collaborative document written with parents, teachers, the Inclusion Team and the students.

LPs are created to show the students' profile, share strategies with teachers and parents, and support students at home.

Levels of Need and Support

Students requiring Level 1 support are provided in-class support through differentiation. In some cases, they might benefit from small group interventions.

LEVEL 1 - GENERAL SUPPORT SERVICE



High quality differentiated teaching in the classroom. It is expected that the large majority of students of determination will be sufficiently supported through this level of support.

Most students identified as requiring Level 2 support will require a Learning Profile. They will be supported in class through differentiation and might receive additional support from the Inclusion Team on a pull-out basis.

LEVEL 2 - TARGETED SUPPORT SERVICE



Additional, specific and time-limited intervention that is provided to students who are falling behind age expected levels of performance. It is expected that a minority of students of determination will require access to level 2 support services.

Some students accessing level 2 support service may require enhanced support through an individual education plan.

All students who are identified as Level 3 will have an Individual Education Plan (IEP). In addition to the in-class support through differentiation, the Inclusion Team will provide 1:1 and/or small group support on a pull-out basis. Some students may require a full-time or part-time Learning Support Assistant (LSA).

LEVEL 3 - INDIVIDUALISED SUPPORT SERVICE



Individualised and specialised provision, which is different from that provided to most other students of determination. This may include full time support by a learning support assistant. It is expected that only few students will require access to level 3 support service.

Identification and Provision for Students of Determination

Where students arrive at the school with pre-existing barriers to learning, Inclusion Leaders liaise with families and external facilitators to develop provision through the construction of an IEP so that students of determination can make good academic progress from their start points.

Where students arrive at the school with no formal identification of a barrier to learning, teachers will use the referral system to start the process of identifying need as, in both Primary and High School, teachers routinely formatively assess the academic progress of students in every subject and highlight areas of strength and development through verbal and written feedback. In addition, teachers also monitor students' social and emotional development in class through activities linked to the IB Learner Profile and Approaches to Learning (ATL).

If through teacher assessment a member of staff highlights a possible concern, they will inform the Inclusion Team through the school referral system. Following this, the Inclusion Team will conduct their own assessment of need and plan next steps with all stakeholders.

Eligibility for Support

- Students have prior medical or psycho-educational assessment reports.
- Students have received support in previous school.
- Students are referred by teachers using the referral form.
- Students are referred by parents.
- Students self-refer.

Referral Process

1. Feedback from all teachers and samples of work are collected through the 'Referral Form', complemented by the 'Inclusion Round Robin Form' if required.
2. Performance across subjects is discussed with the respective Year Leader using scores from data capture, GL assessments and CAT4.
3. Observations and internal assessments may be conducted if required.
4. Parents are met to discuss the student's needs and context, to help determine the type of support required (SEMH, EAL, MEA (G&T), and/or SoD).
5. Students may be referred to the counsellor for socio-emotional support and/or EAL coordinator for language support and/or MEA (G&T) coordinator for the Master Class enrichment programme and further differentiation in class and/or receive support from the Inclusion Team.
6. Should students be identified as requiring support from the Inclusion Team, psycho-educational assessments may be required to provide a better understanding of the students' needs and help determine support. Currently, students are referred to external agencies/centres for assessments.
7. Students are added to the Inclusion Register and IEPs/Profiles are created.

Individual Support (Academic/Behavioural)

Support is based on individual needs and may be provided in class or outside the classroom with a member of the Inclusion Team.

Supporting Social-Emotional and Mental Health

Students are supported by the School Counsellor on an individual basis and in small groups.

Individual SEMH Support

Individual support sessions are scheduled on a weekly basis and require parental approval. Individual support sessions are also offered on a drop-in basis and are open to all students during break times. This does not require parental approval.

Information from sessions remains confidential and is only disclosed when deemed necessary for safeguarding purposes.

Peer Mentoring

Peer Mentoring is a well-planned and organised formal mentoring programme that provides social and emotional support, advice, and guidance in practical ways at important transition points in the life of a student. Senior students are selected to act as Mentors to younger peers (Mentees). Mentors are provided with regular training that helps them be more effective in developing the competence and character of their Mentees. The Peer Mentoring programme has a positive impact on the mentees' connectedness to school, feelings of competency and self-efficacy, grades and academic achievement, and prosocial behaviour and attitudes.

Zones of Regulation

From Early Years to Year 6, students use the Zones of Regulation; a colour-coded programme to identify emotions and feelings, which provides strategies to regulate emotions and behaviour across all year groups.

Support – Cognitive and Learning, Communication and Interaction, and Physical, Sensory and Medical.

Types of Learning Support Provision

In-class support

All students are supported in class through adaptive teaching (differentiation).

Information about Students of Determination is provided to teachers through the shared documents Inclusion Register and the IEPs/Learning Profiles. This includes areas of need, access arrangements/accommodations in class and for assessments, teaching strategies for further differentiation. Further support is provided on an individual and needs basis to teachers for differentiation of material, lessons or assignments.

Pull-out support

Pull-out support is provided on a 1:1 or small group basis.

High Needs Students of Determination (Level 3) are supported by part-time or full-time Learning Support Assistants (LSA). LSAs are employed by parents and work in collaboration with the Inclusion Team.

(See Learning Support Assistant (LSA) Engagement and Conduct, below, for the full policy on LSA engagement, including that parents may not be employed as their own child's LSA.)

Learning Support Assistant (LSA) Engagement and Conduct

Learning Support Assistants provide full-time or part-time 1:1 support to Level 3 Students of Determination. LSAs are employed and paid by parents, not by EISM, but they work on the school site, in close and often unsupervised contact with a vulnerable child, and in collaboration with the Inclusion Team. For this reason, every LSA working with an EISM student is subject to the vetting, induction, supervision and conduct requirements set out below, regardless of who employs them. Parents of students attending EISM are not permitted to be employed in the capacity of an LSA to support any Students of Determination throughout the school.

Vetting before site access. Before an LSA begins working with a student, the family (or the agency arranging the LSA) must provide the Inclusion Team with:

- A valid UAE Police Clearance Certificate (Good Conduct Certificate), or, for an LSA newly arrived in the UAE, a home-country equivalent pending a UAE certificate within 8 weeks of the start date.
- Evidence of relevant qualifications and experience for the student's area of need.
- Submission of photocopies of the Emirates ID and passport from country of origin

The Inclusion Team confirms this evidence is on file before the LSA is granted a site pass or begins working with the student. Incomplete vetting is escalated to the Head of Inclusion and site access is withheld until it is resolved.

Induction. Every LSA shall complete an EISM induction, delivered by the Inclusion Team covering:

- Safeguarding and child protection, including how to recognise and report a concern, and explicit guidance that a change in a student's behaviour, mood or presentation must never be assumed to be "part of their condition" without further checking.
- EISM's Staff Code of Conduct and the standards of professional behaviour expected on site.
- Confidentiality and data protection expectations for the Inclusion Register, IEPs, Learning Profiles and any medical information.
- Any medical, physical-handling or behaviour-support procedures specific to the student they will support.

Supervision

Each LSA is supervised by the relevant sub-school Inclusion Coordinator (with oversight from the Head of Inclusion). The Inclusion Coordinator is the first point of contact for any concern of an LSA, observes their practice at least once per term, and feeds observations into the student's IEP review. The supervisor confirms at each review that the LSA continues to meet the school's conduct and practice expectations.

Conduct and safeguarding duties while on site

While on the EISM campus or on a school activity, an LSA is bound by the same Code of Conduct, safeguarding-reporting duty and confidentiality expectations as directly-employed staff, regardless of their employment relationship with the parents. Any safeguarding concern involving the student, another student, or another adult is reported immediately to the Designated Safeguarding Lead through the same route used by all staff, and takes precedence over any confidentiality expectation the LSA may otherwise observe.

Records

The Inclusion Team holds a record for each LSA of their vetting evidence, induction completion date, and named supervisor, reviewed at the start of each academic year and whenever an LSA's arrangement changes.

Ending an engagement

If EISM identifies a conduct, competence or safeguarding concern involving an LSA, the Head of Inclusion, in consultation with the School Principal and Designated Safeguarding Lead, may suspend the LSA's site access pending investigation, irrespective of the LSA's employment relationship with the parents. Parents are informed of the outcome and, where support continues to be required, supported to arrange a replacement LSA who meets the requirements above.

EISM Programme-Specific Support Provision - Whole School (including Early Learners, Primary, and High School)

Support across the whole school includes Numeracy, Literacy and Specialist support according to the students' needs.

Specific Provisions for the MYP and DP Programmes

Year 7-11

Level 3 students are non-MYP seeking candidates and are pulled-out from non-core subjects. Some students may also be provided with internal work experience opportunities within specific departments (Library, PHE, Arts) according to their interests, career aspirations and skills.

Students of Determination (Level 2) are supported outside of the classroom to access the regular curriculum (PYP/MYP) and within any areas of needs.

Year 12 & 13

At Emirates International School Meadows (EISM), the Diploma Programme (DP) and the Career-related Programme (CP) support students to make informed decisions about subject choices, post-16 and post-18

pathways, and future aspirations. In line with the school's inclusive ethos and IB expectations, DP and CP provision is accessible to all students and adapted where necessary to ensure that Students of Determination and MEA (G&T) students are able to engage meaningfully with their programmes.

Support for DP and CP students may include: one-to-one or small-group provision, a focus on organisational, time-management and study skills and targeted support to enable students to access and complete DP and CP components. This includes access to learning and assessment within the CP core components, including the Reflective Project, Personal and Professional Skills (PPS), Community Engagement and Language and Cultural Studies, where applicable. Learning support arrangements are based on individual needs, and focus on what students can do, rather than perceived limitations. These arrangements are delivered through differentiated teaching, personalised learning approaches, and where appropriate, the use of Individual Education Plans (IEPs) co-created by the Inclusion Team, Teachers and families. Support is planned and reviewed collaboratively between Inclusion Leaders, teachers, curriculum coordinators, students and parents.

Career/ Educational Guidance and Support

At EISM, we offer careers education and guidance to students in Year 6 and above. The guidance and support we offer can be tailored to support students of determination and/or gifted and talented students through bespoke one-to-one programmes, individual discussions with students allow us to ensure the programmes meet the needs of all students.

Provision and Support

Education and guidance may include:

- Whole-year group sessions and workshops.
- Individual guidance meetings (including bespoke one-to-one programmes where appropriate).
- Support with subject choices and pathway planning.
- College/university and training provider guidance, including applications and interviews.
- Work experience, internal opportunities and employer encounters where appropriate.
- Collaboration with parents, Inclusion Leaders and relevant external agencies to support transition planning.

Support for Students of Determination

Where students require additional support, CP/DP planning may be personalised through:

- Additional or extended one-to-one guidance sessions.
- Adapted resources and supported exploration of pathways.
- Targeted transition planning meetings with students, parents, Inclusion Leaders and relevant staff.
- Consideration of reasonable adjustments and access arrangements to support future learning and assessment environments.
- Supported work experience opportunities aligned with student interests, strengths and needs.

Where appropriate, Career Pathways targets and transition planning will be reflected within a student's Learning Profile and/or Individual Education Plan (IEP) and reviewed regularly.

Monitoring and Review

CP/DP provision is monitored through:

- Student voice and feedback.
- Ongoing liaison with parents.
- Review of transition planning and agreed targets.
- Collaboration between the CP lead, Inclusion Team and Senior Leadership Teams to ensure inclusive practice is embedded across careers education and guidance.

English as an Additional Language (EAL) Support

At EISM we ensure all EAL students have full access to the curriculum (and other school opportunities), by being proactive in removing any barriers that prohibit EAL students from accessing the curriculum and fulfilling their potential. In addition, we aim to provide our EAL students (especially mid-year/term arrivals) a safe, welcoming environment where they are valued and encouraged to participate.

EISM recognises that most EAL students needing additional support do not have additional learning needs. However, should additional needs be identified during initial assessment, or subsequently become apparent, EAL students will receive provision only from the Inclusion Team. They will have equal access to the relevant support through the learning support team. The school, Language, EAL and Inclusion Policies are reviewed annually to ensure the needs of students are continually addressed.

Similarly, the school recognises that there will be EAL students who are MEA (G&T). While their English language proficiency may make this less apparent, the identification process used at EISM where behaviours are observed and non-verbal measures are used, should ensure they are identified (see G&T and Inclusion Policy).

Learning an additional language is a long-term process. While basic interpersonal communication skills (BICS) can usually be acquired within two years, it is known to take up to seven years to gain the language needed for academic success (cognitive academic language proficiency - CALP).

Monitoring progress and Exiting the support

Progress is monitored through analysis of scores from the data capture, GL assessments and CAT4 assessments, but also through regular teacher feedback and regular meetings with parents. Weekly meetings with the school counsellor are scheduled to monitor students with SEMH needs.

When all IEP targets are achieved and students are able to access the regular curriculum showing sufficient progress (performing at an IB grade level 4 or above) the students exit the 1:1 or small group support and are monitored.

Assessment and Examination Arrangements

Access Arrangements are examination arrangements for students of determination or temporary injuries. The intention behind an access arrangement is to meet the particular needs of an individual candidate without affecting the integrity of the assessment. Access arrangements are the principal way in which awarding bodies comply with the duty under the Equality Act 2010 to make 'reasonable adjustments'.

'Reasonable adjustments' are made where a candidate, who is disabled within the meaning of the Act, would be at a substantial disadvantage in comparison to someone who is not disabled. Schools and examination boards are required to take reasonable steps to overcome that disadvantage. An example might be providing an enlarged paper for a visually impaired student. These access-arrangement standards come from the disability-access practice used by the school's UK-linked examination boards, and sit alongside — not in place of — UAE and KHDA requirements.

Whether an adjustment will be considered reasonable will depend on a number of factors, which will include: ●
The individual needs of the student.

- The effectiveness of the adjustment.
- The cost of the adjustment and the likely impact of the adjustment upon the candidate and other candidates.

An adjustment will not be approved, because it would not be "reasonable" under the Act, if it:

- Involves unreasonable costs.
- Involves unreasonable timeframes.
- Affects the security and integrity of the assessment.

Types of Access Arrangements

A number of access arrangements are available. Their use depends upon the student's needs, their normal way of working, the type of examination and the current regulations. This means that different arrangements might be allowed in different examinations, and the Head of Inclusion and IB Coordinators are required to consider the need for access arrangements on a subject-by-subject basis.

The access arrangements most commonly used at the school include:

- Supervised rest breaks.
- Use of a word processor (with spelling and grammar check disabled).
- Additional time.
- Bilingual translation dictionary.

Other types of access arrangement are available and may be considered depending on the exact nature of a student's needs. Details of such possible arrangements can be found in the relevant examination board regulations.

Students enrolled in the MYP, DP and CP may apply for assessment and examination access arrangements through the Inclusion Lead in collaboration with the relevant Curriculum Coordinators. Families are required to provide appropriate educational psychology and/or medical reports to identify the barriers to learning or assessment experienced by the student. The school will then gather supporting educational evidence from subject teachers to inform and support the application to the IBO. The agreed access arrangements will be implemented consistently in external assessments/examinations and will apply to both internal assessments also. Assessment access arrangements for CP students follow the same principles, timelines and authorisation procedures as those for Diploma Programme students, in line with IB requirements.

Data Protection and Confidentiality of Inclusion Records

EISM holds a range of records to support Students of Determination and MEA students, including the Inclusion Register, Individual Education Plans, Learning Profiles, referral and Round Robin forms, and psycho-educational, medical and therapy reports supplied by parents or external professionals. Because this information can reveal a student's health, disability or medical condition, it is "sensitive personal data" under UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data (the PDPL), and is handled with a higher level of care than general school records.

Why EISM holds this information

EISM processes inclusion records because doing so is necessary to deliver the education services agreed with parents and to meet the school's statutory obligations under UAE Federal Law No. 29 of 2006 and KHDA's inclusive education framework. Where a specific step goes beyond this — for example, referring a student for an external psycho-educational assessment, or sharing a report with a named external therapist — EISM obtains the parents' (and, where age-appropriate, the student's) clear and specific consent before proceeding, and explains what will be shared and with whom.

Who may access inclusion records

Access is limited to those who need it to support the student:

- The Inclusion Team and the student's Inclusion Coordinator, who hold the full record.
- Class and subject teachers and Learning Support Assistants, who receive the parts of the Inclusion Register, IEP or Learning Profile relevant to teaching that student — not the full file of external medical or psychological reports unless a specific reason requires it.

- The School Counsellor, for students receiving SEMH support.
- Senior Leadership and the Designated Safeguarding Lead, where relevant to their role or to a safeguarding concern.

Records are stored on the school's student information system and the Inclusion Team's shared drive, which is access-controlled by login and role; any paper copies are kept in locked storage in the Inclusion office. Staff access is reviewed when a member of staff changes role or leaves the school.

Safeguarding overrides confidentiality

Wherever inclusion information is held, not only in SEMH counselling sessions, a safeguarding concern is always reported to the Designated Safeguarding Lead in line with the Child Protection/Safeguarding Policy, regardless of any confidentiality otherwise expected by the student or family.

Sharing information outside the school

EISM shares inclusion information with an external professional (for example an educational psychologist, therapist, or a receiving school) only with parental consent, and only the specific information that professional needs. Where a report or assessment is to be shared with, or received from, a provider based outside the UAE, this is treated with particular care: cross-border transfer of sensitive personal data under the PDPL requires an adequate level of protection at the destination, a suitable contractual safeguard, or the family's express consent, and health-related information leaving the UAE can also require separate approval from the relevant health authority. Any such transfer is checked with the Principal before it takes place.

Retention

Inclusion records are retained for the duration of a student's enrolment and for at least five years after they leave the school, in line with the school's records retention schedule, to support safeguarding, reference and transition needs, after which they are securely deleted or shredded. When a student transfers to another school, their IEP/Learning Profile and relevant assessment information are shared with the receiving school with parental consent, and EISM's own copy is then retained or archived in line with this policy rather than duplicated indefinitely.

Parents' and students' rights

A parent (or a student, where age and maturity make this appropriate) may ask to see, correct, or request a copy of the inclusion information EISM holds about them. Requests should be made to the Head of Inclusion and are handled in line with the school's Data Protection Policy and the rights available under the PDPL, including access, rectification, erasure and restriction of processing.

Reporting a concern

Any suspected loss, unauthorised access to, or disclosure of inclusion records, for example a misdirected email, a lost device, or an unattended file, is reported immediately to the Principal, who assesses whether the school must notify the UAE Data Office and the affected families.

Related policies

This section is read alongside EISM's Data Protection Policy and Child Protection/Safeguarding Policy; where any of the three appear to conflict, the more protective position for the student is followed pending clarification.

Monitoring, Evaluation and Student Voice

The effectiveness of inclusive provision will be evaluated through a range of evidence, including student progress and attainment from individual starting points, achievement of IEP/Learning Profile targets, attendance and engagement, participation in the wider life of the school, student and parent voice, lesson and provision reviews, and the impact of interventions. Leaders will use this evidence to identify strengths, address gaps between groups and refine provision. The views of Students of Determination will be sought in an age-appropriate manner and will inform their IEP/Learning Profile reviews and wider decisions about the support they receive.

Transitions

Transitions into EISM, between phases and programmes, and on transfer to another school, university, training or employment will be planned proactively for students requiring additional support. Relevant staff will share appropriate information, with due regard to confidentiality and consent, so that effective strategies and reasonable adjustments can be maintained. Particular attention will be given to key transition points, including Early Years to Primary, Primary to High School, MYP to DP/CP or alternative pathways, and post-18 destinations.

Inclusive Admissions and Participation

EISM is committed to equitable access to education and participation in school life. Admissions decisions and subsequent provision will be considered in accordance with applicable UAE and KHDA requirements and the school Admissions Policy. A student will not be denied participation in learning, enrichment, educational visits or school activities solely because of an identified need or disability; reasonable planning, risk assessment and adjustments will be considered to enable participation wherever practicable and safe.

Concerns and Complaints

Parents, carers and students are encouraged to raise concerns about inclusive provision at the earliest opportunity with the relevant teacher, Inclusion Coordinator or Head of Inclusion. Concerns will be addressed through collaborative discussion and, where required, through the school's formal complaints procedure. Raising a concern will not adversely affect the support provided to a student.

Links to other policies

MEA Policy (Gifted and Talented Policy)

Admissions

EAL

Language

Learning & Teaching

Behaviour

Assessment

Child Protection/Safeguarding

Appendices

For more detailed information please click on the links below:

Federal Law No. 29 of 2006 <https://www.tamm.abudhabi/en/articles/federal-law-no-29-of-2006-concerning-the-rights-of-people-of-determination>

Dubai Inclusive Education Policy Framework (2017)
https://www.khda.gov.ae/cms/webparts/texteditor/documents/Education_Policy_En.pdf

Implementing inclusive education: a guide for schools (2019)
https://www.khda.gov.ae/Areas/Administration/Content/FileUploads/Publication/Documents/English/20190123084554_SENDPOLICYSCHOOLS_EN.pdf

A revised categorisation framework for students of determination (2019)
https://www.gemsoo-alquoz.com/-/media/project/gems/ois_gems_our_own_indian_school_dubai/files-and-documents/revised-categorisation-framework-for-students-of-determination_info-for-schools.pdf

IB Learner Profile <https://www.ibo.org/contentassets/fd82f70643ef4086b7d3f292cc214962/learner-profile-en.pdf>